9 October 2025

Renah Givney
Regional Assessments, Housing & Key Sites Assessments
Department of Planning, Housing and Infrastructure
4 Parramatta Square,
12 Darcy Street, Parramatta, NSW 2150
Locked Bag 5022, Parramatta, NSW, 2124

Dear Madam,

Proposal:	**Demolition, tree removal, construction of a 3 buildings ranging in height between 7 and 21 storeys and ancillary civil works**
Property:	**372-374 Mann Street and 35-37 Dwyer Street, North Gosford**
Application:	**SSD-69773460**

I refer to your letter of 5 September 2025 and your email dated 2 October 2025 granting a time until extension until Friday 10 October 2025 for Council to review and provide an online submission regarding the proposed mixed use development at 372-374 Mann Street and 35-37 Dwyer Street, North Gosford.

Council provides the following in relation to the proposed development on the subject development sites:

Planning

- The proposed development is to comply with the relevant provisions of the State Environmental Planning Policy (SEPP) (Resilience and Hazards) 2021, SEPP (Transport and Infrastructure) 2021, SEPP (Sustainable Buildings) 2022, SEPP (Precincts-Regional) 2021, SEPP (Housing) 2021 and the Gosford City Centre Development Control Plan 2018 that are relevant to this proposal. Any proposed variations to any development standards and DCP controls are to be suitably justified.

- The proposed development will potentially involve the removal of groundwater and may require a controlled activity approval under the *Water Management Act 2000*. You will need to identify the development as 'Nominated Integrated Development' unless evidence is provided to the contrary.

- The proposed development is identified as traffic generating development and is required to be referred to Transport for NSW for their consideration and concurrence.

- The proposed development must be referred to Sydney Trains for their consideration in accordance with the provisions of Sections 2.98 and 2.99 of *State Environmental planning Policy (Transport and Infrastructure) 2021*.

- The proposed residential accommodation component of the development must demonstrate compliance with the provisions of Sections 2.100 and 2.120 of *State Environmental planning Policy (Transport and Infrastructure) 2021*.

Engineering

- Basement Car Park Design

  The grades on the access ramp from the Dwyer Street level to Basement 1 level (RL15.90) for Building B1 (Site A) are indicated at 1:6 (i.e. 16.7%). These grades exceed the maximum 1.6.5 (i.e. 15.4%) permitted in AS2890.2018 for access for commercial vehicles (including the proposed service vehicles) proposed to utilise this ramp. The consent authority will need to ensure that the proposal is amended to comply with the maximum grade of 16.7% (1 in 6.5) permitted under AS2890.2:2004.

- New Private Access Road

  The application indicates that the new private road is designed in such a way that should adjoining properties be developed it could be extended south or widened to add a second footpath to the west. It is unclear how this would be achievable or enforceable as it would require right of accesses and other legal instruments to be created between the subject development site and adjoining sites, which involves other owners and may become more difficult to achieve after the subject development is completed and Strata titled.

- Access to No 370 Mann Street

  The survey indicates that the driveway for No 370 Mann Street encroaches into No 372 Mann Street. The development will remove part of this existing driveway encroachment. It is unknown if any right of carriageway / right of way exists on Title for No 370 & No 372 Mann Street that legalises these existing reciprocal access arrangements. The Consent Authority would need to ensure that any legal access arrangements for No 370 Mann Street are not compromised by the proposed development.

- Waste Servicing

  The Consent Authority will need to ensure that the following matters arising from the assessment of the 'Transport Assessment' (TA) prepared by asongroup are considered and addressed for reasons of safety and function:

- The TA indicates T*raffic management measures will be necessary at infrequent times when waste vehicles (and other heavy vehicles) enter and exit the basement loading areas. This would include a standard stop/go signal system, with laser detectors set at appropriate height. The vehicle swept paths are included in Appendix C.* Details are to be provided as to where and how this traffic management system will operate.

- The waste truck utilises the majority of the access driveway and ramp areas to enter and exit the site, thus removing opportunities for vehicles to pass. It is unclear where vehicles can 'stop' to enable clear travel paths for the waste service vehicle, and if the proposed traffic management system will result in queueing in Dwyer Street. Queuing of vehicles in Dwyer Street associated with vehicles potentially waiting to enter the development from Dwyer Street will not be supported by Council.

- With due reference to the vehicular swept turning paths provided in the TA, Council does not support the waste service vehicle obstructing the parking/circulation aisle area when servicing waste.

- <u>Transport for NSW</u>

  - The site is located at the intersection of Mann Street and Dwyer Street. This section of Mann Street is a Non-Classified Regional Road (RR7757). It is noted that for a previous development application that including that site associated with DA/49565/2016 that was refused, although Transport for NSW did not object to the proposal, they raised concerns that the additional traffic generated by the proposed development would have a negative effect on the safe and efficient operation of the Mann Street / Dwyer Street intersection, and that consideration by TfNSW would be given to traffic control signals at the Mann Street / Dwyer Street intersection pending updated traffic modelling.

    As part of a latter S8.2.A review of the refused application, concepts of proposed signalisation of the Mann Street / Dwyer Street intersection were provided, however, a number of outstanding matters and required amendments related to the traffic modelling associated with the applicant's proposal for the signalisation of the Mann Street / Dwyer Street intersection were raised by TfNSW that remained unresolved at the time the S8.2.A was withdrawn.

  - The Consent Authority would need to refer the proposal to TfNSW under SEPP (Transport and Infrastructure) 2021. It is likely that TfNSW would need to consider the potential impact of the proposal on the surrounding road network, and if they consider there is a need for the development to signalise the Mann Street / Dwyer Street intersection. (It is unknown if potential signalisation of the Mann Street / Dwyer Street intersection would/could result in road widening being required from part of the subject property and/or other properties in the area not associated the subject development to provide for potential turning lanes, etc, at the intersection.)

- Intersection of Dwyer Street and the Private Road.

  The design of the intersection of Dwyer Street and the new Private road as indicated on the Civil Engineering Plans prepared by Smart Structures (Appendix V) indicates that the private road grades away from Dwyer Street resulting in bypass flows from the kerb inlet pit entering the site via the Private Road. The design is to be modified to ensure that the private road grades towards the kerb line in Dwyer Street to ensure that stormwater flows from Dwyer Street do not enter the site via the Private Road. These amendments also have the potential to alter the levels on the Architectural plans in the vicinity of the Private Road and connectivity to the footpath levels adjacent to the private road as well.

- Capacity of Existing Drainage Pipeline

  The development proposes to connect a 450mm diameter stormwater pipeline into an existing 450mm diameter Council stormwater pipeline. This Council pipeline also conveys stormwater from a much larger catchment. Concerns are raised in relation to the ability of this existing stormwater pipeline to accept additional stormwater flows from the proposed development. The developer's engineer is to undertake an analysis of the Council pipeline that stormwater from the development is proposed to connect into, to ensure that this stormwater pipeline has the capacity to accept and convey the additional piped stormwater flows from the development.

- Geotechnical

  It is noted that Section 4 of the 'Addendum to Geotechnical Investigation' dated 15 May 2025 (Appendix T) states: *When considering the depth of the boreholes with regard to the levels for the proposed basement excavation, there is insufficient geotechnical information relating to founding conditions. Further geotechnical investigation would be required to inform the design of the building foundations (particularly piles).* The Consent Authority needs to take this into consideration in their assessment as to whether any further Geotechnical Engineering Reports are required for the subject proposal with the assessment of the SSD application.

- Support Anchors

  Where support anchors are proposed to encroach within adjoining private properties, the Consent Authority must gain concurrence for the anchors from all affected adjoining property owners prior to the issue of a development consent.

Traffic

Concern is raised with the likely impact of this development at the intersection of Mann Street and Dwyer Street. The following comments are made in relation this intersection and the submitted transport assessment:

- No assessment has been made in relation to the location of the proposed driveway to building B1 opposite a T-intersection and its compliance with Australian Standard AS2890.1.

- The SIDRA results reported in Table 5 and Table 12 in the report do not match with the SIDRA outputs provided in Appendix B of the report.

- The SIDRA outputs provided in Appendix B indicated that Dwyer Street West approach at the intersection with Mann Street under the current traffic condition is operating at a Level of Service C with average delay 23.1sec and 95% back of queue length 2.5m in the AM peak and at a Level of Service E with average delay 40.1sec and 95% back of queue length 5m in the PM peak.

- With the proposed development Dwyer Street West approach at the intersection with Mann Street under the proposed traffic condition will operating at a Level of Service F with average delay 58.1sec and 95% back of queue length 22m in the AM peak and at a Level of Service F with average delay 82.5sec and 95% back of queue length 14m in the PM peak.

- Therefore, as a direct result of this development traffic in Dwyer Street West approach at the intersection with Mann Street will experience significant delays between approximately 1 minute to 1.5 minutes respectively while existing from this approach, which is twice the amount of existing delay at this intersection.

- The existing residents and commercial developments in Dwyer Steet West and in Campbell Street will be impacted significantly by the proposed development if the intersection of Mann Street and Dwyer Street is not upgraded to an acceptable level of service. Therefore, the proposed development should not be approved without upgrading the intersection of Mann Street and Dwyer Street to an acceptable operating condition post development as well as at a10 year horizon.

Water and Sewer

- Water and sewer are available to the land.

- Due to the proposed height of the development, the applicant will be required to replace the existing 100mm CICL water main along Dwyer Street into 150mm and extend this water main along Dwyer Street and connect into Council existing 150mm water main along Hills Street. This will ensure sufficient serviceability to the proposed development. It is recommended to obtain a Flow and Pressure statement from Council to assist internal hydraulic design.

- There is an existing Council gravity sewer main traversing the development site. As per Council Building in Proximity to Sewer Pipeline Policy, Council will not support any sewer main to be located within the proposed underground car parking area. Any structure

proposed in close proximity to Council sewer main shall be designed in accordance with Council policy. Sewer relining is required from the proposed development.

- The applicant is required to submit a S305 application and obtain a S307 Certificate prior to issue of the Occupation Certificate.

Waste Management

- Information is required for the future implementation of FOGO waste and collection and how this will be managed within the building. Where on each floor will it be stored, how will it be transferred from each floor to the central consolidation area?

- More detail is required for the proposed Chute access on each floor – currently the drawings to do not show how the chutes will be accessed.

- More detail is required within the chute discharge rooms located on the basement level 1 for B2 and B3. The exact layout of the proposed linear track system and the actual chute discharge point need to be demonstrated. It is unclear how the material will enter the bin system that is further away from the chute.

- The consolidation area (residential bin holding area) for B1 appears to be obstructed by the proposed driveway ramp and a retail carpark, the location of the bin holding areas raises safety concerns for the staff required to move large heavy bins out into a trafficable area at the base of a vehicle ramp.

- The supplied WMP indicates a bin tug will be used to move bins from the chute discharge rooms to the bin holding area and back again, the 2-basement level holding areas do not appear to be connected internally? How does the one bin tug get to B1 from B2/3?

- The proposal for a once weekly collection is not efficient given the proposed number of bins; Council can provide more frequent servicing for larger Multi Unit Dwellings, this will reduce the overall number of bins required by the development and provide a more efficient collection arrangement.

- Clarification required – the supplied WMP indicates that "All residential waste and recycling services to the development will take place from a loading bay located in Basement 1 as indicated on the Architectural Drawings" however the plans indicate 2 loading docks.

- The supplied WMP chapter ***5.2.17*** *Assumptions:" A licensed private waste and recycling contractor will be provided all residential waste and recycling services to the development."* contradicts point **5.2.14 "***The Central Coast Council will provide all residential waste and recycling services to the development."* this needs to be clarified and corrected – it should be noted that Council does not support private contractors to collect residential waste.

- Council's Resource and Waste Management Guidelines should be used to help determine the amount of waste, recycle and FOGO material likely to be generated, information on how much FOGO material and the number of bins, collection frequency is to be included in any Resource and Waste Management Plan.

- The proposed collection point for B1 indicates that the truck will be parked partially on the driveway, this is a safety issue and is not supported. The entire truck must be parked out of any lane of traffic in a safe location with sufficient clearance to allow the safe collection of bins.

- The plans do not show a bulk waste storage area, the supplied WMP *(5.6.10 Bulky Waste Storage) "The BWSA is located in Basement 1 as indicated on the Architectural Drawings. It measures 2.80m x 2.35m, with an area of approximately 6.58sqm."* the plans need to clearly indicate where this storage area is, how many Bulk waste storage areas there are and their size. It should be noted that Council requires a minimum of 10m2 of bulky waste storage and an additional 2m2 for every 10 units above 40, e.g. B1 with 114 units will require 25m2, B2 and B3 (if sharing a storage area) will require 29m2 of bulk waste storage.

- Any bulk waste storage area must be located within 5m of a collection point and be accessible by residents and collection staff. The bulk waste storage areas must be clearly identified on the plans.

- Item **5.7.6** in the supplied WMP indicates that *"As required by Council all collection vehicles will reverse into the site and exit the building in a forward direction. Collection activities will take place as follows: - a) The Collection vehicle will enter the building from the New Private Road Pacific as indicated on the Architectural Drawings,"* Council requires that all collection vehicles enter the site in a forward direction and exit in a forward direction, the plans indicate that the commercial section of the building is located in B1 and access to the B1 loading dock is from Dwyer Street, this point needs to be checked and clarified by the applicant to ensure it accurately reflects the plans.

- How does the waste collection vehicle gain access to the loading dock through any access gates etc, what happens if the there is another vehicle on the ramp at the same time?

- Council requires that applicant use the correct forms within the Guidelines to ensure continuity and consistency in applying the intentions of the guidelines across a diverse range of development applications and associated activities. The forms provided support to applicants and ensure that all applications address the Council requirements in a uniform manner.

- The proposed B1UG1 unit – where does the waste from this property go? Will there be chute access in the lobby?

- More detail on B2 L1-14 and the proposed chute location and the interaction with this unit (and each floor plate above) how is this going to work the proximity of the chute to the entry to this unit is not ideal.

- It is to be conditioned as part of any consent granted that it is conditioned that a Section 88b instrument will be required to provide Council and its contractor indemnity to provide any onsite waste collection activities.

Environmental Health

- Provide a Preliminary Acid Sulfate Soils Assessment. The lots are mapped as Class 5 ASS *(Works within 500m of adjacent Class 1, 2, 3 or 4 land that is below 5m Australian Height Datum and by which the watertable is likely to be lowered below 1m Australian Height Datum on adjacent Class 1, 2, 3 or 4 land)* and within 250 metres of Class 3 ASS land *(Works more than 1m below the natural ground surface. Works by which the watertable is likely to be lowered more than 1m below the natural ground surface).*

- Provide a Site Audit Statement and Site Audit Report prepared by a New South Wales Environment Protection Authority (NSW EPA') Accredited Contaminated Site Auditor. The Detailed Site Investigation (Douglas Partners, 2023), Detailed Site Investigation (Contamination) Addendum (Douglas Partners, 2025), Remedial Action Plan and Validation Report must be reviewed by an NSW EPA Site Auditor. The Statement and Report must be prepared in accordance with the NSW EPAs Guidelines for the NSW Site Auditor Scheme (3rd Edition 2017). This advice may also be provided by the Site Auditor in the form of a letter of Interim Advice.

- Provide a Detailed Contaminated Site Investigation and Site-Specific Risk Assessment and Modelling prepared by a suitably qualified contaminated land consultant that is accredited by the Certified Environmental Practitioners Scheme- Site Contamination (CEnvP(SC)) and/or the Certified Professional Soil Scientist- Contaminated Site Assessment and Manager (CPSS CSAM). Such investigation must be undertaken in accordance with Managing Land Contamination – Planning Guidelines SEPP 55 – Remediation of Land (1998) and NSW Environment Protection Authority's Contaminated Land Guidelines - Consultants Reporting on Contaminated Land 2020 and Contaminated Sites – Sampling Design Guidelines (2022) and the National Environment Protection (Assessment of Site Contamination) Measure (ASC NEPM, 1999 as amended 2013).

- Provide a Remedial Action Plan prepared by a suitably qualified contaminated land consultant that is accredited by the Certified Environmental Practitioners Scheme- Site Contamination (CEnvP(SC)) and/or the Certified Professional Soil Scientist- Contaminated Site Assessment and Manager (CPSS CSAM). Such investigation must be undertaken in accordance with Managing Land Contamination – Planning Guidelines SEPP 55 – Remediation of Land (1998) and NSW Environment Protection Authority's Contaminated Land Guidelines - Consultants Reporting on Contaminated Land 2020 and Contaminated

Sites – Sampling Design Guidelines (2022) and the National Environment Protection (Assessment of Site Contamination) Measure (ASC NEPM, 1999 as amended 2013).

- Provide a Validation Report, Environmental Management Plan and Ongoing Monitoring Report prepared by a suitably qualified contaminated land consultant that is accredited by the Certified Environmental Practitioners Scheme- Site Contamination (CEnvP(SC)) and/or the Certified Professional Soil Scientist- Contaminated Site Assessment and Manager (CPSS CSAM). Such investigation must be undertaken in accordance with Managing Land Contamination – Planning Guidelines SEPP 55 – Remediation of Land (1998) and NSW Environment Protection Authority's Contaminated Land Guidelines - Consultants Reporting on Contaminated Land 2020 and Contaminated Sites – Sampling Design Guidelines (2022) and the National Environment Protection (Assessment of Site Contamination) Measure (ASC NEPM, 1999 as amended 2013).

Once the above matters have been addressed by the applicant and before the determining authority grants consent, conditions should be obtained by Council which are to be placed on any consent that is granted.

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 have any questions please contact Council's Principal Planner Ross Edwards on 0437 628 027 or via email ross.edwards@centralcoast.nsw.gov.au

Regards

Antonia Stuart
Section Manager
DEVELOPMENT ADVISORY SERVICES