



**ANGEL PLACE
LEVEL 8, 123 PITT STREET
SYDNEY NSW 2000**

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ABN 50 105 256 228

24 April 2020

Mr Jim Betts
Secretary
NSW Department of Planning, Industry and Environment
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Attention: Louise Starkey (Senior Planning Officer, Regional Assessments)
Brendon Roberts (Acting Director, Regional Assessments)

Dear Louise and Brendon,

SSD-10114 | RESPONSE TO COUNCIL LETTER DATED 14 APRIL 2020

INTRODUCTION

We refer to your email correspondence of Tuesday 21 April 2020, which contained Central Coast Council's advice (dated 14 April 2020) regarding the RFI Package submitted by St Hilliers (the Applicant) for SSD-10114 (Central Coast Quarter).

At the outset, the Applicant would like to acknowledge Council's important role in shaping the future development of Gosford City Centre. In recognition that Council's feedback was/is critical to the progression of the scheme, the Applicant has proactively engaged with Council staff since St Hilliers purchased the site in 2017, when the planning controls for the site were contained in the Gosford LEP.

St Hilliers also had considerable input to the draft SEPP (Gosford City Centre) 2018 package and have generally attempted to be a proactive landowner in the planning for Gosford City Centre. More recently, the Applicant has engaged with the Council at each critical step of the SSDA process – prior to lodging the EIS, following public exhibition and prior to lodging the RtS.

The intent of these sessions was to present the proposal to Council, inform them of the independent design review process undertaken (with GA NSW/CoGDAP) and to ask for feedback, so it could be incorporated into the next iteration of the scheme. During these discussions, the feedback from Council appeared to be generally supportive of the direction of the scheme.

Despite the generally positive feedback from these discussions, we are disappointed that there seems to be a change in position from the meetings we've had. In the event that there were elements of the scheme and/or RtS that were of concern to the Council, we would have been willing to explore this further prior to lodgement of the RtS.

Notwithstanding, the Applicant wishes to provide clarification on particular matters raised by Council in their recent letter correspondence.

DETAILED RESPONSE

Having reviewed the Council's response to the RtS, we acknowledge that their submission identifies concern primarily with the application of Clause 8.4 of the SEPP, which provides the opportunity for additional height and FSR above the base controls.

As the Applicant has outlined in the EIS (September 2019) and RtS (March 2020), the proposal is strongly aligned with the statutory and strategic planning intent for the area. As part of the extensive engagement with multiple stakeholders including the GA NSW / CoGDAP, we've been able to provide a built form response that aligns positively with the intent of the SEPP.

We acknowledge the key issues in Council's letter advice predominantly relate to additional shadowing of public open space, the visual impact of the proposal and the concept envelope/public domain design. In respect of the Council's comments on each of these matters, we would firstly say that the shadowing should be assessed in relation to the planning controls that are drafted in the SEPP (and supporting DCP). In relation to this matter, we have provided a response that is wholly compliant with the SEPP and DCP controls. The proposal has demonstrated that the shadow impacts upon the Leagues Club Field are experienced before 11am at midwinter (and for a small portion of the park). During lunchtime hours (11am-2pm), when the park is likely to be in use, the Leagues Club Field is not shadowed by the proposal.

It is also noteworthy that the buildings have been extensively modified in response to feedback obtained from the GA NSW / CoGDAP and that these modifications have been supported by extensive visual impact assessment. As with the above, the proposal has addressed the relevant SEPP and DCP guidance regarding slender towers, stepping of built form, preservation of views to the ridgeline and the provision of visual connections from Mann Street to the waterfront. The VIA (and addendum), which has been updated as part of the RtS supports the proposed changes, which are considered to result in an acceptable visual impact outcome.

The publicly accessible space within the development has been carefully planned in consultation with the GA NSW / CoGDAP, who have provided support for the scheme (refer to letter correspondence submitted in the RtS package). It is considered that the through site links will provide activation to a key site in Gosford, encourage a flourishing night-time economy while also enabling an accessible link from Mann Street to the Leagues Club Field and the waterfront. It is acknowledged that these spaces will enable a range of different experiences (i.e. sitting, dining, socialising, thoroughfare). Further detail will be provided in subsequent (detailed) DAs regarding the embellishment of these through site links, which will provide attractive spaces to move through and/or spend time in.

Moreover, the Applicant has proactively engaged with the HCCDC on their plans for the Leagues Club Field redevelopment, to coordinate design documentation and ensure the interface between the Leagues Club Field and the site is appropriately planned and activated.

It is also noteworthy that the proposal has allowed for a high proportion of non-residential uses at the podium level which allows for the delivery of employment, residential, recreational and tourism opportunities. The proposal will stimulate activity during the day and night, in turn providing a significant economic stimulus to the region through the generation of 250 jobs during the operational phase, together with \$36.9 million in value to the NSW economy on an annual ongoing basis.

Refer to Table 1 overleaf which provides a consistency assessment with the SEPP (Gosford City Centre) 2018.

SEPP (GOSFORD CITY CENTRE) 2018 CONSISTENCY ASSESSMENT

SEPP (Gosford City Centre) 2018 Objective	Consistency
(a) to promote the economic and social revitalisation of Gosford City Centre.	The proposal will deliver: 62 direct jobs and 97 indirect jobs, contributing \$122.8 million in direct and indirect value added, to the NSW economy 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. - This will lead to other social benefits such as a stimulation of the night-time economy and greater activation of the space, which will attract new businesses into town and improve Gosford's overall attractiveness, operational efficiency and convenience as a precinct for workers, residents and visitors.
(b) to strengthen the regional position of Gosford City Centre as a multi-functional and innovative centre for commerce, education, health care, culture and the arts, while creating a highly liveable urban space with design excellence in all elements of its built and natural environments.	- The site will deliver a mix of retail, commercial, hotel, residential (& office if 32 Mann Street is considered) uses, which is considered to provide a positive synergy that is aligned with the aspirations of Gosford to be a multi-functional and mixed 'capital' city of the Central Coast region. - The Concept scheme has gone through rigorous independent design review from the State Government appointed panel. During the most recent round of review, the proposal is received endorsement from the CoGDAP, who have confirmed 'design excellence' has been achieved.

SEPP (Gosford City Centre) 2018 Objective	Consistency
(c) to protect and enhance the vitality, identity and diversity of Gosford City Centre.	As noted within the EIS and RtS, the proposal has respected the unique identity of Gosford City Centre through strong alignment with the Gosford Urban Design Framework and Gosford City Centre DCP, which promote these objectives.
(d) to promote employment, residential, recreational and tourism opportunities in Gosford City Centre.	The proposal will deliver significant employment generation (as noted above), together with a hotel (stimulating tourism in the region), together with opportunities for high amenity residential living in a convenient, naturally beautiful location.
(e) to encourage responsible management, development and conservation of natural and man-made resources and to ensure that Gosford City Centre achieves sustainable social, economic and environmental outcomes.	- The environmental assessment prepared as part of the EIS confirms that any potential environmental impacts associated with the development can be appropriately mitigated. - Moreover, the ESD Report prepared by S4B 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.
(f) to protect and enhance the environmentally sensitive areas and natural and cultural heritage of Gosford City Centre for the benefit of present and future generations.	As noted in the EIS, the proposal is not expected to give rise to any unacceptable impacts to areas of environmental sensitivity, including heritage items proximate to the site.
(g) to help create a mixed use place, with activity during the day and throughout the evening, so that Gosford City Centre is safe, attractive and efficient for, and inclusive of, its local population and visitors alike.	- The podium level retail / F&B uses are in a prominent location, easily accessible and visible from all key locations in the new public plaza. This provides a place catering for pre and post events at nearby venues and contributing to the late-night economy. - It is also noted that the open-air through site link and active frontage to Baker Street will encourage a seamless transition to/from the Leagues Club Field.

SEPP (Gosford City Centre) 2018 Objective	Consistency
(h) to preserve and enhance solar access to key public open spaces.	• The proposal maintains appropriate levels of solar access to all public space. The includes the Leagues Club Field and Poppy Park. • Not only does the proposal wholly comply with the metric standards noted within the SEPP and DCP, from a qualitative perspective, it does not cause shadowing to key areas within these public open spaces at key parts of the day (i.e. lunch time and early afternoon).
(i) to provide direct, convenient and safe pedestrian links between Gosford City Centre and the Gosford waterfront.	• The Concept scheme will deliver an accessible, open-air through site link – providing a physical and visual connection from Mann Street to the waterfront in compliance with this objective.
(j) to ensure that development exhibits design excellence to deliver the highest standard of architectural and urban design in Gosford City Centre.	• On 20 March 2020, CoGDAP chair Ben Hewitt wrote to the Applicant, confirming the proposed scheme achieved design excellence for the purposes of the SEPP (Gosford City Centre) 2018.

CONCLUDING REMARKS

Overall, the site is strategically unique and has highly sought-after qualities which are currently underutilised. The proposal leverages these qualities in a sympathetic manner to unlock its potential, providing significant social, environmental and economic benefits.

We note that to date, the Applicant has sought to engage with a number of key stakeholders, including Council. The Applicant wishes to continue working with these stakeholders throughout the next stages of the development. Noting where we are at in the process, the Applicant has tried to successfully balance a range of different opinions that have come from Council, DPIE and the SDRP.

We also note that the proposal will deliver strong alignment with the SEPP, which enables the Applicant to explore a range of public benefits for Gosford City Centre, such as:

- Provision of a high-quality hotel offering (with internally renowned operator) in Gosford CBD.
- Provision and embellishment of through site link.
- Baker Street extension and embellishment of public domain.
- Potential for additional embellishments to the recently refurbished Leagues Club Field.
- Public Art and recognition of place (Indigenous).
- Public lighting, weather protection and wayfinding signage.
- DDA access between Mann Street to the Leagues Club Field.

Without the ability to rely on Clause 8.4 of the SEPP (Gosford City Centre) 2018, the ability to provide a number of these significant benefits would be stymied/lost.

St Hilliers remain very committed to progressing the scheme to deliver these public benefits. In relation to the public interest, the SSDA has attracted one submission from the community. This, along with the targeted stakeholder engagement undertaken prior to lodging the SSDA, indicates there isn't great public or community concerns regarding the project.

In view of the above, we submit that the proposal is in the public interest and that the SSDA should be approved subject to appropriate conditions. If you have any questions or require further information about the above, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in cursive script that reads "Edward Green".

Edward Green
Senior Consultant
(02) 8233 7607
egreen@urbis.com.au