



28 October 2019

Ms Louise Starkey
Department of Planning, Industry and Environment
PO Box 1148
GOSFORD NSW 2001

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Dear Ms Starkey

CENTRAL COAST LEAGUES CLUB REDEVELOPMENT -CONCEPT APPLICATION, SSD 10374

Thank you for the opportunity to review and provide comment on the Secretary's Environmental Assessment Requirements for the Central Coast Leagues Club development and for granting us an extension of time for providing these comments. Council has reviewed the information on the Major Project Planning Portal in response to your request and provides the following comments for your consideration.

Transport/Traffic Engineering

Roads, Access and Traffic – External Works in the Public Road / Kerb & Channel / Shared Paths

1. The development necessitates the completion of road infrastructure in accordance with the relevant provisions of Council's *Civil Works Specification Design Guidelines 2018*. These include, at least, the full upgrade of the frontage civil infrastructure (kerb and channel and pedestrian footpaths), commercial / industrial driveway crossings, pedestrian crossings / upgrades, street trees, stormwater drainage, etc. Approval for these works must be under Section 138 of the *Roads Act 1993*.
2. A Road Safety Audit is recommended to ensure the safety of all road users such as pedestrians, vehicles and cyclists.
3. The provision of a 'Safe Systems Assessment' of the proposal to inform the design of the concept proposal of appropriate treatments to manage safety for all road users, particularly vulnerable road users (e.g. cyclists, pedestrians including those with mobility issues, children, parents with prams etc.), in the immediate precinct.



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4. Comment should be sought from the RailCorp NSW in relation to additional vehicle traffic and loadings proposed over the railway corridor / overpass. Including pedestrian access.
5. Traffic modelling of the existing surrounding road network including, but not limited to, the Dane Drive/Central Coast Highway roundabout, Dane Drive/Pacific Highway intersection, together with a commentary on necessary improvements to minimise any impacts to acceptable levels up to the 10-year horizon.

Roads, Access and Traffic – Internal

6. The proposed off-street car parking dimensions, circulation roadways / ramps, vehicle manoeuvrability and internal driveway grades must comply with AS/NZS 2890.1 (2004) - "Off-street car parking".
7. The proposed loading areas, vehicle manoeuvrability and internal driveway grades must comply with AS 2890.2 (2002) – "Off-street commercial vehicle facilities".
8. The proposed disabled parking space must comply with AS/NZS 2890.6 (2009) – "Off-street parking for people with disabilities".
9. The off-street car parking numbers should comply. Any reliance upon on-street car parking is not supported.
10. An internal traffic report prepared by a suitably qualified and experienced traffic engineer is recommended to demonstrate that the proposal complies with all parts of AS 2890.

Flooding

The site is located within the Brisbane Waters and Gosford CBD Catchments and Council's records indicate that the site is affected by flooding and/or minimum floor level requirements.

11. Council does not support the extensive construction and basement carpark above and underneath the existing culvert drainage system traversing through the property. Such a confined system creates for Council issues for maintenance, leakage, liability, flooding, access and risk to life and property. The system already contains numerous anomalies such as the pipe shape, historical construction and surcharge relief. Council upgraded the stormwater drainage system in Baker Street with duplicate



3600mm x 1500mm box culverts. Please note that limited space is available in Baker Street for any rediverted drainage system through this public road carriageway.

12. Any upgrade of the internal trunk stormwater drainage system must include a revision of the Gosford CBD Overland Flow Study. Consultation with Council's Hydrology and Asset Management sections is highly recommended during any upgrade design.
13. For any basement access driveway, an appropriate crest level / flood gate arrangement must be provided to prevent inundation of the basement due to floodwater.

Drainage

14. The site falls to Georgiana Terrace, Dane Drive and Baker Street. Stormwater management on the site should have regard for the following:
 - An on-site stormwater detention and drainage system may be required due to the complex stormwater / flooding constraints for the development site.
 - A pump-out system will be required for the basement carpark.
 - Water quality measure must treat stormwater in accordance with the Engineers Australia publication *Australian Runoff Quality – A Guide to Water Sensitive Urban Design* prior to entering Council's stormwater drainage system. This is to be detailed within a MUSIC-link report.
15. Concept stormwater drainage plans and a stormwater management report by a suitably qualified and experienced civil / hydraulic engineer should be provided as part of the application documentation and should detail stormwater management in accordance with Council's *Civil Works Specification Design Guidelines 2018*, Chapter 6.7 Water Cycle Management from Council's *Gosford Development Control Plan 2013* and *AS3500*. The stormwater management must be considered in conjunction with the flooding constraints associated with the development site.

Construction Issues – Parking, traffic, Existing Infrastructure

16. Suitable Construction Traffic Management plans will be required to ensure the safety of all road users.



Easements, 88B Requirements, etc

17. The proposed development must adequately address all legal encumbrances on title.

Earthworks / Excavation

18. A geotechnical report prepared by a suitably qualified and experienced geotechnical engineer and structural engineer is recommended addressing appropriate excavation method and vibration control, support and retention of excavated faces, and hydro-geological considerations associated with the basement construction.

Waste Disposal

19. The development must provide adequate waste collection storage areas within the basement carpark, which is accessible by Council's waste collection vehicle. The current vehicle is a Heavy Rigid Vehicle and must be able enter and exit the site in a forward direction, with all vehicles to manoeuvre internally within the site.

Acid Sulphate Soils

20. The site is classified as class 2 acid sulphate soils on 'Council's Acid Works Sulphate Soils Planning Map'.

Water and Sewer

The development site is located within Central Coast Councils "Southern Region Water Supply and Sewerage Development Servicing Plan (DSP) 2019" area. Water Supply and Sewerage system capacity upgrades are being provided within the CBD to accommodate loads and demands from development identified within the DSP area. Should the proposed development progress in its current form, further augmentation of Councils water and sewer infrastructure shall be required.

The proposed development will be located over the existing 150mm Vitreous Clay and uPVC sewer mains traversing the property.

21. The development proposal will impact various Council sewer mains located within the development site. These sewer mains, which service existing development to the north and west of the site, may not physically be able to be relocated without impacting third party properties situated adjacent to the proposed development. It is

essential investigations occur during the preparation of the Environmental Impact Statement to confirm feasibility of relocation of the sewer mains.

22. Any proposal to relocate sewer mains will require the submission of engineering details to Council for approval. Relocation of water and sewer infrastructure shall be at the developer's full cost.
23. The development will require appropriate structural footings to ensure the protection of the Council sewer main servicing the area.
24. Upon determination of loads and demands associated with this development proposal, revised infrastructure requirements including augmentation works will need to be identified. Timely provision of necessary infrastructure to accommodate the proposed development will be dependent upon receipt of government funding under the Gosford CBD Housing Acceleration Fund.
25. The developer shall be required to submit an application to Council under Section 305 of the *Water Management Act 2000*, to obtain a Section 307 Certificate of Compliance. The Application for a Section 307 Certificate under Section 305 *Water Management Act 2000* form can be found on Council's website www.centralcoast.nsw.gov. Early application is recommended. A Section 307 Certificate must be obtained prior to the issue of any Construction Certificate. Section 307 developer contributions shall apply.
26. A trade waste arrangement will be required for any carwash bay in the basement carpark to discharge wastewater to the gravity sewer system.
27. Water and sewer developer services contributions will apply.

Urban Design

It is noted that existing approved applications and the current application for the subject site will result in 85% of the Leagues Club Park being overshadowed at 9am in mid-winter and 50% at 10am. This is considered completely unacceptable as Leagues Club Park will become an essential outdoor public recreation area with its importance increasing with the construction of more apartments and increased population density.

It is essential that any development on the Leagues Club site does not result in any overshadowing of the park or other important public spaces. Overshadowing or other detrimental impacts resulting from any non-compliance with height and FSR controls

are unacceptable and any compliant development should provide adequate solar access and amenity both within the site and external to the site.

28. Through site connections should be generous and provide permanently accessible open spaces with winter solar access for all users. They should not be for the exclusive use of adjoining retail tenancies.

They should relate to through site connections on adjoining sites, particularly the approved application at 50-70 Mann Street and should not result in overshadowing of these connections and associated public spaces.

29. Baker Street and Georgianna Terrace will form important physical and visual connections between the city centre, Leagues Club Field, the waterfront and the stadium. These must be active street fronts with generous footpaths and significant landscaping that provides safe and pleasant pedestrian access. The option of shared ways should be considered.

Planning

Social Planning

30. A social impact assessment should be provided.

A comprehensive Social Impact Assessment (SIA) is a detailed assessment where significant social impacts are anticipated and included in the Environmental Impact Statement (or as a stand-alone document). It should include an in-depth description and analysis of actual and potential social impacts which recommend management and mitigation measures to address identified impacts.

The SIA should include evidence of community input, clear identification of impacts, thorough assessment and mitigation considerations. Identification of potential social impacts informed by local stakeholder consultation is also required and should inform improvements to the proposed development as well as the opportunity to address potential problems through mitigation measures.

Lot consolidation

31. Lot consolidation should be encouraged.

Acoustic

32. Rail noise and vibration must also be considered in accordance with "Development Near Rail Corridors and Busy Roads – Interim Guideline" prepared by the Department of Planning, 2008.

Other general planning matters

33. The height of the buildings should have regard for the draft policy for *Safeguarding Strategically Important Helicopter Landing Sites in NSW* to ensure they do not impact on the flight path for Gosford hospital.
34. The proposed development should also demonstrate how it provides solar access and amenity to the proposed internal public spaces e.g. the southern plaza, east-west public accessway etc.
35. The EIS should provide details on whether the Leagues Club will continue to operate throughout construction and how this will be managed.
36. The staging plan should also include timing of proposed works/stages.
37. The application should receive input from RMS, Sydney Trains and RailCorp NSW.
38. The following additional documents should be included in Attachment A:
- Central Coast Council Civil Works Specification Design Guidelines 2018.
 - Gosford CBD Overland Flow Study.
 - Development Near Rail Corridors and Busy Roads – Interim Guideline, Department of Planning, 2008

If you have any further enquiries relating to this matter, please contact me on (02) 4350 5436.

Yours faithfully

A handwritten signature in black ink, appearing to read "Emily Goodworth".

Emily Goodworth
Section Manager, Major Applications
DEVELOPMENT ASSESSMENT