

Gosford Alive

Concept DA + Stage 1 works (demolition,
clearing, site improvements)

Environmental Impact Statement for State Significant Development

Mecone Pty Ltd on behalf of
Lederer Group



Project Director

Adam Coburn

Signature*: 

Date: 27 September 2019

Contributors

Joseph Bell

Addison Boykin

*This document is for discussion purposes only unless signed and dated by the Project Director.

Contact

Mecone

Suite 12048, Level 12, 179 Elizabeth Street
Sydney, New South Wales 2000

info@mecone.com.au
mecone.com.au

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Statement of Validity

Applicant Details

Name: Lederer Group c/- Mecone NSW

Address: Level 2, 3 Horwood Place, Parramatta NSW 2150

Site and Proposal Details

Site Address: 136-148 Donnison Street, Gosford (former Kibbleplex Shopping Centre)

Legal Description: Lot 6 DP598833 and Lot 1 DP540292

Proposed Development: Multi-tower mixed use development (concept proposal)

Prepared by

Name: Adam Coburn

Qualifications: Bachelor of Environmental Planning, Master of Planning


Address: Mecone NSW Pty Ltd, Level 2, 3 Horwood Place, Parramatta NSW 2150

Certification

I certify that I have reviewed the content of this EIS and to the best of my knowledge:

- It is in accordance with Part 4 of the Environmental Planning and Assessment Act 1979 and Schedule 2 of the Environmental Planning and Assessment Regulation 2000;
- All available information that is relevant to the environmental assessment of the development to which the statement relates; and
- The information contained in the statement is neither false nor misleading.

Signature:



Name: Adam Coburn

Date: 27 September 2019

Executive Summary

This Environmental Impact Statement (EIS) accompanies a development application (DA) submitted to the Minister for Planning and Public Spaces pursuant to Part 4 of the Environmental Planning and Assessment Act 1979 (EP&A Act) for the Gosford Alive mixed use project in Gosford City Centre,

The proposal has a capital investment value of \$345,478,611 and is therefore classified as State Significant Development (SSD) by virtue of the \$75 million threshold in Schedule 2 of State Environmental Planning Policy (State and Regional Development) 2011.

This EIS addresses the Secretary's Environmental Assessment Requirements (SEARs) issued by the Department of Planning, Industry and Environment on 1 February 2019.

The DA is being lodged as a concept DA under Section 4.22 the EP&A Act. It sets out the concept proposal for the staged development of the site. Future detailed DAs would be submitted for the individual stages, with the exception of Stage 1, approval for which is being sought as part of this DA.

The objectives of the proposal are to support the growth of Gosford City Centre as the capital of the Central Coast region, to help meet the region's projected housing demand and to help create a safe, lively and high quality urban environment.

The DA seeks concept approval for a six-stage development comprising clearing of the site and construction of five mixed use towers (residential apartments above commercial podiums) ranging in height from approximately 20 to 30 storeys. The DA also seeks approval for the physical Stage 1 works including demolition, site improvements and vegetation removal. A detailed description of the proposal is provided in Section 3 of this EIS.

As outlined in Section 4 of this EIS, pre-lodgement consultation was conducted with a range of stakeholders including the local community, Central Coast Council, Department of Planning Industry and Environment, City of Gosford Design Advisory Panel, NSW Office of Environment and Heritage, Transport for NSW, Roads and Maritime Services, and service providers.

In accordance with the SEARs, this EIS provides an assessment of the proposal against the strategic and statutory framework (in Section 5), considers the environmental impacts of the proposal (in Section 6) and sets out the measures to mitigate and manage any potential impacts arising from the proposal (in Section 8). Overall it has been found that the proposal aligns with the strategic and statutory framework and will result in no unacceptable risk to the environment, subject to implementation of the mitigation measures set out in Section 8.

The proposal is strategically important for Gosford City Centre in that it will help renew and grow the centre as the capital of the Central Coast region, placing significant new housing and jobs in close proximity to public transport and improving the quality of the built environment and public domain.

This EIS fulfils the requirements of the EP&A Act and Environmental Planning and Assessment Regulation 2000 and addresses all relevant matters for consideration prescribed by the SEARs.

In light of the above, we recommend that consent be granted to the application.

1 Introduction

This Environmental Impact Statement (EIS) accompanies a development application (DA) submitted to the Minister for Planning and Public Spaces for the Gosford Alive mixed use project in Gosford City Centre.

The proposal is classified as State Significant Development (SSD) pursuant to Schedule 2 of State Environmental Planning Policy (State and Regional Development) 2011 given it has a capital investment value of more than \$75 million (being \$345,478,611) and is located in Gosford City Centre.

The proposal comprises a concept DA under cl 4.22 of the Environmental Planning and Assessment Act 1979 (EP&A Act). It sets out the concept proposal for the site and will be followed by detailed applications for physical built form. The first stage of the proposal (demolition, site clearing and site improvements) is included under this SSD.

This EIS has been prepared in accordance with the DPIE guidelines for SSD applications lodged under Part 4 of the EP&A Act and addresses the issues raised in the Secretary Environmental Assessment Requirements (SEARs).

1.1 Project Overview

The proposal seeks approval for the following:

- Clearing of the site including demolition of existing buildings and vegetation removal;
- Building envelopes for a mixed use development comprising five buildings ranging in height from RL 73.1 to RL 110.3 (approximately 20 to 30 storeys);
- Indicative land use mix including residential apartments and commercial premises;
- Maximum GFA of 73,058sqm;
- Part basement and part aboveground car parking with approximately 1,014 parking spaces;
- Vehicular access points at William Street, Donnison Street and Albany Street North;
- Shared vehicle-pedestrian through-site link between William Street and Donnison Street; and
- Staging of the development.

1.2 Project Objectives

The objectives of the proposal are to:

- Support the growth of Gosford City Centre as the capital of the Central Coast region in accordance with the Central Coast Region Plan;
- Help meet the region's projected housing demand of 41,500 additional dwellings by 2036 and contribute to housing choice and affordability in Gosford City Centre;
- Help create a high quality urban environment in Gosford City Centre in accordance with the Gosford Urban Design Framework;

- Help create a livelier, more attractive and safer city centre;
- Minimise overshadowing to Kibble Park and maintain key views to Rumbalara ridgeline; and
- Maximise residential amenity for occupants in accordance with the Apartment Design Guide.

1.3 Project History

A redevelopment of the site has been in planning for several years in response to broader strategic planning.

1.3.1 Previous Gosford Alive Proposal (June 2016)

In December 2015, the then Gosford City Council proposed changes to the Gosford Local Environmental Plan (GLEP) 2014 under its Gosford City Centre Incentives Planning Proposal. A key outcome of the planning proposal was a proposed 'pool' of an additional 150,000sqm of gross floor area that could be absorbed by key sites within the City Centre, and an increase in maximum allowable heights to RL 99.00. Developments utilising these controls would be required to demonstrate design excellence and a net public benefit.

In response to the planning proposal, the Lederer Group Pty. Ltd. lodged a DA to Central Coast Council in June 2016 for:

- Staged construction of 9 mixed use and residential buildings across two sites including the subject 'Kibbleplex' site as well as the Imperial Shopping Centre Site, up to a maximum height of RL 99.0;
- A mix of non-residential and residential uses; and
- Public domain improvements, including publicly accessible pedestrian areas, through site links, and streetscape improvements.

The proposed development from June 2016 is shown in the below figure. Alongside the submission of this DA, a substantial communication strategy and community consultation process took place to familiarise the community with the proposal. This included an event in Kibble Park, resident meet and greets, stakeholder briefings, pop-ups, and surveys.

Following the announcement that Council's planning proposal would not be progressing, Mecone withdrew the DA on behalf of the Lederer Group in March 2018. It was understood that more detailed work would be undertaken by the DPIE to facilitate a change of planning controls and promote renewal of the Gosford City Centre.



Figure 1. Previous Gosford Alive proposal (withdrawn)

Source: CM+



Figure 2. Previous Gosford Alive proposal (withdrawn)

Source: CM+

1.3.2 Current Proposal

In October 2018, planning for the site by the Project Team recommenced following the gazettal of State Environmental Planning Policy (Gosford City Centre) 2018 (Gosford City Centre SEPP). The SEPP facilitates the renewal and revitalisation of the Gosford City Centre through a number of new controls which allow for greater heights and densities on major sites, whilst ensuring design excellence.

In response to the release of the SEPP, the core Project Team comprising Lederer (proponent), Buchan Group (architect) and Mecone (planning) focused attention on

what was referred to in the June 2016 proposal as 'Site B', or the Kibbleplex Site, to the east of Kibble Park.

Formal engagement commenced with the then Department of Planning and Environment in November 2018 relating to the proposed scheme, in order for the Project Team to present initial concepts for the site and understand the Gosford City Centre SEPP in more detail as well as the desired outcomes for the city centre more broadly.

1.4 Alternatives

A number of options were available to the proponent in considering the future use and development of the site.

The proposal set forth in Section 3 of this EIS, which provides for five residential towers above non-residential podiums fronting Kibble Park, represents the preferred outcome for the site. Alternative design options are discussed below.

1.4.1 Mix of Use

The proponent has considered a range of potential outcomes in terms of the ultimate mix of uses for the site. This has included consideration and testing of:

- Commercial towers;
- Larger retail uses such as a supermarket;
- Entertainment uses such as cinemas; and
- Educational establishments.

Following a testing of these options, the preferred scheme has ultimately resulted in a more residential-focused outcome supported by ground floor active uses. This has been developed alongside a decision to continue concentrating destination-type entertainment and retail uses in the existing Imperial Shopping Centre site.

1.4.2 Built Form

Three viable built form options for the redevelopment of the site were considered:

- **Option A:** A 4-tower option with no podium, minor retail and large northwest tower (as per 2016 DA);
- **Option B** (currently proposed): A 5-tower option featuring layered podium with focused commercial uses at the western edge fronting Kibble Park, with residential above and behind (currently proposed); and
- **Option C:** A 5-tower option with large retail podium incorporating larger retail uses or cinemas.

These options are illustrated in the figure below.



Figure 3. Redevelopment options considered

Source: Buchan

Option A was discarded as it would:

- Tend to dominate the street intersection;
- Result in poor street level amenity due to wind and overshadowing impacts;
- Result in ill-defined street edge;
- Result in significant morning overshadowing onto Kibble Park; and
- Block views between Kibble Park and the Rumbalara ridgeline due to the large southwest tower.

Option C was discarded as it would:

- Result in large, imposing and difficult-to-design facades to Kibble Park;
- Interfere with the visual connection from the park to the ridge line;
- Present difficulties in activating street frontages; and
- Hinder delivery of a through-site link.

Option B was ultimately chosen because it:

- Provides a gradual transition between the park and ridge line through a stepped podium;
- Maintains a visual connection between the park and ridgeline due to its tower arrangement and low podium;
- Allows for a strong relationship to the park;
- Results in minimal overshadowing to Kibble Park; and
- Provides for a through-site link.

Further discussion of these options is provided in the Design Report at **Appendix 1**.

1.5 SEARs

The Secretary's Environment Assessment Requirements (SEARs) for the project were issued on 1 February 2019. The table below identifies where the SEARs are addressed within this EIS.

Table 1. SEARs	
Requirement	Chapter of EIS
General Requirements	
<p>The Environmental Impact Statement (EIS) must be prepared in accordance with, and meet the minimum requirements of, clauses 6 and 7 of Schedule 2 of the Environmental Planning and Assessment Regulation 2000 (the Regulation).</p> <p>Notwithstanding the key issues specified below, the EIS must include an environmental risk assessment to identify the potential environmental impacts associated with the development.</p>	Section 5.2.2
<p>Where relevant, the assessment of key issues below, and any other significant issues identified in the risk assessment, must include:</p> <ul style="list-style-type: none"> adequate baseline data consideration of the potential cumulative impacts due to other developments in the vicinity (completed, underway or proposed) measures to avoid, minimise and if necessary, offset predicted impacts, including detailed contingency plans for managing any significant risks to the environment. 	Throughout Section 6 and appendices
<p>The EIS must also be accompanied by a report from a qualified quantity surveyor providing:</p> <ul style="list-style-type: none"> a detailed calculation of the capital investment value (CIV) (as defined in clause 3 of the Regulation) of the proposal, including details of all assumptions and components from which the CIV calculation is derived. The report shall be prepared on company letterhead and indicate the applicable GST component of the CIV an estimate of jobs that will be created during the construction and operational phases of the proposed development certification that the information provided is accurate at the date of preparation. 	Appendix 10
Key issues	
1. Statutory Provisions and Strategic Provisions	
Address all relevant Environmental Planning Instruments, plans, policies and guidelines, including (but not limited to those) outlined at Attachment A.	Section 5.1-5.3

Table 1. SEARs	
Requirement	Chapter of EIS
Provide details of the proposed use for each component of the development, and the relationship between the different uses within the building.	Section 3.2
Detail the nature and extent of any prohibitions that apply to the development.	NA
Identify compliance with the development standards applying to the site and provide a detailed justification for any non-compliances.	Section 5.1-5.2
Address the adequacy of floor space provided for commercial purposes and provide relevant justification.	Section 3.2
2. Design Excellence	
Prepare a Design Excellence Statement to demonstrate how the proposal exhibits design excellence and contributes to the natural, cultural, visual and built character values of Gosford City Centre. In considering whether the development exhibits design excellence, have regard to Clause 8.3 of State Environmental Planning Policy (SEPP) (Gosford City Centre) 2018.	Appendix 3
The proposal must be reviewed by the City of Gosford Design Advisory Panel (the Panel) prior to lodgement of the application. The EIS must attach a copy of the Panel's advice and demonstrate how that advice has been considered and incorporated into the proposal.	Section 4.3 Appendix 16
3. Built Form and Urban Design	
Demonstrate how the proposal is informed by the Gosford Urban Design Framework (GANSW, 2018) and the Gosford Development Control Plan 2018 (DPE).	Section 5.1
Address the height, bulk and scale of the proposed development, including consideration of the building layout, separation, tower and podium heights, massing, setbacks and the size of the proposed floor plates.	Section 3 Section 6.1
Address the design quality of the proposed development, including consideration of building articulation, street activation and interface with the public domain.	Section 6.1 Appendix 1
Demonstrate how above ground parking and services (including waste management, loading zones and mechanical plant) would be fully integrated into the	Appendix 1

Table 1. SEARs	
Requirement	Chapter of EIS
design of the development. This includes how on-site car parking is provided wholly underground, or otherwise is not visible from, or minimizes visual impacts to, the street.	
Demonstrate how the future development potential of adjoining properties would not be compromised by the proposal.	Section 6.21
Detail the location, size and content of any proposed signage zones and provide an assessment of the proposed signage zones against the requirements of SEPP 64 - Advertising and Signage.	Section 5.2.6
4. Public Domain/Landscaping	
Outline the scope of public domain improvements, pedestrian linkages, street activation, and landscaping to be provided as a part of the proposal.	Section 3.5 Appendix 1
Demonstrate how the proposal would: <ul style="list-style-type: none"> • maximise permeability throughout the development and to adjoining sites • maximise street activation within the town centre • provide sufficient open space for future residents • provide access for people with disabilities • minimise potential vehicle, bicycle and pedestrian conflicts. 	Section 3.5 Appendix 2
5. Visual Impacts	
Prepare a Visual Impact Assessment and view analysis of the proposal to/from key vantage points. Photomontages or perspectives should be provided showing the project.	Section 6.4 Appendix 1
Demonstrate how the proposal respects and maintains key view corridors (for example to the ridgelines of Presidents Hill and Rumbalara Reserve) and street vistas.	Section 6.4 Appendix 1
6. Environmental and Residential Amenity	
Assess the environmental and residential amenity impacts associated with the proposal, including solar access, acoustic impacts, visual privacy, view loss, overshadowing, lighting impacts and wind impacts. A high level of environmental amenity must be demonstrated.	Section 5.2.5 Section 6.2 Section 6.4 Section 6.11 Section 6.18

Table 1. SEARs	
Requirement	Chapter of EIS
	Appendix 1
Demonstrate how the proposal protects solar access to key public open spaces, including Kibble Park, and the surrounding public domain.	Section 6.2 Appendix 1
Demonstrate that the proposed building envelopes are capable of complying with SEPP 65 and the Apartment Design Guide (ADG) and ensure the proposal achieves a high level of environmental and residential amenity.	Section 5.2.6-5.2.7 Appendix 1

7. Ecologically Sustainable Development (ESD)

Detail how ESD principles (as defined in clause 7(4) of Schedule 2 of the Environmental Planning and Assessment Regulation 2000) will be incorporated in the design, construction and ongoing operation phases of the development.	Section 6.8 Appendix 19
Demonstrate how future buildings would meet or exceed minimum building sustainability and environmental performance standards.	Section 6.8 Appendix 1

8. Transport and Accessibility (Construction and Operation)

<p>The EIS must be accompanied by a Traffic Impact Assessment (TIA) prepared in accordance with relevant guidelines. The TIA must:</p> <ul style="list-style-type: none"> Assess the traffic impacts of the development on the surrounding local and classified road network using SIDRA or similar traffic model and specify any road upgrade works (local and classified) required to maintain acceptable levels of service. The assessment is to include traffic and parking generated by existing and approved developments, as well as that by the proposal, and consider car sharing facilities to reduce overall parking demands in the area. Estimate the total daily and peak hour trips generated by the proposal, including vehicle, public transport, pedestrian and bicycle trips. Assess the adequacy of public transport, pedestrian and bicycle provisions to meet the likely future demand of the proposed development Demonstrate the proposed road layout, access points, and car parking can comply with the relevant Australian Standards and Council requirements. Demonstrate sufficient on-site car parking loading/unloading, pedestrian and cycling facilities 	Appendix 12
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Table 1. SEARs	
Requirement	Chapter of EIS
<p>(including bicycle parking and end-of-trip facilities) would be provided for the development.</p> <ul style="list-style-type: none"> Assess the impact of the proposal on car parking within the Gosford CBD during construction and operation of the proposed development. Describe the measures to be implemented to promote sustainable means of travel, including public transport use, pedestrian and bicycle linkages. Prepare a preliminary Construction Traffic Management Plan for the proposal and outline how construction traffic, public transport, bicycle and pedestrian impacts, and parking impacts would be appropriately managed and mitigated. 	
9. Flooding	
Assess the potential flooding impacts associated with the development and consider the relevant provisions of the NSW Floodplain Development Manual (2005), including the potential impacts of climate change, sea level rise and increase in rainfall intensity.	Section 6.12 Appendix 8
10. Stormwater	
Prepare a preliminary stormwater management report demonstrating how stormwater would be appropriately managed in accordance with Council's requirements.	Section 6.12 Appendix 8
11. Water Quality	
Assess water quality and hydrology impacts of the development, including any downstream impacts for both surface and groundwater and any impacts on natural processes and functions.	Section 6.12 Appendix 8
12. Bushfire	
Prepare a Bushfire Assessment Report, in accordance with the requirements of Planning for Bushfire Protection 2006, to assess any potential bushfire impacts associated with the proposal.	Section 6.7 Appendix 5
13. Heritage	
<ul style="list-style-type: none"> Assess any impacts on State and local heritage items, including conservation areas, natural heritage areas, relics, gardens, landscapes, views and trees and recommend mitigation and management measures where required. 	Section 6.6 Appendix 4

Table 1. SEARs	
Requirement	Chapter of EIS
<ul style="list-style-type: none"> Prepare an aboriginal archaeology report in accordance with the relevant Office of Environment and Heritage (OEH) guidelines. Should any aboriginal heritage items be impacted by the proposed development, an Aboriginal Heritage Cultural Assessment must be submitted. 	
14. Social & Economic Impacts	
The EIS must include an assessment of the social and economic impacts of the development, including consideration of any increase in demand for community infrastructure and services.	Section 6.9-6.10 Appendix 11
15. Public Benefit and Contributions	
Outline the contributions and proposed public benefits to be delivered as a part of the proposal including details of any Voluntary Planning Agreement.	Section 3.9
16. Noise and Vibration	
Prepare a noise and vibration assessment in accordance with the relevant EPA guidelines. This assessment must detail construction and operational noise impacts on nearby sensitive receivers and outline the proposed management and mitigation measures that would be implemented.	Appendix 9
17. Contamination	
Prepare a contamination assessment for the site, by a qualified environmental consultant and demonstrate that the site is suitable for the proposed development, in accordance with the requirements of SEPP 55.	Appendix 6
18. Biodiversity	
Assess any biodiversity impacts associated with the proposal in accordance with the requirements of the Biodiversity Conservation Act 2016, including the preparation of a Biodiversity Development Assessment Report, where required.	Section 5.2.3
19. Soil and Water	
<p>The EIS shall include a:</p> <ul style="list-style-type: none"> Geotechnical assessment 	Appendix 7-8

Table 1. SEARs	
Requirement	Chapter of EIS
<ul style="list-style-type: none"> Acid Sulfate Soils assessment Groundwater assessment. 	
20. Utilities	
<p>In consultation with relevant agencies prepare a services and utilities impact assessment which:</p> <ul style="list-style-type: none"> assesses the capacity of existing services and utilities and identify any upgrades required to facilitate the development assesses the impacts of the proposal on existing utility infrastructure and service provider assets and describe how any potential impacts would be managed. 	Appendix 8
22.[sic] Staging	
Provide details regarding the staging of the proposed development.	Section 3.7
23. Construction Management Plans	
Prepare a preliminary Construction Management Plan for the proposed works and outline how construction impacts would be appropriately managed and mitigated.	Appendix 18
Consultation	
<p>During the preparation of the EIS, you must consult with the relevant local, State or Commonwealth Government authorities, service providers, local community groups and affected landowners.</p> <p>In particular, you must consult with:</p> <ul style="list-style-type: none"> Central Coast Council NSW Office of Environment and Heritage Transport for NSW Environment Protection Authority NSW Roads and Maritime Services Ausgrid NSW Rural Fire Service NSW Department of Industry (Office of Water) Surrounding residents, businesses and local community groups <p>The EIS must describe the consultation process and the issues raised and identify where the design of the development has been amended in response to these issues.</p>	Section 4

Table 1. SEARs	
Requirement	Chapter of EIS
Where amendments have not been made to address an issue, a short explanation should be provided.	
Further consultation after 2 years	
If you do not lodge a Development Application and EIS for the development within 2 years of the issue date of these SEARs, you must consult further with the Secretary in relation to the preparation of the EIS.	NA
Documents and Plans	
The EIS must include all relevant plans, architectural drawings, diagrams and relevant documentation required under Schedule 1 of the Environmental Planning and Assessment Regulation 2000.	Throughout EIS
In addition to the documents and plans listed in the key issues above, the EIS must include the following:	
Survey plan (A3)	Appendix 15
Overall site plan (A3)	Appendix 1
Concept elevations, floor plans and sections of the proposal (A3)	Appendix 1
3D digital model (refer Central Coast Council's requirements)	On USB
Design verification statement	Appendix 1
Compliance tables for all relevant planning controls	Section 5.1-5.3
Detailed overshadowing diagrams (A3)	Appendix 1
Cross ventilation diagrams (A3)	Appendix 1
Energy Efficiency Report	Appendix 1
Concept landscape and public domain plans (A3)	Appendix 2
A table identifying the proposed land uses including a floor-by-floor breakdown of GFA, total GFA and site coverage	Section 3.2 Appendix 1
Water Cycle Management Plan Strategy	Appendix 8

Table 1. SEARs	
Requirement	Chapter of EIS
Arborist report (if required)	NA – to provide at detailed DA stage
Pre-submission consultation statement	Section 5
Quantity surveyor report	Appendix 10

1.6 Structure of EIS

The structure of the EIS, based on the Draft Environmental Impact Assessment Guidance Series (DPE, 2017), is as follows:

- **Section 1:** Introduction
- **Section 2:** Site analysis
- **Section 3:** Proposal description
- **Section 4:** Consultation
- **Section 5:** Strategic and statutory context
- **Section 6:** Environment impact assessment
- **Section 7:** Environmental risk assessment
- **Section 8:** Mitigation measures
- **Section 9:** Conclusion and justification

2 Site Analysis

2.1 Regional Context

The site is located in Gosford City Centre in the suburb of Gosford, which forms part of the Central Coast local government area. Gosford City Centre is located approximately 50km north of Sydney CBD and 68km south of Newcastle CBD.

Figure 1 provides a context map of Gosford showing its location relative to the surrounding region.

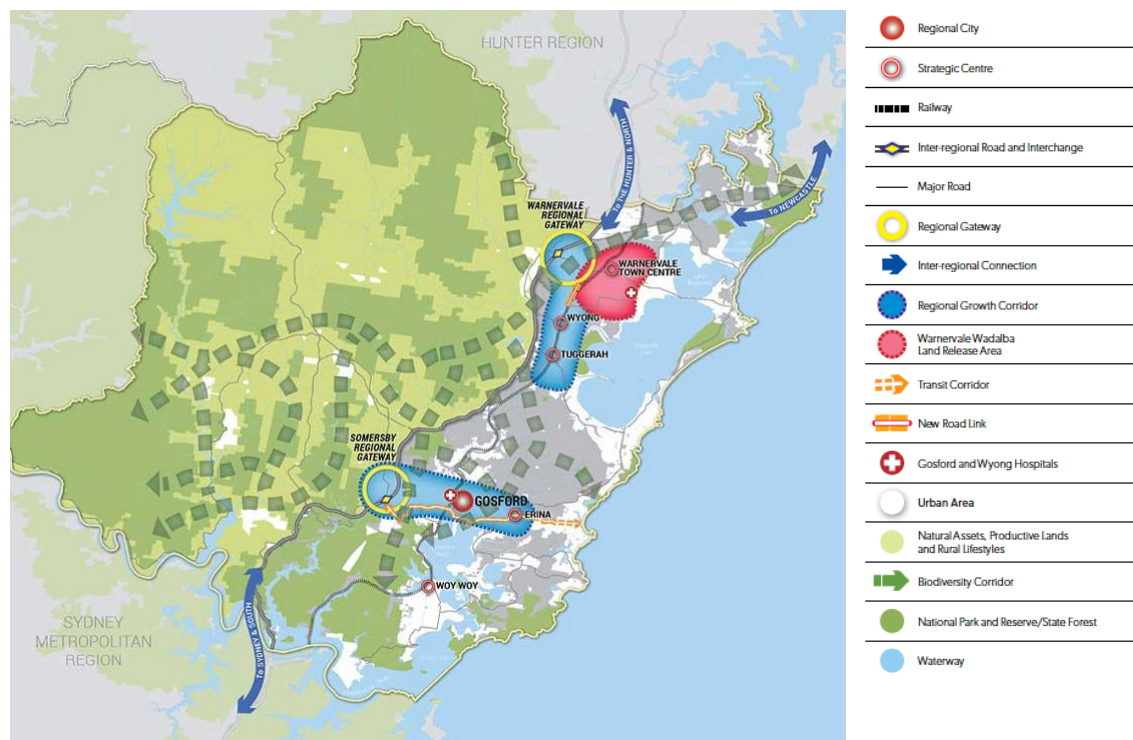


Figure 4. Regional context map

Source: Central Coast Regional Plan

2.2 Local Context

The site is located centrally within Gosford City Centre in the Central Coast Council local government area. It is surrounded by a mix of urban land uses including public open spaces, residential apartments, commercial buildings, civic uses and educational establishments.

Gosford City Centre is largely defined by its natural features, which includes Rumbalara Reserve to the east, The Broadwater to the south and Waterview Park to the west.

Gosford City Centre is the subject of a State-led comprehensive revitalisation effort, which includes infrastructure investment for water, sewer and park upgrades; redevelopment of Gosford Hospital; preparation of a city-specific State Environmental Planning Policy, Development Control Plan, Urban Design Framework; establishment of a Design Advisory Panel; and institution of a Special Infrastructure Contribution.

Figure 4 provides a local context diagram.



Figure 5. Local context diagram

Source: Mecone 2019

2.3 Site Description

The site is bounded by William Street to the north, Donnison Street to the south, Albany Street North to the east and Henry Parry Drive to the west. An aerial photograph of the site is provided in the figure below.



Figure 6. Site aerial image
Source: Mecone Mosaic 2019

The table below provides a summary description of the site.

Table 2. Site Description	
Item	Details
Legal description	Lot 6 DP598833 Lot 1 DP540292
Area	14,194sqm
Frontages	125m to William Street 90m to Henry Parry Drive 200m to Donnison Street 40m to Albany Street North
Topography	The site falls east to west, from RL 20.8 at Albany Street North to down to RL 9.15 at the corner of William Street and Henry Parry Drive.
Current development on site	Former Kibbleplex Shopping Centre currently leased to Council for use as public car park.
Vegetation	The site contains an unoccupied grassy area in the southeast corner as well as several small planted areas, but the site is mostly covered by built form.

Photos of the site are provided below. Additional photos are provided within the Design Report at **Appendix 1**.



Figure 7. Site viewed from corner of William St and Henry Parry Dr (looking SE)

Source: Buchan



Figure 8. Site viewed from Donnison St (looking NE)

Source: Buchan



Figure 9. Site viewed from Albany St N (looking W)

Source: Buchan



Figure 10. Site viewed from William St (looking SW)
Source: Buchan

2.4 Surrounding Development

Immediate surrounding development includes:

- To the north, a row of commercial buildings including a 4-storey medical testing laboratory, a 2-storey medical diagnostic imagery centre and a 1-storey medical office (former dwelling).
- Also to the north (across William Street), a strip of 1- to 2-storey commercial buildings (across William Street)
- To the south (across Donnison Street), Gosford Local Court and Gosford TAFE;
- To the east (across Albany Street North), a 5-storey commercial building and
- To the west (across Henry Parry Drive), Kibble Park.

Photos of the site and surrounding development are provided below.



Figure 11. Neighbouring development at 39-41 William Street
Source: Buchan, 2019



Figure 12. Kibble Park seen from Donnison Street (looking E)

Source: Buchan, 2019



Figure 13. View of Kibble Park (looking N)

Source: Buchan, 2019

Additionally, a number of large developments have been recently approved/are currently under construction in Gosford City Centre, many of which have exceeded planning controls significantly. These are identified and discussed below.



KEY

- | | |
|---|---|
|  The Site |  Merindah |
|  Waterside Development |  27-37 Mann Street |
|  Vogue Towers |  Bonython Tower |
|  32 Mann Street | |

Figure 14. Surrounding development map

Source: Mecone

1. **Waterside Development:** \$230 million mixed use project on the corner of Mann Street, Georgiana Terrace and Baker Street, comprising three towers with 500 total apartments and 9,340sqm of commercial GFA. Proposed height is up to 114m comparative to the planning controls which allow for heights of a maximum 48m. Construction has not yet commenced although the site has been cleared.
2. **Vogue Towers (formerly Mariners Plaza):** \$157 million mixed use project comprising two towers containing 276 residential apartments and 124 hotel rooms. Construction has not yet commenced. Proposed height is up to 98m comparative to the planning controls which allow for heights of a maximum 48m. Construction has not yet commenced.
3. **32 Mann Street:** \$34 million commercial project comprising one tower with six levels of A-Grade commercial office space and one level of retail. The project was recently completed.

4. **Merindah:** \$34 million residential project comprising a 15-storey building with 140 residential apartments at 21-23 Mann Street. This development is nearing completion.
5. **27-37 Mann Street:** \$53 million mixed use project comprising one tower with 132 apartments, 455sqm of retail and 644sqm of commercial space. No activity has occurred on site.
6. **Bonython Tower:** \$19.3 million mixed use project comprising one tower with 56 apartments and three levels of commercial and retail space. The project has been recently completed.

Images of some of these developments are provided below.



Figure 15. Waterside development artist's impression

Source: CKDS Architecture



Figure 16. Mariners Plaza development artist's impression

Source: CKDS Architecture



Figure 17. 32 Mann St development

Source: *St Hilliers*



Figure 18. Merindah development artist's impression

Source: *CKDS Architecture*



Figure 19. 27-37 Mann St artist's impression

Source: *Thrum Architects*

3 Proposal Description

This SSD seeks approval for a concept proposal across six overall stages of development:

- Clearing of the site including demolition of existing buildings and vegetation removal;
- Building envelopes for a mixed use development comprising five buildings ranging in height from RL 73.1 to RL 110.3 (approximately 20 to 30 storeys);
- Indicative land use mix including residential apartments and commercial premises;
- Maximum GFA of 73,058sqm;
- Part basement and part aboveground car parking with approximately 1,014 parking spaces;
- Vehicular access points at William Street, Donnison Street and Albany Street North;
- Shared vehicle-pedestrian through-site link between William Street and Donnison Street; and
- Staging of the development.

As well as the overall concept proposal, approval for the **first stage** of the proposal, being site clearing, demolition, and site improvements, is also sought under this SSD.

Architectural drawings prepared by Buchan are included at **Appendix 1** detailing the proposal.

3.1 Key Components

The table below provides a summary of the proposal's key numerical features.

Table 3. Proposal Summary	
Item	Quantity
Built form	5 building envelopes ranging in height from RL 73.1 to RL 110.3 (approximately 20 to 30 storeys including podiums)
Land uses	<ul style="list-style-type: none">• Mixed use including residential apartments in tower levels and commercial premises, parking and townhouse-style development in the podium levels.• Exact uses to be confirmed at detailed DA stage
GFA	Maximum 73,058sqm GFA: <ul style="list-style-type: none">• 69,366sqm residential• 3,692sqm commercial
Apartments	Approximately 738 apartments

Table 3. Proposal Summary	
Item	Quantity
Vehicular access and car parking	1,014 parking spaces (part basement and part aboveground): <ul style="list-style-type: none"> • 942 residential • 72 commercial
Employment	Estimated 354 construction jobs and 211 operational jobs
Capital investment value	\$345,478,611

3.2 Land Uses

The proposed envelopes will accommodate residential apartments in the tower levels and commercial uses, parking and townhouse-style development in the podium levels.

Based on the example scheme, it is anticipated that the envelopes will accommodate approximately 738 apartments and 3,692sqm of commercial GFA. Specific commercial uses will be applied for at the detailed DA stage.

This mix of uses reflects the desired outcome for the site as a predominantly residential development supported by lower level commercial uses concentrated at the Henry Parry Drive frontage. Whilst somewhat centrally located, the predominant area of the site is set back and away from the town centre, thereby reducing opportunities for substantial commercial floor space. Nonetheless the key frontage to Henry Parry drive will be activated with commercial type land uses, with a predominant active frontage to Dennison Street.

The addition of significant new dwellings for Gosford City Centre will contribute to housing choice and affordability and also improve job containment within the LGA by placing workers closer to employment opportunities and increase local demand for services during the day, evening and weekends.

A GFA breakdown by use and tower is provided in the table below.

Table 4. GFA Breakdown	
Tower	GFA
Tower 1	<ul style="list-style-type: none"> • Residential: 12,833sqm • Commercial: 1,627sqm
Tower 2	<ul style="list-style-type: none"> • Residential: 12,837sqm • Commercial: 1,668sqm
Tower 3	<ul style="list-style-type: none"> • Residential: 10,106sqm • Commercial: 104sqm

Table 4. GFA Breakdown	
Tower	GFA
Tower 4	<ul style="list-style-type: none"> Residential: 17,011sqm Commercial: NA
Tower 5	<ul style="list-style-type: none"> Residential: 16,579sqm Commercial: 293sqm

3.3 Proposed Envelopes

The proposal comprises five distinct building envelopes as illustrated in the drawings at Appendix A of Buchan's Design Report (**Appendix 1** of this EIS) and as described in the subsections below.

Note: The proposed envelopes define the three-dimensional volume within which future development can occur but do not in themselves constitute physical development. Following any approval of this concept DA, future detailed applications would need to be lodged for the physical development within the envelopes.

3.3.1 Layout and Setbacks

The proposed envelopes are arranged in order to optimise solar access to Kibble Park, preserve views to Rumbalara Reserve and maximise residential amenity in terms of solar access and natural ventilation.

At ground level, the layout allows for a generous 24m-wide 'shared zone' through-site link at mid-block as well as a large pedestrianised zone along Henry Parry Drive.

The proposed setbacks, set out in the table below, have been guided by local Council controls and by the Apartment Design Guide's design criteria.

Table 5. Proposed Setbacks	
Street/Boundary	Setback
From William Street	<ul style="list-style-type: none"> 2.5m podium setback up to 14m height 6m tower setback above 14m height
From Donnison Street	<ul style="list-style-type: none"> 2.5m podium setback up to 14m height 6m tower setback above 14m height
From Henry Parry Drive	<ul style="list-style-type: none"> 2.5m podium setback up to 14m height 15m tower setback above 14m height
From Albany Street North	<ul style="list-style-type: none"> 2.5m podium setback up to 14m height 6m tower setback above 14m height

Table 5. Proposed Setbacks	
Street/Boundary	Setback
From adjoining lots to the north (37-43 William Street)	<ul style="list-style-type: none"> 2.5m podium setback up to 14m height 12m tower setback above 14m height
From adjoining lot to the east (37 William Street)	<ul style="list-style-type: none"> 1m podium setback up to 14m height 12m tower setback above 14m height

There is generally 24m separation between towers, consistent with Apartment Design Guide criteria.

The proposed layout and setbacks are illustrated in the Buchan drawing below.

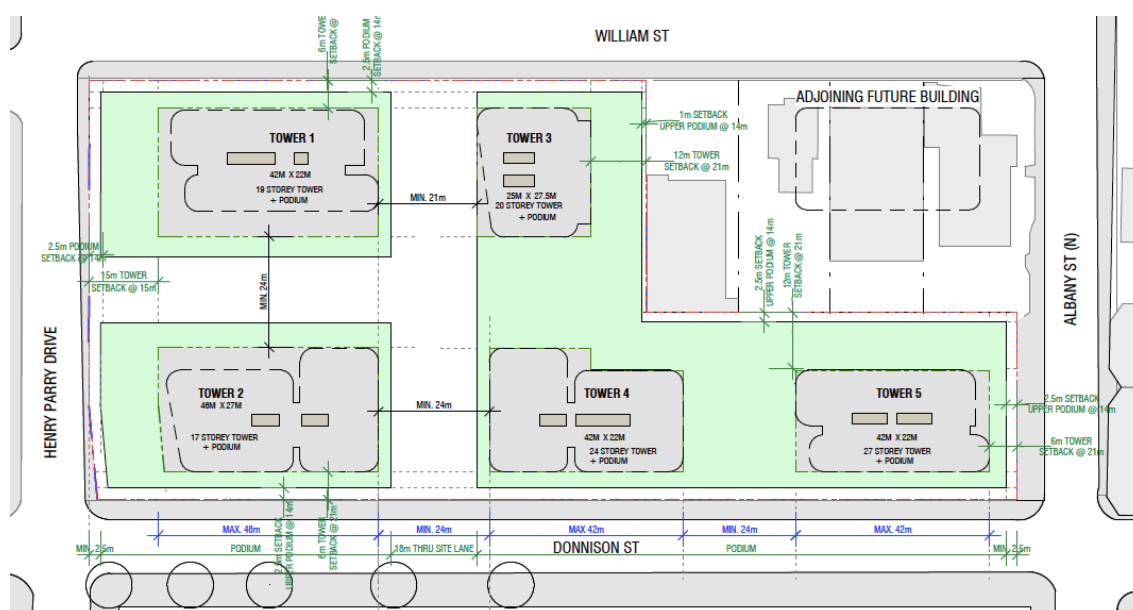


Figure 20. Proposed layout and setbacks

Source: Buchan

3.3.2 Height

The proposed towers are arranged to step down from east to west, with the highest point being RL 110.3 at the eastern end of the site and the lowest point being RL 73.1 at the eastern end. The proposed maximum heights are outlined below.

- **Tower 1:** RL 88.6 | 78.5m above ground (19-storey tower + podium);
- **Tower 2:** RL 73.1 | 60.2m above ground (16-storey tower + podium);
- **Tower 3:** RL 91.7 | 79.4m above ground (21-storey tower + podium);
- **Tower 4:** RL 101 | 85.9m above ground (24-storey tower + podium); and
- **Tower 5:** RL 110.3 | 94m above ground (27-storey podium + podium).

Consideration of maximum height limits has evolved out of work undertaken on earlier schemes (as discussed in section 1.3 of this EIS). Council's now superseded planning

proposal identified Rumbalara Reserve as an important visual bookend for the Gosford City Centre, with schemes to be designed around this ensuring a stepping down from Rumbalara into the City Centre.

The highest point was initially chosen to allow development to sit comfortably below the maximum peak height of around RL 150.00 at Rumbalara Reserve. The stepping nature of the towers allows the development to sit comfortably in its natural surroundings, following the natural transition from Kibble Park up to Rumbalara Reserve.

Further, consideration against the future scale and character of the Gosford City Centre was undertaken to ensure the proposal would be compatible with other developments in the pipeline. Proposals including the Mariners development (98m above ground) and Waterside Towers (114m) were considered and it was ensured that the proposal's heights were comparable. Resultantly, no towers on the subject site are higher than the buildings at these aforementioned two developments.

Individual tower heights have then been amended to ensure variation, articulation, and amenity. Whilst the buildings resemble a "family of building", they will have unique characteristics, which will be further defined during the stage 2 detailed approval process.

As shown in the example scheme at **Appendix 1**, it is envisioned that tower height will be further split such that each tower mass has two elements, which will help increase solar amenity to the residential apartments.

3.4 Vehicle Access and Parking

3.4.1 Access Points

The proposal features five vehicular access points:

- Basement carpark entry/exit point off William Street;
- Through-site link entry/exit off William Street;
- Loading dock off William Street;
- Carpark entry point off Albany Street North; and
- Through-site link entry/exit point off Donnison Street.

3.4.2 Parking and Loading

The proposal features five levels of parking. One level is completely underground forming a basement, while the other four are partially or entirely aboveground. The carpark contains 1,014 car spaces, which is generally consistent with planning controls (refer to Section 6.3 and **Appendix 12** of this EIS for further discussion on parking).

The aboveground levels would be shielded by commercial uses or screened by façade treatment. This detail would be determined at the detailed DA stage.

Loading would occur in the loading dock off William Street. The loading dock would operate as a shared facility for the residential and commercial components of the development and would accommodate three to four loading bays for medium rigid vehicles (MRVs, one bay for large rigid vehicles (HRVs) and additional capacity for

vans and utes. The exact design of the loading area would need to be tested through swept path assessments during the detailed DA stage.

There is opportunity for additional loading bays for small rigid vehicles (SRVs) in the through-site link. This would be explored further at the detailed DA stage.

3.5 Landscaping

The proposal is supported by a comprehensive landscape concept at **Appendix 2** of this EIS. The landscape concept considers ecologies present within the surrounding national parks and reserves for inspiration. Key features of the design include:

- A continual east-west link/pathway through the site connecting users to Rumbalara Reserve in a visual and symbolic way;
- A north-south shared through-site link (vehicles and pedestrians) connecting William Street and Donnison Street;
- A large urban forecourt area fronting Henry Parry Drive directly opposite Kibble Park;
- Plantings which are responsive to elevation and aspect;
- Multiple large water features;
- Ample informal seating areas;
- Communal dining zones; and
- Considered level changes, resulting in a unique experience for the user.

The concept landscape masterplan and proposed circulation patterns are shown in the below figures. The design would be further considered and refined at the detailed DA stage.



Figure 21. Landscape concept masterplan

Source: Arcadia



Figure 22. Ground level circulation plan
Source: Arcadia

3.6 Site Clearing

The proposal seeks approval for clearing of the site including demolition of all existing structures, site improvements and removal of all on-site vegetation as the first stage of the development, pursuant to Section 4.22(4)(b) of the EP&A Act. This is discussed further at Section 5.2.1 of this EIS.

Demolition management measures and a demolition plan are included in the Preliminary Construction Management Plan (CMP) attached at **Appendix 18**, and the vegetation to be removed is described in the BDAR Waiver Request at **Appendix 17a**.

3.7 Staging

It is proposed to stage the development as follows:

- Stage 1: Site clearing including demolition, site improvements and vegetation clearing (**NB:** this is the only stage of physical works sought for approval under this SSD)
- Stage 2: Construction of Tower 1
- Stage 3: Construction of Tower 2
- Stage 4: Construction of Tower 3
- Stage 5: Construction of Tower 4
- Stage 6 Construction of Tower 5

Individual DAs will follow for Stages 2-6 in the future. These construction stages are illustrated in the figures below. It is anticipated that the entire project will take up to 10 years to construct.

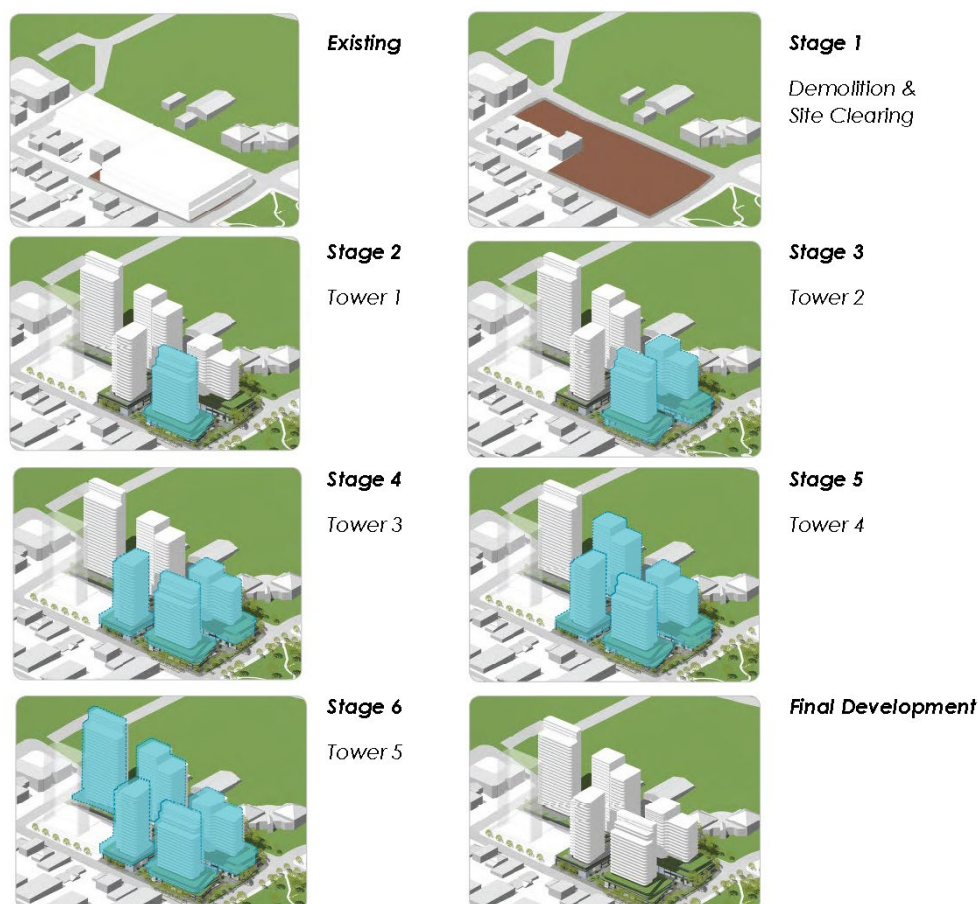


Figure 23. Proposed staging

Source: Buchan, modified by Mecone

The undertaking of Stage 1 works is anticipated to take place within 2 years of receiving DA consent. As identified within this EIS' accompanying QS Report, the demolition phase has a capital investment value of \$3,661,500 (see **Appendix 10**).

3.8 Example Scheme

To assist in the understanding of the possible final built form at the site, Buchan has prepared an example architectural scheme that fits within the proposed building envelopes and that has been used to calculate the proposed maximum GFA. This scheme can be found in Appendix B of Buchan's Design Report at **Appendix 1**.

Reflective of the objectives and controls within Gosford City Centre Development Control Plan, the scheme features towers expressed as two separate vertical forms with a stepped height difference between forms. This approach breaks down the bulk of the tower facades, promotes view sharing, allows for high amenity within the development and still provides viable and useable floor space.

The site plan for the example scheme is shown in the image below.

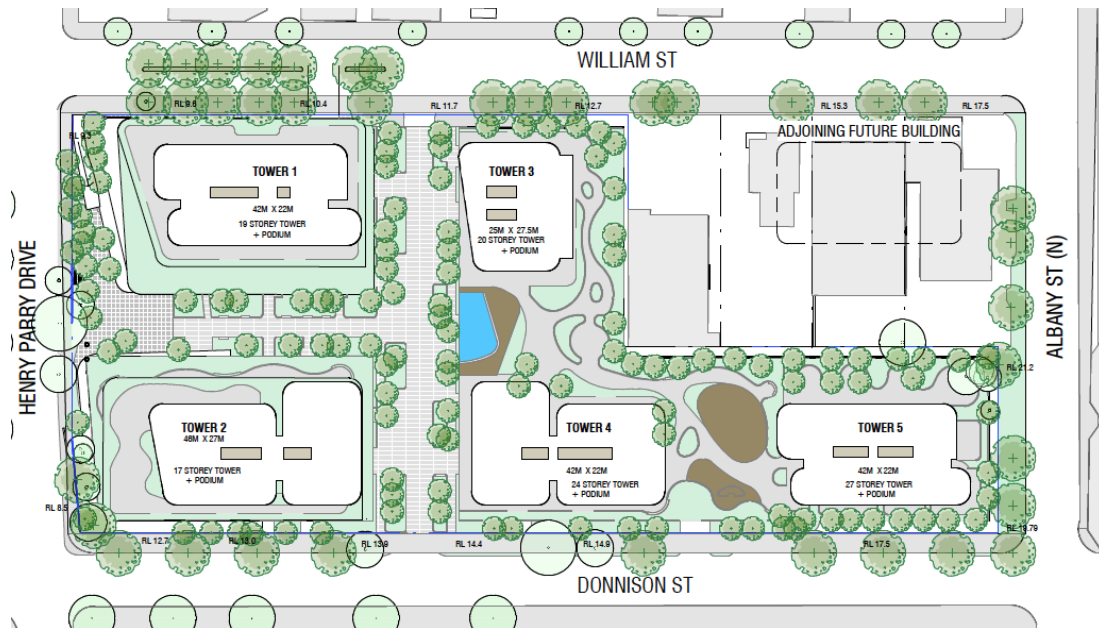


Figure 24. Example scheme site plan

Source: Buchan



Figure 25. Photomontage view from Kibble Park

Source: Buchan



Figure 26. Photomontage aerial view

Source: Buchan

3.9 Public Benefit Offer

At the detailed DA stage the development will be subject both to developer contributions required under Council's 7.12 Contributions Plan (Civic Improvement Plan) for Gosford City Centre and to the Gosford City Centre Special Infrastructure Contribution (SIC). This will result in 3% of the total cost of development being contributed towards local improvements (2% for the SIC and 1% for local contributions).

The SIC contribution in particular will contribute to the renewal of Gosford City Centre through road network upgrades, upgrades to Kibble Park, and provisions of health, education and emergency services facilities.

The proponent is open to a works-in-kind/voluntary planning agreement in place of monetary contributions for certain road upgrades or civic improvements such as the Kibble Park redevelopment. This will be discussed with planning authorities as the project progresses and once the application has been exhibited.

4 Consultation

Stakeholder and community engagement have played a key role in the preparation of this concept SSD Application. This chapter provides a description of who has been consulted, how the consultation was carried out, the issues raised, and how those issues have been addressed in the design resolution of the concept proposal.

4.1 Agency Consultation

Table 6. Agency Consultation Outcomes	
Agency	Outcome
Central Coast Council	<p>On 4 July 2019, the proponent met with the Director of Planning and a Principal Development Planner to present an updated scheme to Council and discuss lodgement timeframes. Key Council feedback included:</p> <ul style="list-style-type: none"> • Maximise public car parking in the through-site link; • Traffic impacts should be addressed; and • Consider whether the concept DA proposes any works to the park.
NSW Office of Environment and Heritage	<p>Preliminary SEARs comments related to biodiversity and the need for a BDAR. A BDAR waiver request was submitted to the NSW Office of Environment and Heritage on 15 August 2019, and the waiver was subsequently granted on 6 September 2019 (refer to Appendix 17a for the request and Appendix 17b for the waiver).</p>
Transport for NSW	<p>Traffic consultants GTA Consultants engaged with Transport for NSW (TfNSW) throughout design development. TfNSW encouraged GTA to:</p> <ul style="list-style-type: none"> • Ensure the transport study provided an assessment of the PT accessibility and pedestrian connectivity of the site; • Assess the implications of displacing the existing parking demand during construction and post-development; • Ensure any Construction Traffic Management Plan would identify potential impacts and mitigations; and • Engage with the NSW Roads and Maritime Services. <p>The first three items have been addressed in GTA's traffic report at Appendix 12, and the fourth item is discussed further below in this table.</p>

Table 6. Agency Consultation Outcomes	
Agency	Outcome
Environment Protection Authority	<p>The Environment Protection Authority's (EPA) letter to DPIE as a part of the SEARs application determined that it <i>'did not appear that the proposed development involves an activity that is listed in ... the Protection of the Environment Operations Act 1997'</i>.</p> <p>Throughout the design process, Mecone invited the EPA to engage on the proposed development further. No response to Mecone's letter dated 4 June 2019 (refer to Appendix 13b) was received.</p>
NSW Roads and Maritime Services	<p>GTA engaged with the Roads and Maritime Services (RMS) throughout the preparation of their Traffic Impact Assessment. Throughout engagement, the RMS raised concerns with the intensification of the Gosford CBD in general, and requests for Council to undertake more detailed traffic impact assessments.</p> <p>The RMS recommended that further engagement be undertaken with Council to understand potential intersection upgrades in the vicinity of the site.</p>
Ausgrid	<p>In August 2019 Mecone invited Ausgrid to provide comments on the proposal. Ausgrid responded that they had no further requirements other than the "Utilities" section of the SEARs being addressed in the EIS.</p>
NSW Rural Fire Services	<p>The NSW Rural Fire Services (RFS) identified through the SEARs process that a bush fire assessment report would need to be prepared for the EIS.</p> <p>In the development of the bush fire assessment report, bushfire consultants Building Code & Bushfire Hazard Solutions engaged with the RFS further and delivered the draft report for comment.</p>

Table 6. Agency Consultation Outcomes	
Agency	Outcome
NSW Department of Industry	<p>The Department of Industry (DoI) identified through the SEARs process that the proposal should provide:</p> <ul style="list-style-type: none"> • Identification of adequate and secure water supply; • Detailed consolidated site water balance; • Assessment of impacts on surface and ground water sources; • Proposed surface and groundwater monitoring activities; and • Consideration of relevant legislation policies and guidelines. <p>The Engineering Due Diligence Report at Appendix 8 addresses the above items from a preliminary perspective. Further detailed consideration can be carried out at the detailed DA stage.</p> <p>In August 2019 Mecone invited the DoI to provide further comments on the proposal. The DoI responded in early September confirming they had no further comments to provide.</p>

4.2 Community Consultation

The community were invited to participate in early engagement through a 2-week consultation period that included community information sessions at the Imperial Shopping Centre on:

- Thursday 27th June 2019 (11am – 2pm);
- Thursday 4th July (11am – 2pm); and
- Saturday 6th July (11am – 2pm).

These community information sessions were hosted by a mix of representatives from Lederer, Mecone, and Buchan, and were advertised via:

- A newspaper advertisement was placed in the *Central Coast Community News* on the circulation beginning Thursday 27 June 2019; and
- A radio segment aired on Monday 24th June 2019 on CoastFM;

Members of the public were invited to provide feedback on the masterplan through the sessions. Key feedback and a response to how the proposal has responded to this feedback (where appropriate) are provided in the table below.

Table 7. Outcomes of Community Consultation	
Comment	Response
Support for the project generally.	Noted.

Table 7. Outcomes of Community Consultation	
Comment	Response
Requests that commercial floorspace is provided to activate local business opportunities.	The desired outcome for the site which has informed the proposed mix of uses is for a predominantly residential mixed-use development, supported by lower level commercial and retail uses which will activate the Gosford City Centre. 3,692sqm of ground floor and podium non-residential uses are included within the scheme.
Some traffic related concerns including the provision of car parking per unit, local traffic impacts, a desire to see traffic removed from the Gosford City Centre, and a desire to see more public transport provided to Gosford.	It is outside the remit of the development to provide for additional public transport to the site; nevertheless, the site is well placed close to the centre of Gosford and its railway station. Car parking will be provided in line with the minimum State standards.
Built form questions including whether maximum height could be lowered and whether the proposal fits in aesthetically with other developments.	The proposed heights provide an appropriate balance between commercial viability and visual impacts. The proposal will maintain direct view lines from Kibble Park to Rumbalara Reserve and will appear consistent with other new development, such as Mariner's Plaza and the Waterside development, in terms of scale. The specific materials and finishes will be determined at the detailed DA stage, but it is anticipated these will be selected to ensure an appropriate relationship to surrounding development.

In addition to the above, a project overview was placed in the *Central Coast Business Review* (CCBR) in the July 2019 issue.

Information made available at the consultation sessions, as well as photographic evidence and community feedback forms have been provided with this EIS at **Appendix 13a**. The CCBR project overview is also included.

4.3 Design Advisory Panel

In accordance with the provisions of clause 8.3 of the Gosford City Centre SEPP, any development involving the erection of a new building in the Gosford City Centre must "exhibit design excellence". Further, the provisions of clause 8.4 of the SEPP, which permit development on certain sites to exceed the mapped height of building and floor space ratio controls, require a design review panel to review such development and for the consent authority to take into consideration the advice of that panel.

The "City of Gosford Design Advisory Panel – Guide for Proponents and Stakeholders" (the Guide) identifies the role and operation of this Panel, known as the City of Gosford Design Advisory Panel (DAP) and its supplementary Design Reference Group (DRG) which assists in formulating advice. In line with the requirements of the Guide, the proponent and Project Team have engaged in an iterative process with the DRG and

DAP to refine the proposal prior to its lodgement. The timeline of this is identified in the table below.

Table 8. DRG & DAP Engagement Process	
Date	Meeting Type
30 May 2019	DRG
25 June 2019	DAP
23 July 2019 (no meeting – comment on submitted plans only)	DRG

Advice received from the DAP meeting of 25 June 2019 is attached at **Appendix 13b**, and responses are provided in the table below.

Table 9. Response to DAP Comments	
DAP Comment	Response
1. The Panel supports the public domain improvements realised throughout the design review process to date.	Noted.
2. The Panel supports the inclusion of opportunities for deep spoil plantings along Henry Parry Drive.	Noted.

Table 9. Response to DAP Comments

DAP Comment	Response
<p>3. The Panel noted the proponent's potential offer to embellish Kibble Park as part of the proposal and encouraged the proponent to:</p> <ul style="list-style-type: none"> a) Consider opportunities to align pedestrian movement between Kibble Park and the proposed development, b) Discuss these opportunities with both Central Coast Council and the Roads and Maritime Service, and c) Consider the current and future plans for Kibble Park, Imperial Centre, surrounding developments, pedestrian and vehicular movements in a holistic manner. 	<p>No formal offer was made by the proponent to embellish Kibble Park at the DAP, however a desire to see the park embellished was stated. Following the DAP, the Proponent engaged with Central Coast Council to understand the future plans for Kibble Park and immediate surrounds. The proponent was advised that:</p> <ul style="list-style-type: none"> • Council staff do not support a pedestrian crossing across Henry Parry Drive; and • Council had requested advice from the State Government regarding the redevelopment of Kibble Park, however no initial funding for the park upgrade has yet been identified. <p>The proponent is supportive of a holistic approach to planning for the Gosford City Centre, and engaged with Central Coast Council in good faith on this matter following the meeting with the DAP. However, no further action was taken given the nature of Council's feedback. These significant undertakings impact several stakeholders and, it is considered, would be better facilitated by Government.</p>
<p>4. The Panel supports the direction taken to improve the street quality of the vehicular through-site link. The vehicular through-site link should have:</p> <ul style="list-style-type: none"> a) a greater street focus instead of being a landscaped link b) additional on-street parking opportunities and activation along both edges. 	<p>Further refinement was made to the through site link in response to the DAP. The link now includes on-street parking bays along both sides of the link and a more street-like paving scheme interspersed with plantings on either side.</p>
<p>5. The landscape architecture treatment for the east-west link between the Henry Parry frontage to the proposed laneway should be reviewed so it is more civic in nature, with a public feel, instead of a primarily vegetation link.</p>	<p>Following the DAP feedback, Arcadia revisited the landscaping concept in order to make it more civic in nature. This included simplifying the link to feature a straight central pathway with plantings on either side and a broad opening to the Henry Parry frontage plaza area.</p>

Table 9. Response to DAP Comments

DAP Comment	Response
6. The Panel recommends the proponent update the proposal to show the proposed floor space ratio (FSR) on different parts of the site, how these relate and respond to the three separate FSRs recommended across the site and how the variations support the achievement of Design Excellence.	<p>Tower-by-tower GFA calculations are provided in Section 3.2 of this EIS.</p> <p>Individual FSRs are considered unnecessary and irrelevant as the SEPP clauses permitting additional GFA does not require an assessment of FSR.</p>
7. The Panel notes the towers need to be better conceived and articulated as a collection of forms. The proposed scale of variation to the height and bulk of the towers needs further justification.	<p>Following this advice from the DAP, substantially more work was undertaken by Buchan and the proponent to ensure that the design read better as a collection of built forms. This included reinforcing:</p> <ul style="list-style-type: none"> • Key built form concepts (water, landscape, and city) which provide a range of design considerations which may filter into future detailed designs; • 'Key moves' associated with: <ul style="list-style-type: none"> ○ Tower footprint (plan) ○ Scale (height) ○ Form (elevation) ○ Materials • Design principles associated with the following key areas: <ul style="list-style-type: none"> ○ Green alleys (design of the shared way thoroughfare and pedestrian links) ○ Podium and Donnison Street Façade ○ Towers <p>The above principles and guides are demonstrated in Section 4.5 of Buchan's architectural package.</p>
8. The Panel recommends the proponent work with the CoGDAP Design Reference Group to review variations in tower height, reduction of bulk and increased diversity of form.	<p>Following the feedback from the DAP, the Project Team worked to further refine variation in height and to reduce apparent bulk and scale.</p> <p>Revised plans were submitted to the DRG on 23 July 2019, and the DRG subsequently recommended that the plans proceed to the DA stage.</p>

Table 9. Response to DAP Comments

DAP Comment	Response
<p>9. The Panel supports most changes to the podium, except for the Donnison Street carpark/street wall, which should be reviewed with the proponent to:</p> <p>a) Clarify which parts are active, and</p> <p>b) Consider options to reduce the dominance of this along that frontage e.g. sleeving or stepping back the car park level.</p>	<p>Updated plans have clarified the situation with respect to the Donnison Street carpark podium. Donnison Street is presented with (from west to east):</p> <ul style="list-style-type: none"> • An active frontage along the podium of Tower 2 (closest to Henry Parry Drive) comprising commercial/non-residential uses and soho/townhouses. • An 18m through site link connecting to William Street. • Soho/townhouses and a residential lobby under Tower 4, as well as part of the above ground carpark structure. • The remainder of the carpark structure, carpark entry, and lobby area in the transition area and underneath Tower 5, with ground floor active retail on the Albany Street corner under Tower 5. • The design presents an acceptable outcome balancing the desire to locate carparking underground and provide active street frontages against the geotechnical constraints of the site (namely the height of the water table).

Table 9. Response to DAP Comments

DAP Comment	Response
<p>10. The Panel made several additional recommendations for the proponent to refine the proposal, before the development application is submitted:</p> <ul style="list-style-type: none"> a) Identify uses proposed in the non-residential elements of the development. b) Design building and car park access points to ensure conflict is not created with pedestrians and where possible to split lobbies for residential and non-residential. c) The relationship between the towers and the podium (vertical face) along the vehicular through-site line should be reviewed and supported by a wind analysis in order to ensure adverse micro-climates are not created. 	<p>In response to these items:</p> <ul style="list-style-type: none"> • It is considered premature to be defining the specific non-residential uses at the concept application stage. Flexibility is needed to be built into the application to ensure these uses, which will be subject to future applications, can respond to market conditions. • Car park access points have been developed to minimise conflict, assisted through by the advice of GTA Consultants. • CPP wind consultants have reviewed the design and confirmed that the proposal would not significantly change the wind environment and that wind conditions around the development are expected to be classified as acceptable for pedestrian standing or walking.

5 Strategic and Statutory Context

This section of the report addresses the strategic and statutory context of the project. All plans, policies and guidelines identified in Appendix A of the SEARs have been considered.

5.1 Strategic Context

5.1.1 Future Transport 2056

The Future Transport Strategy 2056 is an update of the NSW Long Term Transport Masterplan. It sets the 40-year vision, directions and outcomes framework for transport customer mobility in NSW. The Strategy will be delivered through a suite of accompanying plans, including Services and Infrastructure Plans and issue-based or placed-based Supporting Plans.

The Strategy identifies that the service hierarchy in NSW will evolve towards “turn up and go” services between centres and along major transport corridors. The regional transport network will be planned around a “hub and spoke” model. Within this model, Gosford is identified as a satellite city between the global gateway cities of Sydney and Newcastle.

The Strategy contains several infrastructure projects that are relevant to the proposal:

- Central Coast place plans (for investigation, 0-10 years);
- Sydney-Central Coast-Newcastle faster rail improvement (for investigation, 0-10 years);
- M1 Motorway improvements (for investigation, 0-10 years); and
- Outer Sydney Orbital from Great Western Highway to Central Coast (for investigation, 20+ years).

The proposal is consistent with the Strategy in that seeks to place additional housing and employment opportunities in a key satellite city located along a major transport corridor identified for future improvements, both road and rail.

5.1.2 Central Coast Regional Plan 2036

The Central Coast Regional Plan 2036, prepared by the NSW government in consultation with Central Coast Council and wider community, sets out the State government's planning priorities and decisions for Central Coast region over the next 20 years.

Gosford is identified as a Regional City located along the southern regional growth corridor between Somersby and Erina.

The Plan contains several key priorities that are relevant to the proposal including:

- **Direction 1:** Grow Gosford City Centre as the regional's capital;
 - Action 1.1: Grow Gosford City Centre as the region's capital and focus of professional, civic and health services for the region's population.

- Action 1.3: Attract and facilitate greater commercial development in Gosford City Centre by improving the public domain and providing opportunities for development through local planning controls.
- Action 1.8: Ensure that development in Gosford City Centre responds to its natural setting and complements the public domain.
- **Direction 7**: Increase job containment in the region;
 - Action 7.1: Facilitate economic development that will lead to more local employment opportunities on the Central Coast;
- **Direction 8**: Recognise the cultural landscape of the Central Coast;
 - Action 8.1: Protect the Central Coast's scenic amenity by planning for development that respects the distinct qualities of different places;
- **Direction 15**: Create a well-planned, compact settlement pattern;
 - Action 15.1: Create a well-planned, functional and compact settlement pattern around existing urban and employment areas, the Warnervale-Wadalba release area, the Northern and Southern Growth Corridors, existing rural villages and sites included in an endorsed local strategy;
 - Action 15.2: Ensure the settlement pattern responds to settlement planning principles and does not encroach on sensitive land uses;

The proposal is consistent with these directions and actions in that it facilitates construction of a high-quality mixed-use development in the existing urban area of Gosford City Centre. The proposal assists in economic development by providing short term construction and ongoing employment opportunities and by offering new retail opportunities.

5.1.3 NSW Government Architect's Gosford Urban Design Framework 2018

The Gosford Urban Design Framework 2018 was developed by the NSW Government Architect to provide a consistent forward-looking vision for Gosford to help shape the continued development and renewal of the Gosford City Centre.

Under the Framework the site is located within the Civic Precinct and immediately adjacent to Kibble Park, the "Civic Heart" of the city. The Framework identifies a number of principles relevant to the proposal and the adjoining Kibble Park, which are set out below:

- **Civic Heart Design Principles:**
 - Principle 2: Investigate opportunity to retain public parking in part of future development behind an active edge to Henry Parry Drive.
 - Principle 9: Locate development height to minimise overshadowing of Kibble Park.
- **Detailed Urban Design Principles:**
 - Principle 4: Ensure sunlight access to the park.
 - Locate height in surrounding developments to minimise overshadowing of park and public domain.
 - Ensure solar access for 4 hours to 50% of the park between 9am and 3pm at the winter solstice.

- Principle 5: Active street frontages.
 - Ensure active and defined street frontages to all park edges.
- Principle 6: Reduce dominance of cars.
 - Future servicing or parking entries not to be located on Mortimer Lane or William Street adjacent to the park, or where active street frontages are proposed.
- Principle 7: Connect with nature.
 - Protect view corridors to President's Hill and Rumbalara ridgeline.
- **Built Form Principles:**
 - Principle 4: Slender East/West Tower forms, aligned to protect view corridors to Rumbalara ridgeline.
 - Principle 7: Ensure solar access for 4 hours to 50% of the park between 9am and 3pm at the winter solstice.

The proposal is generally consistent with these principles in that it:

- Preserves views to Rumbalara ridgeline (refer to Section 6.4 of this EIS for further discussion);
- Provides for an active frontage to Henry Parry Drive; and
- Ensures adequate solar access to Kibble Park (refer to Section 6.2 of this EIS for further discussion).

5.1.4 Gosford City Centre Transport Management and Accessibility Plan

The Gosford City Centre Transport Management and Accessibility Plan 2010 provides detailed analysis and suggested projects for active transport, public transport and vehicular network. None of the key suggested projects related directly to the proposal.

5.2 Statutory Context

5.2.1 Environmental Planning & Assessment Act 1979

Section 1.3 Objects of Act

The proposed development is consistent with the objects of the EP&A Act in that it:

- Promotes the social and economic welfare of the community;
- Promotes the orderly and economic development of land; and
- Promotes good design and amenity of the built environment.

Section 4.15 Evaluation

The development has been evaluated and assessed against the relevant heads of consideration under this section.

Section 4.22 Concept Development Applications

The proposal is being submitted as a concept DA under Section 4.22 of the EP&A Act. It sets out the concept proposal for the development of the site but proposes no physical built form. It will be followed by future detailed applications for built form.

In addition to seeking concept approval, the proposal seeks approval for physical clearing of the site (i.e., demolition of existing structures and vegetation removal) as the first stage of the development, pursuant to subclause (4)(b), which is set out below [emphasis added]:

(4) If consent is granted on the determination of a concept development application, the consent does not authorise the carrying out of development on any part of the site concerned unless:

- (a) consent is subsequently granted to carry out development on that part of the site following a further development application in respect of that part of the site, or*
- (b) **the concept development application also provided the requisite details of the development on that part of the site and consent is granted for that first stage of development without the need for further consent.***

A demolition plan and management measures are included in the CMP at **Appendix 18**. The vegetation to be removed is described in the BDAR Waiver Request at **Appendix 17a** and confirmed to be unworthy of retention in the granted BDAR Waiver at **Appendix 17b**. This information comprises the "requisite details" required under subclause (b).

5.2.2 Environmental Planning and Assessment Regulation 2000

This EIS has been prepared in accordance with the requirements of Schedule 2 of the EP&A Regulation. The table below outlines these requirements and identifies where each requirement has been addressed in this EIS.

Table 10. Schedule 2 of EP&A Regulation 2000	
Section	Section of EIS
6. Form of environmental impact statement An environmental impact statement must contain the following information:	
a) The name, address and professional qualifications of the person by whom the statement is prepared'	Statement of Validity
b) The name and address of the responsible person,	Statement of Validity
c) The address of the land: <ul style="list-style-type: none">(i) In respect of which the development application is to be made, or(ii) On which the activity or infrastructure to which the statement relates is to be carried out,	Statement of Validity

Table 10. Schedule 2 of EP&A Regulation 2000

Section	Section of EIS
d) A description of the development, activity or infrastructure to which the statement relates,	Section 3
e) An assessment by the person by whom the statement is prepared of the environmental impact of the development, activity or infrastructure to which the statement relates, dealing with the matters referred to in this Schedule,	Section 6
f) A declaration by the person whom the statement is prepared to the effect that: <ul style="list-style-type: none"> (i) The statement has been prepared in accordance with this Schedule, and (ii) The statement contains all information that is relevant to the environmental assessment of the development, activity or infrastructure to which the statement relates, and (iii) That the information contained in the statement is neither false nor misleading. 	Statement of Validity
7. Content of environmental impact statement	
(1) An environmental impact statement must also include each of the following:	
a) A summary of the environmental impact statement	Executive Summary
b) a statement of the objectives of the development, activity or infrastructure,	Section 1.2
c) an analysis of any feasible alternatives to the carrying out of the development, activity or infrastructure, having regard to its objectives, including the consequences of not carrying out the development, activity or infrastructure,	Section 1.4
d) an analysis of the development, activity or infrastructure, including:	
i) a full description of the development, activity or infrastructure, and	Section 3
ii) a general description of the environment likely to be affected by the development, activity or infrastructure, together with a detailed description of those aspects of the environment that are likely to be significantly affected, and	Executive summary

Table 10. Schedule 2 of EP&A Regulation 2000	
Section	Section of EIS
iii) the likely impact on the environment of the development, activity or infrastructure, and	Section 6
iv) a full description of the measures proposed to mitigate any adverse effects of the development, activity or infrastructure on the environment, and	Section 6
v) a list of any approvals that must be obtained under any other Act or law before the development, activity or infrastructure may lawfully be carried out	Section 5.4
e) a compilation (in a single section of the environmental impact statement) of the measures referred to in item (d)(iv),	Section 8
f) the reasons justifying the carrying out of the development, activity or infrastructure in the manner proposed, having regard to biophysical, economic and social considerations, including the principles of ecologically sustainable development set out in sub clause (4). Note. A cost benefit analysis may be submitted or referred to in the reasons justifying the carrying out of the development, activity or infrastructure.	Section 6.8 Section 9

5.2.3 Biodiversity Conservation Act 2016

Section 7.9 of the Biodiversity Conservation Act 2016 (BC Act) requires preparation of a biodiversity development assessment report (BDAR) for SSD that is assessed under Part 4 of the EP&A Act. The proposal will be assessed under Part 4 of the EP&A Act and therefore would normally be required to include a BDAR. However, section 7.9(2) of the BC Act allows for exemption from the requirement where the development is not likely to have any significant impact on biodiversity values.

A BDAR waiver request prepared by Wild Thing Environmental Consultants (**Appendix 17a**) was submitted to the Office of Environment and Heritage via DPIE on 18 August 2019, and the waiver was subsequently granted on 6 September 2019 (**Appendix 17b**). As explained in the request and confirmed by the waiver, the development will not have any significant impact on biodiversity values.

5.2.4 State Environmental Planning Policy (Gosford City Centre) 2018

The Gosford City Centre SEPP sets out the primary local statutory planning controls for the site. Key relevant provisions are addressed in the table below.

Table 11. Gosford City Centre SEPP Assessment	
Provision	Compliance
Land use permissibility	<p>Complies</p> <p>The site is zoned B4 Mixed Use. The B4 zone permits a wide range of uses including residential flat buildings, shop top housing and commercial premises (which includes retail, business and office premises).</p> <p>It is envisioned that the proposed envelopes will accommodate residential apartments (in the tower levels and commercial or other non-residential uses in the ground and podium levels. Particular uses would be proposed at the detailed DA stage, and an assessment would be carried out against the SEPP's land use table.</p>
Zone objectives	<p>Complies</p> <p>The proposed development is consistent with the B4 zone objectives in that it:</p> <ul style="list-style-type: none"> • Provides for a mixture of compatible uses; • Integrates suitable residential and retail uses in an accessible location, approximately 600m from Gosford Station; • Provides high density residential development, which will contribute to a diverse range of activities in Gosford City Centre; and • Improve pedestrian links within Gosford City Centre.
4.3 Height of buildings	<p>Complies (in accordance with variations permitted under cl. 8.4)</p> <p>The site is subject to a building height control of part 15m, part 30m and part 48m. The proposed development varies from these heights in accordance with cl. 8.4 of the SEPP (see comment below).</p>
4.4 Floor space ratio (FSR)	<p>Complies (in accordance with variations permitted under cl. 8.4)</p> <p>The site is subject to an FSR control of part 2.5:1, part 3:1 and part 4.75:1. The proposal varies from the maximum permissible FSR in accordance with cl. 8.4 (see further comment below).</p>
4.6 Exceptions to development standards	<p>Complies</p> <p>A request for the variation of clause 8.6 (active street frontages), in accordance with clause 4.6 of the SEPP, has been submitted alongside this EIS at Appendix 20.</p>

Table 11. Gosford City Centre SEPP Assessment

Provision	Compliance
5.10 Heritage conservation	<p>Complies</p> <p>The site does not contain a heritage item, is not located in a heritage conservation area, and there are no heritage items or heritage conservation areas in the near vicinity. Accordingly, it is considered that no detailed heritage assessment is necessary. Refer to Section 6.6 of this EIS for further discussion</p>
7.1 Acid sulfate soils	<p>Complies</p> <p>The site is identified as Class 5 on the SEPP Acid Sulfate Soils Map. Additionally, the Australian Source Resource Information System Acid Sulfate Soil Risk Map indicates that the site is within an area of Extremely Low Probability of encountering acid sulfate soils within the site. Further soil investigation will occur at the detailed DA stage, and an acid sulfate soils management plan will be prepared if necessary.</p>

Part 8 – Gosford City Centre

8.1 Minimum building street frontage in Zone B6	<p>Not Applicable</p> <p>The proposal is located in the B4 Zone.</p>
8.2 Building height on Mann Street	<p>Not Applicable</p> <p>The proposal does not front Mann Street.</p>
8.3 Design excellence	<p>Complies</p> <p>The Design Excellence Statement (Appendix 3) demonstrates how the proposed envelopes have been designed to accommodate buildings capable of demonstrating design excellence in accordance with this clause. Further detailed design excellence assessment would occur at the detailed DA stage once the specific building forms and materiality are known.</p>
8.4 Exceptions to height and floor space in Zones B3, B4 and B6	<p>Complies</p> <p>Refer to separate assessment below this table.</p>
8.5 Car parking in Zones B3 and B4	<p>Able to comply. Refer to detailed discussion below.</p>

Table 11. Gosford City Centre SEPP Assessment	
Provision	Compliance
8.6 Active street frontages	<p>Variation Sought</p> <p>The concept proposal largely complies with the requirement for active street frontages along Henry Parry Drive and Donnison Street. However as a small portion of the Donnison Street frontage does not technically comply with the clause, a request for variation under clause 4.6 of the Gosford City Centre SEPP is requested (see Appendix 20).</p>
8.10 Solar access to key public open spaces	<p>Complies</p> <p>Current overshadowing to Kibble Park at midwinter has been assessed by Buchan and is presented below.</p> <p>9.00 am = 5.2%</p> <p>10.00 am = 3.5%</p> <p>11.00 am = 1.6%</p> <p>12.00 pm = 1.8%</p> <p>1.00 pm = 2.1%</p> <p>2.00 pm = 4.3%</p> <p>3.00 pm = 13%</p> <p>The proposal only casts a 4% net additional shadow at 9am. After 9am, the development casts no additional shadow onto the park (see detailed shadow study in the Design Report at Appendix 1). As a result, the 9am figure will increase from 5.2% to 9.2%.</p> <p>Therefore, in accordance with this clause, the proposal ensures that no more than 40% of Kibble Park receives less than four hours of solar access between 9am and 3pm at the winter solstice.</p> <p>Refer to Section 6.2 of this EIS for further discussion on overshadowing impacts.</p>
8.11 Key vistas and view corridors	<p>The site is located within view corridors from Kibble Park and adjacent to Central Coast Highway towards the Rumbalara ridgeline. The proposed envelopes achieve the objective of protecting these view corridors by incorporating slender towers oriented east-west, large gaps between the towers (at least 24m) and large upper level setbacks (16m) along Henry Parry Drive.</p> <p>A view study is included in the Design Report (Appendix 1). Also refer to Section 6.4 of this EIS for further discussion on view impacts.</p>

Clause 8.4 – Exceptions to height and floorspace in Zones B3, B4 and B6

Clause 8.4 is a key clause of the Gosford City Centre SEPP as it permits exceedances of the mapped height and floor space ratio controls, to no defined limit, where certain criteria are met.

The clause reads:

(1) This clause applies to land in the following zones:

- (a) Zone B3 Commercial Core,*
- (b) Zone B4 Mixed Use,*
- (c) Zone B6 Enterprise Corridor.*

...

(4) Development consent may be granted to development that results in a building with a height that exceeds the maximum height shown for the land on the Height of Buildings Map, or a floor space ratio that exceeds the floor space ratio shown for the land on the Floor Space Ratio Map, or both, by an amount to be determined by the consent authority, if:

- (a) the site area of the development is at least 5,600 square metres, and*
- (b) a design review panel reviews the development, and*
- (c) if required by the design review panel, an architectural design competition is held in relation to the development, and*
- (d) the consent authority takes into account the findings of the design review panel and, if held, the results of the architectural design competition, and*
- (e) the consent authority is satisfied with the amount of floor space that will be provided for the purposes of commercial premises, and*
- (f) the consent authority is satisfied that the building meets or exceeds minimum building sustainability and environmental performance standards.*

The proposed development utilises the provisions of clause 8.4(4) to exceed the height and floor space ratio controls that apply under the SEPP. The proposal meets all requirements of the clause, as outlined in the table below.

Table 12. Clause 8.4(4) assessment	
Provision	Response
(a) the site area of the development is at least 5,600 square metres, and	The area of the site is 14,194sqm
(b) a design review panel reviews the development, and	The development has been reviewed by the Gosford DAP and was deemed acceptable to progress through to the DA stage.
(c) if required by the design review panel, an architectural design competition is held in relation to the development, and	The Gosford DAP did not identify the need for a competition.

Table 12. Clause 8.4(4) assessment

Provision	Response
(d) the consent authority takes into account the findings of the design review panel and, if held, the results of the architectural design competition, and	The proponent team has taken into account the findings of the DAP as outlined elsewhere in this EIS.
(e) the consent authority is satisfied with the amount of floor space that will be provided for the purposes of commercial premises, and	<p>A specific quantum of commercial floorspace provision is not identified within the SEPP for Clause 8.4(4) to be triggered.</p> <p>Nevertheless the proposed 3,692sqm of commercial floor space is sufficient given the site's location on the fringes of the CBD, making it more suited to a residential-focused mix of uses. The development will be complemented by more intensive employment land immediately north and northwest. Key edges of the site deemed appropriate for activation (i.e. Henry Parry Drive) are provided with commercial floorspace, which has the potential to cater for up to 144 jobs as identified in the Social and Economic Impact Assessment,</p>
(f) the consent authority is satisfied that the building meets or exceeds minimum building sustainability and environmental performance standards.	<p>Given this is a concept DA, it is not possible to demonstrate that the development meets or exceeds minimum building sustainability and environmental performance standards. Nonetheless, an Ecologically Sustainable Development Report (Appendix 19) has been prepared that identifies sustainability initiatives for future built form, including compliance with minimum sustainability and performance measures. A mitigation measure is recommended in Section 9 of this EIS requiring implementation of minimum standards and consideration of additional measures.</p>

Clause 8.5 – Car parking in Zones B3 and B4

Clause 8.5 sets specific car parking rate requirements for 'commercial' and 'retail' floorspace.

Whilst this DA does not seek approval for the detailed car parking layout, nor is the exact split between commercial/retail floorspace known, the example scheme at Appendix B of the Design Report (**Appendix 1**) nevertheless illustrates a parking layout that is capable of complying with these requirements.

This concept DA seeks approval for 3,692sqm of commercial floor space, which is likely to be used for a mix of both commercial and retail floorspace (to be determined under future detailed DAs). Therefore it is appropriate to test car parking against both the higher retail car parking rate as well as the lower commercial rate:

- At 1 space per 40sqm, the 3,692sqm of commercial GFA would require the provision of 92.3 (92) spaces.
- At 1 space per 75sqm, the 3,692sqm of commercial GFA would require the provision of 49.2 (49) spaces.
- If an even split of commercial and retail space was assumed, the 3,692sqm of GFA would require the provision of 70.7 (71) spaces.

The example scheme provides for 72 spaces, representing a provision partway between 49 and 92 spaces. The 23-space 'buffer' above the absolute minimum of 49 spaces and the proposed number of 72 spaces allows for a mix of commercial and retail tenancies, which is the intended development outcome. As demonstrated above, the car parking provision would allow for at least 50% of the space to be purely 'commercial' and 50% to be for retail.

It is also noted that the example scheme provides for additional residential car parking spaces in excess of 100 spaces above the minimum *Apartment Design Guide* requirements (discussed in section 6.3.2 of this EIS). Therefore, there is sufficient flexibility built into the concept proposal to ensure that movement in the commercial / retail GFA split.

The provisions of subclause 8.5(3) are also noted. This clause requires that any area of car parking provided at or above street level be counted as gross floor area for the purposes of clause 8.5 only. Given that this subclause relates to clause 8.5 only, it is understood that this does not change the overall theoretical gross floor area of the proposal as defined under clause 4.4 of the Gosford City Centre SEPP. Further, given that this additional gross floor area is not defined as either 'commercial' or 'retail' gross floor area, it has not been included in the calculation of car parking spaces undertaken above. Nevertheless, the Example Scheme provides for 293 car parking spaces at or above ground and, assuming standard car parking dimensions of 2400mm x 5400mm, this represents 3,797m² of gross floor area under this clause.

5.2.5 SEPP 65 and Apartment Design Guide

This section provides an assessment of the proposal against the nine design quality principles set out in Schedule 1 of SEPP 65 and the key design criteria in the ADG. A Design Verification Statement and further ADG analysis are provided in the Design Report at **Appendix 1**.

SEPP 65 Design Quality Principles

Principle 1 – Context and Neighbourhood Character: The proposal has been designed to respond and contribute to its context. It recognises and minimises impacts on the surrounding key features of the environment, including Kibble Park and Rumbalara Reserve. The concept DA also contributes to the growth of Gosford City Centre as the region's capital by providing a significant mixed-use development in the heart of the city, which will attract investment, promote activity and rejuvenate the city.

Principle 2 – Built Form and Scale: The proposal provides a suitable scale appropriate to the existing and future character of Gosford City Centre. The building envelopes help define the public domain with strong street walls and a shared through-site link, and preserve important viewlines to Rumbalara Reserve. Opportunities for further building articulation would be considered at the detailed DA stage.

Principle 3 – Density: The proposal achieves a density that results in a high level of amenity for residents in accordance with ADG design criteria, as demonstrated in the analysis in the Design Report at **Appendix 1**. The proposed density responds to the projected population increase and regional housing demand of 41,500 additional dwellings by 2036. The density also considers the impacts on the area's social infrastructure (see Section 6.9 of this EIS) and its proximity to public transport.

Principle 4 – Sustainability: The proposal has been designed to satisfy, and exceed, BASIX targets. Additionally, the proposed envelopes are capable of accommodating a design in which complies with or exceeds the ADG's minimum solar access and natural cross ventilation requirements.

Principle 5 – Landscape: The proposal includes an integrated concept landscape plan that increases residential amenity and visual attractiveness. The concept landscape plan references the surrounding natural environment, providing a series of distinct yet connected ecologies based on location, orientation and elevation. The plan establishes significant green links over current hardstand areas and provides for a substantial net addition of canopy tree cover.

Principle 6 – Amenity: The proposal allows for future building forms that will provide excellence amenity for residents. As demonstrated in the example scheme within the Design Report at Appendix 1, future apartments will be able to meet or exceed minimum ADG requirements related to solar access, natural ventilation, visual and acoustic privacy and internal layouts.

Principle 7 – Safety: The proposed envelopes allow for a future design that optimises safety and security within the development and the public domain, with ample opportunity for natural surveillance and clearly defined public and private spaces fit for their intended purpose.

Principle 8 – Housing Diversity and Social Interaction: The proposal allows opportunity for a mix of apartment types and sizes to meet the community needs of Gosford City Centre, and also provides good opportunity for social interaction, with large and varied open spaces at ground level in which residents and the broader public will be able to meet and interact.

Principle 9 – Aesthetics: The proposal allows for future development capable of demonstrating a high standard of aesthetic appearance sensitive to its context. Detailed consideration of building form, articulation and materials would occur at the detailed DA stage.

Apartment Design Guide

An overview of compliance with the key ADG design criteria is provided below. Further discussion is provided in the design Report at **Appendix 1**.

Table 13. ADG Summary Assessment	
Criteria	Comment
Solar access	Buchan has confirmed that all the proposal is capable of providing the minimum of two hours of solar access to 70% of apartments at mid-winter. The details would be confirmed at the detailed DA stage.
Natural cross ventilation	Buchan has confirmed that all the proposal is capable of providing natural cross ventilation to at least 60% of apartment sin the first nine storeys of the buildings. The details would be confirmed at the detailed DA stage.
Deep soil	The proposal offers opportunity for deep soil plantings around the perimeter of the site. Details would be confirmed at the detailed DA stage. It should be emphasised that the existing site is nearly entirely hardstand area, and the proposal would result a significant improvement in the site's overall landscaping and stormwater management.
Communal open space	As illustrated in the example scheme prepared by Buchan, the proposal offers ample opportunity for communal open spaces at the tower and rooftop levels. Details would be confirmed at the detailed DA stage.
Setbacks	Separation between residential uses complies with requirements, with the exception of the tower separation between Towers 1 and 3 (21m proposed vs. 24 required). The 21m separation is considered acceptable, as privacy impacts can be addressed through apartment layout and design treatments as illustrated in Buchan's example scheme.

5.2.6 Other State Environmental Planning Policies

The key relevant State Environmental Planning Policies (SEPPs) are addressed in the table below.

Table 14. Other SEPPs	
SEPP	Comment
State Environmental Planning Policy (State & Regional Development) 2011 (SRD SEPP)	<p>The proposal has a CIV of more than \$75 million (at \$345m) and is located within Gosford City Centre. Therefore, the proposal is classified as SSD pursuant to cl. 15 of Schedule 2 of the SRD SEPP.</p> <p>SSD applications are assessed differently than local development applications. A range of legislation does not apply as outlined in section 4.41 of the EP&A Act. Furthermore, development control plans do not apply pursuant to cl. 11 of the SRD SEPP.</p>
State Environmental Planning Policy (Infrastructure) 2007 (ISEPP)	The proposal includes more than 300 dwellings and therefore constitutes traffic generating development pursuant to Schedule 3 of the ISEPP. Accordingly, the application must be referred to Roads and Maritime Services (RMS).
State Environmental Planning Policy (Building Sustainability Index BASIX) 2004	BASIX compliance assessment has not been undertaken given this is a concept proposal only (no physical built form). Such assessment will occur at the detailed DA stage.
State Environmental Planning Policy No. 55—Remediation of Land	<p>A Phase 1 Contamination Assessment has been submitted (Appendix 6). The assessment has found that the potential for soil contamination due to previous commercial uses is medium, and the potential for groundwater contamination is unknown. Further investigation is recommended. This can occur at the detailed DA stage.</p> <p>Contamination is discussed in further detailed at Section 6.16 of this EIS.</p>
State Environmental Planning Policy No 64 – Advertising and Signage	No signage is proposed as part of this concept DA. This SEPP would be addressed at the detailed DA stage.
State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017	The proposal does not involve clearing above the Biodiversity Offset Scheme threshold nor does it involve any clearing that requires a permit under the applicable DCP. Accordingly, the provisions of this SEPP do not apply.
State Environmental Planning Policy (Coastal Management) 2018	Based on the detailed online mapping accompanying the SEPP, the site is located outside of the SEPP application boundaries, and therefore this SEPP does not apply.

Table 14. Other SEPPs	
SEPP	Comment
Draft State Environmental Planning Policy (Environment)	<p>The draft Environment SEPP consolidates and simplifies seven existing SEPPs. The Explanation of Intended Effect (EIE) for the draft Environment SEPP was on exhibition from 31 October 2017 until 31 January 2018.</p> <p>Only one of the affected SEPPs applies to the concept DA (State Environmental Planning Policy No. 19 – Bushland in Urban Areas) applies to the concept DA. Under this SEPP the site is identified as urban bushland, but there are no specific controls applicable to the proposal. Also, based on the EIS, there appear to be no proposed changes as part of the draft Environment SEPP that would directly affect the proposal. Accordingly, this application is considered to be consistent with the draft Environment SEPP.</p>

5.2.7 Gosford City Centre Development Control Plan 2018

Clause 11 of State Environmental Planning Policy (State and Regional Development) 2011 states that development control plans do not apply to SSD applications. However, the SEARs for this project requires the application to address the Gosford City Centre Development Control Plan (DCP) 2018 as a strategic plan.

An assessment of the proposal against key relevant controls of the DCP is provided in the table below. Overall, it has been found that the concept proposal is generally consistent with the DCP.

Table 15. Gosford City Centre DCP 2018 Assessment		
Section	Objective/Control	Comment
3. Places and Character		
3.3 Civic Heart	1. Protect view corridors to Presidents Hill and Rumbalara Reserve.	<p>Complies</p> <p>The development has been designed to maintain significant views to Rumbalara Reserve. Refer to Section 6.4 of this EIS for further discussion.</p>
	2. Ensure excellent solar access and amenity to Kibble Park.	<p>Complies</p> <p>The proposed development results in minimal overshadowing to Kibble Park—only a half-hour impact to the southwest corner of the park at midwinter. Refer to Section 6.2 of this EIS for further discussion.</p>

Table 15. Gosford City Centre DCP 2018 Assessment

Section	Objective/Control	Comment
	4. Ensure active and defined street frontages and frontages to all park edges.	Complies The proposed envelopes allow for an active street frontage along Henry Parry Drive, which defines the western edge of Kibble Park. Active frontages are also provided along the western portions of Donnison and William Streets towards the park.
	5. Promote a diversity of built form and high-quality mixed-use developments.	Complies The proposed envelopes provide for multiple high-quality mixed-use towers that would promote the diversity and quality of built form in Gosford CBD.
	6. Promote new commercial development in the core for job growth and to protect Gosford's role as a regional city and associated regional functions.	Complies It is estimated that the proposal would support the creation of 354 construction jobs and 211 ongoing jobs per annum.

Public spaces

4.3 Solar access to key public spaces	1. For Key Open Space 1 (Kibble Park), buildings must be designed to ensure at least 60% of the park receives 4 hours of direct sunlight between 9am and 3pm on the winter solstice (21 June). Without limiting the above, it is preferred that Kibble Park receives 70% of direct sunlight for 4 hours during that time if it can be achieved through good design. Note – This performance standard is contiguous hours and is cumulative between developments.	Complies The proposed envelopes result in overshadowing of an additional 4% of the park area at 9am at the winter solstice only, with no additional overshadowing for the remainder of the day. As outlined in detail in Table 11, the resultant overshadowing to Kibble Park is: 9.00 am = 9.2% (increase from 5.2%) 10.00 am = 3.5% 11.00 am = 1.6% 12.00 pm = 1.8% 1.00 pm = 2.1% 2.00 pm = 4.3% 3.00 pm = 13% Therefore, in accordance with this control, at least 60% of the park receives 4 hours of direct sunlight
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Table 15. Gosford City Centre DCP 2018 Assessment

Section	Objective/Control	Comment
		<p>between 9am and 3pm on the winter solstice.</p> <p>Refer to Section 6.2 of this EIS for further discussion.</p>
	4. Solar access exceeding the minimum provisions should be provided if it can be achieved through good design.	<p>Complies</p> <p>The proposal allows for solar access to Kibble Park exceeding minimum provisions.</p>
4.4 Views and vistas	1. The floorplates of buildings above street frontage heights should be designed in accordance with the slender tower provisions in Chapter 5 of this DCP.	<p>Complies</p> <p>See further comment below regarding Chapter 5.</p>
	2. Key views (identified in Figure 4) are those existing views of the ridgelines of Presidents Hill, Rumbalara Reserve and views of Brisbane Water from important locations, including the centre of Kibble Park, Leagues Club Field and Brian McGowan Bridge.	<p>Noted</p> <p>The development is located within the key view corridors from Pacific Highway to Rumbalara Reserve and from Kibble Park to Rumbalara Reserve.</p>
	4. Street vistas (identified in Figure 4) are those existing long-distance street vistas that allow vision of the surrounding bushland and/or water views. To protect street vistas, development adjoining street vistas should comply with street wall and tower setback controls (identified in Chapter 5 Built form) to maximise preservation of long-distance street vistas. Compliance with this control must be demonstrated in any development application for sites adjoining identified street vistas through view	<p>Noted</p> <p>The development is located within the street vistas along William Street and Donnison Street toward Rumbalara Reserve.</p> <p>See further comment below regarding Chapter 5 Built form.</p>

Table 15. Gosford City Centre DCP 2018 Assessment

Section	Objective/Control	Comment
	analysis. Specifically, the analysis should demonstrate that the proposed built form has been designed to minimise its impact on these views.	
4.5 Footpath crossings and pedestrian overpasses and underpasses	1. One vehicle access point only (including the access for service vehicles and parking for non-residential uses within mixed use developments) will be generally permitted.	Complies with intent Multiple entries are proposed, which is considered acceptable given the scale of the development and the length of the frontages.
	2. Where practicable, vehicle access is to be from lanes and minor streets rather than primary street fronts or streets with major pedestrian activity.	Complies Vehicle access is proposed off William Street, Albany Street North and Donnison Street rather than the primary Henry Parry Drive.
	3. Where practicable, adjoining buildings are to share or amalgamate vehicle access points. Internal on-site signal equipment is to be used to allow shared access. Where appropriate, new buildings should provide vehicle access points so that they are capable of shared access at a later date.	Complies with intent The proposed vehicle access points will each serve multiple towers within the development.
	5. Wherever practicable, vehicle access is to be a single lane crossing with a maximum width of 2.7 metres over the footpath, and perpendicular to the kerb alignment. In exceptional circumstances, a double lane crossing with a maximum width of 5.4 metres may be permitted for safety reasons (refer to Figure 5).	Complies Proposed vehicle crossings are two-way, which is considered acceptable given the large scale of the development. Exact dimensions would be determined at the detailed DA stage.

5. Built form

Table 15. Gosford City Centre DCP 2018 Assessment

Section	Objective/Control	Comment
5.2.1 Street setbacks and rear setbacks	1. Buildings should be designed to comply with streetscape controls as shown in Figure 8. These setbacks should be deep soil and contain no parking structures.	<p>Complies</p> <p>The proposal provides the central through-site link and the primary active frontage along Henry Parry Drive as identified in Figure 8.</p>
	<p>2. In addition to the above, street building alignment and street setbacks are to comply with Figure 8.</p> <p>Parking structures may encroach into these setbacks by up to 1m (except for 0m ground setbacks).</p>	<p>Does not comply</p> <p>The proposal provides for 2.5m ground level setbacks vs. 0m required. This is considered acceptable, as proposed increased setbacks will allow for additional landscaping and footpaths, and still provide a strong street wall edge.</p> <p>(Parking structures do not encroach upon the street setbacks.)</p>
	4. Balconies may project up to 600mm into front building setbacks, provided the cumulative width of all balconies at that level is no more than 50% of the horizontal width of the building façade measured at that level. This control does not apply to buildings with 0m setbacks.	<p>NA</p> <p>No balcony projections are proposed.</p>
	5. Building separation and visual privacy requirements of SEPP65 and the Apartment Design Guide will also apply as well as to the controls described above.	<p><i>Within the site:</i></p> <p>Minor non-compliance</p> <p>The proposed tower envelopes comply with the ADG's 24m separation requirement, with the minor exception of the 21m separation between Towers 1 and 3. This variation is considered acceptable, as any potential visual privacy impacts can be addressed through apartment layout and design treatments at the detailed DA stage, with screening or blank/non-habitable façade treatment.</p>

Table 15. Gosford City Centre DCP 2018 Assessment

Section	Objective/Control	Comment
		<p>As indicated in the example scheme prepared by Buchan, the apartments can be designed in order to achieve adequate privacy.</p> <p>Separation between residential uses in the podium levels comply with the required 12m for storeys 1-4 and 18m for storeys 5-8.</p> <hr/> <p><i>From the boundary:</i></p> <p>Complies</p> <p>All residential uses are separated from adjoining sites by at least 12m in accordance with ADG controls.</p>
5.2.2 Street wall heights and upper podium	<p>1. The street frontage height of buildings must comply with the minimum and maximum heights above mean ground level on the street front as shown in Figure 8.</p>	<p>Partially complies</p> <p>The development provides for 14m-high street walls along all street frontages. This varies from the maximum 9m-high street wall required along Henry Parry Drive and the western portions of William Street and Donnison Street. This is considered acceptable because the proposal provides for an appropriate alternative built form relationship to Kibble Park with increased tower setbacks (15m) and a large through-site link between Towers 1 and 2. This built form will provide opportunity for a large public plaza opening to Henry Parry Drive and will minimise overshadowing to the park.</p>
	<p>2. All built form above the street wall height should be set back a minimum of 3m from the building line of the street wall frontage. This may include:</p> <p>a. an 'upper podium' of up to 2 storeys/7m (in height) and side setbacks should be provided consistent with the Apartment Design Guide;</p>	<p>Complies</p> <p>All built form above the proposed street walls is set back at least 6m.</p>

Table 15. Gosford City Centre DCP 2018 Assessment

Section	Objective/Control	Comment
	and b. a tower element above this, which is to be consistent with the controls in Section 5.2.5 of this document.	
5.2.3 Active street frontages and address	<p>1. Frontages labelled 'primary active frontage' on Figure 8 are to:</p> <p>a. Include active uses (for example, retail and business premises) at ground level facing the street for sites within the following character areas: City North, City South and Civic Heart. For sites in other areas, high quality residential with street address may be provided at ground level</p> <p>b. Maximise operable and glazed shop frontages, entries for all uses, active office uses such as reception and any other activities which provide pedestrian interest and activation</p> <p>c. Minimise blank walls (with no windows or doors), fire escapes, service doors, plant and equipment hatches</p> <p>d. Not include more than 12m of frontage dedicated to office use (retail, business and other active uses should be provided at ground level)</p> <p>e. Provide elements of visual interest</p> <p>f. Provide a high standard of architectural finish and detail</p> <p>g. Not contain vehicular access unless</p>	<p>Complies</p> <p>The proposed envelopes provide space for retail/business premises on the ground level along Henry Parry Drive.</p> <p>Detailed treatments will be considered at the detailed DA stage.</p>

Table 15. Gosford City Centre DCP 2018 Assessment

Section	Objective/Control	Comment
	demonstrated to be the only suitable location on the property for such access.	
5.2.4 Building setbacks and separation	1. Minimum side setbacks up to street wall height are defined in Figure 8.	<p>Complies</p> <p>A 2.5m setback (up to the street wall height) is provided from side boundaries (i.e. from the adjoining development to the north and east), which is greater than the minimum of 0m.</p>
	2. In addition to the above, setbacks (including front, rear and side setbacks) for residential uses, serviced apartments and hotels should be compliant with the Apartment Design Guide that accompanies SEPP65 regarding visual privacy.	<p>Complies</p> <p>Residential uses generally comply with Apartment Design guide separation requirements.</p>
	3. Above the street wall height, all building facades should be well articulated to be attractive in all views. Blank walls with minimal articulation facing any boundary will not be permitted.	<p>NA</p> <p>The proposal seeks approval for building envelopes only. Façade articulation will be considered at the detailed DA stage.</p>
5.2.5 Slender towers with high amenity	<p>1. For development within the B zones (B3, B4 and B6), the maximum floorplate size for towers is:</p> <p>a. 750sqm GFA for residential uses, serviced apartments and hotels.</p> <p>b. 1500sqm GFA for commercial uses (office space).</p> <p>Note - This maximum floor plate control applies only to towers, and not to podium level development.</p>	<p>Does not comply</p> <p>4/5 of the tower envelope floor plates are greater than 750sqm in area. This is considered acceptable given the forms have been carefully designed as part of a master planning approach to result in acceptable overshadowing impacts, visual impacts and internal amenity. The envelopes will be further articulated during the detailed DA stage.</p>

Table 15. Gosford City Centre DCP 2018 Assessment

Section	Objective/Control	Comment
	3. The maximum building length for towers in any direction is 45m.	<p>Complies</p> <p>No tower envelope is greater than 42m in any direction.</p>
	4. All tower forms must be set back a minimum 8m from the street wall frontage, however reductions may be accepted (from 8m to 6m) on some sites where it is demonstrated that this control would compromise the ability to design the podium or tower appropriately.	<p>Complies</p> <p>The proposed envelopes feature 6m setbacks from the street wall frontage. The example scheme at Appendix B of the Design Report (Appendix1) demonstrates that it is possible to design an appropriate podium and tower using these 6m setbacks.</p>
	<p>5. All building frontages for a tower with a length over 30m should be:</p> <p>a. expressed as two vertical forms</p> <p>b. include a clear 'break' of minimum 1m width and 1m depth</p> <p>c. include a stepped height difference of minimum two storeys</p>	<p>Complies with intent</p> <p>The proposed tower envelopes are split into two forms, but the intent is to provide more specific design detail on split at the detailed DA stage as illustrated in Buchan's Design Report at Appendix 1.</p>
	6. Tower heights should be varied. Where two towers are provided on one site, their height above ground level should have a minimum of 15% variation between each tower (e.g. with three towers, the tallest should be minimum 30% taller than the shortest).	<p>Complies with intent</p> <p>See further discussion below table.</p>
	7. For sites with more than one tower, separation between buildings should be considered in accordance with the specified distances for each component use, as if	<p>Minor non-compliance</p> <p>Separation between towers is 24m in accordance with ADG requirements, with the exception of the separation between Towers 1 and 3, which is 21m. This minor non-compliance is considered acceptable, as the apartments</p>

Table 15. Gosford City Centre DCP 2018 Assessment

Section	Objective/Control	Comment
	there is a boundary between them.	can be designed to ensure sufficient privacy at the detailed DA stage as illustrated in Buchan's example scheme.
5.2.6 Fine grain frontages	<p>1. The maximum continuous street frontage length of an individual podium (below street wall height) is 40m. Where a podium form exceeds this length it will be visually broken into two or more podium forms. This is described in Figure 9. Each of these forms will:</p> <p>a. not exceed 40m in length with a preferred length of less than 30m.</p> <p>b. be separated from other podium forms by full height breaks of a minimum of 3m (note: separation requirements within the Apartment Design Guide will apply in addition to this where relevant). These breaks should extend to the top of the street wall however may not extend to ground level to ensure continuity of active frontages.</p> <p>c. be designed to relate to the pattern of vertical circulation cores where possible.</p> <p>d. have its own architectural character which establishes 'fine grain' (through massing, articulation, composition of building elements, material use and details for different building elements, etc.) so that the street block presents as a group of buildings rather than a single building.</p>	<p>Able to comply</p> <p>The proposed envelopes express a solid podium form, but this form can be broken and articulated at the detailed DA stage.</p>

Table 15. Gosford City Centre DCP 2018 Assessment

Section	Objective/Control	Comment
	<p>2. Each podium form (below street wall height) is to be articulated into smaller elements at a scale or grain.</p> <p>This is described in Figure 9. Each of these forms should respond to:</p> <ul style="list-style-type: none"> a. the established height datum of adjacent buildings, particularly where the street wall height proposed significantly exceeds this. b. the established rhythm of building frontages within the area (the lot pattern) of between 5 and 20 metres. c. the use of the building and the various components of the building. d. the location of the building, or that part of the building relative to pedestrian or outdoor recreation activity. e. the details and building elements including building entries, ground floor, lower floors, top floor and roof. 	<p>Able to comply</p> <p>Podium articulation would be considered at the detailed DA stage.</p>
5.2.7 Awnings	<p>1. Continuous street frontage awnings are to be provided for all new developments identified as active frontages in Figure 8.</p>	<p>Able to comply</p> <p>Awnings would be considered at the detailed DA stage.</p>
5.2.8 Building sustainability and environmental performance for key sites, medium sites and large sites	<p>1. Measures to improve energy efficiency, water efficiency and waste minimisation should be investigated as part of the enhanced design excellence and design review process.</p>	<p>Complies</p> <p>Sustainability measures are outlined in Buchan's Design Report at Appendix 1.</p> <p>Building sustainability and environmental performance measures would be investigated further at the detailed DA stage.</p>

Table 15. Gosford City Centre DCP 2018 Assessment

Section	Objective/Control	Comment
5.2.9 Above ground parking	1. Car parking is to be provided wholly underground unless the determining authority is satisfied unique site conditions prevent achievement of parking in basements. The determining authority may require the provision of a supporting report (for example, a geotechnical report), prepared by an appropriately qualified professional as information to accompany a development application to the determining authority.	<p>Complies</p> <p>The proposed parking is provided partially aboveground. This is primary due to geotechnical constraints, namely a shallow water table. For further detail refer to the Geotechnical Desktop Study at Appendix 7.</p>
6.5 Key Site 4 (136-148 Donnison Street (former Market Town))	1. This is a key site due to its size, location and address to key public spaces, including Kibble Park and Henry Parry Drive. The site also offers important urban renewal opportunities in the Civic Heart of Gosford City facing Kibble Park. Accordingly, this site must be subject to a master planning process to ensure holistic consideration of site specific urban design issues.	<p>Complies</p> <p>The concept DA sets out the masterplan for the site and incorporates a holistic consideration of the site's urban design issues. Refer to Buchan's Design Report at Appendix 1 for full discussion of the design approach.</p>
	Any development must protect and maximise solar access to Kibble Park and protect key views and street vistas. Development on the western and north-western part of the site should be lower in height to maximise solar access to Kibble Park.	<p>Complies</p> <p>The proposal is designed to minimise overshadowing to Kibble Park and protect key views to Rumbalara ridgeline. The towers sweep up from west to east to maximise solar access to the park. Detailed overshadowing analysis and view analysis are provided in Buchan's Design Report at Appendix 1 of this EIS.</p>
	Maximising solar access to Kibble Park and views from	<p>Complies</p>

Table 15. Gosford City Centre DCP 2018 Assessment

Section	Objective/Control	Comment
	Kibble Park to Rumbalara Reserve are priorities for development of this site. Taller buildings may be appropriate for this site, subject to design testing to determine the optimum location. The preferred location of taller buildings on this site is to the southern and eastern part of the site to minimise overshadowing impacts to Kibble Park.	As above.
	North-south through site links should be provided to improve pedestrian connectivity and to break up the length of the street block.	Complies A shared north-south through-site link is provided between William Street and Donnison Street.
	The appropriate height for development of this site will be determined through a master planning process, which is to include design testing and consideration of impacts on views and overshadowing.	Complies The proposed heights are the result of a comprehensive master planning process with consideration of view and overshadowing impacts. Refer to Buchan's Design Report at Appendix 1 for further detail.
	An active frontage is required on two street frontages. Retail or commercial uses are appropriate fronting Henry Parry Drive while multiple lobby and residential entries (maisonettes) should have adequate street address to, and contribute positive design outcomes for, Donnison Street.	Complies Active frontages are provided along Henry Parry Drive and along the western portions of both William Street and Donnison Street.

Control 5.2.5(6) Discussion

Control 5.2.5(6) promotes variation in tower heights and states:

*"Where two towers are provided on one site, their height above ground level should have a minimum of **15%** variation between each tower (e.g. with three towers, the tallest should be minimum **30%** taller than the shortest).*

The proposal features five tower envelopes with the following heights measured above ground level:

- Tower 1: 78.5m
- Tower 2: 60.2m
- Tower 3: 79.4m
- Tower 4: 85.9m
- Tower 5: 94m

The percentage variations between towers are (shortest to tallest):

- Tower 2 to Tower 1: +30%
- Tower 1 to Tower 3: +1%
- Tower 3 to 4: +8%
- Tower 4 to 5: +9%
- Total (Tower 1 to 5): 56.1%

NB: The sum of the tower-by-tower percentage increases does not match the overall total Tower 1-to-Tower 5 percentage increase, as percentages are rebased for each calculation.

This separation is illustrated in the figure below.

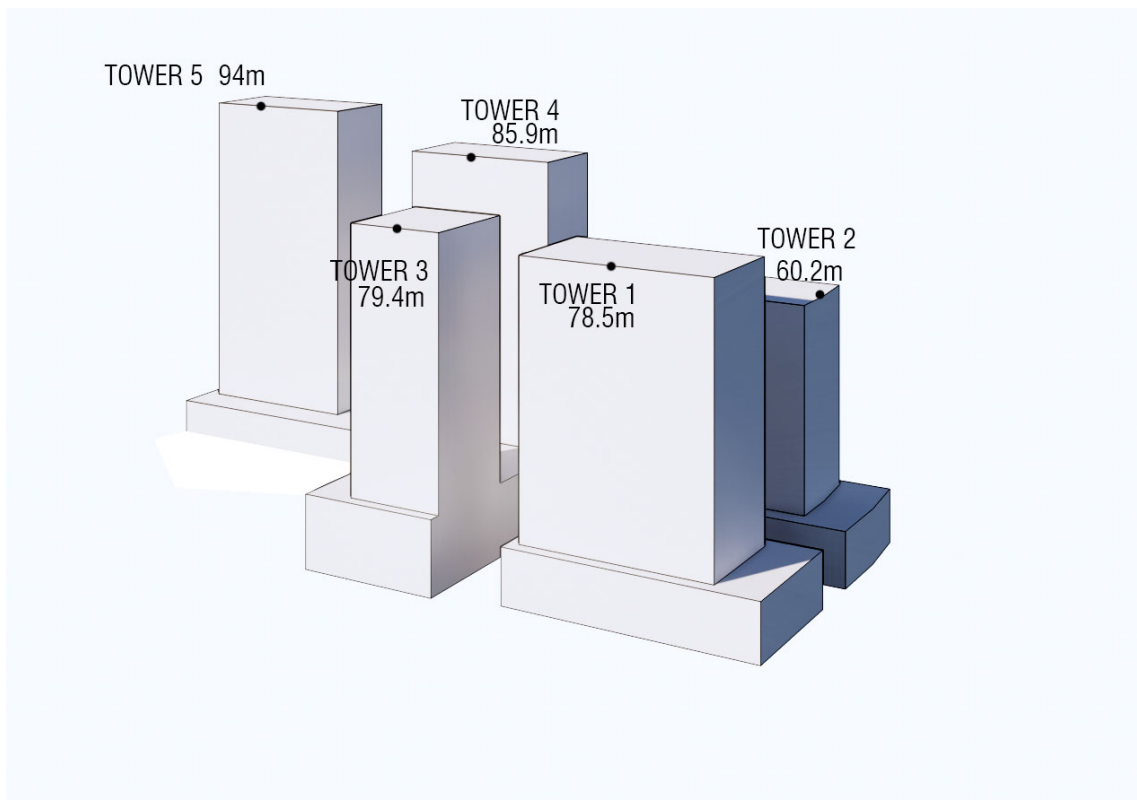


Figure 27. Tower height variations

Source: Buchan

With the exception of Tower 1 to 2 separation, the separation between each tower does not comply with the 15% rule of thumb and the total variation of 56.1% is slightly less than the 60% required.

Despite the non-compliances, the proposal provides for substantial variation of tower forms and meets Objectives A-G of section 5.2.5 of DCP, hence the non-compliances are considered acceptable when noting:

- Despite the non-compliance, the total variation between the tallest and shortest towers is 56.1%, which is only marginally lower than the 60% requirement. A strictly compliant Tower 5 at +60% the height of Tower 2 (60m) would be 96m. Tower 5 is proposed at 94m which is a departure of only 2m from the DCP control. This departure would be un-noticeable from the ground.
- The proposal has been subject to a design excellence process in which building height articulation was a key component of discussion. Following significant amendment to original concepts presented to the DAP, the current scheme was endorsed under the design excellence process for progression through to DA.
- The proposal achieves high amenity for the public domain, with minimal overshadowing of key public areas, including Kibble Park, and retention of key view corridors towards Rumbalara ridgeline.
- The proposal responds to the topography of the land, with built form sweeping up from west to east.
- The proposal allows for high internal amenity including solar access and natural cross ventilation capable of complying with ADG criteria.

Individual tower forms would be further articulated at the detailed DA stage, which would provide for further variation of the skyline.

5.2.8 Central Coast Council 7.12 Contributions Plan (Civic Improvement Plan) for Gosford City Centre

Given that this is a concept proposal only and does not seek approval for any physical built form, it is assumed that a section 7.12 levy (1% of the development cost) will not be applied to any consent for this DA but rather will be applied at the detailed DA stage.

5.2.9 Gosford City Centre Special Infrastructure Contribution

Given that this is a concept proposal only and does not seek approval for any physical built form, it is assumed that the Gosford City Centre Special Infrastructure Contribution (2% of the development cost) will not be applied to any consent for this development but rather will be applied at the detailed DA stage.

The proponent is open to a works-in-kind agreement in place of a monetary contribution, such as contributing towards the redevelopment of Kibble Park, but this would need to be discussed at the detailed DA stage.

5.3 Guidelines and Policies

5.3.1 Design in Context

This section considers the proposal's built form and design in the context of the six key criteria identified in 'Design in Context: Guidelines for Infill Development in the Historic Environment' (NSW Office of Environment and Heritage, 2005).

Character

The proposal recognises the key character features of the area, namely Kibble Park to the east and Rumbalara Reserve to the west. The concept DA minimises overshadowing to the park and maintains key views to the reserve.

Scale

The proposal provides a scale that responds to the strategic vision for growth of Gosford City Centre as the region's capital. There is no existing heritage character in the immediate area that the scale would conflict with. While the scale is larger than currently surrounding development, it does not have any unreasonable adverse impacts in regards to overshadowing or views.

Form

The proposal's exact form would be decided at the detailed DA stage. The example scheme at **Appendix 1** demonstrates a possible design that fits within the proposed envelopes. This design features variations in form and façade articulation that are compatible with the city centre context.

Siting

The proposed envelopes have been sited to optimise amenity for residents within the buildings and to minimise overshadowing and view impacts. All envelopes also allow opportunity for activation of street frontages.

Materials and Colour

Materials and colour would be determined at the detailed DA stage. It is anticipated that future development will incorporate a mix of glazing and masonry including textural brick (or similar) as shown in the example scheme at **Appendix 1**.

Detailing

Building and landscaping detailing would occur at the detailed DA stage. The detailing would seek to add visual interest, contribute positively to the character of the area and reflect the surrounding natural environment.

5.3.2 Other Guidelines and Policies

Other key guidelines and policies are addressed in the table below.

Table 16. Guidelines and Policies	
SEPP	Comment
City of Gosford Design Advisory Panel (CoGDAP) Guide for Proponents and Stakeholders (DPE, 2018)	<p>The Design Excellence Statement at Appendix 3 has been prepared in accordance with this guide.</p> <p>The proponent has been engaged with the DAP and associated DRG throughout the application preparation process (refer to Section 4.3 of this EIS).</p> <p>The DRG has reviewed the current architectural documentation and recommended that it be submitted as a DA.</p>
Gosford City Centre Streetscape Design Guidelines (Oculus for Gosford City Council, 2011)	These guidelines would be implemented at the detailed DA stage.
Central Coast Council's 3D Model Submission Requirements	A 3D model has been submitted in accordance with Council's requirements.
Central Coast Council's Civil Works Specification	The proposal seeks approval for building envelopes only. No physical built form is proposed. Council's Civil Works Specification would be addressed at the detailed DA stage.
Central Coast Council's Gosford City Centre Developer Services Plan (DSP)	The development is located within the Gosford City Centre DSP area. Any future detailed DA for physical works would be subject to the relevant water and water contributions.
Central Coast Council's Gosford City Centre Water Servicing Strategy (Aug 2017)	The site has access to Council potable water mains. A detailed servicing strategy for the development would be developed at the detailed DA stage in accordance with Council's strategy.
Central Coast Council's Gosford City Centre Sewer Servicing Strategy (Mar 2017)	The site has access to Council sewer mains. A detailed servicing strategy for the development would be developed at the detailed DA stage in accordance with Council's strategy.
Central Coast Council's Gosford CBD Overland Flood Study	The site is not subject to flooding as identified in Central Coast Councils' online flooding mapping. The road reserves adjacent to the site, however, are affected by flooding, and this will likely result in restrictions to minimum floor levels of ground floor

Table 16. Guidelines and Policies

SEPP	Comment
	tenancies and driveway entry levels to the lower basements.
EIS Guidelines – Roads and Related Facilities (DoPI)	The proposed development includes no road widening or new roads, and therefore these guidelines are not relevant.
NSW Planning guidelines for walking and cycling (DIPNR & RTA, 2004)	These guidelines function to improve the consideration of walking and cycling and their role in the creation of sustainable neighbourhoods and cities. The proposal (and eventual the physical development) aligns with these guidelines by improving walkability and cycling across in Gosford City Centre through the provision of new pedestrian routes and wayfinding signage.
Guide to Traffic Generating Developments (RMS, 2002), including Section 2 Traffic Impact Studies	A traffic impact study (Appendix 12) has been prepared in accordance with this guide. Traffic impacts are discussed in further detail at Section 6.3 of this EIS.
Austroads Guide to Traffic Management Part 12: Traffic Impacts of Development (Austroads, 2016)	The proposal results in no inconsistencies with this guide. This guide will be considered in detail at the detailed DA stage.
Standards Australian AS2890 Parking Facilities Set	The example scheme in the Design Report (Appendix 1) demonstrates consistency with AS2829. Detailed assessment would occur at the detailed development application stage.
Cycling Aspects of Austroads Guides (2017)	The proposal results in no inconsistencies with these guides. These guides would be considered at the detailed DA stage when physical development is proposed.
Draft Environmental Impact Assessment Guidance Series (DPE, 2017)	This EIS has been prepared in accordance with the draft guidance series.
Planning for Bushfire Protection (NSW RFS, 2006) (PBP 2006)	A Bush Fire Assessment Report (Appendix 5) has been prepared in accordance with PBP 2006. Refer to Section 6.7 of this EIS for further discussion.
Managing Land Contamination: Planning Guidelines - SEPP 55 Remediation of Land (DUAP)	A Phase 1 Contamination Assessment (Appendix 6) has been submitted in accordance with these guidelines. Refer to Section 6.16 of this EIS for further discussion.

Table 16. Guidelines and Policies

SEPP	Comment
Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW (DECCW, 2011)	The submitted Aboriginal heritage due diligence assessment (Appendix 4) concludes that the potential for Aboriginal objects at the site is low and that works may proceed with caution. DECCW's guide would be followed in the case of any unexpected finds.
Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010	Consultation would occur in accordance with these requirements in the case of any unexpected finds.
Statement of Heritage Impact Guide (OEH)	The submitted Aboriginal heritage due diligence assessment (Appendix 4) concludes that the potential for Aboriginal objects at the site is low and that works may proceed with caution. As such, a statement of heritage impact is considered unnecessary. OEH's guide would be followed in the case of any unexpected finds.
Managing Urban Stormwater – Soils & Construction Volume 1 (Landcom, 2004)	Erosion and sediment controls would be designed and implemented at the detailed DA stage in accordance with Landcom's guide.
NSW Aquifer Interference Policy (2012)	Water licenses for aquifer interreference activities would be obtained at the detailed DA stage for physical works if required.
Guidelines for Controlled Activities on Waterfront Land (2018)	The site is not defined as waterfront land as it is not within 40m of the highest bank of a river, lake or estuary. Therefore, these guidelines are not applicable.
Central Coast Council's Water Cycle Management Guidelines	A preliminary water cycle management strategy is included in the Engineering Due Diligence Report (Appendix 8). Refer to Section 6.12 of this EIS for further discussion. A detailed strategy in accordance with Council's guidelines would be prepared at the detailed DA stage.
Central Coast Council's Waste Control Guidelines	Detailed assessment against Council's waste control guidelines has not been conducted as part of this proposal given that no physical works are proposed. Such assessment would occur at the detailed DA stage.
Interim Construction Noise Guideline (DECC, 2009)	Construction noise is addressed at Section 6.11 of this EIS. Construction noise would be addressed in further detail at the detailed DA stage in accordance with DECC's guideline.

Table 16. Guidelines and Policies	
SEPP	Comment
Approved Methods for the Modelling and Assessment of Air Pollutants in NSW (EPA, 2005)	Detailed air quality modelling and assessment has not been conducted as part of this proposal given that no built form is proposed. Such modelling is unlikely to be required even at the detailed DA stage given the nature of the proposed uses.

5.4 Other approvals

The table below addresses other various approvals that may be required in the future to permit the construction of the mixed-use development.

Table 17. Required Approvals	
Act	Approval Required
Fisheries Management Act 1994	NA
Mine Subsidence Compensation Act 1961	NA
Mining Act 1992	NA
Petroleum (Onshore) Act 1991	NA
Protection of the Environment Operations Act 1997	NA
Roads Act 1993	Local approval for driveway cross overs and footpath works.
Pipelines Act	NA

6 Environmental Impact Assessment

This section of the report assesses and responds to the environmental impacts of the proposed development. It addresses the matters for consideration set out in the SEARs (refer to Section 1.5). The environmental risks and mitigation measures for the environmental impacts are detailed in Sections 7 and 8, respectively.

6.1 Built Form

6.1.1 Existing Environment

Gosford City Centre is characterised by a range of built forms including low, medium and high-rise buildings. The development immediately surrounding the subject site is generally low rise as described in Section 2.4 of this EIS. There is no prevailing historical or architectural character in the immediate area.

The city centre is currently undergoing a transformation towards more high quality, high rise development as part of a State-led revitalisation effort. In the past few years, the number of development applications for high density development in the centre has increased, particularly in the area surrounding Mann Street. Some of the key approved projects are described in Section 2.4 of this EIS.

6.1.2 Impacts

The proposal would result in a change to the built environment in Gosford City Centre, but this change would be positive and reflective of the ongoing revitalisation of the area.

The proposal would not conflict with any prevailing historical or architectural character.

The height and scale are considered appropriate in that are compatible with surrounding existing and future development and would result in no unacceptable overshadowing or view impacts. (Overshadowing and view impacts are discussed in detail in separate sections below.)

6.1.3 Mitigation Measures

Specific forms, articulation and materials will need to be considered at the detailed DA stage in order to ensure that the development is compatible with its surroundings. In particular, it is recommended that the building envelopes be divided into two vertical forms (as illustrated in the example scheme by Buchan). This approach will break down the bulk of the tower facades, promote view sharing, increase amenity within the development and still provide viable and useable floor space.

6.2 Overshadowing

Buchan has prepared hourly shadow diagrams from 9am to 3pm at the winter solstice and the March/September equinox to determine the proposal's overshadowing impacts onto the surrounding area including Kibble Park.

6.2.1 Impacts

Kibble Park

The Gosford City Centre SEPP requires that buildings must be designed to ensure at least 60% of the park receives four hours of direct sunlight between 9am and 3pm on the winter solstice.

As seen the diagrams below, the development (namely Tower 1) causes minor overshadowing to the southwest corner of the park at mid-winter at 9am (equivalent to 4% of the total park area); however, the shadow has disappeared by 10am, and the park remains unaffected for the remainder of the day.



Figure 28. Overshadowing diagram – winter solstice

Source: Buchan

The net additional 4% overshadowing at 9:00am from the development, on top of existing overshadowing, results in total shadow to Kibble Park from surrounding development matching the below:

9.00 am = 9.2%

10.00 am = 3.5%

11.00 am = 1.6%

12.00 pm = 1.8%

1.00 pm = 2.1%

2.00 pm = 4.3%

3.00 pm = 13%

It is clear, therefore, that the at least 60% of the park receives 4 hours of direct sunlight between 9am and 3pm.

At the equinox, (see figure below), the overshadowing of the southwest corner of the park is slightly greater due to the sun's expanded arc, but again, the shadow has disappeared by 10am, and the park receives full sun for the remainder of the day. Also, it should be emphasised that the relevant overshadowing controls relate to mid-winter when the need for solar access is greatest.



Figure 29. Overshadowing diagram – equinox

Source: Buchan

Other Areas

The development causes some overshadowing to the TAFE campus, Gosford Local Court and other properties to the south, most significantly during mid-winter as shown in the images below. However, this overshadowing is not atypical in an urban context and is considered acceptable in the context of the revitalisation of the city centre. Moreover, these properties do not comprise key public open spaces and do not warrant special overshadowing consideration as reflected in the planning controls.

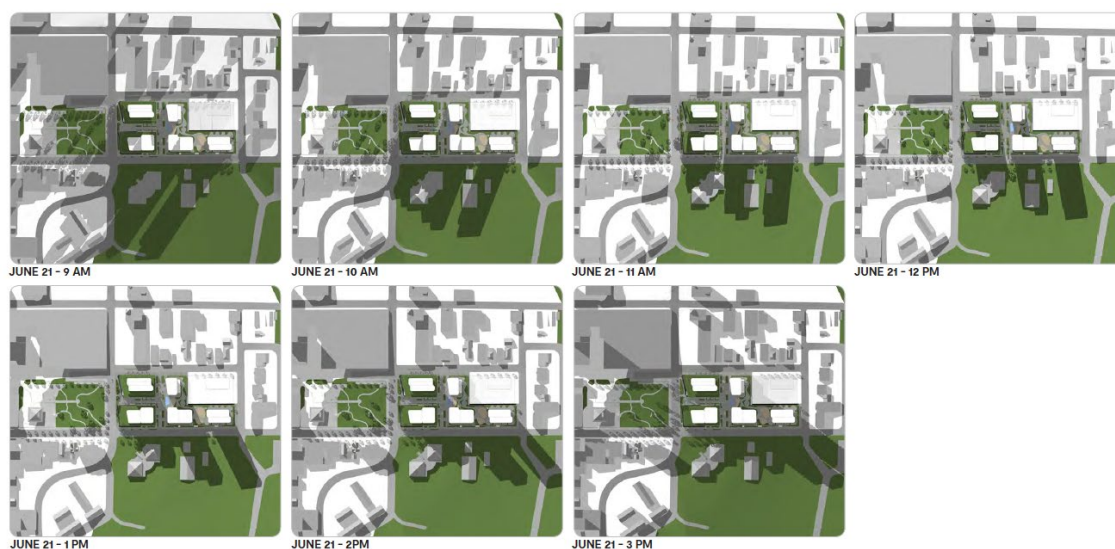


Figure 30. Overshadowing Diagrams – winter solstice

Source: Buchan

6.2.2 Mitigation Measures

No mitigation measures regarding overshadowing have been identified. Compliance with the proposed envelopes would result in acceptable overshadowing impacts.

6.3 Traffic, Parking and Loading

A Traffic Impact Assessment prepared by GTA Consultants accompanies this EIS (**Appendix 12**). Key points from GTA's report are outlined below.

6.3.1 Existing Environment

Pedestrian and Cycle Access

The pedestrian network in Gosford City Centre is well established, with ample footpaths, through-site connections and formal crossings. All of the subject site's street frontages have formal footpaths connecting to the rest of the centre's network. Formal crossings from the site to Kibble Park (across Henry Parry Drive) are provided at the intersections with William Street and Donnison Street.

In regard to cycle access, the road conditions in the surrounding area cater for cycle traffic but are limited in storage capacity. No formal bicycle storage arrangements existing on site.

Existing Travel Behaviour

Journey to work data from the Australian Bureau of Statistics 2016 census reveals 66% of trips in the local area were made via private car, 25 via public transport and 9% via walking.

Public Transport

The site is well served by public transport services, with Gosford Interchange less than 600m to the northwest. Gosford is a major node in the Sydney Trains network and is well serviced by the Central Coast and Newcastle Line.

The Interchange also functions as one of the main bus interchanges in the region. Many routes travel through the interchanging servicing key destinations including Tuggerah, Terrigal and Umina Beach.

Road Network

The site is well connected to the city's centre's road network, being bordered by three local roads (William Street to the north, Donnison Street to the south and Albany Street North to the west) and by a classified main road (Henry Parry Drive) to the west, which links directly with the Pacific Highway to the north and to the Central Coast Highway to the south.

Traffic Volumes and Intersection Operation

The site currently provides free car parking under agreement with Council and is at capacity most weekdays. Based on a survey conducted by GTA in 2016, it is estimated that the existing site generates approximately 220 vehicle trips during a typical weekday with no significant activity on weekends.

SIDRA modelling shows that queuing and delay at the surroundings intersections is generally acceptable. Longer queues do occur at the Henry Parry Drive/Donnison Street intersection in both peak hours due to through-vehicles avoiding delay associated with vehicles turning right. Site observations are consistent with the SIDRA assessment.

6.3.2 Parking

Required Minimum Parking

The example scheme by Buchan provides for approximately 1,014 spaces, including 942 spaces for residents and visitors and 72 spaces for the commercial uses.

Compliance with relevant minimum parking rates is outlined in the table below. The fifth column identifies the parking provision recommended by GTA in its report.

Table 18. Parking Compliance					
Component	SEPP Min.	DCP Min.	RMS Min.	Consultant Recommended	Proposed
Residential	NA	1,025 spaces	804 spaces	871 spaces	942 spaces
Commercial	49 spaces	92 spaces	NA	74 spaces	72 spaces

In regard to residential parking, the proposal complies with RMS rates but varies from DCP rates. Given the RMS rates would override the DCP rates at detailed DA stage (by way of the ADG), it is considered appropriate to consider the RMS rate in the assessment of the proposal, in which case the provision of residential car parking is sufficient. Regardless, the exact dwelling mix is subject to change at the detailed DA stage, and further parking assessment would be carried out then.

In regard to commercial parking, the proposal complies with the Gosford City Centre SEPP's rate for "commercial activities" under cl. 8.5, which is 1 space per 75sqm. The SEPP also specifies a retail rate of 1 space per 40sqm.

The concept DA seeks approval for 3,692sqm of general commercial floorspace, not retail premises in particular, however it is acknowledged that this might be an eventual outcome. As there is not absolute certainty as to the final uses of the commercial space, both the 40sqm and 75sqm rate are assessed below:

- At 1 space per 40sqm, the 3,692sqm of commercial GFA would require the provision of 92.3 (92) spaces.
- At 1 space per 75sqm, the 3,692sqm of commercial GFA would require the provision of 49.2 (49) spaces.

The provision of 72 spaces represents a rate partway between 49 and 92 spaces. The 23-space 'buffer' between the required 49 spaces and the proposed 72 spaces allows for opportunity for provision of retail premises within some of the development's commercial tenancies. Combined with the additional residential car parking spaces discussed above, in excess of 100 additional spaces, there is sufficient flexibility built into the concept proposal ensuring that car parking rates will be able to be met when assessed in greater detail in future stages.

Removal of Existing Public Parking

Removal of the existing public parking from the site is not expected to inherently change the parking environment in the city centre. Regardless of any impacts resulting from parking displacement, it is emphasised that the site is privately owned, and mitigation of these impacts is not the proponent's responsibility and matter for government.

6.3.3 Traffic Impacts (Operation)

Estimated Traffic Generation

GTA's analysis indicates that the proposal will result in a net increase in vehicle trips of 94 and 157 vehicle trips in the weekday AM and PM peak periods, respectively, and 472 trips during the Saturday peak hour.

Notably, the increase in vehicle trips largely consists of a reversal of flow compared to the existing environment. This will likely benefit the local area as the proposal's vehicle trips will oppose the direction of peak flow. Regardless, proposal is not expected to inherently change traffic conditions in the city centre.

An Overview Green Travel Plan (discussed further below) has been prepared and will help alleviate vehicle demand. No other mitigation measures are considered necessary.

Intersection Operation

GTA's analysis shows that all surrounding intersections will continue to operate similar to their existing conditions following completion and occupation of the development, with only minor reductions in level of service.

GTA has also conducted an analysis of future intersection operation 10 years post-development, which accounts for both local development (under construction or in planning) and regional transport network growth. This analysis shows that the Henry Parry Drive/Donnison Street intersection is expected to experience some congestion in 2029, but all other intersections are expected to operate well with spare capacity during peak area. It is expected that future improvements to the road network will help address this potential future congestion.

No intersection upgrades are considered necessary to accommodate the proposal.

6.3.4 Traffic Impacts (Construction)

The proposal has potential to impact on the surrounding traffic network due to construction vehicle activity. It is estimated that there will be up to 50 heavy rigid vehicle (HRV) movements per day or five to ten per hour.

It is also estimated that there will be up to 100 workers on site at any given time during peak activities. Given the staged nature of the development, workers may utilise a portion of the site for parking, but, given the site's proximity to good public transport, construction worker parking will generally not be provided on a formal basis.

A Construction Traffic Management Plan (CTMP) Overview has been prepared to outline methods for mitigated construction vehicle impacts (refer to Section 10 of

GTA's report). The CTMP Overview comments on construction site access arrangements, truck travel routes and pedestrian and cycling access.

6.3.5 Green Travel Plan

In order to help manage traffic generation, an Overview Green Travel Plan has been prepared to identify measures and initiatives that could be implemented to encourage more sustainable traffic modes, including:

- Limiting on-site parking;
- Provide a traffic access guide to residents and staff;
- Provide public transport information boards;
- Provide car share pods;
- Provide bicycle facilities;
- Encourage carpooling; and
- Provide regular newsletter with latest news of sustainable travel initiatives.

6.3.6 Mitigation Measures

It is recommended that a full Construction Traffic Management Plan be prepared prior to works commencing based on the overview plan at **Appendix 12** (including any demolition works).

It is also recommended that a full Green Travel Plan be prepared prior to occupation of the development based on the overview plan at **Appendix 12**.

6.4 Visual Impacts

A view study is included at Appendix C of the Design Report at **Appendix 1** of this EIS. The study shows the view impacts of the development in terms of streetscape views and key views to Rumbalara ridgeline.

Key views to be considered are those identified in the view diagram in the Gosford City Centre DCP, extracted below. These views include:

- Views from Kibble Park to Rumbalara ridgeline;
- Views from Central Coast Highway towards Rumbalara ridgeline; and
- Streetscape vistas along Henry Parry Drive, William Street and Donnison Street.



Figure 31. DCP view diagram
Source: Gosford City Centre DCP

6.4.1 Impacts

Views from Kibble Park to Rumbalara ridgeline

When viewed from Kibble Park, the proposal will result in some obstruction of current views to Rumbalara Reserve and ridgeline as shown in the figure below. However, the proposal will maintain a strong, direct view line to the reserve, and this has been a key driver in the proposal's design. In particular:

- The proposal reaches a maximum height of RL 110.30, compared to a maximum peak height of around RL 150.00 at Rumbalara Reserve;
- The low, stepping podium provides a gradual transition between the park and ridgeline (as opposed to a larger podium, which would inhibit views);
- The proposal incorporates slender towers oriented in east-west forms; and
- The proposal incorporates large gaps between towers (generally 24m).



Figure 32. View from Kibble Park to ridgeline

Source: Buchan

Some changes in views to the ridgeline should be expected as the city centre transforms, and it is considered that the proposal's design mitigates the impact to an acceptable level.

It is further noted that the proposed concept application will seek absolute maximum building envelopes. Each future detailed DA will need to demonstrate acceptable view impacts and, with the benefit of more detailed design work, will be able to incorporate further articulation and design responses. Typically the GFA represents 75% of the actual building envelope, which is documented within the ADG. Therefore the actual scale of the ultimate development will be less than what is approved as part of this concept application.

Views from Central Coast Highway to Rumbalara Ridgeline

When viewed from the Central Coast Highway, the development will obstruct some current views to the ridgeline. However, these impacts are considered acceptable context of the urban transformation of the city and approval of similarly scaled development, such as the Waterside Development. In fact, the Waterside development will sit squarely within the view corridor from the highway and ridgeline, in front of the proposed development.

Also, as discussed above, the development features slender east-west towers, large gaps between towers and a low podium, all of which serve to minimise impacts on views towards the ridgeline.

Local Streetscape Vistas

The proposal will appear prominent from when viewed from the surrounding local streets. Views from Henry Parry Drive and Kendall Drive (western side of Pacific Highway) are shown in the images below.

As discussed above, the impacts are considered acceptable in the changing urban context of Gosford City Centre. The State-led revitalisation effort envisions high quality, high density development, and the proposal aligns with this vision. The proposal will appear compatible with future surrounding development such as the Waterside Development and Mariner's Plaza.



Figure 33. View from Henry Parry Dr (looking S)
Source: Buchan



Figure 34. View from Henry Parry Dr (looking N)
Source: Buchan

6.4.2 Mitigation Measures

Compliance with the proposed building envelope would ensure that future development has an acceptable visual impact. At detailed DA stage the development should investigate opportunities to vary and articulate the building form within the envelope in order to minimise visual impacts.

6.5 Vegetation Removal

6.5.1 Existing Vegetation

The site contains a 900sqm unoccupied grassy area in the southeast of the site dominated by introduced flora plus seven planted areas along the site borders ranging in size from 10sqm to 70sqm.

None of the areas contain threatened flora species or are otherwise significant from an ecological perspective. Refer to the BDAR Waiver Request and granted BDAR Waiver at **Appendices 17a** and **17b**, respectively.

Photographs of the larger vegetated areas are provided in the figures below. The areas are described in further detail in the BDAR Waiver Request.



Figure 35. Vegetated area in southeast portion of site

Source: Wild Thing



Figure 36. Planted areas at carpark entry off Albany St N

Source: Wild Thing

6.5.2 Impacts

Stage 1 of the proposal (site clearing) would involve complete removal of the site's vegetation. This removal is considered acceptable given the vegetation is a marginal feature of the site and not ecologically significant.

Notably, a BDAR waiver has been granted by the Office of Environment and Heritage (**Appendix 17b**), providing strong indication that the proposal is not likely to have any significant biodiversity impacts.

As demonstrated in the concept landscape plan at **Appendix 2**, the proposal would result in increased vegetation compared to the current environment and would greatly improve site's amenity and visual appearance.

6.5.3 Mitigation Measures

It is recommended that future development include a comprehensive landscape plan based on the concept plan at **Appendix 2**.

6.6 Heritage

6.6.1 Indigenous Heritage

An Aboriginal Heritage Due Diligence Assessment has been undertaken by Extent Heritage Advisors and is attached at **Appendix 4**.

In terms of the existing context of the site and study area, Extent note:

- The site is located within the Wyong sub-bioregion of the Sydney Basin bioregion, characterised by an undulating sandstone-based landscape. The study area is largely located within the Erina Soil Landscape, which has soils that are highly erosional.

This landscape restricts a number of archaeological site types common in the region (such as rockshelters, rock engravings and grinding grooves) which require sharp exposed sandstone relief. The study area would therefore be more likely to contain surface artefact scatters and buried cultural material.

- Much of the western and central parts of the study area lie on Disturbed Terrain, which has highly variable soils as a result of disturbance. While archaeological sites and materials can be found within these landscapes, they are commonly disparate and localised.
- The study area does not fulfil any of the five criterion specified by the Office of Environment and Heritage for landscape features likely to indicate the presence of Aboriginal objects, although is close to Rumbalara Reserve within which Aboriginal art sites have been identified.
- The construction of a carpark and shopping centre, which takes up the majority of the site, is likely to have significantly impacted the site and forms the main source of disturbance. Impacts are considered to have significantly impacted the relatively shallow soil profile of the study area likely resulting in the destruction, removal and/or truncation of any cultural deposits, if present.

AHIMS Database

An extensive search of the AHIMS database was undertaken by Extent which identified 5 Aboriginal sites within close proximity to the study area. Two of these are located within the upper slopes of Rumbalara Reserve, both of which are rock shelters with charcoal art and a small shell surface scatter. To the southeast of the site, one potential archaeological deposit and one minor artefact scatter have been documented as part of road upgrades and commercial redevelopment. Finally, a rock shelter is located to the northeast of the study area.

The five sites are identified in Figure 37 below.



Figure 37. Registered AHIMS sites in the vicinity of the study area

Source: Extent Heritage

A site inspection was undertaken by Extent Heritage in June 2019, where the substantial developments and modifications to the site were noted. No Aboriginal objects were identified during the inspection nor any remnant vegetation or trees with potential for cultural modification observed.

Extent Heritage have concluded that the site's location on gentle slopes encompassed by a shallow soil landscape limits the likely cultural material to surface and/or buried stone artefacts of varying densities. Whilst regional data does indicate the potential for cultural material to be present in the vicinity of the study area, these are likely to have been severely impacted or removed as a result of recent development.

6.6.2 State and Local Heritage

As shown in Figure 38 below, the site is not within immediate proximity of any State or local heritage items as identified under the Gosford City Centre SEPP. The closest items are:

- Item 41 (Feature tree – fig), 176m to the southwest; and
- Item 39 (Central Coast Council administration building), 200m to the southwest.

Given the distance of the project from these items and others, a detailed heritage assessment against these items has not been undertaken. It is considered that the

redevelopment of the site for a high density mixed use outcome does not present any further impact to the heritage value of these items.



Figure 38. State and local heritage items in vicinity of site

Source: Mecone Mosaic

6.6.3 Mitigation Measures

Extent Heritage has recommended that works may proceed at the site alongside a set of recommendations relating to the management of unexpected discoveries of Aboriginal objects, sites or places, or human remains.

6.7 Bushfire Hazard

A Bush Fire Assessment Report prepared by Building Code & Bushfire Hazard Solutions (BCBHS) accompanies this EIS at **Appendix 5**. Key items from the report are outlined below.

6.7.1 Existing Environment

The southeast corner of the site is identified as Bushfire Prone Vegetation Buffer (see figure below), being located within 100m of Category 1 Bushfire Prone Vegetation. The vegetation posing a hazard to the proposed development is a discrete fragment of Rumbalara Reserve to the southeast, beyond Donnison Street, and has no direct connectivity to the larger bushfire hazard within Rumbalara Reserve to the east.

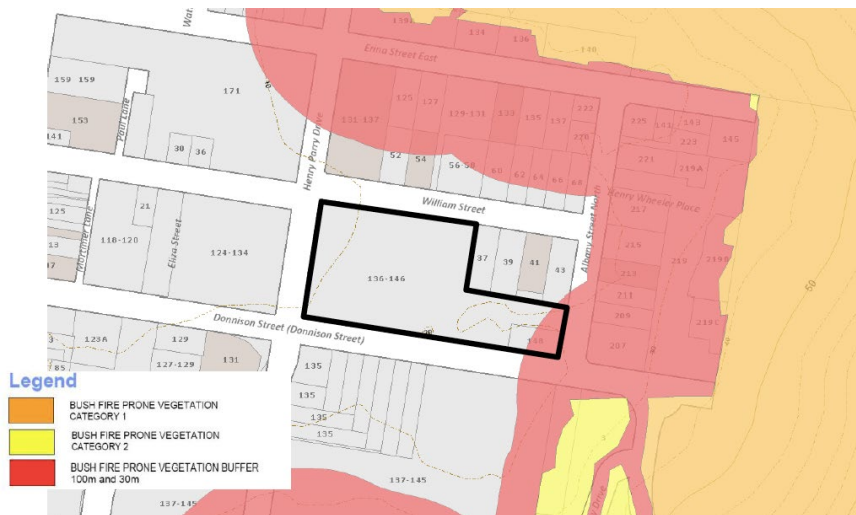


Figure 39. Bushfire prone land map

Source: Gosford Electronic Mapping System

6.7.2 Impacts

BCBHS considers that the vegetation hazard does not have the fuel loading of a true forest hazard and is a shape and size that could be considered a remnant hazard. However, BCBHS also considers that the risk, however small, of a fire front emanating from the large Rumbalara Reserve should be considered given the large scale of the development. Minimum required asset protection zones (APZs) and bushfire attack levels have been calculated based on this conservative approach. Furthermore, the slope from west to east within the hazard (being the slope any fire impacting across John Whiteway Drive would traverse) has been used in the assessment.

Using Appendix 2 of Planning for Bush Fire Protection 2006, BCBHS determined the minimum asset protection zone (APZ) to be 20m. The proposed development includes a minimum APZ of 39m (to Tower 5), which exceeds the minimum requirement. Accordingly, no amendments to the layout are required to achieve compliance.

6.7.3 Mitigation Measures

BCBHS provides the following recommendations for compliance with PBP 2006 and AS 3959 'Construction of buildings in bushfire-prone areas' 2009.

- That the layout, access provisions and building footprints comply with the Masterplan prepared by Buchan;
- That all grounds not built upon within the subject site east of Tower 4 be maintained as an Asset Protection Zone as detailed in the NSW Rural Fire Service's document 'Standards for Asset Protection Zones' and Appendix 2 of Planning for Bush Fire Protection 2006;
- That Tower 5 is to comply with section 5 (BAL 12.5) Australian Standard AS3959-2009 "Construction of buildings in bush fire-prone areas" and section A3.7 Addendum Appendix 3 of "Planning for Bush Fire Protection";
- That a Bushfire Emergency/Evacuation Plan is to be prepared for Tower 5 in accordance with the NSW Rural Fire Service Guidelines for the Preparation of Emergency/Evacuation Plan and comply with Australian Standard AS 3745 - 2010 'Emergency Control Organisation and Procedures for Buildings Structures and Workplaces for Residential Accommodation'; and

- That the sizing, spacing and pressure of the proposed hydrant system is to comply with AS2419.1-2005.

6.8 Ecologically Sustainable Development

6.8.1 ESD Principles under EP&A Regulation

There are four ecologically sustainable development (ESD) principles defined by clause 7(4) of Schedule 2 of the EP&A Regulation that must be considered in the assessment of the concept proposal. These are addressed briefly in the table below. The ESD Report at **Appendix 19** addresses the principles in further detail.

Table 19. ESD Principles under EP&A Regulation		
Principle	Description	Comment
Precautionary principle	The precautionary principle says that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation.	There are no threats of serious or irreversible environmental damage associated with the proposal. The proposal provides for a development that avoids environmental impacts where possible.
Intergenerational equity	The principle of intergenerational equity says that the present generation should ensure that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations.	The proposal would benefit present and future generations through health and environmental benefits associated with locating homes close to jobs and public transport.
Conservation of biological diversity and ecological integrity	This principle says that conservation of biological diversity and ecological integrity should be a fundamental concern.	The site is located in a highly developed urban context and has no notable biological and ecological value. Future development would feature appropriate stormwater management systems and have no detrimental impact on surrounding waterways.
Improved valuation, pricing and incentive mechanisms	This principle says that environmental factors should be included in the valuation of assets and services.	Major building components and systems will be selected in order to maximise sustainability benefits. Recommended measures are outlined in the discussion below.

6.8.2 ESD Measures for Future Development

An Ecologically Sustainability Development (ESD) Report by Efficient Living accompanies this EIS at **Appendix 19**. The report identifies sustainability initiatives for the future built form in line with SEPP and DCP controls. Key initiatives are outlined below.

Table 20. ESD Initiatives

Item	Initiative
Regulatory Requirements	
NatHERS Thermal Simulation	<ul style="list-style-type: none"> All Class 2 sole occupancy units are targeting a 10% improvement upon the mean average heating and cooling cap for NatHERS climate zone 15
BASIX Water and Energy	<ul style="list-style-type: none"> The residential component will reach a 40% potable water savings as measured by the BASIX framework The residential component is aiming for a 10% increase of BASIX energy target
NCC Section J, Energy Efficiency 2019	<ul style="list-style-type: none"> The commercial component will be designed and specified to comply with NCC Section J, Energy Efficiency, which is due to come into effect in May 2020. The NCC just had a significant increase in stringency that is estimated to generate a further 30% reduction in overall energy consumption of commercial buildings
NABERS	<ul style="list-style-type: none"> All commercial tenancies with a lettable area over 1000sqm will be subject to a NABERS 4.5 star commitment agreement A NABERS rating will be required at the point of sales or lease and must be maintained into the future under the Building Energy Efficiency Disclosure (BEED) Act 2010
SEPP 65	<ul style="list-style-type: none"> The residential components will be designed with passive solar design, heating and cooling energy conservation, solar and daylight access, natural ventilation, and recycling, reuse and waste management in accordance with ADG design objectives and criteria
Recommended Initiatives	
Green Star	<ul style="list-style-type: none"> The Green Building Council of Australia (GBCA) has developed the Green Star tool which provides a holistic approach to Building Sustainability.

Table 20. ESD Initiatives	
Item	Initiative
	<ul style="list-style-type: none"> Green Star Design and As Built framework is a suitable rating scheme to ensure the future development meets the Best Practice objectives of the Gosford City Council DCP and the SEARs requirements
Passive solar design	<ul style="list-style-type: none"> Adopt passive building design principles High performance glazing Thermal mass and insulation Natural ventilation
Indoor environment quality	<ul style="list-style-type: none"> Daylight Volume Ventilation External views Product choice
Energy efficiency	<ul style="list-style-type: none"> Significant increases to BASIX and 2019 NCC Section J, energy efficiency targets Typical Energy savings inclusions
Water Conservation	<ul style="list-style-type: none"> Reduce water consumption through water-efficient fixtures and fittings Collection of rainwater and reuse for garden watering Native planting and water efficient irrigation to community open spaces
Waste Management	<ul style="list-style-type: none"> Access to waste systems. Safe practices for storage, handling and collection of waste and recycling Waste management plan
Building Materials	<ul style="list-style-type: none"> Material selection based on environmental benefits, fit-for-purpose and cost-effectiveness

6.9 Social Impacts

A Socio-Economic Assessment prepared by Urbis accompanies this EIS at **Appendix 11**. Key points from Section 4 of Urbis' report, which relates to social impacts, are outlined below.

6.9.1 Current Social Infrastructure

Current social infrastructure in the area is summarised below:

Child care facilities:

- 1 facility within 400m
- 5 facilities within 2km
- All six are at or nearing full capacity

Community facilities:

- 1 facility (Gosford Library) within 400m
- 4 facilities within 2km (only one of which is available for public hire)

Health facilities:

- No facilities within 400m
- 5 facilities within 2km including Gosford Hospital

Education facilities:

- 3 facilities within 400m
- 8 facilities within 2km including a mix of primary, secondary and tertiary institutions

Open space:

- 8.3ha within 400m
- 267.8ha within 2km

6.9.2 Impacts

The proposed development would result in an influx of approximately 1,482 new residents in the area, based on an average of 1.9 people per household (ABS Census 2016 – Gosford suburb). The table below outlines the expected demand for additional social infrastructure and services resulting from this influx and also provides comment on the overall impact for each infrastructure type.

Table 21. Impact on Social Infrastructure		
Type	Additional Demand Generated by Proposed Development	Overall Impact
Childcare facilities	18 child care places	This is in itself is likely insufficient demand to incentivise construction of a new centre. However, the existing centres in the area are at or nearing capacity.
Community centres:	Insufficient demand for a new centre	The one community centre in the area available for public

Table 21. Impact on Social Infrastructure		
Type	Additional Demand Generated by Proposed Development	Overall Impact
		hire is outdated and only has capacity for 80 people, and therefore there is a gap in the current supply of temporary multiple space in Gosford.
Performing arts / cultural centre	Insufficient demand for a new performing arts / cultural centre	No new facilities or expansions warranted.
Library	Demand for approximately 100sqm of additional library floor space	This demand is expected to be absorbed by the future Gosford Regional Library (currently in the planning stage).
Education	Insufficient demand for a new public primary or high school	Gosford Public School recently relocated to a shared site with Henry Kendall High School, which included the delivery of new classrooms and recreation facilities.
Health	Demand for an additional 1-2 hospital beds	This demand is expected to be absorbed by the surrounding health facilities, including Gosford Hospital, which has recently undergone significant upgrades
Open space	Some additional pressure on Kibble Park and Rumbalara Reserve	This pressure is expected to be alleviated by planned upgrades to Kibble Park and the public and private open space within the proposed development.

6.9.3 Mitigation Measures

Urbis concludes that the development is supportable from a social infrastructure perspective and makes following (non-mandatory) recommendations to support a positive social outcome:

- Consultation with Council to consider a multi-purpose community space in future planning for the site or a possible planning agreement;

- Consider provision of a childcare facility on site to meet the demand generated by the incoming resident and worker population as well as other anticipated background growth (subject to operator interest); and
- Ongoing consultation with Council regarding the future plans for Kibble Park and Gosford Regional Library.

6.10 Economic Impacts

A Socio-Economic Assessment prepared by Urbis accompanies this EIS at **Appendix 11**. Key points from Section 5 of Urbis' report, which relates to economic impacts, are outlined below.

6.10.1 Construction Phase

The estimated construction cost of the development is \$345 million, and the estimated construction time period is 10 years.

The 10-year construction phase is expected to result in the following economic benefits:

- Up to **354 total jobs** per annum (138 direct jobs and 354 indirect jobs); and
- Up to **\$193.3 million gross value added (GVA)** to the local region and broader State economies (\$75.1 million direct GVA and \$118.2 million indirect GVA).

6.10.2 Operation Phase

The operation phase is expected to result in the following economic benefits:

- Up to **211 total jobs** per annum (144 direct jobs and 67 indirect jobs);
- Up to **\$13.9 million GVA** (\$8.2 direct GVA and \$5.7 indirect GVA).

6.10.3 Broader Economic Benefits

In addition to the specific benefits of jobs and GVA, the proposed development would also generally strengthen the role of Gosford CBD, help meet Gosford CBD's housing target of 6,000 additional dwellings by 2031, improve housing choice and affordability, stimulate and attract further investment in the immediate area, and raise the profile of Gosford CBD as a place to live and work.

6.11 Noise and Vibration

A Noise Impact Assessment prepared by Reverb Acoustics accompanies this EIS at **Appendix 9**. Key points from Reverb's assessment are outlined below.

6.11.1 Existing Environment

The site is surrounded by commercial and institutional uses as shown in the figure below. There are no residential or other notably sensitive receivers in the near vicinity.



Figure 40. Noise locality map

Source: Reverb Acoustics

The primary potential noise sources that would intrude upon the proposed development include road traffic noise and the operational activities and mechanical plant of the surrounding commercial uses.

The primary potential noise sources that would emit from the development are operational activities and mechanical plant of podium commercial uses; vehicles entering, leaving and manoeuvring within the carpark levels; and construction activities.

6.11.2 Noise Intrusion Impacts

Traffic Noise

Analysis of noise intrusion from passing traffic is addressed in Section 3.2.1 of Reverb's report. In summary, Reverb has found that the residential uses within the development comply with the relevant criteria, subject to implementation of the construction measures outlined in Section 4 of their report.

Other External Noise

Analysis of noise intrusion from surrounding commercial activity and mechanical plant is addressed in Section 3.2.2 of Reverb's report. In summary, Reverb has found that noise from nearby commercial activities and equipment would exceed the relevant criteria by up to 6dB(A) during the night at the nearest facades, assuming the use of standard windows. Modified glazing, therefore, would be required to meet the criteria, as outlined in Section 4 of Reverb's report.

6.11.3 Noise Emission Impacts (Operation Phase)

Analysis of noise emission from various mechanical plant (air conditioning condensers, refrigeration condensers, exhaust discharge, etc.) is addressed in Sections 3.2.3 and 3.2.5 of Reverb's report. In summary, Reverb has found that a typical vehicle entering, leaving or manoeuvring within the carpark would result in an acceptable level of approximately 40dB(A) at the nearest receiver. However, the noise would increase if

multiple vehicles were moving simultaneously. Accordingly, Reverb recommends positioning ventilation grills (a source of noise leakage from the car park) behind retaining walls or along facades facing away from more sensitive receivers.

6.11.4 Construction Noise and Vibration

Reverb anticipates that some construction activities are expected to exceed the relevant noise criteria, particularly mobile plant such as pile boring machines and dump trucks. Mitigation measures should therefore be considered.

Construction activities also have the potential to cause vibration that would affect the comfort of surrounding receivers and structural or cosmetic impacts on surrounding buildings. Mitigation measures should therefore be considered.

6.11.5 Mitigation Measures

A range of construction measures related to roofs, ceiling, walls, balconies, glazing and mechanical plant are recommended in Section 4 of Reverb's report. These measures would need to be implemented in order to achieve the residential amenity noise criteria and the project noise trigger levels.

Additionally, a range of noise and vibration control strategies applicable during the construction phase are recommended in Section 5 of Reverb's report. These include a noise and vibration monitoring program, vibration management strategies, equipment selection, acoustic barriers, consultation/complaints handling procedure and risk assessment.

Reverb's recommendations would be reviewed and refined as necessary at the detailed DA stage.

6.12 Water Cycle Management

Water cycle management is discussed in Section 2 of the Engineering Due Diligence Report prepared by Northrop at **Appendix 8**. Key points from Northrop's report are outlined below.

6.12.1 Connection to Drainage Infrastructure

Existing stormwater drainage infrastructure is located along Donnison Street and Henry Parry Drive and partially along William Street. This infrastructure drains towards the low point in Henry Parry Drive, which is located in the centre of the site's west boundary.

It is anticipated that the development's stormwater runoff would be conveyed to the stormwater drainage located within Henry Parry Drive. Localised catchments may be directed to the Donnison and William Street frontages, subject to detailed assessment.

An additional drainage line traverses the centre of the site from the southwestern corner of the neighbouring development at 37 William Street to the street drainage located in Henry Parry Drive. In order to avoid a significant redesign of the development, Northrop has recommended diverting the drainage line around the site via William Street and then connecting to the existing drainage line within Henry Parry Drive. This strategy would need to be further investigated at the detailed DA stage.

6.12.2 Stormwater Reuse

Runoff from roof areas would be captured and harvested by a system of reuse tanks. Based on Council DCP requirements, the development would need to provide a total reuse volume of 458sqm. Northrop note, however, that based on their experience it is often impractical to provide this volume, as adequate drawdown and reuse efficiency are not typically achieved. As the design progresses, further consultation with Council is required in order to provide an alternative solution that will meet the intent of the DCP in a more practical manner.

6.12.3 On-Site Detention

In accordance with Council's Civil Design Guidelines, on-site detention would be required in order to limit post-development flows from the site to less than or equal to pre-development flows for all storm events up to and including the 1% AEP event.

Preliminary calculations indicate that a total detention volume of approximately 300 cubic metres would be required. The exact volume will be determined during the detailed DA stage by conducting hydraulic modelling of the drainage system.

6.12.4 Stormwater Quality

In order to minimise adverse impacts upon the ecology of downstream watercourses, stormwater treatment devices will need to be incorporated into the design of the development. The nutrient and pollution targets would need to meet the requirements from Council's Engineering Guidelines.

For development of this type, propriety stormwater quality improvement devices are typically provided at the stormwater outlet prior to discharge offsite. Device selection would occur during the detailed design stage.

6.12.5 Local Overland Drainage

Local overland flow paths would need to be provided within the site to convey surface flows towards the road frontages. Any diversion of the site's central drainage line would need to be designed to convey surface runoff for up to the 1% AEP storm events.

Additional flow paths would be required within the development in order to direct surface runoff from the common areas towards the road frontages in the event of pipe blockages or surcharge of the drainage system.

Maximum ponding depths and velocity depths would be calculated to ensure safe flow routes for extreme storm events. Floor levels would be designed to ensure adequate freeboard is provided to retail tenancies and residential lobby entries.

6.12.6 Flooding

A review of Council's online flood mapping indicates that the site itself is not subject to flooding; however, the road reserves adjacent to the site are affected by the 1% Annual Exceedance Probably (AEP) event as shown in the figure below. This will likely result in restrictions to minimum floor levels of ground floor tenancies and driveway entry levels to lower basement levels. Specific floor levels would be considered at the detailed DA stage.



Figure 41. 1% AEP flood extents

Source: Central Coast Council Online Mapping

6.13 Utilities

Potable water, sewer, natural gas, electricity and communications servicing is discussed in Sections 3 and 4 of the Engineering Due Diligence Report prepared by Northrop at **Appendix 8**. The report considers the required capacity of the proposal and the impacts on existing utility assets.

In summary, Northrop has found that the development is able to be serviced by all necessary infrastructure, subject to certain upgrade requirements, which would be addressed in further detail at the detailed DA stage.

Council's recently completed detailed servicing studies (i.e., Gosford City Centre Water Servicing Strategy August 2017 and Gosford City Centre Sewer Servicing Strategy March 2013) would also be considered in detail at the detailed DA stage.

6.14 Waste Management

6.14.1 Impacts

Construction Phase

The objectives for waste management during construction work are:

- Minimise waste throughout the project lifecycle;
- Implement waste management strategies in accordance with the Waste Avoidance and Resource Recovery Act 2001; and
- Maximise the recycling and reuse of recyclable construction and demolition waste.

It is expected that construction of the development would have predictable and manageable waste impacts, subject to preparation of a waste management plan outlining expected construction waste and disposal methods.

Operation Phase

Key objectives for waste management during operation are:

- Residential and commercial waste to be stored and managed separately;
- Residential waste to be serviced by Council's appointed residential waste contractor;
- Commercial waste to be served by a private waste contractor;
- Waste vehicle manoeuvring to be designed and demonstrated with swept turning path overlay and certified to AS2890.2;
- Waste transfer from storage areas to collection areas to be undertaken within the footprint of the development.

It is expected that operation of the development would have predictable and management waste impacts, subject to preparation of a waste management plan identifying waste streams and approximate quantities for future development and use this information to provide recommendations for waste bin sizes and quantity and waste storage areas.

6.14.2 Mitigation Measures

At detailed DA stage, a waste management plan should be prepared in accordance with Chapter 7.2 of Gosford DCP 2013 addressing demolition, construction and operation phases (as applicable).

6.15 Accessibility

It is anticipated that future development within the proposed envelopes would be able to comply with relevant accessibility requirements including the Disability Discrimination Act, Building Code of Australia and Australian Standards. Accessibility would be assessed in detail during the future detailed DA stage once the physical building form, layout and levels are known.

6.16 Contamination

A Phase 1 Contamination Assessment prepared by Coffey accompanies this EIS at **Appendix 6**. The assessment describes the results of a desktop study and historical review of past activities and a site walkover to help identify areas of environmental concern and chemicals of potential concern. Key points from Coffey's report are outlined below.

6.16.1 Contamination Potential

Coffey's site history review has found that the site has been used for commercial/industrial purposes since at least 1954. The current shopping centre was constructed in about 1978. The specific uses prior to 1978 are not well known, but it appears that portions of the western side of the site were used for sawmilling, a fire/ambulance station and other commercial/industrial purposes, while the northwest corner may have been used as a corner store. The remainder of the site was occupied by buildings appearing to be residential.

Most contaminating activities associated with commercial/industrial uses cause "top down" contamination. The exception would be if wells or other underground infrastructure were installed.

It is not known if surfaced soils on the site were removed during construction of the current shopping centre. It is possible that imported fill material was used to level the site or provide a base for concrete slabs.

Based on the above, the potential for soil contamination to be present is medium. The potential for groundwater contamination is unknown at this stage; such contamination would result from soil contamination, and at this point soil contamination has not been assessed in detail.

6.16.2 Mitigation Measures

In order to ensure the site is suitable for the proposed development, Coffey recommends further assessment including:

- Obtaining NSW WorkCover dangerous goods records for the site, if available, to assess if dangerous goods such as fuel tanks may be present;
- A hazardous materials survey of the existing buildings, prior to demolition, and a hazardous materials clearance, after demolition of the buildings, to ensure hazardous materials were removed;
- A visual inspection of the site, after demolition of the existing buildings, to assess the presence of potential former wells or other underground infrastructure such as storage tanks as well as fill and potential asbestos containing materials;
- Collection of soil samples across the site, after demolition of the existing buildings (the minimum number of samples should comply with the NSW EPA (1995) Sampling Design Guidelines);
- If soil contamination is identified, the risk of groundwater contamination should be assessed, and groundwater sampling carried out if required;
- If volatile substances are identified, the risk of vapour contamination should be assessed, and vapour sampling carried out if required; and
- If materials are proposed to be removed from the site for the development, the material will require waste classification in accordance with the NSW EPA (2014) Waste Classification Guidelines.

6.17 Geotechnical

A Geotechnical Desktop Study Assessment prepared by Coffey accompanies this EIS at **Appendix 7**. The assessment describes the anticipated ground conditions beneath the site, identifies likely geotechnical constraints that may affect the development, identifies the likely foundation strategies for the proposed development, and recommends future site investigation strategies to support development of the design. Key points from Coffey's report are outlined below.

6.17.1 Impacts

Coffey has identified a number of key geotechnical constraints, including fill materials (potentially contaminated and of variable composition), shallow groundwater table, low strength alluvial soils and potential for acid sulfate soils.

Potential impacts associated with geotechnical matters include:

- Adverse impacts (structural and cosmetic) on adjacent structures and services resulting from poor construction techniques and management;
- Adverse impacts on construction timing and budget due to less than optimal construction techniques and management; and
- Adverse impacts on the structural integrity of the development itself.

6.17.2 Mitigation Measures

Section 6 of Coffey's report discusses and recommends strategies for excavation, building foundations and groundwater management.

Also, in Section 7, Coffey provides specific recommendations for future investigations to be carried out to inform the detailed design of the development.

Overall, based on their site observations, preliminary investigation and experience of similar projects, Coffey has that the proposed development is feasible from a geotechnical perspective and that the risks to adjacent structures and services should be able to be managed provided that appropriate site investigation, design assessment and construction monitoring are carried out.

6.18 Wind Impacts

The proposal has the potential to change the wind environment in the city centre and impact pedestrian amenity. A Qualitative Wind Assessment prepared by CPP accompanies this EIS at **Appendix 17**. Key findings from the report are outlined below.

6.18.1 Existing Environment

Based on a combined wind climate using data from both the Gosford weather station and Nora Head weather station, the prevailing winds at the site are organised into three main groups – northeast, south and west.

Winds from the northeast pass over a region of elevated topography and bushland (including Rumbalara Reserve) when approaching the site, and therefore the site is relatively shielded from such winds.

Winds from the south approach the site over a section of Brisbane Water and the low rise residential buildings of Point Frederick. Some strong wind conditions can be expected to impact the development from this direction.

In general, winds from the west are not as strong as the winds from the south and north-east but occur frequently throughout the year. The site is somewhat protected from these winds due to its low elevation and nearby topographic features.

6.18.2 Impacts

CPP advises that wind conditions within the site post-development would remain similar to existing wind conditions. The protection provided by local topography, the development's massing layout and separation of larger towers from the ground plane through podium setbacks will limit the impact of prevailing strong winds.

From a pedestrian comfort perspective, the wind environment around the site is expected to be classified as acceptable for pedestrian standing to walking.

The spacing and layout of the proposed envelopes are considered sufficient to allow breeze penetration and circulation. All locations would be expected to satisfy the safety/distress criterion.

6.18.3 Mitigation Measures

CPP advises that localised mitigation measures should be considered if calmer areas are desired for particular locations. In particular, measures such as local screening, landscaping, and overhead protection are suggested for areas intended for long-term seating or outdoor dining. These measures would be refined at the detailed DA stage once building design and particular commercial uses are identified.

6.19 Crime and Public Safety

6.19.1 Existing Environment

Crime rates in Gosford City Centre are generally higher than NSW averages, with the some of most common offences being assault, theft, malicious damage to property disorderly conduct and drug offences (based on NSW Bureau of Crim Statistics and Research for 2019).

6.19.2 Impacts

Future development has the potential to encourage criminal and anti-social behaviour if not designed appropriately.

A review of Buchan's example scheme shows that the development is consistent with/is capable of applying the key principles of Crime Prevention Through Environmental Design (CPTED). In particular:

- **Natural Surveillance:** The proposal provides ample opportunity to incorporate natural surveillance, particularly at the retail and lobby areas at ground level, primarily through the use of glazing and entry placement. Further natural surveillance of the communal open spaces and surrounding street network would also be provided by residential balconies in the apartment levels.
- **Territorial Reinforcement:** Residential and commercial entries are distinct, providing strong territorial cues to users. Differentiation in architectural design and materials would further assist the delineation between residential and commercial uses.
- **Space Management:** Maintenance of the future development would be the responsibility of the owners of the various strata lots. A building management committee would likely be required to manage spaces shared between lot owners.
- **Access Control:** The proposal provides sufficient opportunity for effective access control. It is anticipated that access to residential-only areas (e.g. lobbies, lifts and residential car parking) would be controlled by key-cards or similar.

6.19.3 Mitigation Measures

Future development within the proposed envelopes would need to be designed in order to minimise opportunity for anti-social and criminal behaviour. This can be achieved by applying the four key principles CPTED. Detailed assessment against

CPTED principles should be carried out at the detailed DA once the final built form is known.

6.20 Construction Impacts

A Construction Management Plan (CMP) accompanies the EIS at **Appendix 18**. The purpose of the plan is to:

- Outline key environmental matters associated with the construction of the proposed development;
- Guide compliance with potential consent conditions and relevant regulatory requirements;
- Suggest management procedures to achieve the above; and
- Recommend monitoring, auditing and reporting process to guide the ultimate head contractor appointed to deliver the works.

It should be noted that, with the exception of demolition, all physical works would be subject to future development applications, each of which would likely be required to provide a detailed CMP. Therefore, the CMP submitted with this concept DA should be read primarily as a preliminary document.

It is also anticipated that any consent for this concept DA would require preparation of a detailed CMP for demolition.

6.21 Adjoining Development Potential

The proposal allows ample opportunity for redevelopment of the adjoining sites to the northeast (37-41 William Street). In particular, the proposal:

- Provides for ADG-compliant building separation from the adjoining sites;
- Provides for side setbacks from the adjoining sites in accordance with Gosford City Centre SEPP;
- Results in no unacceptable overshadowing of the adjoining sites; and
- Does not result in the adjoining sites being isolated.

A potential building envelope for redevelopment of a 37-41 William Street as a single amalgamated site is shown on the architectural drawings at **Appendix 1**.

Overall it is evident that the proposal will not hinder the adjoining sites' ability to redevelop with a suitable ADG-compliant form. No further analysis on this item is considered necessary.

6.22 Site Suitability

The proposal is considered suitable for the site in that it:

- Is permissible in the B4 Mixed Use zone pursuant to the Gosford City Centre SEPP and would deliver additional high quality mixed use development in the centre;

- Is consistent with the State and local vision to grow Gosford as the region's capital;
- Is compatible with the existing and emerging built form in the centre;
- Is centrally located in Gosford City Centre and within walking distance of public transport (Gosford Station), retail opportunities, employment opportunities and a variety of social infrastructure including parks and schools; and
- Does not create any adverse impacts on Kibble Park, views to the Rumbalara ridgeline or surrounding properties.

6.23 Public Interest

The proposal is in the public interest in that it:

- Supports the growth of Gosford City Centre as the region's capital in accordance with State and local strategies;
- Provides significant short-term and long-term employment opportunities (354 jobs during construction and 211 jobs during operation);
- Contributes to housing choice and affordability;
- Contributes to a high quality built environment;
- Supports a lively and active public domain;
- Minimises overshadowing to Kibble Park and maintains view lines to the Rumbalara ridgeline; and
- Does not place an unreasonable burden on the area's existing social infrastructure.

7 Environmental Risk Assessment

The Environmental Risk Assessment establishes a residual risk by reviewing the significance of environmental impacts and the ability to manage those impacts. The ERA for Project Archimedes has been adapted from Australian Standard AS4369.1999 Risk Management and Environmental Risk Tools.

The Risk Assessment Matrix in the figure below illustrates how the residual environmental impacts of a proposal are assigned. The sum of the values assigned provides an indicative ranking of potential residual impacts after the mitigation measures are implemented as follows:

- The significance of impact is assigned a value between 1 and 5 based on:
 - The receiving environment;
 - The level of understanding of the type and extent of impacts; and
 - The likely community response to the environmental consequence of the project.
- The manageability of environmental impact is assigned a value between 1 and 5 based on:
 - The complexity of mitigation measures;
 - The known level of performance of the safeguards proposed; and
 - The opportunity for adaptive management.
- The sum of the values assigned provides an indicative ranking of potential residual impacts after the mitigation measures are implemented.

Significance of impact	Manageability of impact				
	5 Complex	4 Substantial	3 Elementary	2 Standard	1 Simple
1 – Low	6 Medium	5 Low/Medium	4 Low/Medium	3 Low	2 Low
2 – Minor	7 High/medium	6 Medium	5 Low/Medium	4 Low/Medium	3 Low
3 – Moderate	8 High/Medium	7 High/Medium	6 Medium	5 Low/Medium	4 Low/Medium
4 – High	9 High	8 High/Medium	7 High/Medium	6 Medium	5 Low/Medium
5 – Extreme	10 High	9 High	8 High/Medium	7 High/Medium	6 Medium

Table 22. Environmental Risk Assessment

Item	Phase C = Construction O = Operation	Potential Adverse Impact	Mitigation Measures	Significance of Impact	Manageability of Impact	Residual Impact
Built form and urban design	O	Adverse impacts on the area's built form environment due to inappropriate design or materials.	No specific mitigation measures have been identified. The design of any future development within the proposed envelopes would be assessed in detail at the detailed DA stage.	2	2	4 Low/Medium
Overshadowing	O	Minor overshadowing of Kibble Park and surrounding public domain.	No specific mitigation measures have been identified. Compliance with the proposed envelopes would ensure overshadowing impacts are acceptable.	2	2	4 Low/Medium
Traffic, parking and loading	C	Increased construction traffic on surrounding roads. Conflict with normal pedestrian and vehicle operations.	A CTMP should be prepared prior to any works commencing.	2	2	4 Low/Medium
	O	Minor increase in traffic on surrounding roads.	No specific mitigation measures have been identified.	2	1	3 Low
Visual impacts	O	Minor impacts on views to Rumbalara ridgeline. Visual change to the streetscape.	At detailed DA stage the development should investigate opportunities to vary and articulate the building form in order to minimise visual impacts.	2	2	4 Low/Medium

Table 22. Environmental Risk Assessment

Item	Phase C = Construction O = Operation	Potential Adverse Impact	Mitigation Measures	Significance of Impact	Manageability of Impact	Residual Impact
			No other specific mitigation measures have been identified. Compliance with the proposed envelopes would ensure view impacts are acceptable.			
Vegetation	O	Removal of multiple trees.	No specific mitigation measures have been identified.	1	1	2 Low
Heritage	C	Potential impacts to buried artefacts encountered during works.	Standard conditions regarding unexpected finds, as outlined in the Aboriginal Heritage Due Diligence Assessment (Extent, June 2019), are sufficient for mitigating potential impacts.	1	2	3 Low
Bushfire	O	Bushfire risk to proposed development.	Future development should implement the recommendations contained in Bush Fire Assessment Report (Building Code & Bushfire Hazard Solutions Pty Ltd, May 2019) regarding asset protection zones, construction of Tower 5, emergency management plan and water supply.	2	2	4 Low/Medium
ESD	O	Increased carbon emissions and energy consumption.	Future development should implement the minimum regulatory requirements and consider the recommended initiatives outlined in	2	2	4 Low/Medium

Table 22. Environmental Risk Assessment

Item	Phase C = Construction O = Operation	Potential Adverse Impact	Mitigation Measures	Significance of Impact	Manageability of Impact	Residual Impact
			the ESD Report (Efficient Living, August 2019).			
Social impacts	O	Impacts on capacity of surrounding social infrastructure.	<p>No mandatory measures identified. The proponent could consider:</p> <ul style="list-style-type: none"> Consulting with Council to consider a multi-purpose community space in future planning for the site. Providing a childcare facility on site (subject to operator interest). 	2	1	3 Low
Economic impacts	O	NA	The anticipated economic impacts are positive and require no mitigation measures.	NA	NA	NA
Noise and vibration	C	<p>Noise and vibration impact to surrounding commercial receivers resulting from construction activities (vehicles and machinery).</p> <p>Due to staged construction, noise and vibration impacts to on-site residential receivers resulting from construction activities (vehicles and machinery).</p>	<p>Future development should implement the recommendations contained in the Noise Impact Assessment (Reverb Acoustics, July 2019) regarding noise and vibration monitoring, vibration management, equipment selection, acoustic barriers, consultation/complaints handling procedure and risk assessment.</p> <p>Future construction activities should be limited to standard works hours</p>	2	2	4 Low/Medium

Table 22. Environmental Risk Assessment

Item	Phase C = Construction O = Operation	Potential Adverse Impact	Mitigation Measures	Significance of Impact	Manageability of Impact	Residual Impact
			(7am to 6pm Monday to Friday and 8am to 1pm on Saturday, with no construction on Sundays or public holidays).			
	O	Noise impacts on surrounding commercial receivers and residential receivers on-site due to noise emissions from vehicle manoeuvring and building plant and equipment.	Future development should implement the recommendations contained in the Noise Impact Assessment (Reverb Acoustics, July 2019) regarding construction materials.	2	2	4 Low/Medium
Water cycle management	O	Impacts to stormwater drainage system and quality of downstream waterways. Risks to human life resulting from flooding.	Future development should meet the design intent for water cycle management as outlined in Section 6.7 of Gosford DCP 2013.	2	2	4 Low/Medium
Utilities	O	Impacts on capacity of local utility networks.	No specific mitigation measures have been identified. The need for any upgrades to utility infrastructure would be assessed in detail at the detailed DA stage, and approvals for connections and upgrades would be obtained as required.	2	2	4 Low/Medium

Table 22. Environmental Risk Assessment

Item	Phase C = Construction O = Operation	Potential Adverse Impact	Mitigation Measures	Significance of Impact	Manageability of Impact	Residual Impact
Waste Management	C	Impacts (visual, odour) resulting from improper waste management.	Any future detailed DA should include a waste management plan prepared in accordance with Section 7.2 of Gosford DCP 2013.	2	2	4 Low/Medium
	O	Impacts (visual, odour) resulting from improper waste management.	Any future detailed DA should include a waste management plan prepared in accordance with Section 7.2 of Gosford DCP 2013.	2	2	4 Low/Medium
Accessibility	O	Inability for disabled person to access the development.	No specific mitigation measures have been identified at this stage. Accessibility would be assessed in detail at the detailed DA stage.	2	2	4 Low/Medium
Contamination	O	Risks to human health resulting from contamination.	Future development should implement the recommendations contained in the Phase 1 Contamination Assessment – Site B (Coffey, December 2015)) regarding further assessment.	2	3	5 Low/Medium
Geotechnical	C	Risks to structural integrity of surrounding development and the development itself.	Future development should implement the recommendations contained in the Geotechnical Desktop Study Assessment – Site B (Coffey, December 2015))	2	3	5 Low/Medium

Table 22. Environmental Risk Assessment

Item	Phase C = Construction O = Operation	Potential Adverse Impact	Mitigation Measures	Significance of Impact	Manageability of Impact	Residual Impact
			regarding further targeted geotechnical investigations.			
Wind	O	Adverse wind environment along surrounding streets and through-site link.	Future development should consider wind amelioration measures as recommended in the Wind Assessment Report (CPP, August 2019).	2	2	4 Low/Medium
Crime and Public Safety	O	Anti-social and criminal behaviour within and around the development.	Future development should be designed in accordance with the principles of Crime Prevention Through Urban Design.	2	2	4 Low/Medium
Construction Management	C	Noise, dust, etc. associated with construction activities.	A detailed Construction Management Plan should be prepared prior to commencement of any works, based on the framework outlined in the submitted Preliminary Construction Management Plan (August 2019).	2	2	4 Low/Medium

8 Mitigation Measures

The collective measures required to mitigate the impacts associated with the proposed works are summarised in the table below. These measures have been derived from the previous assessment in Section 7 and the measures detailed in the appended specialist reports.

Table 23. Mitigation Measures	
Item	Proposed mitigation measures and/or comments
Built form and urban design	No specific mitigation measures have been identified. The design of any future development within the proposed envelopes would be assessed in detail at the detailed DA stage.
Overshadowing	No specific mitigation measures have been identified. Compliance with the proposed envelopes would ensure overshadowing impacts are acceptable.
Traffic, parking and loading	Construction: A CTMP should be prepared at the detailed DA stage.
	Operation: A Green Travel Plan should be prepared at the detailed DA stage.
Views	No mitigation measures have been identified. Compliance with the proposed envelopes would ensure view impacts are acceptable.
Vegetation	No mitigation measures have been identified.
Heritage	Standard conditions regarding unexpected finds are sufficient for mitigating potential impacts. These are outlined in the Aboriginal Heritage Due Diligence Assessment (Extent, June 2019).
Bushfire	Future development should implement the recommendations contained in Bush Fire Assessment Report (Building Code & Bushfire Hazard Solutions Pty Ltd, May 2019) regarding asset protection zones, construction of Tower 5, emergency management plan and water supply.
ESD	Future development should implement the regulatory requirements and consider the recommended sustainability initiatives in the ESD Report (Efficient Living, August 2019) during the design, construction and operation of the development.

Table 23. Mitigation Measures

Item	Proposed mitigation measures and/or comments
Social impacts	<p>No mandatory mitigation measures have been identified.</p> <p>The proponent could consider providing a childcare facility on site (subject to operator interest) and also consider consulting with Council regarding a community facility on site.</p>
Economic impacts	<p>The anticipated economic impacts are positive and require no mitigation measures.</p>
Noise and vibration	<p>Construction:</p> <p>Future development should implement the recommendations contained in the Noise Impact Assessment (Reverb Acoustics, July 2019) regarding noise and vibration monitoring, vibration management, equipment selection, acoustic barriers, consultation/complaints handling procedure and risk assessment.</p> <p>Construction activities should be limited to standard works hours (7am to 6pm Monday to Friday and 8am to 1pm on Saturday, with no construction on Sundays or public holidays).</p> <p>Operation:</p> <p>Future development should implement the recommendations contained in the Noise Impact Assessment (Reverb Acoustics, July 2019) regarding construction materials.</p>
Water cycle management	<p>Future development should meet the design intent for water cycle management as outlined in Section 6.7 of Gosford DCP 2013.</p>
Utilities	<p>No specific mitigation measures have been identified. The need for any upgrades to utility infrastructure would be assessed in detail at the detailed DA stage, and approvals for connections and upgrades would be obtained as required.</p>
Waste Management	<p>Any future detailed DA should include a waste management plan prepared in accordance with Section 7.2 of Gosford DCP 2013.</p>
Waste Management	<p>Any future detailed DA should include a waste management plan prepared in accordance with Section 7.2 of Gosford DCP 2013.</p>
Accessibility	<p>No specific mitigation measures have been identified.</p> <p>Accessibility would be assessed in detail at the detailed DA stage.</p>
Contamination	<p>Future development should implement the recommendations contained in the Phase 1 Contamination Assessment – Site B</p>

Table 23. Mitigation Measures	
Item	Proposed mitigation measures and/or comments
	(Coffey, December 2015)) regarding further assessment.
Geotechnical	Future development should implement the recommendations contained in the Geotechnical Desktop Study Assessment – Site B (Coffey, December 2015)) regarding further targeted geotechnical investigations.
Wind	Future development should consider wind amelioration measures as recommended in the Wind Assessment Report (CPP, August 2019).
Crime and public safety	<p>Future development should be designed in accordance with the principles of Crime Prevention Through Environmental Design (CPTED).</p> <p>A CPTED assessment should be prepared at the detailed DA stage.</p>
Construction Management	A detailed Construction Management Plan should be prepared prior to commencement of any works, based on the framework outlined in the submitted Preliminary Construction Management Plan (August 2019).

9 Conclusion and Justification

This EIS is submitted to the Minister for Planning to accompany an SSD concept proposal for the Gosford Alive project.

In accordance with the requirements of Schedule 2 of the EP&A Regulation, this EIS considers the relevant statutory instruments and strategic documents, built form and social and environmental impacts. Further, this EIS provides an assessment of the environmental risks of the proposed development in accordance with the SEARs issued by DPIE on 1 February 2019.

We recommend approval of this application for the following reasons:

- The proposal will play a key role in renewing Gosford City Centre and growing the centre as the capital of the Central Coast Region;
- The proposal will generate jobs, both short-term and ongoing, and will assist in meeting housing demand;
- The proposal's design is the result of detailed analysis of the site and ongoing consultation with the Gosford Design Advisory Panel and Design Reference Group;
- The proposal's design ensures that overshadowing impacts to Kibble Park are minimised and that key views to the Rumbalara ridgeline are maintained;
- The potential environmental impacts of the proposal can be satisfactorily mitigated subject to the recommendations of the technical supporting documentation accompanying this EIS;
- The site is suitable for the proposal; and
- The proposal is in the public interest.

This EIS fulfils the requirements of the EP&A Act and Regulation, addresses all relevant matters prescribed by the SEARs and demonstrates that the potential impacts of the proposal can be satisfactorily managed or mitigated.

In light of the above, we strongly recommend that the proposal be granted consent.



Suite 12048, Level 12, 179 Elizabeth Street
Sydney, New South Wales 2000

info@mecone.com.au
mecone.com.au