

Our Ref: 2190781
8 October 2019

Mr Jim Betts
Secretary
NSW Department of Planning, Industry and Environment
320 Pitt Street
Sydney NSW 2000

Dear Mr Betts

Request for Secretary's Environmental Assessment Requirements Proposed mixed use development | 1 Dane Drive, Gosford

We write to you on behalf of the proponent, Central Coast Leagues Club requesting that the Secretary issue requirements for the preparation of an Environmental Impact Statement (EIS) to accompany a State Significant Development Application (SSD DA) for a proposed mixed use development at 1 Dane Drive, Gosford.

Under Schedule 2, item 15 of State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP) development identified within the Gosford City Centre area with a capital investment value (CIV) of more than \$75million is identified as State Significant Development (SSD) pursuant to section 4.36(2) of the *Environmental Planning and Assessment Act 1979* (EP&A Act). As the proposed development of 1 Dane Drive, Gosford will have a CIV of greater than \$75 million, the proposal is classified as SSD.

The purpose of this letter is therefore to request the Secretary's Environmental Assessment Requirements (SEARs) for the preparation of an EIS for the proposed development. To support the request for the SEARs this letter provides an overview of the proposed development, sets out the statutory context, and identifies the key likely environmental and planning issues associated with the proposal.

This letter is accompanied by a set of Indicative Architectural Drawings prepared by Fender Katsalidis (**Attachment A**).

1.0 The Site

1.1 Site Description

The site is located at 1 Dane Drive, Gosford at the southern periphery of the Gosford CBD, within the Central Coast Local Government Area (LGA). The site contains three road frontages, Baker Street to the east, Georgina Terrace to the south and Dane Drive to the west. The site is located approximately 700m to the south of Gosford Railway Station.

The site is legally described 1 Dane Drive, and includes the following lots: Lot C, DP 162895; Lot 1, DP 163642; Lot 1, DP 206469; Lot 2, DP 206470; Lot A, DP 365707; Lots A-C, DP 400849; Lot 1 DP 414824; Lots 19 and 20, DP 456228; Lots 1 and 2, DP 511498; Lots 5 and 6, DP 551659; Lot 18, DP 662773; Lots 1 and 2, DP 795183 and Lots 1-4, DP 795184. The lots provide a total site area of 14,695m².

The site is currently occupied by the existing Central Coast Leagues Club and also includes the following:

- Vacant lot with existing DA for a hotel;
- Multi-storey carpark; and
- Shops and commercial buildings

The location of the site and an aerial photograph are provided in **Figure 1 and 2**.

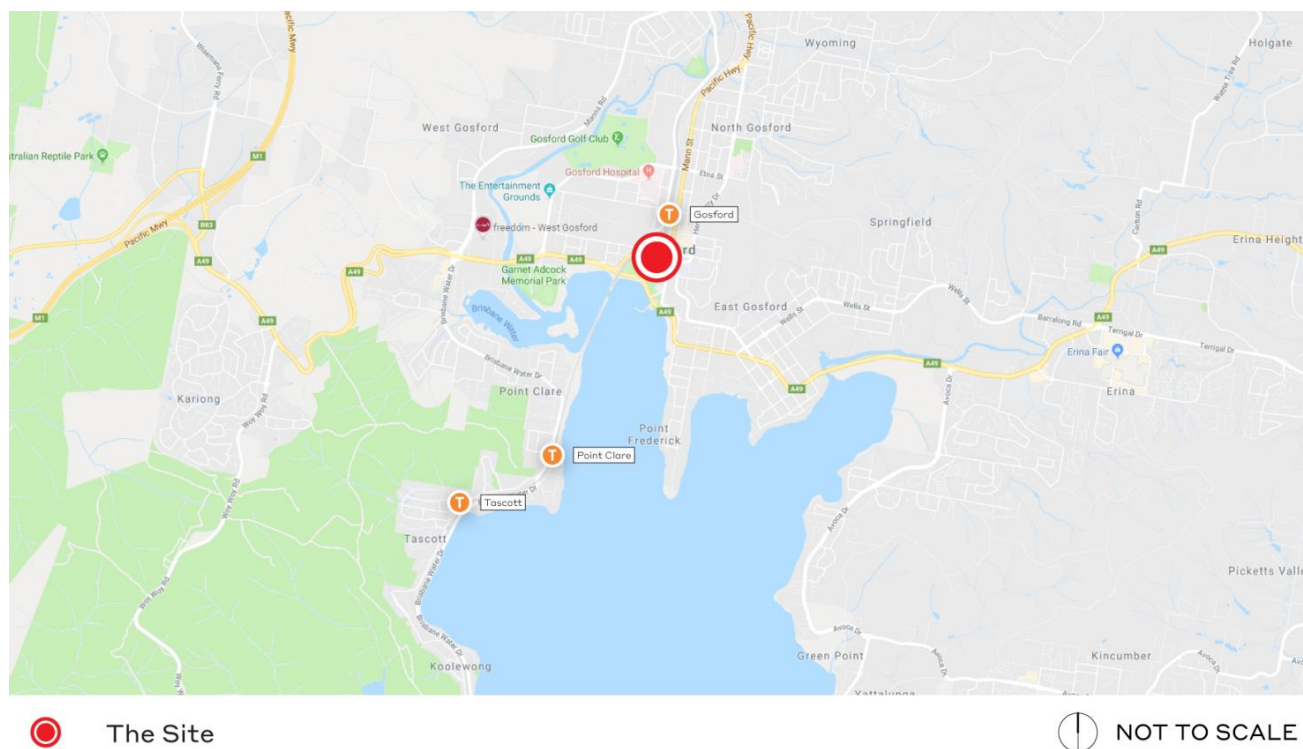


Figure 1 Context Map

Source: Nearmaps



Figure 2 Aerial Photo of Site

Source: Nearmaps

1.2 Surrounding Development

The area is characterised by a mix of uses including medium to high density residential, commercial and retail buildings.

- To the north of the site along Donnison Street are various underdeveloped lots, including 91 Donnison Street which has an approved DA for a 7 storey apartment building of similar scale to the commercial building on the corner of Donnison and Baker Streets.
- To the east of the site along Baker Street are a mix of small-scale shop buildings, a large multi-storey apartment building and a large vacant lot which has an approved DA for a development of three residential towers, known as 50-70 Mann St.
- To the south east of the site is the new ATO building which is a mid-scale governmental building.
- To the south of the site across Georgiana Terrace is the Leagues Club Field and Gosford City Park.
- To the west of the site on Dane Drive is the Central Coast Stadium.

1.3 City of Gosford Design Advisory Panel

The proposal was presented to the City of Gosford Design Advisory Panel Design Reference Group on 30 July 2019 and 27 August 2019. A copy of their comments is at **Attachment B**.

Following the Reference Group feedback the proponent provided additional information clarifying height, FSR, bulk, scale, pedestrian links, overshadowing into the forecourt plaza and storm water runoff.

The Panel confirmed general support for the proposed massing approach and breaking up of the built form. The Panel noted the shadow diagrams demonstrate impact on the Leagues Field is compliant. The Panel also supported the internal street/laneway concept to increase permeability across the site. The Panel acknowledged the proponent's support to design excellence and the design review process, demonstrating a willingness to respond to comments and improve site outcomes.

The key final recommendations of the Panel included that the proposal proceeds to the development assessment pathway and the proponent addresses the following issues when preparing their DA:

- the variation of height of the towers;
- activation and mixture of uses in the through site link;
- the need for activation of all frontages, particularly the interface of Georgina Terrace and the frontage to the Leagues Club Field;
- identify opportunities for an integrated drainage strategy;
- the adequacy of commercial floor space; and
- design excellence.

2.0 Description of proposed development

Preliminary concept drawings illustrating the Central Coast Leagues redevelopment proposal (to an indicative level of detail) are included at **Attachment A**.

The proposal for the site is for a mixed-use development comprising two towers above a podium.

The concept State Significant Development Application (SSDA) will seek approval for:

1. The proposed built form including building envelope, to provide for:
 - Two towers above a podium on the northern portion on the site;

- A new east-west publicly accessible accessway through the site with vehicular access from Baker Street and exit onto Dane Drive;
 - Carpark at basement level and above podium level;
 - An open plaza adjacent to Georgina Terrace fronting Leagues Club Maher Field;
 - Building heights ranging up to a maximum of 135m; and
 - A maximum gross floor area of approximately 58,280sqm apportioned across the site.
2. Indicative land use mix, which will be confirmed in subsequent details development applications is likely to include:
- Hospitality – Central Coast Leagues Club;
 - Mixed use (Retail / Commercial);
 - Residential;
 - Hotel including 200 keys;
 - Associated car parking; and
3. The development of the site will be staged.

An indicative photomontage of the Central Coast Leagues Club redevelopment at 1 Dane Drive, Gosford is at **Figure 3**.



Figure 3 **Aerial Photo of Site**

Source: *Nearmaps*

3.0 Planning context

3.1 Environmental Planning and Assessment Act 1979

The EP&A Act establishes the assessment framework for SSD. Under Section 4.5 of the Act the Minister for Planning or the Independent Planning Commission is the consent authority for SSD. Section 4.39 requires that a development application for SSD is to be accompanied by an Environmental Impact Statement (EIS) in the form prescribed by the Regulations.

3.2 State Environmental Planning Policy (State and Regional Development) 2011

The State Environmental Planning Policy (State and Regional Development) 2011 (the SRD SEPP) identifies development which is declared to be State Significant. Schedule 2 of the SRD SEPP states that development within the Gosford City Centre with a Capital Investment Value (CIV) of more than \$75 million is SSD.

3.3 State Environmental Planning Policy (Gosford City Centre) 2018

The Gosford SEPP commenced in October 2018 and is the primary environmental planning instrument applying to the site, providing controls relating to land use, built form, and design.

The following controls have been applied to the site under the SEPP Gosford City Centre 2018:

- Land Zoning: B4 Mixed Use Zone
- Maximum Permissible Height: 24m and 48m
- Permissible FSR: 4:1 and 4.75:1

The objectives of the B4 mixed use zone aim to provide a mixture of compatible land uses. The concept application does not seek approval for specific land uses. However the building envelope is designed to accommodate a range of compatible land uses including a registered club, hotel, commercial premises, retail premises, residential accommodation including the potential for shop top housing which are permissible with consent in the B4 mixed use zone.

The Gosford SEPP allows for the site's height of building (HOB) and floor space ratio (FSR) controls to be varied in the circumstances identified in clause 8.4. The proposed development is considered to meet these requirements.

The building envelope seeks to accommodate the maximum permissible floor space provided for the site under SEPP Gosford City Centre 2018 but variation to the height of buildings standard is sought with two higher building elements on the northern part of the site and lower buildings in the south.

Under clause 8.10 of the SEPP, the solar access controls to the Leagues Club Field / Gosford City Park require 70% non-shaded park area for a minimum of 4 hours between 9am and 3pm on the 21st June Winter Solstice. The proposed position of the towers exceeds this provision.

3.4 Gosford Local Environmental Plan 2014

The provisions of the Gosford LEP 2014 do not apply to the site.

3.5 Gosford Development Control Plan 2013

The provisions of the Gosford DCP 2013 do not apply to the site. However, the relevant provisions within the DCP will be considered as a guide when preparing the SSD application.

3.6 Gosford City Centre Development Control Plan 2018

Relevant provisions within the GCC DCP 2018 will be considered as a guide when preparing the SSD application.

3.7 Gosford Urban Design Framework 2018

The Gosford Urban Design Framework (UDF) helps to shape the continued development and renewal of the Gosford City Centre and support implementation of the Central Coast Regional Plan 2036 vision for Gosford. Relevant provisions within the UDF will be considered as a guide when preparing the SSD application.

3.8 Other planning policies

In addition to the above, the following planning policies apply to the site and will need to be considered as part of the SSD application:

- Central Coast Regional Plan 2036
- Future Transport 2056
- State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55).
- State Environmental Planning Policy (Infrastructure) 2007.
- State Environmental Planning Policy No. 65 – Design Quality of Residential Flat Buildings
- State Environmental Planning Policy (BASIX) 2004

4.0 Overview of likely environmental and planning issues

Based on our preliminary environmental assessment, the following are the key environmental assessment issues that will need to be considered as part of the future DA:

4.1 Built Form and Design Excellence

The proposed development in establishing a new built form element on southern western edge of the Gosford City Centre will address the matters raised by the City of Gosford's Design Advisory Panel. The height, bulk and scale of the development with respect to surrounding context will therefore be a key issue to be addressed. This will include a comprehensive response in relation to:

- The interface with existing development and adjoining development under construction and the public domain;
- Design excellence and the design quality of the proposal, including site layout, siting and design, vistas and connectivity, street activation, pedestrian spaces, building massing, articulation, materials and finishes;
- Relationship of maximum building height to other development in the Gosford City Centre and provide a transition of tower heights towards the edges of the site and provide variation in the design; and
- Visual impact when viewed from the public domain and key vantage points around the site.

4.2 Public Domain and Urban Design:

The proposed development will include a public domain concept, both around the site as well as connections into, and out of, Gosford City Centre. The EIS will provide an assessment of building interface with Gosford as well as the impact of the proposal upon pedestrian connectivity and sight lines to and from the proposal and the Gosford CBD and Leagues Field precinct. All aspects of the public domain including pathways, cycle connections, landscape concept, public art, lighting will be addressed to concept level of detail. Activation of all frontages, the through site link and the Georgina Terrace frontage will be addressed. Crime prevention through environmental design principles will also be addressed.

4.3 Traffic, Access, Parking & Public Transport:

A traffic and parking assessment will be prepared by a specialist traffic consultant and accompany the EIS. The report will consider site access arrangements and the design and operation of the proposed car park. The report will also assess the following:

- Pedestrian desire lines;
- Accessibility to public transport;

- Existing and proposed car parking demand;
- Existing and proposed impacts of car parking and vehicle movement on the surrounding street network and environmental capacity;
- Loading and servicing arrangements; and
- Accessibility to public transport infrastructure.

4.4 Ecologically Sustainable Development:

How ESD principles will be incorporated in the design of the development and potential for sustainable technologies and/or renewable energy will be addressed in an ESD strategy.

4.5 Amenity

Solar access, potential acoustic impacts, visual privacy, view loss, wind impacts, and overshadowing impacts (particularly to Leagues Field) to the surrounding area will be included in the environmental assessment.

4.6 Drainage, Flooding, Climate Change and Sea Level Rise

A drainage concept for the site will be prepared and will address groundwater, flooding and sea level rise risk, and measures to ameliorate any impacts. The Club will continue to work with Council on the opportunities and timing of drainage works in Baker Street and the opportunity to establish an integrated drainage strategy for the area.

4.7 Waste Management

A concept waste management plan will be prepared as part of the EIS. The plan will indicate the collection points and method of removal from the site, include the various waste streams from the different uses proposed. The report will include details of the waste storage and collection arrangements for the proposed uses.

4.8 Services Plan and Details

Information on the proposed site services will be provided which will confirm that the existing site services can be suitably augmented to accommodate the proposed development.

4.9 Staging

The development will be staged. It is anticipated that the development will be delivered in separate stages, over a period of 5 -10 years. The expected time frame and number of stages will be further developed and provided to the Department as part of the Environmental Impact Statement. A staging plan will also be issued to support the DA.

4.10 Capital Investment Value

The current estimated Capital Investment Value (CIV) for the construction of the proposed development of Central Coast Leagues Club, Gosford being a mixed use development including hotel, hospitality, residential, carparking and retail/commercial to be \$442,485,000 excluding GST as set out below and in **Attachment C**.

- Building Costs \$ 406,066,000
- Consultant Fees \$ 36,419,000
- Loose FF&E & IT Equipment \$ Excluded

Total \$ 442,485,000

The scope of the development allowed for in the above estimate is as per Preliminary masterplan documentation prepared by Fender Katsalidis dated August 2019 Rev C.

The Capital Investment Value has been calculated in accordance with the definition contained in State Environmental Planning Policy Amendment (Capital Investment Value) 2010 stated as:
"Capital Investment Value of a development or project includes costs necessary to establish and

operate the project, including the design and construction of buildings, structures, associated infrastructure and fixed or mobile plant and equipment, other than [a] amounts payable, or the cost of land dedicated or any other benefit provided, under a condition imposed under Division 6 or 6 A or Part 4 of the Environmental Planning and Assessment Act or planning agreement under that Division [b] costs relating to any part of the development or project that is the subject of a separate development consent or project approval [c] land costs (including any costs of marketing and selling and) [d] GST (as defined by A New Tax System (Goods and Services Tax) Act 1999 of the Commonwealth).

The above costs exclude internal fit out to podium mixed use space as we understand this space will be subject to a separate development consent.

4.11 Community and Stakeholder Consultation

In preparing the EIS, a Consultation and Community Engagement Strategy will be developed to detail the consultation activities undertaken in preparation of the DA. The strategy is likely to include a letterbox drop, and a community information session. It is anticipated that the following key stakeholders and government agencies will be consulted with:

- Businesses, residents and local community groups in the surrounding area;
- Central Coast Council;
- City of Gosford Design Advisory Panel;
- Roads and Maritime Services;
- Transport for NSW;
- Office of Environment and Heritage;
- Heritage Division of the Department of Premier and Cabinet;
- Aboriginal communities;
- Lands Water and Primary Industries Group (within DPIE);
- Environment, Energy, Science Group (within DPIE);
- Ausgrid;
- Sydney Water; and
- Existing users of Central Coast Leagues Club.

5.0 Conclusion

This letter requests the SEARs for the preparation of an EIS for a concept application that will facilitate the proposed mixed use development at 1 Dane Drive, Gosford. It includes a description of the proposed development and an outline of what are considered to be the key issues for the assessment of the State Significant Development Application.

We trust that the information detailed in this letter is sufficient to enable the Secretary to issue the SEARs. Should you have any queries about this matter, please do not hesitate to contact me on 02 9956 4936 or bthomas@ethosurban.com

Yours sincerely,



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