



# Wollongong City Centre Planning Review

Submission from the Illawarra Business Chamber to  
Wollongong City Council

**Illawarra Business Chamber**  
Level 5, 6-8 Regent Street  
Wollongong NSW 2500  
(p) (02) 4229 4722  
(e) [ed@illawarrabusiness.com.au](mailto:ed@illawarrabusiness.com.au)

27 April 2020



## Contents

**Contents**..... 2

**Response to recommendations** ..... 3

1. Prioritising jobs by safeguarding land for commercial development ..... 3
2. Encouraging a variety of housing types in the right locations to support City life ..... 4
3. Defining a thriving retail network ..... 4
4. Clearly guiding development to respond to context ..... 5
5. Elevating the importance of a well-designed City Centre ..... 5
6. Strengthening connections to make it easier to move around ..... 5
7. Delivering high amenity public spaces ..... 6
8. General feedback on the Urban Design Framework and the Economic Analysis..... 6

**Recommendations** ..... 8

**About the Illawarra Business Chamber and Illawarra First** ..... 9

## Response to recommendations

### 1. Prioritising jobs by safeguarding land for commercial development

*The Review recommends that planning policy prioritise job generating development in the commercial core by:*

- 1. Preserving the existing supply of commercial floorspace.*
- 2. Allowing mixed-use development in parts of the Commercial Core with a limitation on the proportion of residential floorspace.*
- 3. Defining commercial only areas for large and small office buildings.*

- The Illawarra Business Chamber (IBC) is of the view that the Commercial Core of Wollongong should be clearly defined to a limited area where residential encroachment is prohibited.
- Evidence of the need to consolidate the Commercial Core is the location of a number of corporate head offices outside of the Commercial Core of the city, making it more likely that employees need to travel larger distances to meetings, shops and food outlets.
- This will make the city more navigable for office workers and their visitors, provide a focal point for the kind of significant, additional A-grade commercial office development the city seeks attract, which in turn will enable the greater attraction of employers to the region and hence create jobs in accordance with Wollongong City Council's *Economic Development Strategy 2019-29*.
- However, residential uplift that has occurred around the Wollongong CBD creates vibrancy and economic opportunities and so clear signals need to be sent to the property industry to encourage the increased development of both.
- For this reason, residential development should not be prohibited in the Commercial Core, but rather minimised.
- The IBC does not support the recommended Retail Core (Active Frontage + limit residential FSR) zoning in Council's Urban Design Framework, which provides for 70 percent residential land use in the heart of the CBD. This will invariably lead to land use conflicts and compromise future commercial land use in the City Centre beyond 2036.
- In place of providing for as much as 70 percent residential development within the CBD, Council should consider measures to incentivise the relocation of professional services businesses into the Commercial Core from outside it.
- This should complement the efforts of Invest Wollongong to entice businesses to relocate from outside of the area, and it too should seek to consolidate interested and appropriate businesses into the Commercial Core where possible.
- Complementing this, the IBC has previously submitted that it is imperative that Council establish a Major Projects Unit to work with potential proponents and ensure that commercial investment does not readily escape the LGA. Further, Council must work to expedite processing times for significant commercial Development Applications to less than 6 months. (IBC Submission to Wollongong City Council, *Draft Economic Development Strategy 2019-2029*, 28 June 2019).
- The IBC has previously suggested a Commercial Core that is bounded by Burelli Street, Harbour Street, Market Street and Regent Street. On review, the IBC agrees with the recommendation that Corrimal Street is an appropriate eastern boundary, with Auburn Street to the west.

**The IBC does not support this recommendation.**

## 2. Encouraging a variety of housing types in the right locations to support City life

*The Review recommends that planning policy guides the location and proportion of residential development by:*

1. *Limiting residential development throughout the Commercial Core to prioritise job generating development and minimise conflicts between residential and other development.*
2. *Removing the requirement for non-residential ground floors in the Mixed Use zone.*
3. *Exploring the development of an affordable housing scheme.*

- The IBC supports Council's recommendation to remove the existing requirement that all new residential developments include ground floor commercial space in Mixed Use zones. When this occurs outside the Commercial Core it dilutes the CBD and draws retail, food offerings and other consumer services outside of town, requiring customers to drive or walk long distances.
- The IBC does not consider that residential development need necessarily occur in the heart of the CBD to support City life, given the close proximity of B4 Mixed Use zoning.
- The IBC submits that only limited residential development should occur in the Commercial Core.
- Council should conserve the integrity of the CBD in the medium-long term through this Planning Review by confining a significant majority of residential development to B4 Mixed Use zones.

**The IBC supports this recommendation in part.**

## 3. Defining a thriving retail network

*The Review recommends that planning policy facilitates a vibrant retail network by:*

1. *Only require non-residential uses on ground floor on key retail streets where there is good pedestrian traffic and access to public transport.*
2. *Protect the character and role of key retail streets and precincts.*
3. *Delivering a balance between night-time economy and residential living.*

- The IBC notes that retail trade in the City Centre, including Crown Street Mall, is excessively dispersed, which impacts patronage due to a lack of navigability. This is evidenced by the number of observable vacancies throughout that precinct in particular.
- The Retail Core defined in Council's recommended Urban Design Framework is too large to present a viable retail precinct, even in the longer term.
- The IBC recommends that Council seek to consolidate retail trade along Crown Street Mall, which would be incentivised if Council abolished the City Centre Levy applied to these premises in order to put downward pressure on rents and encourage greater retail activity in the City Centre.
- The IBC suggests that Crown Street Mall should instead comprise of ground-level retail frontage and low-rise office development above, instead of the residential space that is being recommended.

- The IBC recommends that micro-precincts be devised for the Mall itself, to establish an alfresco dining zone, along with the existing entertainment zone, and a family friendly zone where children can play.

**The IBC does not support this recommendation.**

#### 4. Clearly guiding development to respond to context

*The Review recommends that planning policy be updated to clearly guide development to be right for place by ensuring building envelope controls:*

1. *Respond to the City Centre's natural setting.*
2. *Support the desired future character of City Centre Precincts.*

- The IBC considers that the City Centre should not be considered in isolation, rather with reference to a broader Framework; for instance the [Metro Wollongong Precinct Study](#), which has not been publicly released by the NSW Government despite formal requests by the IBC.
- Alongside the Commercial Core, Wollongong comprises a number of existing precincts that require greater activation, and these include the Entertainment, McCabe Park, Waterfront, Recreation, and Health precincts.
- The IBC believes that there should be a plan for each of these precincts that better directs public and private investment and includes better linkages between them and to public transport.

**The IBC supports a precinct approach to city planning in the Wollongong CBD.**

#### 5. Elevating the importance of a well-designed City Centre

*The Review recommends that planning policy strengthens the commitment to design excellence by:*

1. *Introducing new design review requirements for high impact and challenging development sites.*
2. *Encouraging innovation and design quality in the local design and development industry.*
3. *Preparing design guidelines that communicate better design outcomes.*

- The IBC supports the intent of this recommendation, provided that design requirements do not disincentivise prospective development.
- We would seek any new design requirements in draft and would obtain the feedback of the property industry to ascertain the impact upon potential developer investment in the city.
- The IBC considers that there is merit in requiring new commercial buildings to meet the Green Building Council of Australia's Green Star certification standards.

**The IBC supports this recommendation.**

#### 6. Strengthening connections to make it easier to move around

*The Review recommends that planning policy facilitate a strong active transport network by:*

1. *Defining the role and function of streets in the City.*

2. *Creating a walkable city grid for pedestrians with additional pedestrian and shared connections.*
3. *Delivering active transport infrastructure including bike lanes and footpaths.*
4. *Helping people make the shift from cars to public and active transport by making these a more attractive option than driving and parking.*

- While the IBC supports the intent of active transport options but does not consider it to present a solution to limited carparking across a geographically-dispersed Commercial Core.
- Informed by our membership, the IBC recognises that carparking is an issue for businesses and residents alike and submits that it should be addressed in this Review.
- Council should consider supplementing active transport infrastructure by:
  - investigating means to better utilise existing parking spaces, whether by upgrading them (from single to multi-level) or by utilising better wayfinding (e.g. electronic signs),
  - constructing Park and Ride facilities within 5 minutes ride to the City Centre, and
  - investigate the construction of additional multi-level paid car parks on the edge of the Commercial Core, as part of a mixed-use development led by the private or public sector.
- With the increased number of residents and workers projected for the City Centre (as well reduced car parking requirements to incentivise new commercial developments), Council should look to offset this by providing for additional capacity, thereby removing a burden to commercial development.
- Council should consider the development of multi-level car parks in the west (nominally the existing Rawson Street site) and east; partnering with private operated where appropriate and realising the potential uplift at its existing at-grade carparks within the CBD.
- The IBC considers that Wollongong is not of a scale that it can look to or expect active and public transport patronage to address this.

**The IBC supports the removal of the requirement for car parking in residential developments, however believes that Council should take measures to improve parking availability in the Wollongong CBD, including upgrading its at-grade carparks across the city.**

## 7. Delivering high amenity public spaces

*The Review recommends that planning policy facilitates high amenity public spaces by:*

1. *Planning for building envelopes that protect sunlight to key public spaces, preserve views to natural and built assets and facilitate street tree planting.*
2. *Reinforcing the character of key streets and precincts with appropriate tree planting.*
3. *Identifying and prioritising public domain projects to promote renewal and encourage investment in the City.*

**The IBC supports this recommendation.**

## 8. General feedback on the Urban Design Framework and the Economic Analysis

- The IBC is concerned that SGS Economics does not reference or acknowledge Council's *Economic Development Strategy 2019-29* and considers that there is a tension between this and elements of the Urban Design Framework which should be reconciled.

**The IBC believes that the Urban Design Framework should be more integrated with Council's Economic Development Strategy.**

## Recommendations

The IBC recommends that Wollongong City Council undertake the following as part of its City Centre Planning Review to:

1. Revise recommended zoning in the Retail Core (Active Frontage + limit residential FSR) to allow for only limited residential development in the Commercial Core (in order to conserve the integrity of the CBD in the medium-long term), confining the significant majority to B4 Mixed Use zones.
2. Consider measures to incentivise the relocation of professional services businesses to the Commercial Core, contributing to its consolidation.
3. Consolidate the Retail Core around Wollongong Central and Crown Street Mall, which should comprise of ground-level retail frontage and low-rise office development above, instead of the residential space that is recommended.
4. Review City Centre planning within the context of a broader strategic plan that articulates a precinct planning approach to planning, directs public and private investment, and includes better linkages between precincts and to public transport.
5. Supplement active transport infrastructure by:
  - investigating means to better utilize existing parking spaces,
  - constructing Park and Ride facilities within 5 minutes ride to the City Centre, and
  - constructing additional multi-level paid car parks on the edge of the Commercial Core, as part of a mixed-use development led by the private or public sector.
6. Prescribe that all new commercial buildings in the Commercial Core meet the Green Building Council of Australia's Green Star certification standards.
7. The IBC considers that there is merit in re-exhibiting the City Centre Planning Review – before a Gateway Determination is sought – to provide more detail and clearly articulate what changes Council has agreed to.

## About the Illawarra Business Chamber and Illawarra First

The IBC is the peak business organisation and the regional chamber that supports businesses and local chambers across the Illawarra-Shoalhaven, primarily, as well the South East and Tablelands. The IBC is a Division of Business NSW – a founding member of the Australian Chamber of Commerce and Industry.

The IBC develops policy, advocates to all levels of government on issues affecting businesses, undertakes research to guide greater public and private sector investment in economic infrastructure, and supports the development of workforce capacity and skills in our region.

Illawarra First is the top tier of IBC membership, harnessing best practice and thought leadership to progress key priorities including improving connectivity with Sydney, realising greater value from existing strategic infrastructure and leveraging competitive advantages to bolster economic growth. Its membership comprises a select group of leading businesses in the Illawarra, sharing a commitment to driving the development and prosperity of the Illawarra.