

RECORD OF PRE-DEVELOPMENT ADVICE



31 March 2026

Attn: Andrew Newman
The Department of Planning and Environment
E: andrew.newman@dpie.nsw.gov.au

Dear Andrew,

Proposal: Central Coast Quarter - HDA Scheme
Property: 26–30 Mann Street, Gosford, NSW
Application: SSD-90960208

Council refers to the public exhibition of the Central Coast Quarter – Housing Delivery Authority (HDA) Scheme, being State Significant Development Application (SSD-90960208), and provides the following submission.

The application relates to land at 26–30 Mann Street, Gosford, and seeks approval for a major mixed-use development comprising two towers (36 and 42 storeys) above a retail podium. The development includes 2,153 m² of retail floor space, 394 residential apartments (including 98 affordable housing units), a 152-key hotel, five levels of basement parking providing 479 spaces accessed from Vaughan Avenue, publicly accessible through-site links and public domain works, and a pavilion building for food and drink uses.

The application is accompanied by a concurrent rezoning proposal to amend the State Environmental Planning Policy (Precincts – Regional) 2021, including increasing the maximum building height from 48m to 150 m, increasing the floor space ratio from 3.5:1 to 9.5:1, removing height provisions from the site, and excluding the application of car parking controls.

Council has reviewed the exhibited Environmental Impact Statement and supporting documentation and raises the following matters for consideration as part of the assessment of the proposal.

Council acknowledges the strategic importance of the site, its proximity to public transport, and the contribution the proposal could make to housing supply, including the provision of affordable housing. Council also recognises the architectural capability demonstrated within the site boundaries and the integration of a mix of residential, retail, and visitor accommodation uses.

Notwithstanding these positive aspects, Council has significant concerns regarding the external impacts of the proposal, particularly in relation to Memorial Park. Council considers Memorial Park to be a highly valued civic, cultural, and commemorative public space, with its elevated

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landform, outlook, and function making winter solar access a critical consideration. The proposal would result in additional mid-winter overshadowing of the upper park and Cenotaph during peak daytime hours, which Council considers to be an unacceptable impact on public amenity and cultural significance.

While the proposal may technically align with existing development control provisions for park overshadowing, Council notes that these controls were not drafted with the scale and height now proposed in mind. Council places significant weight on the qualitative impacts of overshadowing on this specific and sensitive public space.

Council also has concerns regarding the dominance of the southern tower, particularly in its relationship to Memorial Park and the foreshore. In Council's view, the current height and bulk do not sufficiently demonstrate a balanced or stepped built-form outcome. Council considers that alternative massing strategies—such as reducing the height of the southern tower and redistributing floor space—could substantially improve solar access, visual scale, and public domain outcomes.

In addition, Council considers that further built-form refinement are required to demonstrate that the proposed public domain, including through-site links and ground-level spaces, can achieve acceptable pedestrian comfort and support the intended range of public activities.

Council has identified the following key issues with the proposal:

Built Form, Height and Massing

- The southern tower is perceived as overly dominant in both height and bulk, particularly given its foreshore and park interface.
- Insufficient differentiation between tower forms reduces the effectiveness of the stepped height strategy originally intended to moderate visual and environmental impacts.
- Council considers that alternative massing arrangements—such as redistribution of height between towers or reduced southern tower height—could materially improve outcomes.

Impacts on Memorial Park (Solar Access and Public Amenity)

- The proposal would result in additional mid-winter overshadowing of the upper areas of Memorial Park, including the Cenotaph and the elevated bluff edge.
- Council considers Memorial Park to be a highly valued civic and cultural space, with its elevated landform, outlook, and commemorative function making winter solar access particularly important.

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- While the proposal may technically comply with existing DCP overshadowing controls, those controls did not anticipate the scale and height now proposed. The resultant loss of sunlight during peak daytime hours is considered unacceptable from a public amenity and place-making perspective.

Public Domain and Wind Environment

- The success of the proposed public domain, including through-site links and ground-level spaces, is highly dependent on effective wind mitigation.
- Further detailed wind testing and corresponding built-form refinements are required to demonstrate that pedestrian comfort and proposed public uses (including outdoor seating and circulation areas) can be satisfactorily accommodated.

Assessment of Reasonable Alternatives

- Council notes that a limited range of alternative built-form scenarios has been tested, and that options demonstrating reduced impacts on Memorial Park—particularly in relation to solar access—were not fully developed or pursued.
- Council considers that a broader exploration of alternative height distributions and yield scenarios would better demonstrate whether competing objectives (housing delivery, design quality, and protection of public amenity) have been appropriately balanced.

Design Quality

- Council acknowledges that, within the site itself, the proposal demonstrates a high level of architectural capability and offers a diverse mix of uses, including housing, retail, and hotel accommodation.
- However, Council considers that the extent of the external impacts—particularly on Memorial Park—prevents the proposal from achieving an acceptable overall design outcome in its current form.

Council notes that reasonable alternative built-form scenarios capable of reducing impacts on Memorial Park were not fully developed or advanced. Council considers that a more comprehensive exploration of alternatives would be necessary to demonstrate that the proposal represents an optimal balance between housing delivery objectives and the protection of valued public spaces.

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For these reasons, Council considers that further design refinement is required to address the identified impacts on Memorial Park, the public domain, and the surrounding context. Please note this submission has been provided by Councils technical staff and further comments may be provided once the proposal has been reviewed by Councils Environment & Planning Committee.

Should you wish to discuss any of the above, please contact Amy Magurren, Senior Development Planner, on 0401 593 712 or email amy.magurren@centralcoast.nsw.gov.au

A handwritten signature in black ink, appearing to read 'AS Stuart'.

Antonia Stuart
Section Manager
DEVELOPMENT ASSESSMENT