



Community Environment Network Inc.

An alliance of community & environment groups.



24 March 2026

NSW Department of Planning, Housing and Infrastructure

Re: Re: Submission objecting to proposed amendment to State Environmental Planning Policy (Precincts—Regional) 2021 and associated State Significant Development application - Central Coast Quarter Stage 2 – SSD-90960208, 26–30 Mann Street, Gosford HAD proposal

Dear Sir/Madam

The Community Environment Network (**CEN**) is a Not-For-Profit Incorporated Association with Deductible Gift Recipient (Charity) status. CEN was founded in 1997, with the goal of providing a network for environmental and community organisations. CEN's mission is to support ecologically sustainable development (**ESD**) and oppose threats to ESD as defined in NSW Legislation.

The CEN appreciates the opportunity to comment on the exhibited amendment to State Environmental Planning Policy (Precincts-Regional) 2021 (**SEPP P-R 2021**) associated the State Significant Development application of the Central Coast Quarter Stage 2 – (**SSD-90960208**). After reviewing all the documentation of exhibition, we have arrived at a position that we **do not support the proposed concurrent amendment** to the SEPP P-R 2021 and the associated SSD-90960208.

We understand the lodged Environmental Impact and Rezoning Statement confirms that the proposal seeks to amend Chapter 5 of the SEPP by increasing the applicable **maximum building height from RL 48m to RL 153m** and the **floor space ratio from 3.5:1 to 9.5:1**, to facilitate a development comprising **two towers of 36 and 42 storeys**, 394 dwellings, a 152-key hotel, retail uses and associated works.

This submission contends that the proposed uplift **should not be supported** because it is inconsistent with the long-established Gosford City Centre planning framework, contrary to the retained statutory purpose of the Gosford-specific controls now embedded in Chapter 5 of the SEPP, and adverse to the public interest having regard to the matters in section 4.15(1) of the *Environmental Planning and Assessment Act 1979*, including likely impacts, site suitability, submissions, and the public interest. We believe these issues far outweigh the net gain of only 98 affordable housing apartments to be managed by a CHP for 15 years, after which they return to “market apartments”.

1. The proposal seeks an extraordinary and site-transformative uplift

The amendment sought is not a modest calibration of existing controls. It is a wholesale rewriting of the statutory built form envelope for this waterfront-edge site. On the proponent's own material, the height control would increase by **105 metres RL** and the FSR control would increase from **3.5:1 to 9.5:1**.

That magnitude of uplift fundamentally changes the planning role of the land. It would convert a site presently governed by a controlled waterfront-city interface into one capable of accommodating towers of a scale that will dominate the southern city centre skyline and materially alter the visual relationship between Mann Street, Leagues Club Field and Brisbane Water and the green ridgeline that has been strategically characteristic of Gosford since the 1970.. That is precisely the kind of outcome the Gosford-specific statutory framework has historically sought to regulate with care.

2. The Gosford planning framework has consistently treated height and FSR near the waterfront as a visual, public-domain and urban-structure issue

The former Gosford City Centre Local Environmental Plan 2005 expressly stated that the planning framework for Gosford was to take into account the city's *waterfront and natural setting*, including *views from key public places and to ridgelines*.

That logic continued in the Gosford City Centre Local Environmental Plan 2007, which relevantly included zone objectives directed to allowing development to take advantage of and retain *view corridors* while *avoiding a continuous built edge along the waterfront*.

It then continued in the State Environmental Planning Policy (Gosford City Centre) 2018, which imposed Gosford-specific controls directed to:

- a *3-storey street frontage limit on Mann Street*,
- protection of *solar access to key public open spaces*, including Leagues Club Field, and
- protection and enhancement of *key vistas and view corridors* in Gosford City Centre.

Those controls were not discarded. They were carried forward into Chapter 5 of SEPP (Precincts—Regional) 2021, which presently retains:

- section 5.44, requiring building height at the Mann Street frontage not to exceed 3 storeys,
- section 5.52, protecting solar access to Kibble Park and Leagues Club Field, and
- section 5.53, whose express objective is to protect and enhance key vistas and view corridors in Gosford City Centre.

Accordingly, the statutory history is clear: the Gosford controls were designed to ensure that redevelopment does not compromise the city's relationship with Brisbane Water, does not create an overbearing built edge, and does not erode the carefully managed visual permeability between the city core and the waterfront.

3. The proposed amendment is inconsistent with the retained purpose of Chapter 5 of the SEPP

The Department cannot properly assess this amendment as though the current mapped controls are arbitrary or expendable. The present controls reflect a deliberate statutory policy framework that continues to apply to Gosford City Centre.

The current SEPP expressly provides that development consent must not be granted unless the consent authority is satisfied that development is consistent with the objective of protecting and enhancing *key vistas and view corridors*. It also maintains the Mann Street frontage limitation and the solar access protections for Leagues Club Field.

The amendment sought would materially undermine those retained statutory purposes in at least four ways.

First, it would permit built form of such scale and bulk that the site would operate as a *dominant vertical marker at the waterfront edge*, rather than as a transitional element between city centre development and Brisbane Water. That is directly at odds with the longstanding planning objective of avoiding a continuous or visually dominant built edge along the waterfront.

Second, it would materially reduce the effectiveness of the existing Gosford framework for protecting *key vistas and view corridors*. A tower or tower pair at RL 153m on this site would not simply affect views from the site. It would alter the wider visual field of the city centre.

Third, it would compromise the planning logic of the *Mann Street frontage control*, which exists to preserve a human-scaled street wall, maintain sky exposure and prevent excessive visual bulk at street level along one of Gosford's principal city spines.

Fourth, the proposed increase in FSR from **3.5:1 to 9.5:1** would significantly intensify the bulk and envelope of development on a constrained and strategically sensitive site adjoining key public space. In practical terms, that is not merely a change in density. It is an abandonment of the statutory density setting that presently mediates built form at this location.

4. The DCP material reinforces why height was historically constrained at this site and along the waterfront precinct

The Gosford City Centre Development Control Plan 2018 reinforces the statutory purpose of these controls. The DCP states that Gosford's character is strongly shaped by views, including views to Brisbane Water, and requires the maintenance and enhancement of significant view corridors from public spaces and streets to Brisbane Water. It also identifies Key Site 6: 26–32 Mann Street as a site where visual connections and pedestrian links between Mann Street and Baker Street / Leagues Club Field are priorities. The DCP further states that the site should be subject to a master planning process and that design testing should address impacts on views and overshadowing. The published material also identifies a principle of maximising views between street level on Mann Street through to the park and the water.

That planning rationale is highly material. It demonstrates that the limitation of height and density in this part of the waterfront precinct was not accidental. It was intended to preserve:

- public and shared views to Brisbane Water,
- visual permeability between the city and the waterfront,
- the amenity and solar access of Leagues Club Field and adjoining public spaces, and
- a built form outcome that would not present as a continuous wall or visual barrier.

5. The proposal would act as a visual barrier to Brisbane Water for other development land and existing buildings to the east and north

A central concern is that the proposed uplift would create a *visual barrier to Brisbane Water* for other buildings and redevelopment sites to the *east and north* within the Gosford city centre.

That is not rhetorical. It follows from the site's strategic position between inland parts of the city centre and the waterfront. When a site at that location is permitted to rise to RL 153m, the likely consequence is that a substantial amount of built form behind it, and to its north and east, will lose part of its visual relationship with Brisbane Water. The barrier effect is especially acute where tall buildings are introduced on sites directly adjoining key open space and at major public approach routes to the waterfront. This is precisely why the statutory and DCP framework has historically emphasised view corridors, street vistas, visual connections and avoidance of a continuous built edge.

In planning terms, the Department should be slow to support a site-specific amendment that transfers view opportunity from the broader city to one development parcel at the expense of surrounding land, neighbouring towers, future redevelopment sites and the public domain.

6. Housing supply and affordable housing do not justify the abandonment of place-specific controls

The proponent relies on housing delivery and affordable housing outcomes, including 98 affordable dwellings for 15 years. Those outcomes are relevant, but they do not displace the need to apply Gosford's place-based statutory controls lawfully and coherently. The existence of housing objectives does not justify a planning outcome that undermines the long-established visual and public-domain structure of the city.

The relevant question is not whether Gosford should accommodate growth. Plainly it should. The relevant question is whether this particular site should be granted a dramatic uplift that compromises the retained purpose of the Gosford-specific planning framework. On the statutory material, the answer should be no.

7. The proposal is contrary to the public interest under section 4.15(1)(e)

For the purposes of section 4.15(1), the proposal raises significant adverse issues concerning:

- the *built environment impacts* of excessive height and bulk,
- the *suitability of the site* for the intensity of development proposed,
- the *effect on public views, visual permeability and urban structure*, and
- the broader *public interest* in maintaining a coherent and predictable planning framework for Gosford City Centre.

A planning framework loses integrity if site-specific amendments are used to override carefully designed waterfront controls without a compelling place-based justification. Here, the historical and current statutory framework points in the opposite direction: this is a location where height and density have been intentionally moderated in order to protect the city's relationship with Brisbane Water and prevent visual domination of the waterfront edge.

8. Conclusion

For the above reasons, I respectfully submit that the Department should:

1. refuse the proposed amendment to Chapter 5 of SEPP (Precincts—Regional) 2021 for 26–30 Mann Street, Gosford;
2. refuse the associated SSD application in its present form; or
3. alternatively, require a substantially reduced built form that preserves the statutory intent of the Gosford city centre controls, including:
 - protection of key vistas and view corridors to Brisbane Water,
 - protection of solar access and amenity to Leagues Club Field and adjoining public spaces,
 - retention of genuine visual permeability between Mann Street, Baker Street and the waterfront, and
 - avoidance of a dominant built form outcome that acts as a visual barrier to Brisbane Water for surrounding development to the east and north.

The planning history of Gosford demonstrates that building height and FSR in the waterfront precinct were limited for sound urban design and public-interest reasons. Those reasons remain valid. The proposed uplift is excessive, inconsistent with the retained Gosford-specific statutory framework, and should not be supported.

Thank you for reviewing our submission.

Yours faithfully



Gary Chestnut

B.Nat.Res., M.Sc., B Leg S., MBA

Chairperson

Community Environment Network