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Kendall Clydesdale
Team Leader, Regional Assessments
NSW Department of Planning and Environment
Sent via email

Dear Kendall,

CENTRAL COAST QUARTER - STAGE 1, NORTHERN TOWER (SSD-23588910) RESPONSE TO RFI

We are in receipt of your lettered correspondence dated 22 December 2021 requesting a formal response to the supplementary Visual Impact Assessment (VIA) submission prepared by Urbaine Architectural on behalf of Rola Property Group in relation to SSD-23588910.

We have reviewed both the initial submission made by Doug Sneddon Planning (8 November 2021), which we responded to as part of the Response to Submissions (RtS) package lodged with DPE on 10 December 2021, together with the subsequent VIA submission prepared by Urbaine Architecture, shared with us on Friday, 17 November 2021.

Background and Evolution of Gosford CBD

To thoroughly assess the appropriateness of the built form, it is important to consider the desired future character of Gosford City Centre (CBD) and the surrounding built environment. Traditionally, Gosford CBD has been characterised by low-rise buildings nestled within a valley floor, framed by forested hills and the Brisbane Water. However, as outlined in the suite of planning documents released by the NSW Government in 2018, Gosford is undergoing a period of renewal, which has (and will) result in changes to the built environment.

The Gosford Urban Design Framework (UDF) envisages the construction of tall, slender towers on key sites, such as Central Coast Quarter (CCQ). Future development is expected to create significant improvements to public domain and connectivity, such as the through site links provided at CCQ.

Notwithstanding the Gosford Urban Design Framework – new development, including tall buildings, have been approved and constructed along the central spine of the CBD, which establishes a new built form character and an evolution away from the traditional low-rise character of Gosford.

In this context, the prevailing character of Gosford can no longer be primarily defined by low-rise buildings. Instead, the planning framework released by the NSW Government outlines the emerging character of Gosford as an area characterised by a variety of building heights, scales and designs, which include some tall, slender buildings located along and near its central spine. This, in part, makes a positive contribution to the visual experience of Gosford and reinforces its role as a vibrant focal point, economic destination and regional centre.

Concept SSDA (SSD 10114)

The site was identified by the Gosford City Centre DCP 2018 as a 'key site', and as required by the planning controls, the built form was determined through a master planning process that was reviewed by the CoGDAP. This culminated in the preparation of a Concept SSDA, which approved three building envelopes over podium and basement.

As part of the Concept SSDA, the Applicant analysed 15 public domain viewpoints (chosen by DPE) to assess the visual impact of the proposal, together with a comprehensive view sharing assessment from a series of existing (constructed) residential buildings. This environmental assessment was combined with a series of ongoing, independent design review sessions by the CoGDAP. The Concept SSDA resulted in a series of 'key moves' which sought to mitigate visual impacts, including:

- The envelopes establish view corridors between towers, which continue to allow the height, slope and forested nature of the Rumbalara Reserve to be appreciated from key views. This also assists with view sharing outcomes (to Brisbane Water) from neighbouring residential development.
- The Applicant prepared Design Guidelines (approved by the IPC), that ensure all future development, including SSD-23588910, provide slender, well-articulated towers.
- The Northern Tower envelope has a clear break and setback above the podium level to increase the visual differentiation between podium and tower. This also improves the appearance of the buildings bulk and scale from the surrounding public domain.
- The IPC also imposed a 'volumetric fill' control that had the effect of shrinking the actual built form by up to 15% from the approved building envelope.
- It was also demonstrated that a (theoretical) height and FSR compliant building arrangement would have undesirable built form impacts (i.e. the buildings would appear squat, inelegant and relate awkwardly to adjoining public open space).

As noted above, the Concept SSD also assessed view impacts from four residential properties to the east of the site. The analysis indicated the neighbouring properties would generally experience a moderate reduction in existing water and district views and that the envelopes were designed to address the *Tenacity* view sharing principle. In relation to the fourth step of the Tenacity planning principle which considers the reasonableness of the proposal, having regard to compliance with the planning controls and the 'skilful design' test, the proposal was considered reasonable because:

- The transition of Gosford CBD to higher densities will inevitably see the interruption of some existing views.
- The site is in Gosford CBD, on an identified, vacant, redevelopment site. The views currently enjoyed across the site are across private land, where the planning controls allow development of the height, bulk and scale proposed.
- Most affected properties retain some elements of existing views and in most cases, water views, and therefore the view impacts are considered reasonable.
- The distance between the closest residential buildings and the proposal is approximately 80m, which ensures that an appropriate level of outlook is maintained to all neighbouring apartments.

In summary, at the Concept SSD stage, DPE, the CoGDAP and the IPC reviewed the impacts of the development (as a whole) and concluded that the visual impacts and view sharing were reasonable and acceptable. This proposal (SSD-23588910) is made wholly in compliance with the approved building envelopes.

27-37 Mann Street, Gosford

In response to the submissions received from Rola Property Group, we have undertaken further analysis of potential view loss from 27-37 Mann Street, Gosford (also known as 'Creighton's'). It is noteworthy that these views do not currently exist and are hypothetical, given the building has not been constructed. Therefore, the protection of these views is unlikely to carry the same weight as a completed/constructed building, especially considering the consent may never be acted upon, or otherwise may be modified to provide a different floor plan arrangement and/or land uses.

The Applicant sourced the approved floor plans and undertook an assessment of view sharing (refer to images overleaf). The analysis found that the proposed building floor plan is oriented to the north-west, which in combination with the fact it is located to the north of the site, means that most views are oriented away from Brisbane Water and will not be obstructed by the proposal.

In accordance with standard practice, we analysed the potential view loss from the '*worst affected*' position on the approved floor plate at low, mid and high-rise positions. This would represent one apartment on each floor plate of eight apartments.

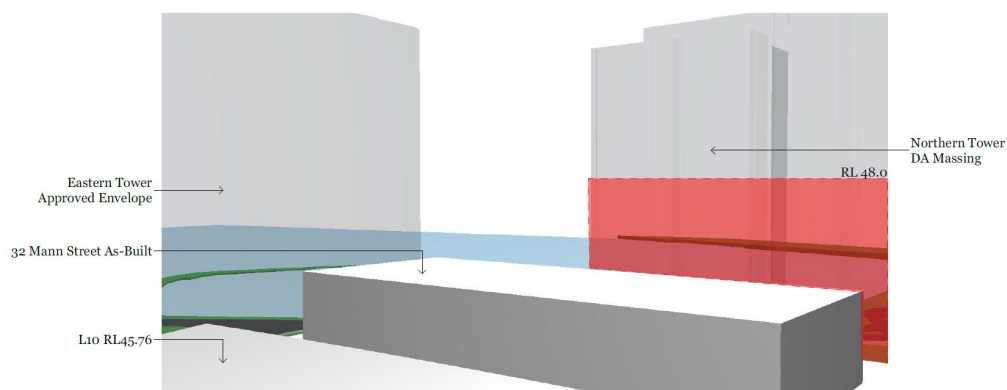
The analysis found:

- Low-rise views are already impacted by the approved/constructed development at 32 Mann Street, which blocks a section of the view that is characterised by open water, land/water interface and intervening building development between the proposal (Northern Tower) and the approved Eastern Tower. In relation to the proposal (Northern Tower), it was found that an RL 48m compliant scheme would also block all water views experienced from this position. Notwithstanding, due to the slender tower and generous building separation arrangement approved under the Concept SSDA, distant water views would still be obtained between the buildings. As explored during the Concept SSDA stage, a potentially compliant (RL 48m) scheme would not allow for views between these buildings, as the towers would be shorter and squatter. The proposal is therefore considered reasonable having consideration of the skilful design outcome test described in *Tenacity*.
- Mid-rise views have a similar affectation to low-rise views in that an RL 48m compliant scheme would also block the water views available in this direction. The gap between the proposal (Northern Tower) and approved Eastern Tower envelope preserves the partial views towards an aperture of the Brisbane Water, including the land/water interface. This is considered to provide a reasonable view sharing outcome.
- High-rise views will be affected by the proposal (Northern Tower), including distant water views above the RL 48m height datum. Notwithstanding, views will be preserved between the proposal (Northern Tower) and approved Eastern Tower envelope, including of the land/water interface. This is considered to provide a reasonable view sharing outcome.

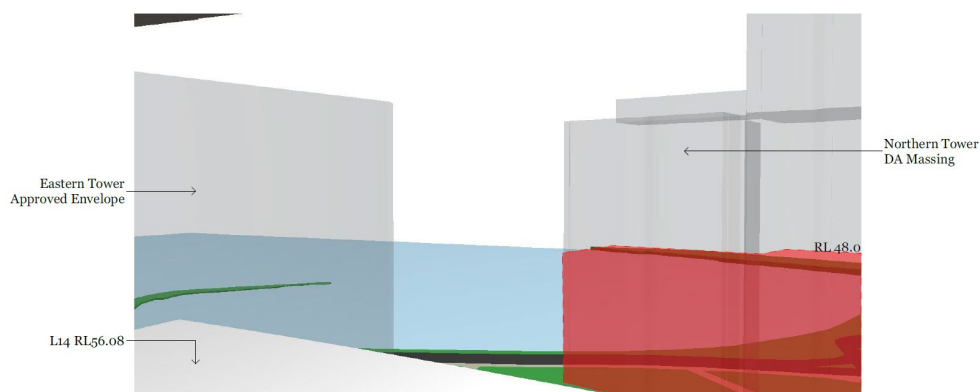
As mentioned above, this view study was undertaken for the '*worst affected*' location (balcony facing west). These worst affected apartments (one per eight on each floor plate) will still receive good/uninterrupted views from internal living spaces, secondary balconies, bedroom windows etc.

It is also noteworthy that only four of these south west facing apartments sit above RL 48m, meaning that only 4 out of 131 apartments (4%) have any consequential view affectation because of a non-compliance with the Gosford SEPP height control. However, in this context (where a Concept SSDA is approved with building envelopes), it is the envelopes which dictate compliance. The building is sited wholly within the approved envelopes.

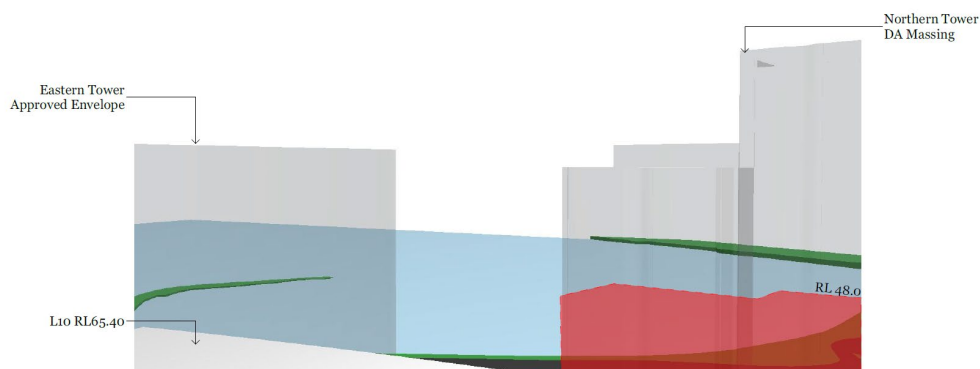
Figure 1 – Excerpts from DKO View Sharing Analysis



Picture 1 – Low Rise (L10 Balcony; Eye Level RL 47.26m)

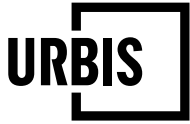


Picture 2 – Mid Rise (L14 Balcony; Eye Level RL 57.58m)



Picture 3 – High Rise (L17 Balcony; Eye Level RL 66.90m)

Source: DKO



Conclusion

In conclusion, the view sharing outcomes in relation to 27-37 Mann Street are considered reasonable. As above, the SSD-23588910 site is in a CBD environment, is privately owned and currently vacant. In this context, changes to existing views are unavoidable and the extent of view impacts proposed are reasonable.

We wish to reiterate that a comprehensive assessment of visual impact and view sharing was undertaken for the Concept SSDA. Besides the planning and environmental assessment process, the built form masterplan underwent thorough and iterative design review by the CoGDAP (appointed by DPE), who confirmed that the scheme exhibits 'design excellence' in accordance with the criteria outlined in the Gosford SEPP.

In this sense, the Concept SSDA provides a robust built form framework for future 'detailed' applications. SSD-23588910 is made wholly in compliance with these parameters. Therefore, SSD-23588910 cannot be viewed in isolation and it is noteworthy that the Rola Property Group submissions do not acknowledge the 'key moves' that were implemented at the Concept SSDA stage to mitigate visual impacts and provide reasonable view sharing outcomes (having regard to the *Tenacity* planning principle).

While it is acknowledged that the profile of the building will have an impact on the built form character of Gosford CBD (and surrounds), it is important to recognise that this change is wholly anticipated by the planning controls and policies introduced by the NSW Government in 2018.

The Applicant has demonstrated through the SSD-23588910 lodgement package (and the subsequent documentation submitted at RfS stage) that the proposal is suitable for the site, represents an orderly development outcome and will not unreasonably impinge on the potential views afforded to the Creighton's site under a historic development consent.

Should you wish to discuss any aspect of this letter with me, please reach out via my contact details below.

Yours sincerely,

Edward Green

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CC: Justyn Ng (SH Gosford Residential Pty Ltd)