

SSD-10114 | CENTRAL COAST QUARTER

RESPONSE TO SUBMISSIONS

23 MARCH 2020
P7719
DRAFT
PREPARED FOR SH GOSFORD RESIDENTIAL PTY LTD

URBIS

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EXECUTIVE SUMMARY

This 'Response to Submissions' (RtS) Report addresses the matters raised by the community and Public Authorities during public exhibition of the Environmental Impact Statement (EIS) for Central Coast Quarter at 32 Mann Street, Gosford (SSD-10114).

NSW DPIE issued an 'RTS Letter' on 20 December 2019 which addressed a range of planning and environmental assessment issues. This RtS provides a detailed response to the DPIE letter, along with Agency and Central Coast Council comments.

Based on the comments received from DPIE and Agencies, we understand that the design and built form of the proposal is a key assessment issue. The project team have undertaken an iterative and cohesive process with the relevant stakeholders (i.e. DPIE, CoGDAP, Council) to arrive at the scheme presented in this package. The proposal has responded positively to the feedback obtained from key government stakeholders, culminating in a Letter from the CoGDAP Chair (Ben Hewitt) confirming it meets the 'design excellence' criteria set out in the SEPP (Gosford City Centre) 2018.

From EIS lodgement to now, a number of key design amendments have been implemented which respond to DPIE and CoGDAP comments. This includes changes to the proposed building envelopes and ground plane, setting future guidelines/frameworks to ensure ongoing design excellence and undertaking further environmental assessment on key issues such as visual impact and overshadowing.

It is considered that the proposed development, as modified, has a number of significant benefits which are aligned to state, regional and local planning controls. The proposal accords with the strategic initiatives to contribute to strength of Gosford as the 'Capital City' of the Central Coast region.

Specifically, the proposal will:

- Deliver transformational urban renewal of an underutilised site.
- Provide a new destination for locals and visitors. The provision of retail and F&B tenancies in a prominent, accessible and visible location will also contribute to the late-night economy, catering for pre and post event at nearby venues.
- Support the local, visitor and night-time economies. Specifically, it will contribute \$36.9 million in value to the New South Wales economy on an annual ongoing basis.
- Provide improved accessibility from Mann Street to the Leagues Club Field and waterfront, through open-air through site links. These will create a physical, visual and accessible connections between Mann Street and the waterfront.
- Deliver highly accessible commercial space that will attract new businesses into Gosford.
- Supports a significant increase of employment opportunities within the precinct and Gosford City Centre. Specifically, it will deliver:
 - 250 direct jobs through the ongoing operation of the retail, commercial, and hotel components of the development and a further 86 indirect jobs from flow-on-effects.
 - 62 direct jobs and 97 indirect jobs contributing \$122.8 million in direct and indirect value to the New South Wales over the five-year development phase
- Support high amenity lifestyles in a naturally beautiful location.
- Set the parameters for various improvements to the public domain, both on and off site.
- Provide a framework for future built form applications that has considered environmental impacts at a 'masterplan' scale.

It is considered that the proposal meets the key aims and objectives of the SEPP (Gosford City Centre) 2018, which encourages development through design excellence and uplift incentives. This RtS demonstrates that the proposal meets the relevant preconditions noted in Clauses 8.3 and 8.4 of the SEPP and will facilitate a sound development outcome that upholds the NSW Government's vision for the site. Accordingly, it is requested that the Minister for Planning recommend this Concept SSDA for approval.

Figure 1 – Photomontages of Proposal



Picture 1 – Artist Impression of the Proposal – view from the Leagues Club Field



Picture 2 – Artist Impression of the Proposal – view from proposed through site link

Source: DKO

1. INTRODUCTION

The EIS was on public exhibition between 11 October 2019 and 7 November 2019. During this period, 10 submissions were received from Government agencies. These included submissions from:

- NSW Department of Planning, Industry and Environment (advice was also provided by the City of Gosford Design Advisory Panel).
- Central Coast Council.
- NSW RMS (now TfNSW).
- NSW DPIE – Biodiversity and Conservation Division (formerly OEH).
- DPIE – Division of Crown Lands.
- NSW Health – Central Coast Local Health District.
- Transport for NSW.
- NSW EPA.
- NSW Department of Primary Industries.
- Department DPIE – Water and the Natural Resources Access Regulator (NRAR).

During exhibition, one public submission was also received from Community Environment Network Inc. The key matters raised in the agency and public submissions include:

- Height, bulk and scale of the proposal.
- Perceived environmental impact (i.e. visual impact, overshadowing); and
- Cumulative traffic Impacts.

After receiving the submissions, the Applicant has undertaken further engagement with key stakeholders to develop the revised scheme.

- Meetings with Central Coast Council – 20 December 2019 & 25 February 2020.
- Meeting with NSW Department of Planning, Industry and Environment – 12 February 2020.
- Meeting with GA NSW & DPIE – 3 March 2020.

This RtS incorporates additional information and amendments to the design to address the issues raised.

The amended plans and the RtS demonstrate that the proposal balances environmental impact with community benefit and should be approved. This RtS confirms that there are no significant adverse impacts associated with the project.

The specialist consultants have assessed the design and recommend mitigation measures to ensure the proposal will not have any unreasonable or significant environmental impacts on adjoining or surrounding properties or the public domain. The content contained in this RtS and the EIS demonstrate that the application should be approved.

2. OVERVIEW OF AMENDMENTS TO THE PROPOSAL

The Applicant has engaged with various Government stakeholders over the life of the project to ensure an appropriate built form outcome is achieved. Ongoing feedback has been meaningfully addressed, either through amendments to the scheme or further documentation/analysis. This is reflected in the design evolution of the scheme, shown in Figure 2 below.

The amendments made as part of this RtS package relate to the building height reduction and stepping of the southern tower, together with enhancements to the ground-plane through various minor changes. The amendments also extend to the introduction of Design Guidelines, which will assist in moderating the built form in future (detailed) SSDAs through various 'key moves'; and a Design Excellence Strategy which ensures a commitment to continuous independent design review/integrity.

Figure 2 – Design Evolution



Picture 3 – Presented 26 March 2019



Picture 4 – Presented 28 May 2019



Picture 5 – EIS/SSDA Submission

Source: DKO



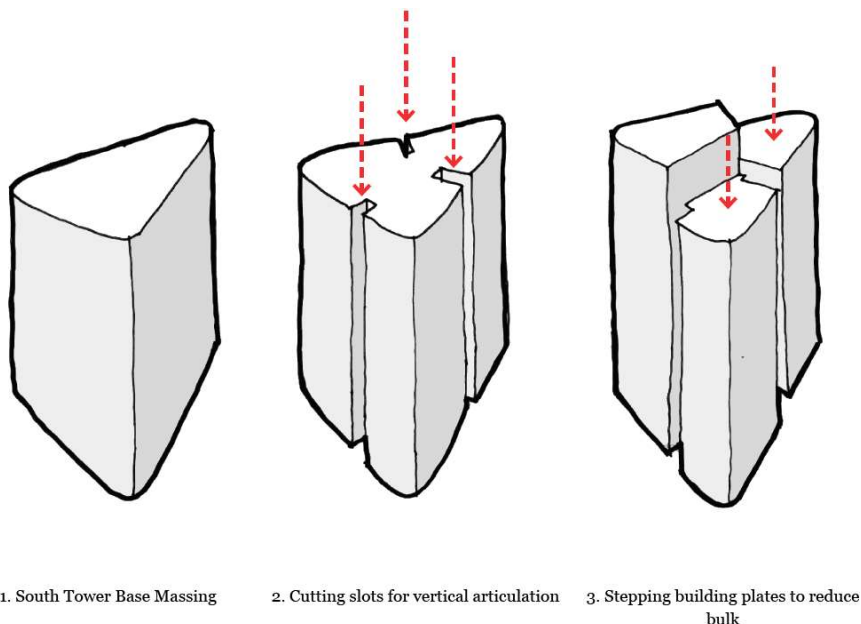
Picture 6 – RtS Submission

Detailed Overview of Amendments

In response to agency and public submissions, the project team have revised the built mass in the following ways:

- The massing of the southern tower has been articulated through a continual vertical break on all sides. This reduces its perceived bulk and scale through it reading as two distinct forms. In addition, the tower has been stepped to create three differing roof heights – with the southern corner being the lowest, consistent with the higher-level massing principles established with the CoGDAP.

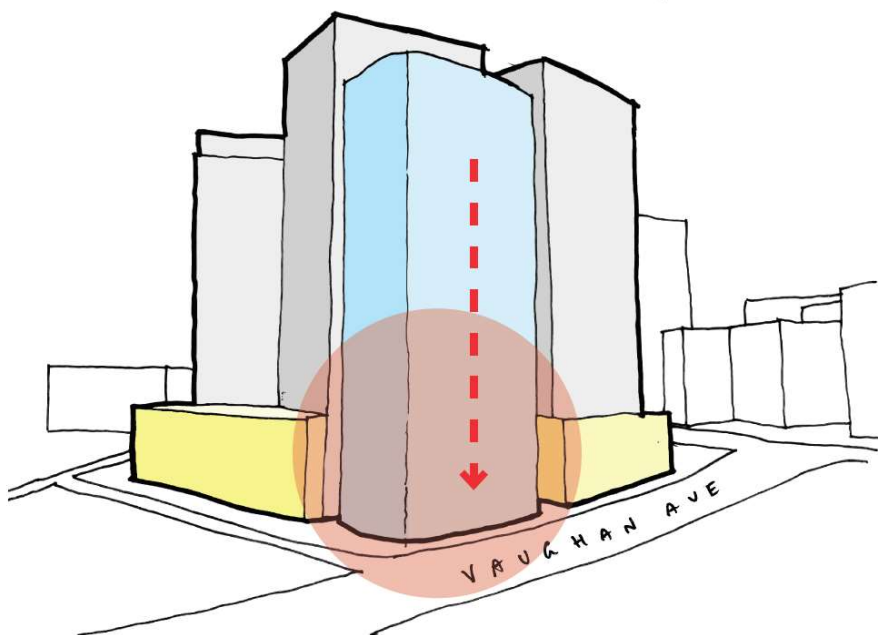
Figure 3 – Southern Tower Articulation



Source: DKO

- The corner of the southern tower has been brought down to street level, further accentuating the split in massing, consistent with CoGDAP feedback.

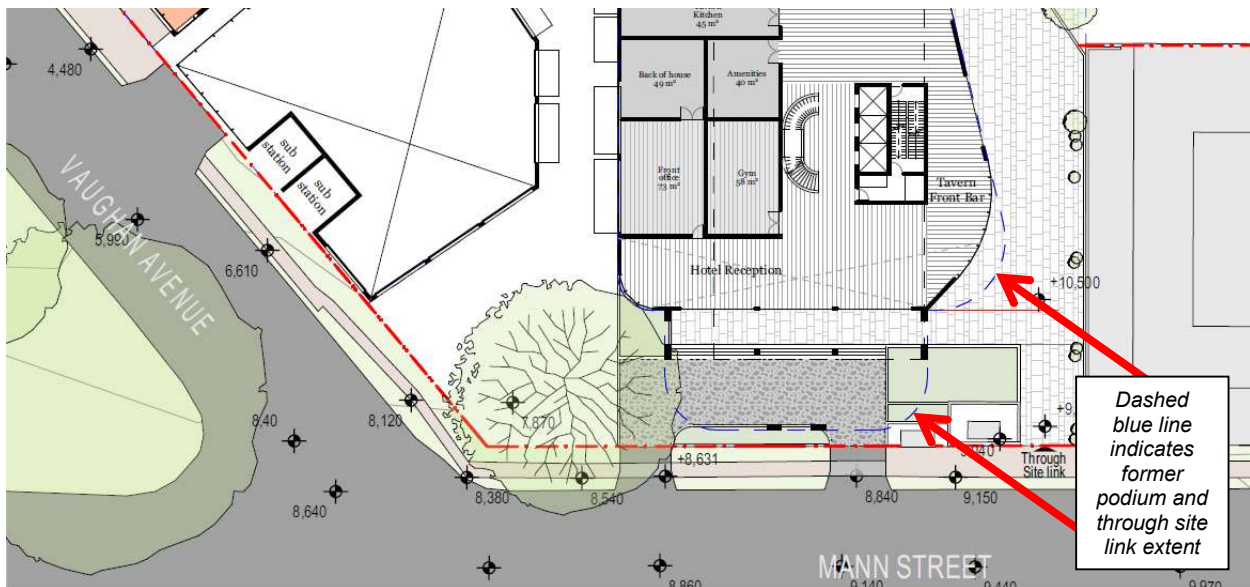
Figure 4 – Southern Tower Expression



Source: DKO

- The eastern (hotel) tower envelope has been setback 6m from the podium wall. The podium footprint has also been revised to increase the width of northern through site link.

Figure 5 – Revised Mann St Interface and Through Site Link



Source: DKO (marked by Urbis)

- The Applicant has also prepared Design Guidelines (Appendix A) and a Design Excellence Strategy (Appendix L) to set the parameters for future (detailed) SSDAs, ensuring ongoing design review/integrity. These documents aim to ensure the following 'key moves' are incorporated into future SSDAs:
 - Through site link from Mann Street to the Leagues Club Field – including its visual connections and outlining the desired character of its spaces/edges.
 - Architectural character – seeking a distinctive urban skyline that consists of buildings exhibiting differing characters and scales.
 - Built form – guidelines for the vertical articulation of each tower.

2.1. REVISED PROJECT DESCRIPTION

This application sets out a 'Concept' proposal for the development of the 26 Mann Street, Gosford. Detailed approval for each building will be subject to subsequent DAs.

The purpose of the concept proposal is to confirm the location, form, massing and programming of the proposed building envelopes and public domain, which will in turn establish maximum building heights and GFA allocations for each building (for approval).

The final number and mix of residential dwellings (and corresponding carparking spaces), layout of apartment buildings and the design and fit out of commercial tenancies will be determined as part of the subsequent detailed development applications. The concept proposal seeks consent for the following:

- Allocation of GFA across all three phases of development.
- Indicative building envelopes.
- Building heights; and
- Land uses.

The concept proposal also includes new public plaza and through site link, with the detailed design of the public plaza to be included in a subsequent DA.

Table 1 – Numeric Breakdown of Proposal

Component	Proposal
Land Use	Building 1: Hotel and visitor accommodation Building 2: Southern Residential and podium commercial Building 3: Northern Residential and podium commercial
Site Area	8,884 sqm
Gross Floor Area & Floor Space Ratio	Building 1 (Hotel): 10,034 sqm Building 2 (Southern residential tower and podium commercial Premises): 13,701 sqm Building 3 (Northern residential tower and podium commercial Premises): 15,509 sqm Overall: 39,244 sqm (FSR 4.42:1)
Building Height	Building 1 (Hotel): • RL 71.3m (top of plant) • RL 69m (parapet) Building 2 (Southern Residential and podium commercial): • RL 65.1m (top of plant – top splay); RL 58.8m & RL 52.6m (tiered roof heights) Building 3: (Northern Residential and podium commercial): • RL 81.4m (top of northern splay) • RL 71.3m (top of southern splay/plant) • RL 69m (parapet height of southern splay)

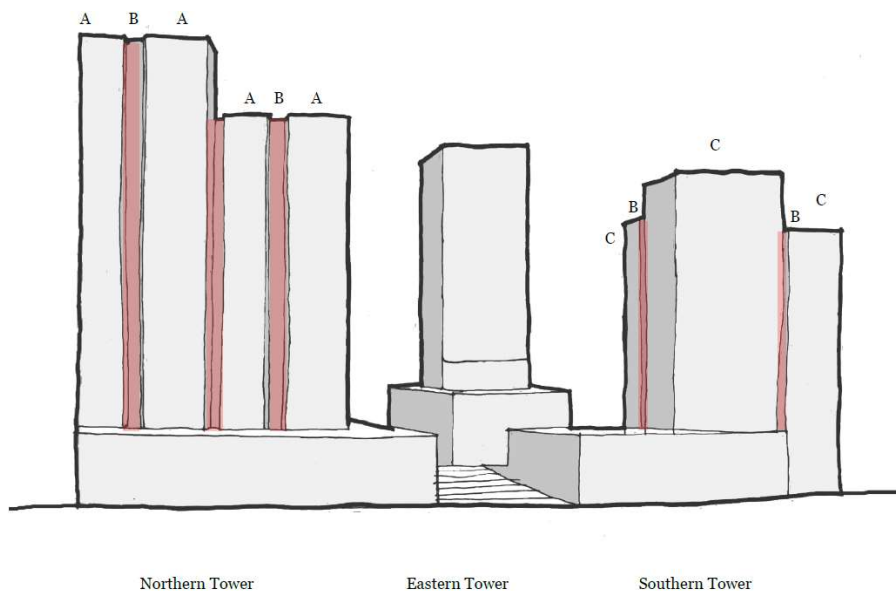
2.2. FURTHER ENVIRONMENTAL ASSESSMENT

2.2.1. Built Form and Public Domain

The revised built form is considered to provide a positive outcome because:

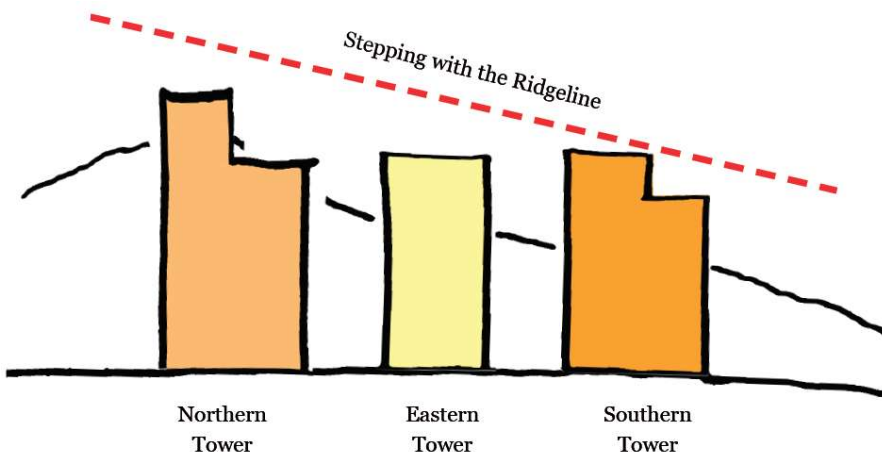
- The vertical articulation proposed across the residential towers will reduce their perceived bulk and scale – see Figure 5.
- The stepped southern tower envelope will allow increased solar access to the public domain and reduce the perceived visual bulk of the building.
- The southern tower's residential interface with Vaughan Avenue will engage with the ground plane and accentuate the massing split by breaking up the extent of podium.
- The revised hotel podium/setback will improve its presentation to Mann Street. The northern through site link has been widened, which will improve its amenity.
- Shadow diagrams prepared by DKO demonstrate that the revised layout maintains SEPP & DCP compliant levels of solar access to the Leagues Club Field, Memorial Park and Poppy Park at the summer/winter solstice and spring/autumn equinox.

Figure 6 – Vertical Articulation of Towers



Source: DKO

Figure 7 – Stepping of Towers and Relationship to Ridgeline



Source: DKO

2.2.2. Overshadowing

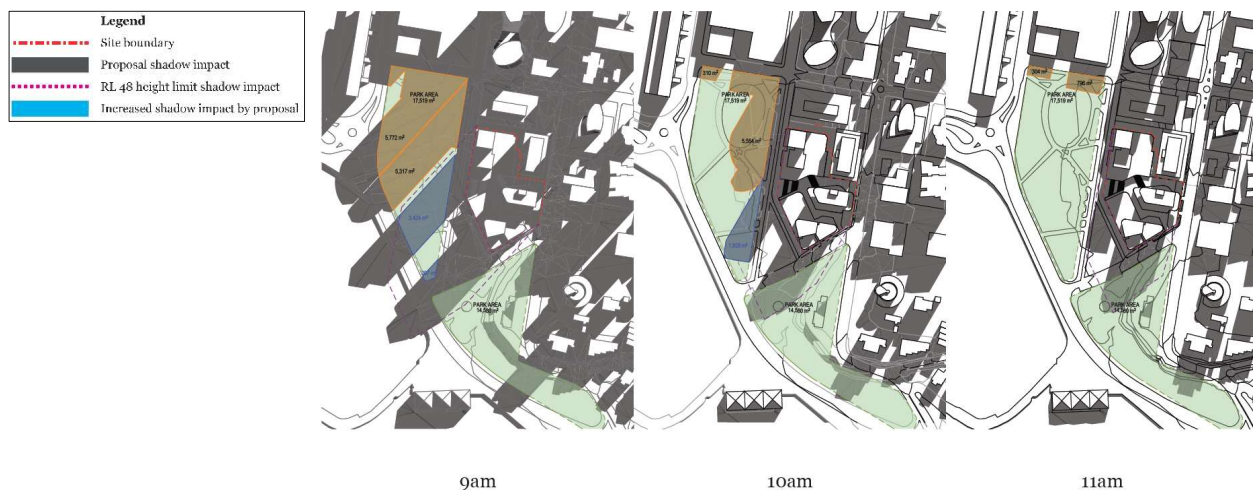
Further overshadowing analysis has been undertaken by DKO, accounting for the modifications to the scheme. The overshadowing analysis confirms:

- The proposal **complies** with the SEPP control relating to solar access to the Leagues Club Field.
- The proposal **complies** with the DCP control relating to solar access to other public open spaces.
- The proposal **will not** have significant or consequential impacts on surrounding residential properties.

Refer to the DKO shadow diagrams below (and appended) which show:

- 100% of Leagues Club Field receives 4 hours of direct sunlight; and
- Poppy Park is only affected by the proposed (height and FSR) variations between 10am and 11am. It is also noted that these spaces are significantly overshadowed by existing (heritage-protected) vegetation.

Figure 8 – DKO Shadow Drawings



Picture 7 – 9am to 11am (winter solstice)

Source: DKO



Picture 8 – 12pm to 3pm (winter solstice)

Source: DKO

- The north east (War Memorial) corner of Poppy Park is not used as an active space. It is also not commonly used for gatherings during the affected times (10-11am). The South West (water feature) portion of the park is used for gathering/activities, and this space is not significantly overshadowed by the proposal.

- The Leagues Club Field is noted in the Gosford DCP and UDF as being an active open space, which once refurbished, will provide a regional playground for children and families. It is also proposed that the Leagues Club Field will provide open space for active play, training groups and lunch time sports.
 - It is noteworthy, having accounted for the above, that the impact of the proposal upon the Leagues Club Field at midwinter is negligible at the 'critical' times (i.e. 11am-2pm, when people will be most commonly using it); also
 - The impact of the proposal is comparable (if not less) than the approved 'Froggys' development; and
 - If a compliant RL 48 scheme was proposed, it is likely to generate a greater impact upon the Leagues Club Field at 'critical' times of the day.
- In terms of impacts to the Private Open Space of adjoining residential development, the proposal would only have a negligible impact between 2-3pm at midwinter.

2.2.3. Visual Impact

In their letter correspondence dated 20 December 2019, NSW DPIE identified concern with the visual impact of the proposal, specifically from key public domain vantage points such as the Brian McGowan Bridge, the Waterfront and Rumbalara Reserve. NSW DPIE also requested analysis of the impacts arising from the proposed variations (i.e. comparing to a potentially compliant scheme).

To assess this, DKO prepared a compliant envelope scheme that achieved both the base FSR of 3.5:1 and the maximum building height of RL 48. This is represented in plan-view in Figure 8; and in 3D montage views – see Figure 9, Figure 10 and Figure 11.

Figure 9 – Plan View



Picture 9 – Proposed Building Layout



Picture 10 – Compliant Option Building Layout

Source: DKO

The following provides a written summary of the Addendum VIA (refer to Appendix D):

- The proposed development comprises three slender towers with substantial separation. The spatial configuration of the towers allows pedestrian links connecting Mann Street to the Leagues Club Field. These links allow activities such as sitting, strolling, socialising and dining and present a more varied spatial and visual sequence for pedestrians as they move between the buildings.
- Their visual experience will be enhanced by the adjoining commercial and retail frontages, combined with landscape treatment, which frame the through site links. As pedestrians descend the elevation difference from Mann Street, they will walk into the Leagues Club Park as an enjoyable visual and physical experience.
- The stepping of the slender towers from north to south creates a relationship with the sloping ridgeline behind. The visual relationship between the towers (and the view corridors between them) would constantly and dynamically change as the viewer moves toward and around the site. These views between towers are not readily available on a compliant scheme.
- The building form required to achieve a compliant height and FSR would appear bulky and monolithic. Opportunities for a pedestrian corridor through the site would be very limited. A compliant scheme would

have substantially less commercial and retail GFA, which would greatly limit the level of activation at the ground plane for pedestrians moving through the site.

- Consequently, pedestrian activities such as sitting, strolling, socialising and dining would not be available within the site. This would be a significant loss of opportunity for a more varied and engaging visual and physical experience for pedestrians that would help achieve the goals of the Gosford UDF.
- A compliant scheme would preclude views through the site from areas located to the east. The absence of sky views to the west from Mann Street, combined with a lack of direct sunlight reaching the ground plane in the afternoon, would result in a compromised visual and physical experience.

The following pages provide an assessment of the visual impacts (including comparison against a compliant scheme) for the three specific viewpoints identified in their 20 December 2019 correspondence. For further information, refer to the Addendum VIA prepared by Corkery Consulting at Appendix D.

Brian McGowan Bridge

Figure 10 – View from Brian McGowan Bridge



Picture 11 – Proposed Scheme as viewed from Brian McGowan Bridge

Source: Corkery Consulting



Picture 12 – Compliant Option as viewed from Brian McGowan Bridge

Key insights:

- The Brian McGowan Bridge forms the principal gateway to the southern portion of Gosford City Centre.
- The proposal comprises a set of slender towers that step down from north to south, creating a relationship with the sloping ridgeline behind. The towers provide views between them, including to the tree covered ridgeline to the east of the site.
- It is noteworthy that the visual relationship between the towers would change as motorists and pedestrians move toward and around the development, resulting in a dynamic visual experience. The slender towers of the proposed scheme would provide a clearer visual connection between the ground plane and sky when seen from this viewpoint.
- It is noted that the proposed (approved) 'Creighton's' development (27-37 Mann Street), in red translucent outline, would block views to a significant portion of the tree-covered ridgeline.
- In contrast, the bulky built form of a compliant scheme would not provide a similar visually dynamic experience due to the lack of separation between the buildings and its monolithic form. A compliant scheme (combined with existing/proposed high-rise buildings behind) would effectively block views to the tree-covered ridgeline beyond – see Picture 6.

The Waterfront

Figure 11 – View from The Waterfront



Picture 13 – Proposed Scheme as viewed from The Waterfront

Source: Corkery Consulting



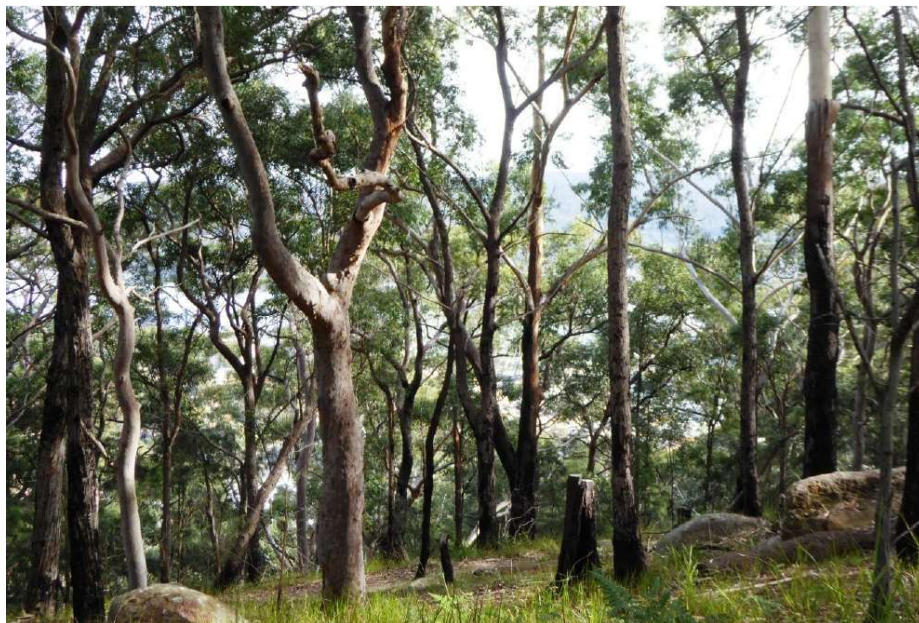
Picture 14 – Compliant Option as viewed from The Waterfront

Key Insights

- The waterfront of Brisbane Waters forms a clearly defined southern edge of Gosford CBD, which is a key aspect of the character of Gosford, as noted in the Gosford UDF. Views to and from the water are highly valued by residents, visitors engaged in recreation activities and those working in the CBD.
- The proposal comprises a set of slender towers that step down from north to south, creating a relationship with the sloping ridgeline behind. This is accentuated by the key design move (as part of this RtS) to step the southern tower by creating three differing roof heights – with the southern corner being the lowest (in respect of the ridgeline) – see Picture 7.
- The visual relationship between the towers and the view corridors between them would constantly change as the viewer moves around on Brisbane Water. The variation in orientation of the tower facades would result in different levels of reflected light and shadow on those surfaces, which would visually reduce the perceived bulk of the towers.
- In contrast a compliant scheme would consist of a bulky, monolithic built form that would not provide the same dynamic visual experience of the proposal.
- As viewers move closer to the Gosford foreshore the tops of the buildings in both the proposed scheme and a compliant scheme will project above the top of the tree covered ridgeline. However, the proposed scheme will provide significant opportunities for views between the towers. This will not be the case for a compliant scheme, even though the top would be lower than the proposed towers.

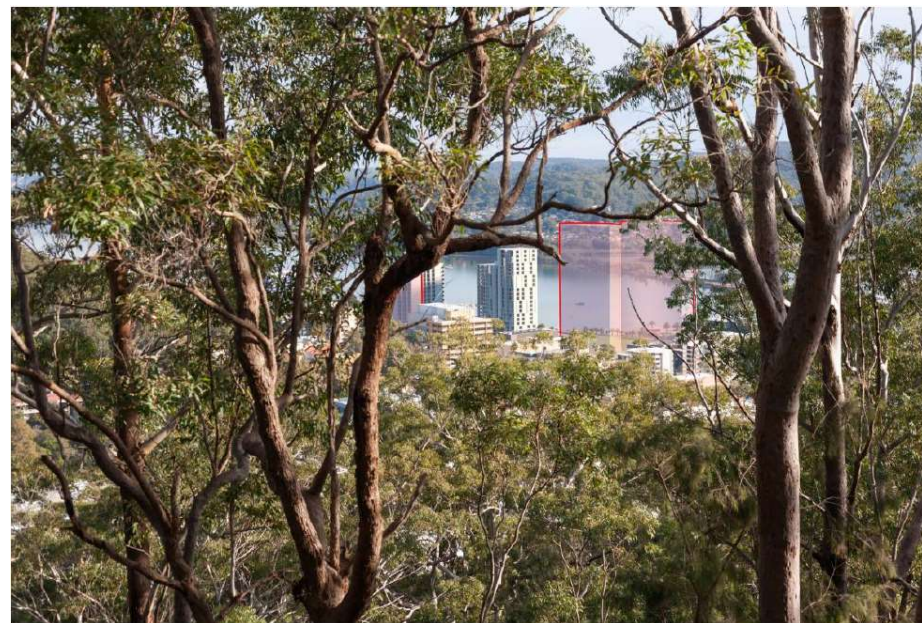
Rumbalara Reserve

Figure 12 – View from Rumbalara Reserve



Picture 15 – Existing View from Rumbalara Reserve

Source: Corkery Consulting



Picture 16 – View of Proposal from Rumbalara Reserve

Key Insights

- Rumbalara Reserve is located approximately 1.2 kilometres to the north east of the site. The Reserve is on a visually prominent tree-covered ridgeline that forms a major component of the natural landscape setting for Gosford City Centre.
- While the extensive tree cover across the Reserve creates an attractive natural landscape experience for visitors, it also screens most views towards Gosford and Brisbane Water as shown in Picture 9. Gaps in the tree canopy do provide some glimpses that are framed by tree trunks and canopies.
- The photomontage presented in Picture 10 shows a glimpse between trees to the southern portion of Gosford City Centre. The proposal is shown in the photomontage together with the envelopes of the proposed 'Waterside' development (in red), which would block a substantial portion of Brisbane Water in this view.
- Picture 10 shows that views between the towers in the proposed development would extend to Brisbane Water. The proposed southern towers would be largely screened by the tree in the foreground and the proposed high rise 'Creighton's' development (also shown in red).

2.2.4. Aboriginal Heritage

Archaeological Management and Consulting Group (AMAC) and Streat Archaeological Services Pty Ltd prepared an Interim Aboriginal Archaeological Report for SSDA submission. Post-submission, this was converted to a full Aboriginal Cultural Heritage Assessment Report (ACHAR) in accordance with the SEARs and OEH requirements. The ACHAR, submitted as part of this Rts, has included:

- Aboriginal consultation – undertaken in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW 2010); and
- Test excavation – undertaken over two days (05/12/19 – 06/12/19), in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales.

The test excavation found that the majority of the site has been disturbed due to past land use, with no Aboriginal objects and/or deposits, or features of cultural/archaeological significance present. AMAC concluded that further investigation is not warranted, and the works may proceed with caution.

Mitigation measures have been formulated after consultation with the Environment, Energy and Science Group (EES Group) of the Department of Planning, Industry and Environment (DPIE) and Aboriginal stakeholders. These are listed (in detail) within the ACHAR submitted at Appendix F and are expected to form conditions of consent.

2.2.5. Traffic

Various traffic matters were identified in submissions from Central Coast Council, RMS (now TfNSW) and NSW DPIE. GTA Traffic Consultants have prepared a letter response, addressing each technical item sequentially – refer to Appendix I.

It is noted that agencies have raised concern with the existing (and future) performance of the Gosford CBD road network, given the cumulative impact of various development projects either under construction or in the planning phase. The Traffic Impact Assessment (TIA) submitted for SSDA identified future, longer-term (2032) capacity concerns – particularly at the intersections between local and state roads. The TIA concluded that capacity issues would occur with or without the proposed development. As such, infrastructure improvements are likely to be required to ensure acceptable levels of service across the road network.

The Applicant acknowledges that a Gosford CBD Traffic Study is currently being undertaken, involving both State and Local governments. It is expected that this study will holistically determine the appropriate road upgrades and associated funding mechanisms.

It is also noted that the contributions framework that applies to the proposal is as follows:

- Gosford City Centre Special Infrastructure Contribution (SIC) Levy – 2% of development cost.
- Central Coast Council 7.12 Contributions Plan for Gosford City Centre – 1% of development cost.

According to the DPIE's explanation note, the Gosford City Centre SIC levy is to be collected for:

- Road network upgrades to improve traffic flow and pedestrian connections through the city centre.
- *An upgrade to Kibble Park.*
- *The planning and delivery of health, education and emergency services facilities.*

Based on the above and because that the proposal is made in Concept, the Applicant is not in a position to commit to specific upgrade works. Rather, it is expected that SSD-10114 would be conditioned so that development contribution levies are payable at each detailed stage of development; and the contribution payable would be determined in accordance with any VPA, or if no VPA is entered into, the relevant contributions plan that applies to the development at the time of approval for each stage.

This is considered appropriate, not only because the 2% SIC levy is being collected for the purpose of road network upgrades (with levies being paid proportionately to the cost of work), but also because a detailed traffic study is currently being undertaken, which will determine most appropriate type and sequence of upgrade works.

3. ALIGNMENT WITH STRATEGIC OBJECTIVES

3.1. CENTRAL COAST REGIONAL PLAN 2036

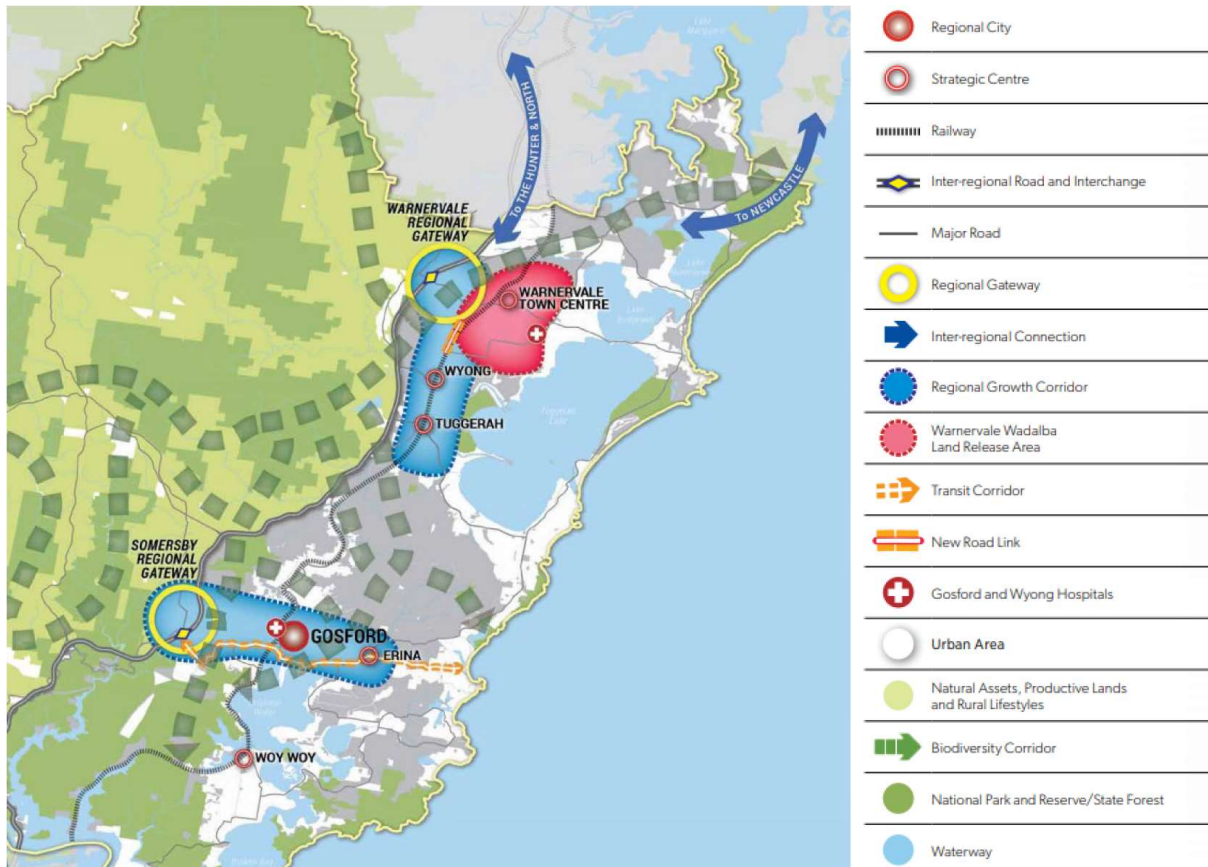
The Central Coast Regional Plan 2036 sets the vision for the Central Coast region to create a 'healthy natural environment, flourishing economy and well-connected communities'. To achieve this vision, the Government has set four goals:

- Goal 1 – A prosperous Central Coast with more jobs close to home.
- Goal 2 – Protect the natural environment and manage the use of agricultural and resource lands.
- Goal 3 – Well-connected communities and attractive lifestyles.
- Goal 4 – A variety of housing choice to suit needs and lifestyles.

The proposal satisfies these priorities in the following ways:

- The proposal supports a significant increase of employment opportunities within the precinct and Gosford City Centre, with the 3,215 sqm retail / commercial floor space, together with a new hotel. This will result in varied employment options for the locality and wider catchment and satisfies a key strategic goal to create a '*prosperous Central Coast with more jobs to home*'.
- The provision of high-quality residential dwellings in a convenient, accessible and naturally beautiful location affords future residents the opportunity to live in a high-amenity location. The proposal provides a variety of housing to suit the needs and lifestyles of existing and future residents of Gosford.
- The proposed development will greatly contribute to the urban regeneration and revitalisation of Gosford and provide a new meeting place and destination for existing and future residents of the locality, satisfying the key strategic goal to create '*well-connected communities and attractive lifestyles*'.

Figure 13 – Central Coast Region Plan 2036



Source: Central Coast Region Plan

3.2. GOSFORD URBAN DESIGN FRAMEWORK 2018 (GA NSW)

The Gosford Urban Design Framework (UDF) was released in October 2018 and sets a vision for the renewal of the Gosford City Centre. The UDF seeks to provide place-based approaches to strengthening Gosford's role as the regional capital of the Central Coast.

The UDF builds on previous work, plans and strategies undertaken for Gosford City Centre by the NSW Government and the former Gosford City Council (now Central Coast Council), including the 2008 Our City, Our Destiny Masterplan and the 2007 Revitalising Gosford City Centre Plan.

The UDF outlines the following four 'opportunities' for the City South region of Gosford:

- *For Gosford to be more than an 'event city'. There is the opportunity to enliven City South for more times of the day, and for more locals, regional visitors and tourists.*
- *To strengthen the image or identity of the city's landscape setting, particularly as the city is approached from the south by car and train.*
- *To capitalise on the investment in new jobs and homes in City South, helping to bring together the social and economic opportunities in this area.*
- *To create public connections to a unique and evolving water's edge that supports the identity of the regional capital.*

The proposal aligns with these objectives because it:

- Supports an active interface with the Leagues Club Field, providing an attractive place for people to congregate both day and night, and caters for pre and post events at nearby entertainment venues.
- Maintains a sympathetic relationship to its landscape setting, through deliberate design interventions to preserve views to the escarpment from key public vantage points and provide a gesture and visual connectivity to the natural topography through the stepping of the three slender tower forms.
- Enables new residential and commercial uses that will provide a boost to the local economy through jobs growth and a larger captive population to service those local economies.
- Delivers an accessible, open-air pedestrian connection from Mann Street to the Leagues Club and the water – providing both a physical and visual connection to the water's edge. The proposal similarly represents a bold design outcome, representative of Gosford's future aspirations.

The proposal also specifies principles specifically relating to the subject site (UDF, p. 90):

- *Prioritise active edges to the proposed Baker Street extension, with limited internalised retail, food and drink areas whilst also presenting an attractive 'front door' to Mann Street.*
- *Service entries to be located on Vaughan Avenue, with access from Mann Street and no through traffic to the highway. Consider lengthening the built form along the Baker Street edge to further strengthen an active edge to the park and better connection to the waterfront.*
- *Incorporate accessible through site links connecting higher levels of Mann Street to Baker Street.*

The proposal aligns with these objectives because it:

- Advocates for active edges through retail and commercial uses on Baker Street. The Applicant has been collaborating closely with the Hunter & Central Coast Development Corporation to generate synergies between the Leagues Club Field refurbishment and the proposed public domain outcomes at the site. The proposal's address to Mann Street will (as noted above) provide both a physical and visual connection to the waterfront, inviting people to appreciate the water views from publicly accessible vantage points, or linger in formal and informal spaces.
- Provides two open-air through site links which will successfully manage public access through the site – mitigating the significant level difference between Mann Street and Baker Street.

Overall, the proposal is considered to maintain strong strategic alignment with the Gosford UDF, noting that it has been independently reviewed by the CoGDAP who were (in part) involved in the creation of the UDF.

4. DETAILED RESPONSE TO SUBMISSIONS

During the public exhibition period, a total of 10 submissions were received during the EIS exhibition period. Of these submissions, nine were received from government agencies (including NSW DPIE) and Central Coast Council; and one submission was received from a community group. A detailed response to issues the issues raised by the DPE and all other submitters is provided in Table 2 below.

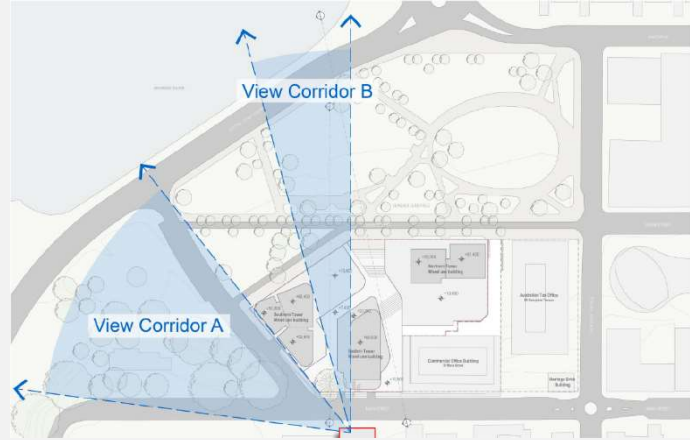
Table 2 – Detailed Response to Submissions

Issue	Comment	Response
NSW Department of Planning, Industry and Environment		
1. Design Excellence	The Department notes the proposal has been presented to the City of Gosford Design Advisory Panel (the Panel) on several occasions, and the Panel's advice of 19 November 2019 recommends further design refinements to the proposal.	Noted.
2. Design Excellence	In order to demonstrate that the proposal exhibits design excellence, and qualify for the additional height and floor space, the Department requires the following: refinements to the proposal in line with the Departments built form comments below and the Panel's advice dated 19 November 2019	Noted (Panel comments addressed individually below).
3. Design Excellence Process	a strategy setting out the process to ensure the detailed design of buildings (which will be subject to future development applications) exhibit design excellence, including opportunities for design review and design integrity	A Design Excellence Strategy has been prepared by the Applicant (refer to Appendix L). It is intended that this, in concert with the existing design excellence/review framework, will guide future (detailed) applications to ensure ongoing design integrity.
4. Draft Design Guidelines	- the preparation of draft design guidelines, setting out the key principles and design parameters to inform the detailed design of the buildings within the envelopes, addressing: - massing, modulation, heights, articulation and building materiality - extent to which the buildings fill the proposed envelopes, such as through a comparison of the gross floor area - response to Gosford's natural setting, existing and future character and relationship to adjacent built form - parameters to protect views and vistas and solar access to public spaces - fine grain frontages, street activation, servicing, access and loading arrangements and amenity	Draft Design Guidelines have been prepared by the Applicant at Appendix A.

Issue	Comment	Response
	○ landscape design and public domain.	
5. Further Panel Consultation	● further consultation with the Panel, following the design refinements, to: ○ confirm the Panel's recommendations dated 19 November 2019 have been adequately addressed ○ confirm the (revised) bulk, scale and height is consistent with the future desired character of Gosford ○ review the draft design guidelines.	The Applicant met with the Panel (and representatives of the DPIE assessment branch on 3 March 2020). Subsequently, the Panel has issued correspondence supporting the revisions made to the scheme and confirming it achieves 'design excellence' in accordance with the SEPP.
6. Built Form	In order to support the proposed variations to the height and floor space controls, the Department requires a detailed visual and solar access / overshadowing analysis of the impacts arising from the proposed variations (compared to a scheme that does not rely on the variations) and additional information justifying the land use mix.	Refer to Section 2.2.3 and Appendix D for a comprehensive analysis of visual impacts, including an assessment of the proposed scheme against a 'compliant' option. Regarding solar access, DKO have prepared shadow diagrams for the summer/winter solstice and spring/autumn equinox – which demonstrate the Leagues Club Field, Memorial Park and Poppy Park all achieve the solar access in accordance with the SEPP and DCP. The land use mix is considered appropriate and will generate significant economic benefit for Gosford. The site will deliver a mix of retail, commercial, hotel, residential (& office if 32 Mann Street is considered). The economic benefits are summarised below: ● Contributes \$36.9 million in value to the New South Wales economy on an annual ongoing basis ● Generates 62 direct jobs and 97 indirect jobs, contributing \$122.8 million in direct and indirect value added to New South Wales over the five-year development phase. ● Creates 250 direct jobs through the ongoing operation of the retail, commercial and hotel components of the development & a further 86 indirect jobs from flow-on-effects.

Issue	Comment	Response
7. Built Form – Southern Tower	Noting the advice from the Panel and issues raised in submissions, the Department also requests that the overall height, bulk and scale of the proposal be reviewed, and consideration given to: reducing the mass and bulk of the Southern Tower envelope, so that it presents as a more slender tower form, reduces its visual dominance from key vantage points and enhances views through the site	The southern tower has been amended to include a continual vertical break on all sides, together with a stepped roof height, making it more vertically proportioned and reducing its perceived bulk and scale. The southern corner of the tower has been brought down to street level, further accentuating the split in massing/breaking up the podium mass.
8. Built Form – Southern Tower	reducing the height of the Southern Tower envelope, to be sympathetic to Gosford's natural setting, including the ridgeline and the Waterfront, and improves solar access impacts to Leagues Club Field, Poppy Park and Memorial Park	The built form changes described in #8 above provide greater levels of solar access to the public domain, while also mitigating the visual impact from key public domain vantage points (refer to Appendix D).
9. Built Form – Southern Tower	relocating the Southern Tower envelope, to be further setback from the southern corner of the site, as well as Vaughan Avenue and Baker Street	The design team have followed the Design Panel's comments – which recommended running the residential component of the tower down to ground. This assists in breaking the southern tower into two distinct forms, mitigating its bulk and scale – while also engaging with the ground plane and breaking up the podium mass.
10. Built Form – Vertical Articulation	providing additional vertical articulation in all the buildings, to reduce the perceived bulk and scale of the buildings when viewed from key vantage points (this may be specified in the design guidelines above)	Vertical articulation will be achieved through the massing concepts described in Section 2.2.1 above and the Draft Design Guidelines at Appendix A.
11. Built Form – Eastern Tower	relocating the Eastern Tower envelope to increase the setback from the podium street wall to respect the scale of Mann Street	The eastern tower envelope has been repositioned (setback 6m from the podium wall) to maintain an appropriate presentation to Mann Street, consistent with this comment.
12. Built Form – Through Site Link	increasing the width of the northern through site link to provide greater amenity for the site's public domain	The eastern tower podium has been amended (reduced) to create a wider through site link passage at the Mann Street entrance to the site, consistent with this comment.

Issue	Comment	Response
13. Built Form – Northern Tower	reducing the height, mass and bulk of the Northern Tower envelope and refine the tower setback to improve its relationship to Gosford's natural setting (including the ridgeline backdrop), reduce its visual dominance (when viewed from key vantage points including Brian McGowan bridge, the Waterfront and Rumbalara Reserve) and reduce its solar impacts to Leagues Club Field	The northern tower has been articulated with a vertical break along the 'long face' of its mass to create two distinct forms. The tower is stepped with variable roof levels to accentuate the expression of two towers.
14. Built Form – Interface with 32 Mann Street	investigating options to improve the proposal's interface with the existing commercial office building at 32 Mann Street, so that the proposal and the existing building have a strong built form relationship on the Mann Street frontage.	The enlarged northern through site link provided as part of this RtS, together with the landscape/public domain strategies explored in the package submitted for SSDA (planting, public art) will provide a strong relationship between the proposal and 32 Mann Street. An illustrative section, demonstrating this relationship, is provided on p. 23 of the Concept Landscape Package submitted for SSDA.
15. Amended Drawings	The Department requires amended plans that clearly show the proposed building envelopes and include any important dimensions, including heights (RL), the width of towers, width of through site links and length of podium street walls.	Amended plans have been provided by DKO which demonstrate all relevant information requested by NSW DPIE.
16. Aviation Impact Statement	Having regard to advice from the NSW Health Central Coast Local Health District, and the Department's guideline on Safeguarding Strategically Important Helicopter Landing Sites in NSW, the Department requires an Aviation Impact Statement to assess the potential aviation impacts of the proposal (during construction and operation) including helicopter flight paths servicing Gosford Hospital.	An Aviation Due Diligence report has been prepared by AviPro. The report confirms the proposal will have no impact on the approach and departure paths to/from the Helicopter Landing Site; and that aviation obstruction lighting is not required on buildings (once developed).
17. ADG Compliance	The Department requests further justification that the proposal is capable of achieving compliance with the SEPP 65 and associated Architectural Design Guide (ADG) principles and controls, noting that the proposal is concept stage only.	The design package submitted at Appendix B provides various ADG compliance diagrams demonstrating that the reference scheme can achieve compliance with the key ADG design criteria. This will be addressed further at detailed DA stage, when a full architectural scheme is developed.

Issue	Comment	Response
18. Visual and View Impacts	The Visual and View Impact Assessment (VIA) should be revised to consider visual impacts and view loss for the approved development at 17 Mann Street (DA28605/2005 as modified).	A supplementary response has been prepared by Corkery Consulting, responding to this matter (refer to Appendix D). It was concluded: - Occupants of the lowest level apartments in Block A would have views over the podium of the closest building at 26 Mann Street, which has a level of RL19.80, when standing on the outdoor patio that has a floor level of RL19.20. All other units in Block A facing Mann Street and the roof terrace garden will have views over the podium between the proposed two towers at 26 Mann Street adjoining the corner of Mann Street and Vaughan Avenue. These views will extend to Brisbane Water and the tree covered escarpment west of Gosford. Occupants of the apartments fronting Mann Street will also have views to the south west over the tree canopies in War Memorial and Poppy Park, extending to Brisbane Water. These two view corridors are illustrated below.  - If a compliant scheme were to be developed at 26 Mann Street, the top of the structure would be at RL48, which is higher than the top of Block A of 17 Mann Street, which is RL37.00 and the top of Block B, which is RL45. As the form of the complying development is likely to be a monolithic building form, views to the west from both Blocks A and B at 17 Mann Street would be blocked (i.e. worse outcome).

Issue	Comment	Response
19. Amended Shadow Diagrams	Noting Council's concerns about potential solar and amenity impacts associated with the proposal, the Department requests amended shadow diagrams showing the solar access impacts (for summer and winter solstice and spring and autumn equinox, at hourly intervals between 9am and 3pm) to the surrounding public domain, including Leagues Club Field, Poppy Park, the Memorial Park and the Waterfront and likely solar access to the proposed through site links.	DKO has prepared updated solar drawings in satisfaction of this comment. The drawings demonstrate that the proposal complies with the SEPP and DCP controls pertaining to shadowing. In relation to Poppy Park, it is noted that the primary gathering space is currently shaded by dense tree plantings, which are retained on the Council's local heritage register. The trees (that shadow the park) are unlikely to be removed in the short to medium term. The shadow impact of the proposal above/beyond the existing condition is therefore considered negligible and inconsequential (notwithstanding its compliance with the DCP controls).
20. Amended Shadow Diagrams	The Department also requests further assessment of solar access impacts of the proposal to (existing and approved) residential development to the east and south-east of the site to ensure these developments are not adversely impacted by the proposal.	Amended plans have been provided by DKO which demonstrate all relevant information requested by NSW DPIE. The drawings demonstrate that residential development will not be unreasonably and/or adversely impacted by the proposal.
21. ESD	A consolidated list of ESD commitments is required to set building sustainability and environmental performance targets for future development. In providing these, the Department encourages a high level of sustainability and environmental performance in line with current industry leading practice.	The ESD Report prepared by S4B (submitted for SSDA) details a broad range of sustainability objectives for the development that have been tailored to the site. The report provides a practical and holistic approach to maximising sustainability opportunities and provides hard benchmarks for improvement in performance.
22. Heritage	Having regard to advice from Central Coast Council, the Department requests further assessment of potential impacts to nearby local heritage items, including item 31 (Memorial Park and avenue feature trees) and item A9 (Rotary Club fountain and garden), arising from the solar impact of proposed envelopes.	John Carr has provided a letter response to this comment. Having regard to the solar drawings, it is concluded: <i>"The shadows cast by the proposed buildings are a moving issue and do not affect the heritage significance of the Items 31 and A9 as they are and have been for some considerable time subject to moving shadows from the existing landscaping [which is heritage-protected]"</i>.
23. ACHAR	Having regard to the advice from the Department's Biodiversity and Conservation Division (BCD), the Department requires an Aboriginal Cultural Heritage Assessment Report prepared in accordance with the Guide to investigating, assessing and reporting on Aboriginal cultural	An ACHAR has been prepared by AMAC Group, which has been prepared in accordance with OEH guidelines. The ACHAR concludes that the majority of the site has been disturbed due to past land use, with no Aboriginal objects and/or deposits, or features of cultural/archaeological significance present. AMAC concluded that

Issue	Comment	Response
24. Public Benefit	heritage in NSW (OEH, 2011) and in consultation with the local Aboriginal community. Given the scale of the proposal and the extent of variations proposed, the Department requests that the public benefit offer be reviewed and expanded, to include for example facilities for local community groups and public domain and pedestrian improvements surrounding the site. The Department notes ongoing discussions with the Hunter and Central Coast Development Corporation (HCCDC) and Central Coast Council regarding potential public domain upgrades in the vicinity of Leagues Club Field to provide a seamless transition between both sites.	further investigation is not warranted, and the works may proceed with caution. In accordance with the planning framework that applies to the site, SH Gosford Residential Pty Ltd have opted to undertake a 'Masterplan' approach for the redevelopment, meaning SSD 10114 is made in 'Concept' pursuant to Section 4.22 of the Environmental Planning and Assessment Act 1979. No built works are proposed as part of this application, and as such SH Gosford Residential Pty Ltd are not in a position to enter into any detailed VPA. It is expected that this Concept SSDAs would be conditioned so that development contributions levies are payable at each detailed stage of development; and the contribution payable would be determined in accordance with any VPA, or if no VPA is entered into, the relevant contributions plan that applies to the development at the time of approval for each stage. Contributions totalling 3% of the development cost will be levied for local and state infrastructure. SH Gosford Residential Pty Ltd have been liaising with the NSW Department of Planning, Industry and Environment via a separate forum to discuss the relevant contributions framework and various on and offsite benefits that can be provided. It is expected that this dialogue will continue into the (detailed) DA phase.
25. Biodiversity	Having regard to advice from the Department's Biodiversity and Conservation Division (BCD), the Department requests the inclusion of the Biodiversity Assessment Method credit calculator into the Biodiversity Development Assessment Report.	A revised BDAR report has been prepared by Niche Environmental, which includes the Biodiversity Assessment Method credit calculator.

Issue	Comment	Response
26. Traffic and Transport Impacts	The Department requests further consideration be given to the impacts of the proposal on traffic, parking, transport, pedestrian and road networks, including consideration to cumulative impacts arising from other significant proposals in the city centre. In addition, consider any further mitigation measures, infrastructure or upgrades required to accommodate the proposal and how these might be linked with future development stages.	Refer to Section 2.2.5 above.
27. Staging and consents	Provide additional detail regarding the proposed staging of the development and confirm the accuracy of the indicative timing provided.	St Hillers have staged the works based on the best information available at the time. They have amended the Stage 1 Milestone dates in line with current anticipated planning approvals (i.e. pushed back one year). Refer to Addendum CMP at Appendix J.
Central Coast Council		
<i>Planning Considerations</i>		
28. Height, width and diversity of towers	The proposed towers should be reduced in height and width. In addition, a greater height difference between towers should be provided. This is essential to reduce shadow impact on the Leagues Club Field (and other public spaces) and to reduce the bulk, scale and visual impact of the proposal when viewed from the Gosford Waterfront. The three towers significantly overshadow Leagues Club Field in the AM period (e.g.: 84.5% at 9.00am and 45.9% at 10.00am). In addition, overshadow impacts on the nearby 'Poppy Park' and War Memorial with resultant impacts on the heritage value. In accordance with Clause 5.2.5 of DCP 2018 slender towers with high amenity are required. The floorplate of the towers (particularly the northern tower) should be reduced and greater separation provided.	Refer to Section 2.2.1 above. The revised built form is considered to provide a positive outcome because: • The vertical articulation proposed across the residential towers will reduce their perceived bulk and scale – see Figure 4. • The stepped southern tower envelope will allow increased solar access to the public domain and reduce the visual bulk of the building. • The southern tower's residential interface with Vaughan Avenue will engage with the ground plane and accentuate the massing split by breaking up the extent of podium. • The revised hotel podium/setback will improve its presentation to Mann Street. The northern through site link has been widened, which will improve its amenity.

Issue	Comment	Response
	The northern tower should be at least 15% lower than the eastern tower, and the southern tower should be at least 30% lower than the eastern tower.	Shadow diagrams prepared by DKO demonstrate that the revised layout maintains SEPP & DCP compliant levels of solar access to the Leagues Club Field, Memorial Park and Poppy Park at the summer/winter solstice and spring/autumn equinox.
29. Surrounding development	The cumulative shadow impacts and traffic impacts of other development sites in the City Centre should be taken into consideration.	Noted. DKO have prepared diagrams at the summer/winter solstice and spring/autumn equinox – which demonstrate the SEPP & DCP levels of solar access are provided to the Leagues Club Field, Memorial Park and Poppy Park, accounting for surrounding approved and under construction development. Cumulative traffic impacts have been considered. It is acknowledged that infrastructure improvements are likely to be required to ensure acceptable levels of service across the road network. The Applicant notes that a Gosford CBD Traffic Study is currently being undertaken, involving both State and Local governments. It is expected that this study will holistically determine the appropriate road upgrades and associated funding mechanisms. Refer to Section 2.2.5 for more information.
30. Parking	As the proposal is relying on the special provisions of the State Environmental Planning Policy (Gosford City Centre) 2018 (Gosford City Centre SEPP) & DCP 2018, car parking should be provided in accordance with DCP requirements and not reduced under State Environmental Planning Policy 65 (Design Quality of Residential Apartment Development) and/or Roads and Maritime Service provisions. Where a development already gains benefit/concessions of the provisions of the Gosford City Centre SEPP and associated DCP 2018, it is unreasonable for the development to then gain further concessions on carparking through deferring to RMS provisions.	Disagree. Because this proposal is made in 'Concept', it is not seeking any detailed basement car parking numbers (the reference scheme is subject to change). It is also noteworthy that due to flood constraints, together with existing (state road) intersection performance issues & site accessibility, the Applicant has sought to minimise basement excavation/parking where possible. Notwithstanding, the Applicant has demonstrated (through the reference scheme) that the applicable parking requirements for the retail and

Issue	Comment	Response
		commercial components of the development (legislated under the SEPP) can be accommodated on-site. The residential component of the development will be further reviewed at the detailed DA stage(s) when the apartment mix is finalised, noting that the RMS guidelines are applicable because the site is zoned B4 (per ADG guidance). The ADG is 'switched-on' via SEPP 65, which is the state-based planning policy that guides apartment development in NSW. Accordingly, SEPP 65 & the NSW ADG supersede the Gosford City Centre DCP 2018 in this instance.
31. Consent Authority	Under the provisions of Clause 4.37 of the Environmental Planning & Assessment Act (EPA Act) 1979, the Minister may declare that Central Coast Council is the consent authority for subsequent stages of the development. Council requests that future applications should be determined by the Central Coast Council.	Noted, however the Applicant understands that future SSDAs will be assessed by the Planning Minister (or delegate).
<i>Architectural/SEPP65 Comments</i>		
32. Context and Neighbourhood Character	The proposal is on a prominent site within the city centre with the important public spaces of the Leagues Club Field on the west and the heritage listed Rotary Park and Memorial Park on the south. The Leagues Club Field is proposed for redevelopment and is a significant public park within the city centre. Its importance to the community will only increase as more apartments are constructed and population density increases. It is essential that the amenity of the park for all users is maintained and that there is no increase in overshadowing or loss of views from within the park (see previous comments made in the opening planning section of this correspondence). It is acknowledged that there will be some overshadowing of Leagues Club Park from approved developments however further overshadowing	Noted.

Issue	Comment	Response
	of public spaces resulting from non-complying height and FSR is unacceptable. Though the proposal is supported in principle, it is considered to have detrimental impacts on Leagues Club Park and views of Rumbalara Reserve and must be amended to address these issues.	
33. Built Form and Scale	There is major non-compliance with height controls in the Gosford City Centre SEPP. The site is zoned with a maximum height of RL 48.00. The application proposes a maximum height of RL 81.40 or 59% non-compliance. It is acknowledged that the Gosford City Centre SEPP permits some exceptions to both height and FSR on key sites if the proposal meets design excellence criteria. Though some non-compliance with height controls could be acceptable if it produced “slim towers”, this is not the case with this application. The north tower and podium are particularly bulky and overscaled resulting in them visually overpowering the park. It is noted that the only perspective is from the distant location of Brian McGowan Bridge and even from this distance it clearly illustrates the excessive scale and height of the north tower. The commercial podium to define the Baker Street frontage is supported in principle however the continuous 60-70 metre length of both podiums lack the “fine grain frontage” required by the Development Control Plan. The visual impact and overshadowing of Leagues Club Field, Rotary Park and Memorial Park and the inadequate space devoted to public areas within the development and its overshadowing demonstrate the proposal has not achieved the required level of design excellence and therefore the proposed extent of height non-complying cannot be justified.	Refer to Section 2.2.1, which details the built form changes made to the proposal to mitigate visual and solar impacts (including analysis/comparison vs. a compliant scheme). The southern corner of the tower has been brought down to street level, further accentuating the split in massing/breaking up the podium mass. The podium will be further articulated and broken up at detailed DA stage. Notwithstanding, the reference scheme includes a colonnade/open condition at the Baker Street edge, which together with fenestration will provide an active frontage. The design of the porte-cochere at the Mann Street frontage is subject to a detailed development application, however initial concepts (illustrated in the reference scheme) advocate for the integration of a colonnade space – to provide a mediation between the necessary permeability of the porte-cochere, while maintaining the defined podium scale and established vertical rhythm of the adjacent buildings. This can be further resolved in future (detailed) Development Applications, in combination with the principles outlined in the Draft Design Guidelines (Appendix A). It is noted that solar impacts are full compliant with the SEPP and DCP controls. The shadows will disappear from the Leagues Club Field (at midwinter) from 11am. Design development has been invested in the public domain, driven by CoGDAP comments. The open-air spaces lend themselves to activation, enhancing the pedestrian experience. Public lifts will also be provided to

Issue	Comment	Response
		resolve accessibility. The through-site link will enable an accessible, physical and visual connection between Mann Street to Baker Street (and the waterfront). The through site link will be anchored by retail which will ensure it provides a useful and positive benefit to Gosford City Centre, in alignment with the NSW Government's vision for the locality.
34. Density	The Reference Scheme proposes an Floor Space Ratio of 4.5:1; 28% above the 3.5:1 shown in the Gosford City Centre SEPP. It is acknowledged that the Gosford City Centre SEPP permits some exceptions to both height and FSR on key sites if this meets design excellence criteria. As stated under Built Form and Scale, the visual impact and overshadowing of Leagues Club Field, Rotary Park and Memorial Park and the inadequate space devoted to public areas within the development and its overshadowing demonstrate the proposal has not achieved the required level of design excellence and is has not provided justification for the proposed additional FSR.	Refer to item #33 above.
35. Sustainability	The application must comply with mandatory minimum sustainability standards however a development of this size and significance is an opportunity to encourage and demonstrate sustainable design by providing more than the bare minimum. This could include but is not limited to providing solar and wind power generation and storage, storm and grey water recycling and a high level of passive solar design.	The ESD Report prepared by S4B (submitted for SSDA) details a broad range of sustainability objectives for the development, which have been tailored to the site. The report provides a practical and holistic approach to maximising sustainability opportunities and provides hard benchmarks for improvement in performance. These will be further developed in future (detailed) applications.
36. Landscape	The landscape concept is generally acceptable in principle however the large trees shown in the drawings appear unlikely to be realistic in the soil depths and volumes shown and the planting palette includes only low shrubs and ground covers. A full landscape plan including all species, numbers and sizes should be included with the application.	A full landscape drawing will be submitted with future detailed applications. Due diligence has been undertaken to ensure the prominent <i>Ficus rubiginosa</i> at the corner of Mann Street and Vaughan Avenue is maintained.

Issue	Comment	Response
37. Amenity	The previous February 2018 proposal was an excellent example of a well designed public space within a private development. It included an open, fully publicly accessible central space with good solar access, particularly during lunch time. There was adequate area for both outdoor dining and simply sitting in the sun or strolling and it also provided an attractive and inviting through site link gently stepping down the site to connect Mann Street with Baker Street and Vaughan Avenue. The current proposal removes these highly commendable qualities and relegates the only real public space to a narrow through site link largely overshadowed and with long and continuous flights of stairs. The current proposal is inconsistent with the DCP key sites 6 in that the publicly accessible podium is very poorly integrated into the site and is simply relegated to leftover areas that cannot be developed for other uses. Envisaging the public open space as “more urban in character” does not justify a poor urban design outcome. The application provides no details of unit layouts, private open space, communal facilities and open space or pedestrian access to foyers. It is essential that all units comply with amenity requirements in the ADG and provide adequate communal facilities for 295 residential units.	It is noted that the February 2018 proposal was made under different planning controls. Once the SEPP was released, the scheme evolved in response to the planning controls which ‘unlock’ the following benefits: • Larger quantum of commercial, retail and hotel floor space (the amount of residential GFA has remained similar). • Superior public realm outcomes offered with an open-air through site link (providing a link to the park and waterfront) and active street frontages. • Greater flexibility with key development standards (HOB and FSR) has resulted in slender tower forms that generate less shadow impact and preserve view corridors through the site. Design development has been invested in the public domain, including the through-site link, driven by CoGDAP comments/feedback. The open-air spaces lend themselves to activation, enhancing the pedestrian experience. Public lifts will also be provided to resolve accessibility. The Applicant has engaged a retail consultant to assist in curating the ground plane/public domain to ensure it provides a useful and positive benefit to Gosford City Centre, in alignment with the NSW Government’s vision for the locality. The through-site link will enable an accessible, physical and visual connection between Mann Street to Baker Street (and the waterfront). The design package submitted at Appendix B provides various ADG compliance diagrams demonstrating that the reference scheme can achieve compliance with the key ADG design criteria. This will be addressed further at detailed DA stage, when a full architectural scheme is developed.

Issue	Comment	Response
38. Safety	Living areas and balconies overlook streets and public spaces to provide surveillance.	Noted.
39. Housing Diversity and Social Interaction	The proposal provides a mix of 1, 2 and 3 bedroom units. No information is provided on accessible units.	This information will be determined at the detailed DA stage in accordance with the relevant ADG/DDA criteria.
40. Aesthetics	The design is largely uniform and repetitive with no differentiation between floors and no definitive top to any of the towers. It is accepted there is some variation in fenestration to the northern tower.	Draft Design Guidelines (Appendix A) have been created (in conjunction with the Design Review Panel) to guide future built form outcomes. These guidelines advocate for a diverse range of architectural treatments for each tower. It is noted that the residential tower envelopes both contain 'steps' to enable this at the detailed DA stage.
41. Architecture	The application is not supported and requires major amendments to address the issues raised in this assessment. In particular, the visual impact and overshadowing of the important public spaces of Leagues Club Field, Rotary Park and Memorial Park and the inadequate space devoted to public areas within the development and its overshadowing are significant public amenity problems that require major amendment to resolve. These demonstrate the proposal has not achieved the required level of design excellence and therefore the proposed extent of height and FSR non-complying cannot be justified. The issues of Sustainability, Landscape and Aesthetics, though important have less impact on public spaces and could be resolved in conjunction with the Design Review Panel.	Disagree. Refer to Visual Impact commentary at Section 2.2.3. The GoGDAP have provided a Letter of Support, confirming the proposal achieves design excellence – refer to Appendix K.
42. Height	The northern tower should be reduced to the complying height of 48 metres and significantly reduced in width to reduce both its visual impact and extent of overshadowing on Leagues Club Field, Gosford War Memorial Park and Rotary Park (Poppy Park), and to open views through the site in compliance with the DCP 2018 below.	Disagree. The proposal is compliant with all planning controls (SEPP & DCP) relating to overshadowing. Detailed visual analysis has been undertaken, refer to Section 2.2.3 and Appendix D. It is concluded that the proposed development comprises

Issue	Comment	Response
	<i>“4. The appropriate height for development of this site will be determined through a master planning process, which is to include design testing and consideration of impacts on views and overshadowing. In particular, the master planning process should test options to maximise views between street level on Mann Street through to the park and the water. The development must comply with the view, slender towers, and solar access provisions contained in this DCP. The development must also take into account the potential impacts on existing heritage items in the vicinity of this site including Gosford War Memorial Park, Rotary Park (Poppy Park), and other nearby heritage items”.</i>	three slender towers with substantial separation. The spatial configuration of the towers allows for pedestrian through site links connecting Mann Street to the Leagues Club Field. These gaps between the towers also create a relationship with the sloping ridgeline behind. The slender towers also create a clearer visual connection between the ground plane and sky; and a more dynamic visual experience (compared to a compliant scheme) as pedestrians and motorists move toward and around the site. The building form required to achieve a compliant height and FSR would appear bulky and monolithic. Opportunities for a pedestrian corridor through the site (and associated activation, anchored by retail) would be very limited. Detailed visual analysis undertaken for specific viewpoints (Brian McGowan Bridge and The Waterfront) reveal that a compliant scheme, together with existing approved development, would block significant portions of the ridgeline view (in most cases, to a greater extent than the proposed option).
43. Public Space	In comparison to the February 2018 proposal the public space has been reduced to a narrow through-site link largely overshadowed and with long and continuous flights of stairs. The claimed public space above Baker Street is not public but is private outdoor dining area for the adjoining commercial outlets. While the “eat street” concept and outdoor dining are strongly supported these are not a substitute for public space. The current application is inconsistent with the DCP key sites 6 in that the publicly accessible podium is very poorly integrated into the site and is simply relegated to leftover areas that cannot be developed for other uses. It should be amended to address the DCP2018 below.	It is noteworthy that the proposed scheme is based on the existing planning controls. Once the SEPP was released, the scheme evolved in response to the planning controls which ‘unlock’ the following benefits: • Larger quantum of commercial, retail and hotel floor space (the amount of residential GFA has remained similar). • Superior public realm outcomes offered with an open-air through site link (providing a link to the park and waterfront) and active street frontages – all embellished with landscape plantings, places to sit/ponder and public art.

Issue	Comment	Response
	<i>"3. Publicly accessible podium open space above Baker Street, at the level of Mann Street and overlooking the waterfront should be considered and integrated into development of the site".</i> It is recommended that the residential and commercial area of the southern podium is significantly reduced in length and a larger landscaped truly public area is created on the podium. As the shadow diagrams illustrate, this is the only area public that achieves continuous sunshine in mid winter. <i>"6. For any new public spaces, buildings are to be designed to ensure that at least 50% (minimum) or 70% (preferred) of the open space provided receives a minimum of 4 hours of sunlight between 9am and 3pm on the winter solstice (21 June)".</i> This should be integrated with the staircase, preferably with additional large landings to provide further public seating and an easier and more gradual ascent.	Greater flexibility with key development standards (HOB and FSR) has resulted in slender tower forms that generate less shadow impact and preserve view corridors through the site. The design of the public space has been rigorously workshopped with the State Government appointed CoGDAP. It has also included close consultation with the HCCDC to ensure the proposal was integrated with the Leagues Club Field refurbishment. Overall, the proposal provides a superior outcome and is worth of support.
<i>Engineering Considerations</i>		
44. Baker Street	This recently constructed extension of Baker Street provides vehicle access to and from the ATO and NSW Office of Finance buildings and the associated perpendicular car parking made up for a parking shortfall associated with the existing developments. This constructed portion of Baker Street must be retained to continue the ongoing operation of the existing developments. Vehicular access to and from the basement of the proposed (future) hotel on the subject site will be via the vehicle access driveway, constructed in association with the NSW Office of Finance building, which is accessed from the 2-way constructed section of Baker Street. According to DCP 2018, the Baker Street (extension) is a desired pedestrian boulevard (emergency vehicle access only). This being the case, a turning head is required adjoining the 2-way constructed section	The Baker Street extension is currently being constructed as a one-way shared zone, consistent with the SSDA submission.

Issue	Comment	Response
	of Baker Street to enable 12.5m heavy rigid vehicles (HRVs) to turn around and exit back onto Georgiana Terrace. The Master Plan is to be amended to accommodate a turning head within Baker Street and the Site (if there is insufficient room in the road reserve to accommodate it). This turning head should be designed in such a way that it clearly delineates the 2-way trafficked portion from the pedestrian boulevard beyond. As per the DCP 2018, the remaining section of Baker Street (i.e. from the end of the 2-way constructed portion and turning head through to Vaughan Avenue) is to be a pedestrian boulevard with vehicle access provided for emergency vehicles only. This remaining section shall be constructed of materials and signposted in a manner that clearly delineates it as a pedestrian boulevard.	
45. Water Cycle Management	Water Cycle Management for the future developments on the Site shall be in accordance with Chapter 6.7 of the Gosford DCP 2013. DA's for the various stages of the proposal shall be supported by Water Cycle Management Plan (WCMP) Strategies prepared in accordance with Chapter 6.7 of Gosford DCP 2013.	Noted. Can be addressed at detailed DA stage.
46. Flood Planning Level	The Flood Planning Level for future developments shall be RL 3.00m AHD based on the 1% AEP flood level + freeboard + projected sea level rise for an 80-year design life. Access to the basement car park shall have a minimum crest level or flood gate with a minimum crest level of RL 3.00m AHD to cater for the appropriate flood planning level.	Noted. Can be addressed at detailed DA stage.
47. Vehicular Access and Car Parking	Vehicular access and car parking for the various future DA's on the Site shall comply with all applicable sections of the current car parking standard AS 2890.	Noted. Can be addressed at detailed DA stage.

Issue	Comment	Response
48. Recommendation	1. The recently constructed two-way extension of Baker Street and associated car parking shall be retained. 2. The Master Plan shall be amended to provide for a turning head on the south side of the recently constructed two-way section of Baker Street. The turning head shall be designed for a 12.5m heavy rigid vehicle (HRV). If there is insufficient room to accommodate it, part of the Site is to be dedicated as road reserve as required. The turning head shall be designed to clearly delineate the 2-way portion of Baker Street from the proposed pedestrian boulevard extension to Vaughan Avenue. 3. Baker Street shall be extended from the proposed turning head through to Vaughan Avenue as a pedestrian boulevard with access for emergency vehicles only. This section of Baker Street is to be constructed of materials and signposted to clearly designate it as a pedestrian boulevard.	As above in #44, the Baker Street extension is currently being constructed as a one-way shared zone, consistent with the SSDA submission.
<i>Traffic</i>		
49. Architectural Plans	The Concept plan does not appear to readily provide wheelchair access for the different levels through the site. Ramps at 1:14 grade near the staircases should be provided, in addition to any lifts. Preliminary through site link. The levels given to Leagues Club Park are a level zero, which is not correct.	The Applicant will be providing vertical transportation as part of future (detailed) DAs. This is proposed to form part of a future public benefit offer.
50. Traffic Study	8.3.1 Analysis shows Central Coast Highway / Dane Drive roundabout in the PM is operating over capacity now with significant delays particularly to Dane Drive vehicles accessing the roundabout. The Dane Drive approach to the roundabout should be upgraded as part of the masterplan proposed Plans or provisions should be made to upgrade both the Donnison Street and Etna Street railway overbridges as outlined in the SEAR's Attachment A Strategic Plan 'Gosford City Centre Transport	Refer to Section 2.2.5 above.

Issue	Comment	Response
	Management and Accessibility Plan'. Both bridges require major upgrading for improved bus, vehicle, pedestrian and cyclists access across the railway corridor. The proposed development will contribute to the need to upgrade both bridges.	
<i>Landscape</i>		
51. Designated Tree Protection Zone	It is understood that the upper most proposed basement floor was deleted within the DTPZ and that the lower two basement floors will be undercut to limit disturbance to the existing soil within the trees DTPZ. The existing upper surface is to remain undisturbed to a depth of 1200 – 1500mm.	Noted.
52. Ficus tree	Other recommendations are to retain the existing crib wall approximately 4m to the west of the tree, due to fig roots entwined into and around it.	Noted.
53. Removal of additional trees	It is apparent that all other trees on the property are to be removed consisting of Camphor laurel, Eucalypt, Blackbutt, Brush Box and She oak, however these trees have not been addressed in the Arborist letter.	Noted.
54. Landscape Plans	Landscape Plans show new tree planting however the conceptual plans have not provided species or sizes at this stage. Landscaping is supported providing the applicant: - • Provide an Arboricultural Impact Assessment of all trees on site, including other trees within the DTPZ that are not intended to be retained. • Engages a Project Arborist to provide Monitoring and Certification in accordance with Section 5 of AS 4970-2009 Protection of Trees on Development Sites.	An Arborist Report has been provided, which assesses all trees on-site – refer to Appendix H. Due diligence has been undertaken to ensure the prominent <i>Ficus rubiginosa</i> at the corner of Mann Street and Vaughan Avenue is maintained. A full landscape drawing will be submitted with future detailed applications. Refer to Arborist Report at Appendix H.

Issue	Comment	Response
	Provide a detailed Landscape Plan showing species and sizes of trees to be planted and in accordance with Occulus Gosford City Centre Streetscape Design Guidelines Sept 2011.	
<i>Waste</i>		
55. Residential and commercial waste storage	Any proposal will require residential and commercial waste to be stored separately with residential waste serviced by Councils contractor in accordance with the current Domestic Waste Contract provisions. Residential waste to be stored in 1.1m3 bulk waste bins. The residential waste storage enclosure must be located to provide ready roll out of bulk waste bins to the rear of the waste collection vehicle. The waste servicing location must not impede other vehicle access while servicing of bulk waste bins is undertaken. Commercial waste to be serviced by a private, Commercial waste contractor. The Commercial waste storage enclosure to be similarly located as per the residential waste storage enclosure.	Noted. Can be addressed at detailed DA stage.
56. Waste Management Plan	All Development Applications will require a detailed comprehensive signed and dated Waste Management Plan in accordance with Chapter 7.2 – Waste Management of Gosford DCP 2013 and the 'Guide for Applicants on Supporting Document Requirements', for all site preparation, construction, use of premises and on-going management of waste.	Noted. Can be addressed at detailed DA stage.
57. Waste vehicle access and manoeuvring	Waste vehicle entry/exit from the site must be in a forward direction without crossing the centre line of the public road. All waste vehicle entry/exit and internal manoeuvring must be demonstrated by swept turning path overlays to AS2890.2 for a rear loading HRV. A minimum 4.0m vertical height clearance must be provided.	Noted. Can be addressed at detailed DA stage.

Issue	Comment	Response
	Submission of specifications for the heavy duty, 12.5 metre minimum radius truck turntable. A minimum 1.0m clearance to be indicated from the turntable to the nearest wall and/or other obstruction. Additional space to be indicated at the rear of the waste servicing location to facilitate servicing of bulk waste bins. Travel paths for transfer of waste containers within the footprint of the development of the principal waste storage enclosures. A bin lifter to be indicated within bulk waste bin storage enclosures to facilitate transfer of waste from mobile garbage bins into mixed and recyclables bulk bins.	
<i>Waste and Sewer</i>		
58. Water Supply and Sewerage system capacity upgrades	The development site is located within Central Coast Councils “ <i>Southern Region Water Supply and Sewerage Development Servicing Plan (DSP) 2019</i> ” area. Water Supply and Sewerage system capacity upgrades are being provided within the CBD to accommodate loads and demands from development identified within the DSP area. Should the development progress in its current form, further augmentation of Councils water and sewer infrastructure will be required.	Noted. Can be addressed at detailed DA stage.
59. Revised water and sewer infrastructure requirements	Upon determination of loads and demands identified as a consequence of the development proposal, revised water and sewer infrastructure requirements, including augmentation works can be identified. Timely provision of water and sewer infrastructure necessary to accommodate the proposed developments will be dependent upon receipt of government funding under the Gosford CBD Housing Acceleration Fund. Water and sewer developer services contributions shall also apply.	Noted. Can be addressed at detailed DA stage.
60. Section 307 Certificate of Compliance	The developer shall be required to submit an application to Council under Section 305 of the <i>Water Management Act 2000</i> , to obtain a Section 307 Certificate of Compliance. The Application for a Section 307 Certificate under Section 305 Water Management Act 2000 form can be found on Council's website www.centralcoast.nsw.gov . Early application	Noted. Can be addressed at detailed DA stage.

Issue	Comment	Response
	is recommended. A Section 307 Certificate must be obtained prior to the issue of any Construction Certificate. Section 307 developer contributions and water and sewer relocation / augmentation works shall apply to obtain the Section 307 certificate	
61. Relocation of Council sewer mains	The development shall impact existing Council sewer mains traversing the development site. The sewer mains, which service land east and north of the development site, will be required to be relocated prior to commencement of any development. Engineering details for the relocation of the sewer mains must be submitted to Council for approval. Relocation of this sewer main shall be at the developers full cost.	Noted. Can be addressed at detailed DA stage.
<i>Environmental Health</i>		
62. Acid Sulphate Soils	The site is located on Acid Sulfate Soil Class 2. Coffey Services Australia Pty Ltd have undertaken a preliminary acid sulfate soils assessment which found there is a relatively low likelihood of widespread presence of acid sulfate soils. Acid sulfate soils have been previously detected on adjacent site developments. Coffey recommends the implementation of an Acid Sulfate Soil Management Plan at the detailed DA stage.	Noted.
63. Air Quality/Dust	A Preliminary Construction Management Plan (CMP) has been prepared by St Hilliers, dated 3/09/2019. The CMP indicates dust control will be required during construction. Mitigation controls are recommended including: • The use of non-potable water for dust suppression and soil binders • Signage to vehicle drivers and plant/equipment • Installation of dust barriers (e.g. vegetation, walls).	Noted.

Issue	Comment	Response
	- Watering of work areas will be supplemented with wet brooming and the retrieval of deposited dirt from sealed access points and affected roads with street sweepers etc. - All dust-generating activities will be inspected daily.	
64. Asbestos	A Detailed Site investigation (DSI) has been prepared by Coffey Services Australia Pty Ltd. The DSI concluded asbestos was detected below laboratory limits of reporting and no visible asbestos fragments were apparent. The previous Preliminary Site Investigation conducted by Douglas Partners identified one asbestos fragment at one location. Coffey Services Australia recommends an Unexpected Finds Protocol during excavation and construction to mitigate risk of asbestos contamination. The Environment and Public Health Team support this recommendation and further recommends a Clearance Certificate/s issued by a suitably qualified independent Occupational Hygienist or Licensed Asbestos Assessor certifying that the site has been made free of asbestos material following completion of excavation works.	Noted. Can be addressed at detailed DA stage.
65. Contamination	A Detailed Site investigation (DSI) has been prepared by Coffey Services Australia Pty Ltd. The detailed site investigation is incomplete as investigation was not able to be completed in some areas of the site due to construction material still being present on site. The DSI concludes <i>"the site can be made suitable for the proposed mixed use residential/commercial development."</i>	Noted. Can be addressed at detailed DA stage.
66. Groundwater	Groundwater is expected to be encountered in some areas of the excavations on site following extended periods of rainfall. Information will need to be provided in relation to extent of excavation and associated dewatering management plan.	Noted. Can be addressed at detailed DA stage.
67. Noise	A Noise Impact Assessment ('The Assessment') has been prepared by Acoustic Logic. The Assessment has been prepared in accordance with NSW EPA Noise Policy for Industry and Infrastructure SEPP 2007. The	Noted. Can be addressed at detailed DA stage.

Issue	Comment	Response
	Assessment presents a review of traffic noise impacts on the proposed development. The assessment provides recommendations for adoption in future DA's for each stage of the development to ensure suitable internal noise levels and residential amenity are achieved. The recommendations include: • Windows and doors to be glazed in accordance with standard building construction • Penetrations in any façade should be acoustically sealed The Assessment also reviewed potential noise during construction. Construction Noise goals have been provided to guide the preparation of a Construction Noise Management Plan during future DA's for each stage of the development. Construction Vibration goals have also been included in the Assessment and should be used a guide for future DA's. In addition, a Preliminary Construction Management Plan (CMP) has been prepared by St Hilliers, dated 3/09/2019 which outlines mitigation controls for noise management during the construction phase of the development. A detailed Construction Noise Management Plan will be required at DA stage. The Assessment of operational noise impacts has not been reviewed. This includes noise from the proposed tavern and outdoor pool, noise from mechanical plant. The Assessment recommends these noise impacts are to be undertaken at future DA stage for each individual component once specific location, type of plant and hotel operations are known. These will be reviewed at future DA.	
68. Soil and Water Management	The potential size of soil disturbance and exposure is 8,884sqm. Section 6.3 of the Gosford DCP requires a soil and water management plan, which has not been provided by the applicant.	Noted. Can be addressed at detailed DA stage.
<i>Social Planning</i>		

Issue	Comment	Response
69. Affordable housing	Consideration should be given to the inclusion of affordable housing within the residential component of the development. There is a significant need for affordable housing across the Central Coast. Although the Central Coast has historically been an affordable area, a range of factors have resulted in the area being less affordable than Greater Sydney for local residents. While housing is cheaper than the Greater Sydney average, the incomes of local people are much lower with higher levels of overall social disadvantage on the Central Coast, particularly in the former Wyong LGA. The Central Coast now has higher rates of housing stress and higher rates of growth of primary homelessness and those who are marginally housed than Greater Sydney. In 2016, there were around 24,200 households in the Central Coast LGA in 'housing stress', with this figure projected to reach at least 31,000 by 2036. There was a 35% increase in homelessness in the Central Coast from 2011 to 2016, with around 6,000 people who are homeless or marginally housed in the LGA. Affordable housing is an important resource particularly for low income workers, as well as seniors and people with a disability.	Noted. It is acknowledged that there is no Planning Policy that presently requires an affordable housing contribution to be made at the site.
70. Community facilities	When considering whether additional community facilities are required, this should be done in the context of the cumulative impact of the proposed large-scale developments being considered for Gosford. The proposal appears to underestimate the increased need and consideration should be given to including community facilities within the development.	Noted. A comprehensive Social and Economic Impact Assessment has been prepared for the project, which concluded: • <i>Childcare facilities:</i> There will be demand for approximately 10 additional childcare places based on the incoming resident and worker population. While this does not trigger the need for a childcare facility, there is likely to be future demand for additional long-day childcare based on the projected growth in Gosford CBD and this could be considered as part of any future planning agreements. • <i>Library and performing arts centre:</i> The development will trigger demand for an additional 25 sqm library floor space. Early planning for a regional library and performing arts centre in Gosford CBD is

Issue	Comment	Response
		currently being undertaken by Central Coast Council and the additional demand is expected to be met by this facility. • <i>Community centre</i>: The development does not trigger the demand for an additional community centre. • <i>Open space</i>: Demand for open is expected to be met by the proposed local open space upgrades, public plaza and private open space within the development. Notwithstanding the above, St Hilliers is open to discussing a range of on and off-site improvements as part of a future public benefit offer (tied to a detailed DA) with the NSW DPIE and/or Council.
71. Disabled access	The proposal needs to demonstrate how access will be provided for people with a disability. This building is only a few doors up from the NDIS offices. The public thoroughfare from Mann Street through to Baker Street and the Leagues Club Park appears to be a staircase. This would prevent access for people with limited mobility, wheelchair users, people with prams, the elderly, small children etc. While the gradient of the site is acknowledged, an important link like this must provide access options for all. There may also be a public liability issue with a large public staircase. Consideration could also be given to inclusion of quiet spaces within the development to cater for people with sensory difference, older people and parents with children.	The Applicant will be providing vertical transportation as part of future (detailed) DAs. This is proposed to form part of a future public benefit offer.
72. Activation of Gosford	The proposal appears to provide benefits for activation of Gosford, increased employment and linking Mann Street with the Leagues Club Park.	Noted.
NSW RMS		
73. Trip rate source	The TIA has assumed a trip rate of 0.4 trips per bed for the hotel, however the author has not described where this trip rate has been	The rate of 0.4 trips/room from the motel casual accommodation rate in Table 3.7 from the RMS Guide to Traffic Generating Developments.

Issue	Comment	Response
	sourced from. The source for the hotel trip rate should be provided to support these numbers.	Other components of the hotel such as retail and commercial uses have been calculated separately.
74. SIDRA Assessment	The SIDRA assessment has been undertaken so that all intersections operate individually. There are a number of closely spaced intersections within the study area, and the network traffic impacts have not been assessed. Due to proximity of these intersections, it is likely that impacts are expected on these intersections. Therefore clarification for not assessing the network using a networked SIDRA model is required. Alternatively, a networked SIDRA assessment is recommended. The SIDRA assessment does not include the intersection of Vaughn Avenue / Central Coast Highway even though traffic counts and distribution assumptions have been made in the report. Furthermore, the Roads and Maritime correspondence dated 19 July 2019 requests the intersection of Henry Parry Drive / Donnison Street to be included in the assessment, and this has also been omitted. Undertaking SIDRA assessment for these intersections is recommended.	Impacts of queuing have been considered while calibrating the models to queues observed on site and through survey videos. It is noted that, with the exception of intersections along Central Coast Highway, the local intersections around the proposed site were not observed to have excessive queuing. Any significant delays or queues were related to the Central Coast Highway. Intersection approach and exit distances were altered to match existing ground conditions. Therefore, any impacts due to short storage lanes were accounted for in the individual intersection models. It should also be noted that when pedestrian signals are activated on the Central Coast Highway south of Vaughan Avenue, southbound queues can potentially block vehicles exiting from Vaughan Avenue. However, the southbound vehicles were observed (during site inspection) to leave appropriate gaps for vehicles to exit from Vaughan Avenue. Queue lengths and detailed SIDRA results are provided in the TIA report and considered an appropriate representation of existing conditions. Nonetheless, GTA carried out a high-level comparison between SIDRA intersection and SIDRA network results for existing base case (2017) models. Marginal difference was observed in the actual results. Therefore, it is expected that the network models will yield the same conclusion for the future scenarios. The intersection of Vaughan Avenue / Central Coast Highway is a left-in-left out intersection and the impact was expected to be minimal. As discussed in Comment 2, traffic at Vaughan Avenue was observed to operate well due to its left in /left out only arrangement, during any queuing periods as a result of the nearby pedestrian signals vehicles were observed find appropriate gaps with delays being only marginal and hence this intersection was not included in the assessment. Furthermore, the development is expected to generate an additional 86

Issue	Comment	Response
		vehicles (left out) in the AM peak and addition 64 (left out) vehicles in the PM peak. These can be easily be accommodated at this intersection. GTA has undertaken a high-level SIDRA Network assessment and included the intersection of Vaughan Avenue / Central Coast Highway for existing base case (2017) models. The review indicates that the intersection of Central Coast Highway/ Vaughan Avenue operates at a good LOS A for both AM and PM peak hours. Based on the expected traffic distribution from the development any potential impact on the intersection of Henry Parry Drive / Donnison Street is expected to be minimal. Figure 8.1 of GTA's TIA report shows the traffic distribution and the potential increase in traffic at the surrounding intersections. Therefore, it is not considered necessary to model this intersection.
75. Trip distribution	It is clear that under existing conditions and under the 2022 and 2032 scenarios, the intersection of Central Coast Highway / Dane Drive experiences significant delays and poor level of service as outlined in the report. The trip distribution assumptions state that it expects 30% of traffic generated by the site to come from the west. However, there appears to be significant development to the west, including industrial, retail, an entertainment ground and other traffic generating developments. Furthermore, based on existing travel patterns significant traffic volumes utilise this intersection, which in turn would suggest that additional traffic on the network would also utilise this intersection as a priority. Additional traffic at this intersection is likely to further exacerbate the existing congestion and intersection upgrades would be required to address current and future operations. Therefore further clarification for the trip distribution assumptions should be provided.	The directional distribution and assignment of traffic generated by the proposal will be influenced by a number of factors including: • configuration of the arterial road network near the site • existing operation and directional distributions of traffic at intersections providing access between the local and arterial road network • configuration of access points to the site and existing turning bans • distribution of households in the vicinity of the site • surrounding employment centres and retail centres in relation to the site. With the Central Coast Highway / Dane Drive roundabout experiencing delays in the peak periods it is unlikely that a higher percentage of traffic from this development would use this intersection. The traffic distribution

Issue	Comment	Response
		used within this assessment is considered appropriate to assess potential impacts of the development on the surrounding road network.
76. Traffic network	The intersection of Mann Street / Central Coast highway is expected to operate at acceptable levels of service in 2022 during the AM and PM peak hours, however the queue lengths along the north western leg of Mann Street extend up to around 467m in the PM peak. This would extend passed the intersection of Central Coast Highway / Vaughn Avenue, which could block vehicles exiting from the development and cause queues to back up along Vaughn Street. These queues could also back up to the intersection of Central Coast Highway / Dane Drive, further exacerbating the poor performance of this intersection. (The signalised pedestrian crossing which may also add further delay which hasn't been considered). This issue is further exacerbated in 2032, where queues also extend along the southern leg of the intersection and could extend passed the signalised pedestrian crossing and up to Albany Street. Therefore, it is recommended to address these issues and impact on traffic network as a result of the development.	Section 8.4 of the GTA report discusses localised improvements around the site. As discussed above, it was observed that when the pedestrian crossing was activated at Central Coast Highway south of Vaughan Avenue, vehicles at Central Coast Highway would leave appropriate gaps for the traffic at Vaughan Avenue to exit and similar behaviour can be expected in the future. The 2022 PM peak hour results without the development traffic indicates that the 95 percentile queues at Central Coast Highway will extend back to Vaughan Avenue during the PM peak hour only, with a degree of saturation close to 0.9 indicating that the intersection is operating very close to capacity without the development traffic in 2022. With the development traffic the queues on Central Coast Highway are further extended in the peak periods, particularly the PM peak, however the average increased delay is only around 10 seconds. There is minimal impact on queues at Mann Street due to the development for both peak hours assessed. The issues identified on Central Coast Highway are existing issues and as noted in TfNSW's submission letter, a lot of development is currently being proposed within the Gosford CBD. It has been identified in the report that the intersections along Central Coast Highway do need considerations for capacity improvements. However, it is pertinent that any upgrades proposed to these intersections are developed in consultation and agreement with Council and TfNSW to accommodate proposed developments within and around the CBD. At the concept stage, this level of SIDRA intersection assessment is considered appropriate and updated assessments will be carried out for each Stage Development Application when assumptions around the land use mix of the proposed development are finalised.

Issue	Comment	Response
77. Calculation methodology	It is not clear from the SIDRA files how the 2% growth has been applied. The SIDRA files have not been run to account for 2% compound growth year on year, so a manual calculation appears to have been done. Clarification of the methodology for calculating the 2% growth year should be provided.	A 2% annual growth rate has been applied to the existing traffic volumes through an excel spreadsheet to calculate background growth and distribute the proposed traffic generation on the surrounding network.
78. Base year intersection models	The intersection of Mann Street / Central Coast highway is a signalised intersection. The SIDRA files show that an optimal cycle time has been used of 120 seconds in the PM and 100 seconds in the AM. It is not clear if site observations along with SCATs data were used to calibrate and validate the base year intersection models. Please provide further commentary or alternatively please update modelling using SCATs data. SCATs data can be obtained from SCATS.Traffic.Signal.Data@rms.nsw.gov.au	It is noted that only a single signalised intersection is included in this assessment. The cycle length for both peak hours were calculated from survey videos collected on the survey days for the entire peak period. The models were then run at optimised cycle times. Phasing data was not obtained from RMS however, observed signal timings were used to calibrate the models. This is considered an appropriate calibration method.
79. Dane Drive and Mann Street	The key point to consider for the proposed development under SSD10114, and other future large traffic generating projects in the vicinity, including mixed used developments is that the performance of the intersections of Central Coast Highway with Dane Drive and Mann Street. These two intersections are currently performing poorly and the issue being cumulatively exacerbated to the future.	Refer to Section 2.2.5 of this report.
80. DPIE consultation with Council	Transport for NSW note that there are a significant number of development applications lodged and/or expected for large mixed use developments, in the vicinity of Gosford City Centre. These developments have potential to result in an increase in the commercial and retail, and a significant increase in the number of residential units within the city centre. It is noted that Transport for NSW and DPIE currently drafting a Gosford City Centre Movement Study which includes this location. It is understood Central Coast Council is also currently undertaking a network model through Gosford. It is recommended that DPIE consult Council regarding any available modelling that Council may have.	Refer to Section 2.2.5 of this report.

Issue	Comment	Response
81. Land Ownership	Roads and Maritime has no proposal that requires any part of the property.	Noted.
82. Car park entry / exit point	The stage 2 and 3 car park entry / exit point is expected to cater for approximately 350 parking spaces. It is not clear at this stage how the car park entry / exit is going to be managed (ie through boom gates, roller doors, or unsecured). It is expected that a significant number of trips during the peak hour may use this driveway access, particularly in the PM peak when residents are returning home from work for example. It is recommended to undertake an assessment of the expected queues at this driveway, and appropriate management measures.	Individual Development Applications will be submitted for each stage of the development. The management of the carpark access will be developed through the detailed design stage and incorporate appropriate queuing analysis.
83. Car parking rate	It is not clear how the car parking rate for the hotel has been used. The lesser of the RMS guide and Council DCP parking rates should only be used for the residential portion of the development as per the apartment design guide. It appears from table 5.3 that the DCP requirement for parking is 137, however only 103 are provided, representing a deficiency. Furthermore, the DCP is unclear as to how to treat hotel accommodation parking rates by stating 1 space per accommodation unit should be used in addition to 1 space for every 2 persons employed in connection with the development and on duty at any one time. The study assumes the hotel as a commercial development under the DCP assessment which is an incorrect application of the DCP guidance. Therefore, it is recommended to review the parking assessment, and if required make amendments to the satisfaction of Council and DPIE requirements.	Disagree. The hotel is included in the 'commercial activities' rate, provided by the SEPP (Gosford City Centre) 2018.
84. Impact of the development	Transport for NSW considers that the impacts of the development as a whole need to be understood at concept plan to ensure: • The impact of the development as a whole is mitigated, • Consistency with any resulting infrastructure requirements, and	Noted.

Issue	Comment	Response
	Timely delivery of the identified upgrade works, for each stage of the development.	
85. RMS comments on Planning Proposal	On 13 November 2018, Roads and Maritime provided the following advice to Central Coast Council on the Planning Proposal (RZ/6/2016): <i>“Roads and Maritime consider that there will be an impact on the state network from proposals within the area, which form a larger catchment affecting the Pacific Highway and Sparks Road. Roads and Maritime recommend Council to undertake an update of the S7.11 plans informed by a Traffic Impact Assessment in consultation with Roads and Maritime, to determine appropriate upgrades to the state road network and funding mechanisms. The Traffic Impact Assessment is to consider the cumulative impacts of the continued intensification of the Gosford CBD and the surrounding residential areas on the State road network.”</i>	Noted.
86. Intensification	Transport for NSW raise concern regarding continuing intensification with the Gosford Central Business District (CBD) and surrounds prior to acceptable works being proposed to mitigate the impacts of the development. Transport for NSW recommend the relevant Planning Authority consider options for to enable equitable cost sharing of future road upgrade works as a result of the intensification of development within the Gosford CBD, apportioned relative to the number of trips generated by that development.	Noted.
NSW DPIE – Biodiversity and Conservation Division (formerly OEH)		
87. Biodiversity Assessment Method credit calculator	BCD recommends the Biodiversity Assessment Method credit calculator report is included in the Biodiversity Development Assessment Report.	A revised BDAR report has been prepared by Niche Environmental, which includes the Biodiversity Assessment Method credit calculator.

Issue	Comment	Response
88. Basement carpark flood gate	BCD recommends that the basement carpark flood gate is appropriately designed and maintained.	Noted. Can be addressed at detailed DA stage.
89. Aboriginal community consultation	BCD recommends that the full process of Aboriginal community consultation be undertaken and completed in the project area with opportunity provided to the Registered Aboriginal Parties to participate in the Aboriginal cultural heritage assessment.	An ACHAR has been prepared by AMAC Group, which has been prepared in accordance with OEH guidelines (including stakeholder consultation and test excavation). The ACHAR concludes that the majority of the site has been disturbed due to past land use, with no Aboriginal objects and/or deposits, or features of cultural/archaeological significance present. AMAC concluded that further investigation is not warranted, and the works may proceed with caution.
90. Aboriginal Cultural Heritage Assessment Report	BCD recommends that a full and complete Aboriginal Cultural Heritage Assessment Report be prepared documenting the Aboriginal community consultation process and Aboriginal cultural values of the project area.	See above.
DPIE – Division of Crown Lands - DPIE Crown Lands has no comments for this proposal.		
NSW Health – Central Coast Local Health District		
91. Cumulative impacts	The potential cumulative impacts of development should be considered in light of this project and other significant current and future development within Gosford's centre and surrounds.	Noted.
92. Traffic	Obvious concerns include increased traffic and need for access to quality public open space. While developments are assessed independently, over time all developments stand to contribute positively and negatively to urban form and function. We welcome dialogue on how the best possible outcomes can be achieved.	Noted.
93. Air quality and noise and vibration impacts	The current application does not include built works and accordingly, does not address air quality and noise and vibration impacts. Should the project proceed, approval conditions should be applied to ensure that these impacts are assessed and managed under subsequent	Noted. Can be addressed at detailed DA stage.

Issue	Comment	Response
	development applications. Any project approval should also require more comprehensive assessment of site contamination risks and management.	
94. Impact on health services	Similarly, there will be a cumulative impact on the demand generated for health services from multiple developments within the Gosford area. This also needs to be considered in the context of health service capacity. It is noted that the current Socio-Economic impact statement suggest "no additional requirements" for either hospital or community health services". However, in the light of multiple significant developments in the area, this opinion will be challenged.	Noted.
95. Helicopter flight paths	As the development is of significant height, assessment on the impact on helicopter flight paths to and from Gosford Hospital will be required. Contacts for this are provided in the submission.	An Aviation Due Diligence report has been prepared by AviPro. The report confirms the proposal will have no impact on the approach and departure paths to/from the Helicopter Landing Site; and that aviation obstruction lighting is not required on buildings (once developed).
Transport for NSW		
96. Construction Management Plan	The preliminary Construction Management Plan (CMP) does not provide sufficient detail regarding how pedestrian and bicycle rider movements will be maintained during construction. The CMPs should demonstrate that pedestrian and bicycle rider movements along footways and cycle ways are maintained at all times during construction activities. If the development requires closure to either facility, the CMP should outline adequate safety and diversion measures that will be implemented to limit time delay and detour distances.	The site will be self-contained. No pedestrian or bicycle access is currently provided through the site, nor will any be permitted before Stage 2 is completed. Site access will be clearly maintained and managed to ensure that when vehicles are entering or exiting the site this is carried out to ensure the safety of the public.
97. Wayfinding and signage	The Environmental Impact Statement (EIS) specifies that the development will encourage active transport through the provision of bike lockers and end of trip facilities. The EIS suggests the end-of-trip facilities will be accommodated in the basement. Accordingly, wayfinding	Noted. Can be addressed at detailed DA stage.

Issue	Comment	Response
	and signage would assist both locals and visitors in raising awareness of the facilities available and provide easy access to them. It is recommended the Proponent develop appropriate wayfinding and signage to assist staff and visitors in locating the bicycle parking and end of trip facilities. Bicycle parking and end of trip facilities should be located in easily accessible locations.	
NSW EPA		
	The proposal does not appear to require an environment protection licence under the Protection of the Environment Operations Act 1997. Furthermore, the proposal is not being undertaken by or on behalf of a NSW Public Authority nor does the proposal include other activities for which the EPA is the Appropriate Regulatory Authority. In view of these factors, the EPA has no further interest in the proposal and no further consultation is required. Central Coast Council should be consulted as the Appropriate Regulatory Authority for the proposal.	Noted.
NSW Department of Primary Industries – no comment on proposal.		
Department of Planning, Industry and Environment - Water and the Natural Resources Access Regulator (NRAR) – no comment on proposal.		
City of Gosford Design Advisory Panel		
98. Improvement of proposal	The Panel acknowledges the proponent's support to design excellence and the design review process, demonstrating a willingness to respond to comments and improve site outcomes.	Noted.
99. Porte cochère treatments	The footpath/driveway treatments at the porte cochère should ensure the footpath is dominant and pedestrians are prioritised.	Varying surface treatments will differentiate the driveway of the Porte cochere and the footpath, to ensure the footpath is more dominant and prioritised. Low level vegetation and clear site-lines will ensure safety of pedestrians where the footpath meets the entry/exit of the Porte cochere.
100. Southern tower	The southern tower is short, squat and undifferentiated. The Panel recommends that it be differentiated/broken in to separate segments,	The massing of the southern tower has been articulated through a continual vertical break on all sides. This reduces its perceived bulk and

Issue	Comment	Response
	and the heights shifted so that the southern corner (Vaughan Ave/Baker St corner) is the lowest corner (stepping or tiering is recommended).	scale through it reading as two distinct forms. In addition, the tower has been stepped to create three differing roof heights – with the southern corner being the lowest, consistent with the higher-level massing principles for the project.
101.Vaughan Avenue commercial frontage	The Panel recommends that consideration be given to continuing the expression down, removing the commercial frontage on Vaughan Avenue and replacing it with residential down to street level.	The corner of the Southern tower has been brought down to street level, further accentuating the split in the massing. In addition to the vertical articulation, the envelope of the Southern Tower has been stepped down allowing for increased solar access to the Leagues Club Field, Poppy Park and Memorial Park. The continuation of the Southern tower down to the ground level also benefits the expression of the tower in defining it as a series of smaller forms.
102.Northern tower	The Panel recommends that the northern tower have greater articulation with slender towers and variable roof levels, as they were in the version presented to the Panel in May 2019.	The northern tower has been articulated with a vertical break along the long face of the mass to create two distinct forms. The tower is stepped with variable roof levels to accentuate the expression of two towers.
Community Environment Network Inc		
103.Height and FSR	The Community Environment Network objects to the proposed development because: • The proposal does not comply with the height and FSR controls. • The recommendations of the Design Review Panel have not been published in the EIS. • The amount of floorspace provided for the purpose of commercial premises is not satisfactory. • The applicant has only provided an outline of how the buildings will meet the minimum building sustainability and environmental performance standards.	• While the proposal breaks the height and floor space controls, this is considered warranted having regard to its compliance with Clause 8.4 of the SEPP. • The DRP Comments have been sequentially addressed in the DKO Design Report at Appendix B for full transparency. • The amount of commercial floor space is considered appropriate, as the Social and Economic Impact Assessment demonstrated it: - Will complement the existing space in Gosford City Centre and improve the overall offer in the local area.

Issue	Comment	Response
		- Will provide higher quality commercial space that will attract new businesses into the town centre who are currently put off by the poor quality of the existing vacant space. - Will deliver highly accessible commercial space that is well serviced by public transport, offering convenient access by commuters, local residents and visitors. - Will add to the town centres attractiveness, operational efficiency and convenience as a precinct for workers, residents and visitors. • The assessment also found a range of economic benefits, including: - Delivery of 62 direct jobs and 97 indirect jobs contributing \$122.8 million in direct and indirect value added, to New South Wales over the five-year development phase. - Delivery of 250 direct jobs through the ongoing operation of the retail, commercial, and hotel components of the development and a further 8 indirect jobs from flow-on-effects. - Contribution of \$36.9 million in value added to the New South Wales economy on an annual ongoing basis. • The ESD Report prepared by S4B (submitted for SSDA) details a broad range of sustainability objectives for the development, which have been tailored to the site. The report provides a practical and holistic approach to maximising sustainability opportunities and provides hard benchmarks for improvement in performance. This will be further developed during the detailed development phase as building designs are progressed.

5. CONCLUSION

This RtS has considered the submissions received from NSW DPE, government/infrastructure agencies and the community during the exhibition of SSD-10114 for the Concept DA approval of Central Coast Quarter at 26 Mann Street, Gosford.

The proposal has been refined, where appropriate, to respond to comments raised by all stakeholders. The EIS and RtS confirm that there are no significant adverse environmental impacts and the proposal should be approved due to its strong alignment with the strategic objectives for Gosford.

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