



# Gosford Alive

## Concept DA & Stage 1 works

Response to Submissions

Mecone Pty Ltd on behalf of Lederer Group  
April 2020



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\* This document is for discussion purposes only unless signed and dated by the persons identified. This document has been reviewed by the Project Director.

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# 1 Introduction

This Response to Submissions Report (RtS Report) has been prepared for the Department of Planning, Industry and Environment (DPIE) in response to the submissions received following the public exhibition of State Significant Development SSD-9813 for the concept development application and stage 1 early works for a proposed mixed-use development (the project).

The SSD was publicly exhibited from 11 October to 7 November 2019 in accordance with Schedule 1(9) of the NSW Environmental Planning and Assessment Act 1979 (EP&A). The publicly exhibited SSD received a total of eleven (11) submissions, including ten (10) public authority agency submissions and one community submission. The details of the submissions are shown in Section 4 – Consideration of all the submissions.

This Report will be reviewed by DPIE in conjunction with the amendments made to the documentation in response to the submission raised. This report is accompanied by:

- Appendix 1: Response to Central Coast Council Submission
- Appendix 2: Architectural Package
- Appendix 3: Social & Economic Impact Assessment
- Appendix 4: Arboricultural Assessment Report
- Appendix 5: Aviation Impact Assessment
- Appendix 6: Traffic Assessment
- Appendix 7: Demolition & Construction Traffic Management Plan
- Appendix 8: Design Guidelines
- Appendix 9: Design Excellence Strategy
- Appendix 10: Ecological Sustainable Development (ESD) Commitments
- Appendix 11: Visual Impact Assessment
- Appendix 12: Coffeys Advice
- Appendix 13: Updated landscape package
- Appendix 14: Design Advisory Panel Advice

## 1.1 Purpose of Report

This Report addresses the legislative requirements of Schedule 1(9) of the EP&A Act.

In general, this Report:

- Responds to the matters raised in the submissions; and
- Sets out and assesses some additional clarifications to the project layout which have been made to address the issues raised in submissions and as a result of further detailed design of the project.



## 2 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 Figure 1, with Figure 2 showing the local context.



**Figure 1** Subject Site  
Source: Mecone 2019



**Figure 3** Local context diagram  
Source: Mecone 2019

Table 1 provides the legal description, and a brief summary of the site and surrounding context.

Table 1 – Site Description	
Item	Description
Legal Description	Lot 6 DP598833 Lot 1 DP540292
Total Area	14,194m <sup>2</sup>
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.
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.
Previous uses	Former Kibbleplex Shopping Centre currently leased to Council for use as public car park.

## 3 Background

The application for the concept DA and stage 1 early works was lodged in September 2019 and publicly exhibited from 11 October to 7 November 2019 in accordance with Schedule 1(9) of the NSW Environmental Planning and Assessment Act 1979 (EP&A). The publicly exhibited SSD received a total of eleven (11) submissions, including ten (10) public authority agency submissions and one (1) community submission. The details of the submissions are outlined in Chapter 4.

On 20 December 2019, the Department of Planning, Industry and Environment (DPIE) requested that a consolidated response to submissions be prepared. In doing so, several changes have been proposed addressing many of the issues raised in the submissions.

### 3.1 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.

Developments may be considered by the consent authority where an exceedance to the maximum building height and floor space ratio is proposed, subject to the satisfactory demonstration of the following:

- 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.*

In line with the requirements of the 'City of Gosford Design Advisory panel – Guide for Proponents and Stakeholders' (the Guide), the proponent and Project Team engaged in an iterative process with the Design Reference Group (DRG) and Design Advisory Panel (DAP) to refine the proposal prior to its lodgement. Further design refinements were suggested by the DAP post-lodgement, dated November 2019, which have been incorporated into the updated scheme accompanying this report. It is argued that the amended proposal has satisfactorily responded to the DAP's commentary.



## 4 Proposed Changes to the Project

The proposed changes to the project have responded to the matters raised in the DAP's design suggestions and DPIE's request for information letter.

A common theme raised by DAP and DPIE related primarily to the bulk and scale of the built form (heights of buildings and podiums, setbacks) and general massing, modulation and articulation of the building envelopes. As well as this, concerns were raised regarding the provision of fine grain frontages and street activation, particularly along the eastern edge.

In addressing these concerns among others, envelopes have been tightened and reduced to minimise perceived bulk and scale, particularly from public domain areas, including Kibble Park. In addition to this, the heights of Towers 1 and 5 have been reduced with the envelope of Tower 5 stepped down towards Albany Street. Podium envelope height has slightly increased on Albany Street to better respond to the existing built form on the opposite side of the subject site. These built form changes have resulted in a reduction to apartment numbers and total gross floor area, as described in the table on the following page. All street frontages have been amended to provide for improved activation with the public domain.

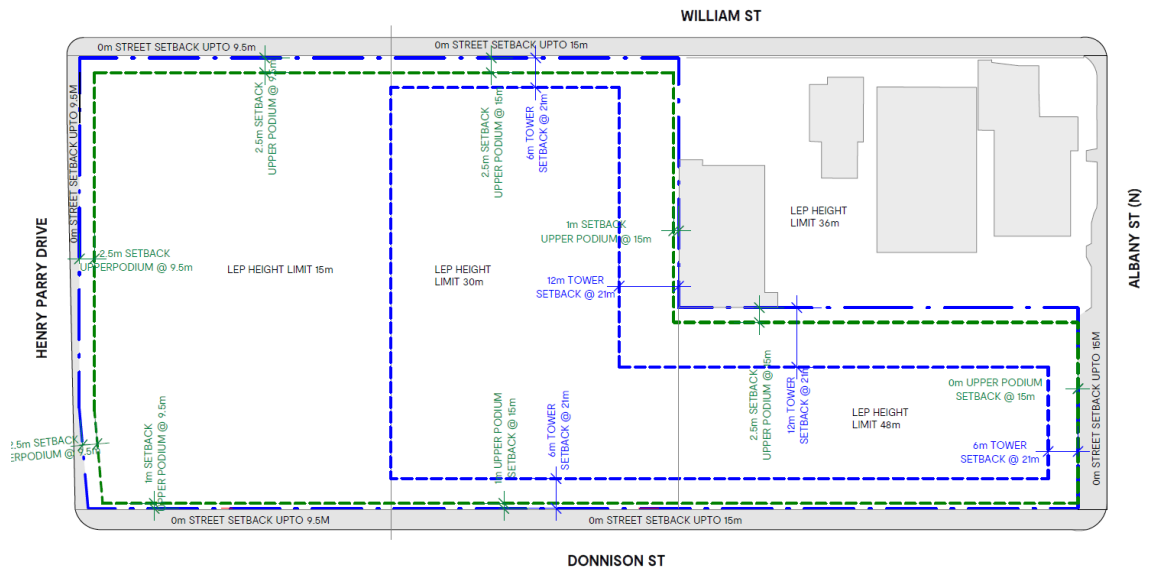
Concerns relating to the lack of commercial floor space have been addressed with the allocation of commercial and residential floor space revisited providing around a 50% increase of commercial GFA compared to the original proposal.

The design changes that have been made during this process have gone to considerable length to address the built form issues, which in turn have aided in addressing impacts relating to amenity, including overshadowing of public spaces.

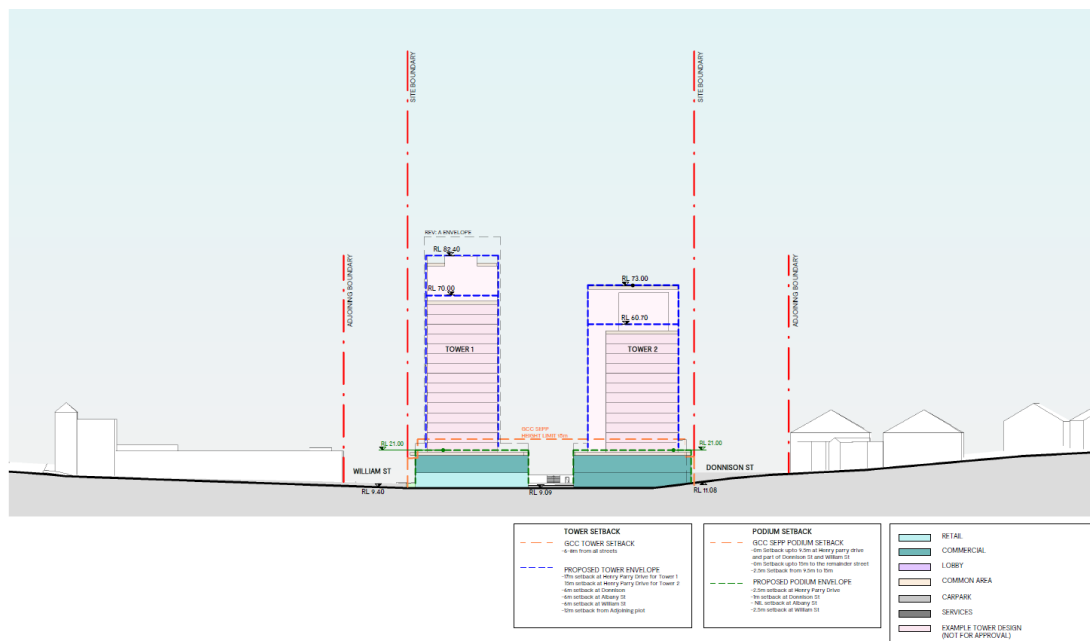
It is believed that the design changes which have been made align with those comments made by DAP and DPIE with respect to achieving design excellence and achieve a desirable outcome for the Gosford City Centre. For further detail relating to issues raised in submissions from DAP and DPIE, refer to Section 6 of the Report.

The following table provides an overview of changes regarding key numeric values relating to heights, setbacks and gross floor area.

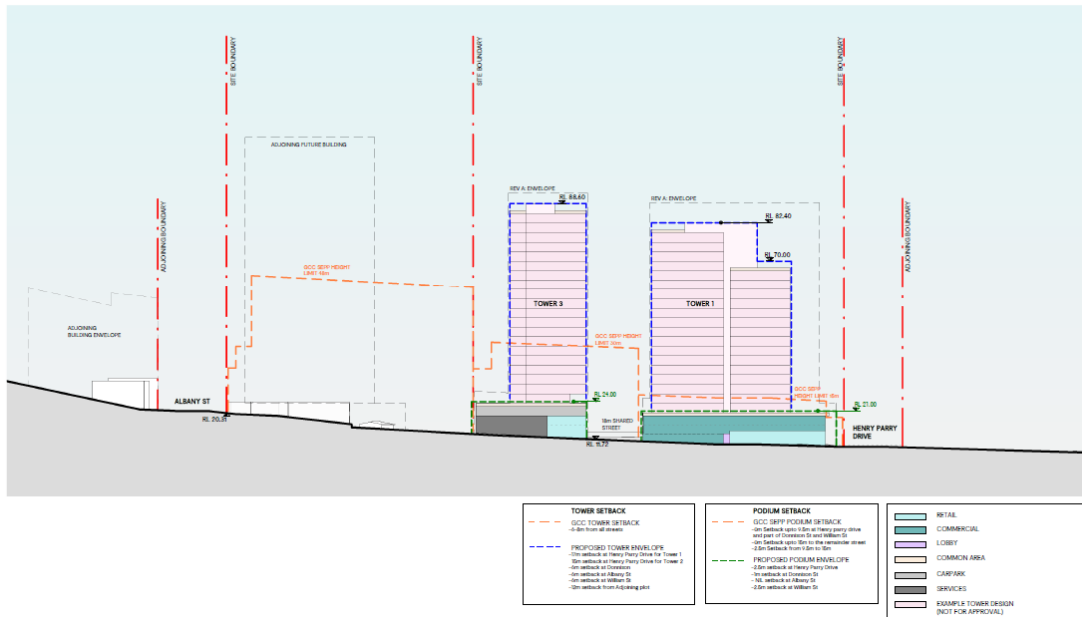
Table 2 – Built form changes		
Item	Original	Amended
Apartment numbers	738	727
Building Height	Tower 1: RL 89 Tower 2: RL 73 Tower 3: RL 92 Tower 4: RL 101 Tower 5: RL 110	Tower 1: RL 82.4 Tower 2: RL 73 Tower 3: RL 88.6 Tower 4: RL 101 Tower 5: RL 101
GFA	73,058m <sup>2</sup> Residential: 69,366m <sup>2</sup> Non-residential: 3,692m <sup>2</sup>	72,782m <sup>2</sup> Residential: 67,360 <sup>2</sup> Non-residential: 5,422m <sup>2</sup>
Setbacks	<b>North:</b> Podium – 2.5m (tower 1 and 3); and 2.5m (tower 4 and 5) Tower – 6m (tower 1 and 3); and 12m (tower 4 and 5) <b>South:</b> Podium – 2.5m Tower – 6m <b>East:</b> Podium – 1m (tower 3), and 2.5m (tower 5) Tower – 12m (tower 3), and 6m (tower 5) <b>West:</b> Podium – 2.5m Tower – 15m	<b>North:</b> Podium – 2.5m (tower 1 and 3); and 2.5m (tower 4 and 5) Tower – 6m (tower 1 and 3); and 12m (tower 4 and 5) <b>South:</b> Podium – 1m Tower – 6m <b>East:</b> Podium – 1m (tower 3), and 0m (tower 5) Tower – 12m (tower 3), and 6m (tower 5) <b>West:</b> Podium – 2.5m Tower – 14m (tower 1), and 15m (tower 2)



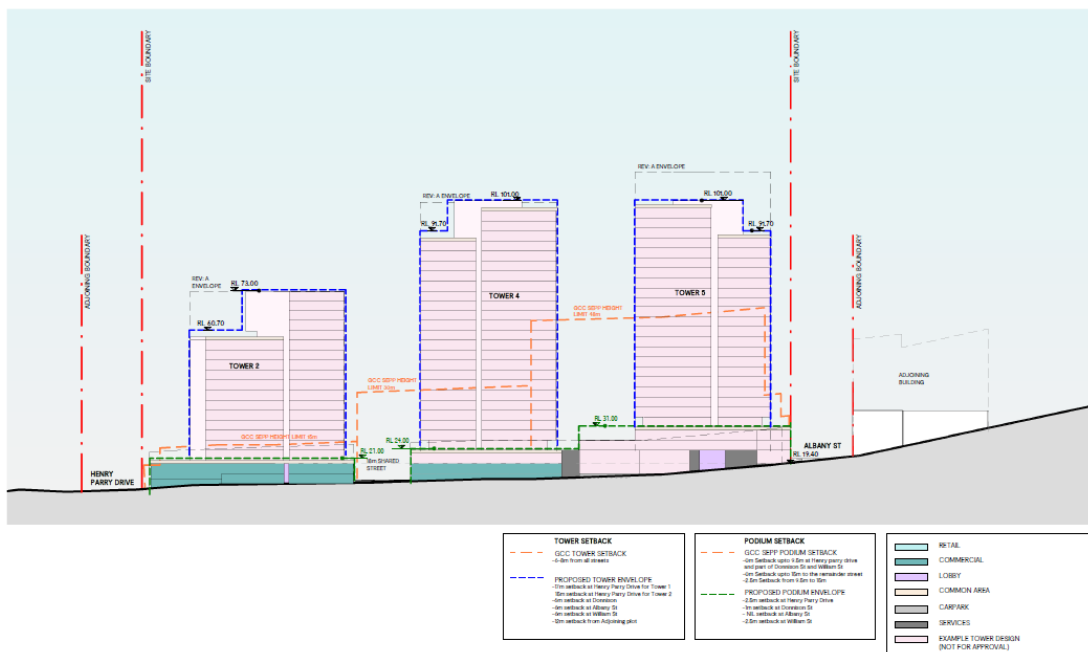
**Figure 4** Amended setbacks  
Source: Buchan



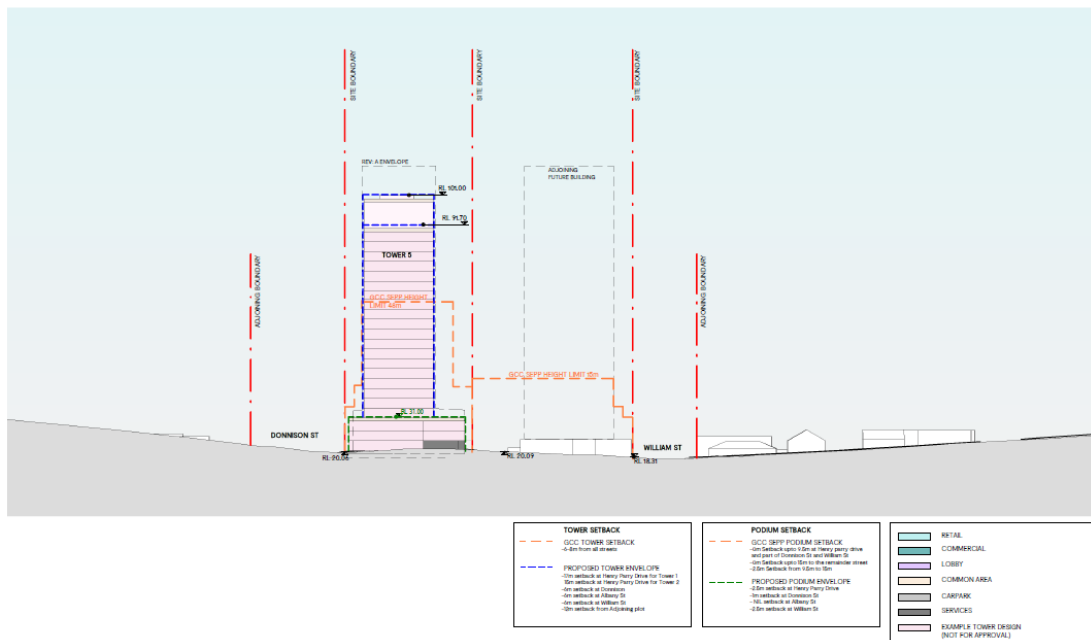
**Figure 5** Amended Henry Parry Drive Elevation  
Source: Buchan



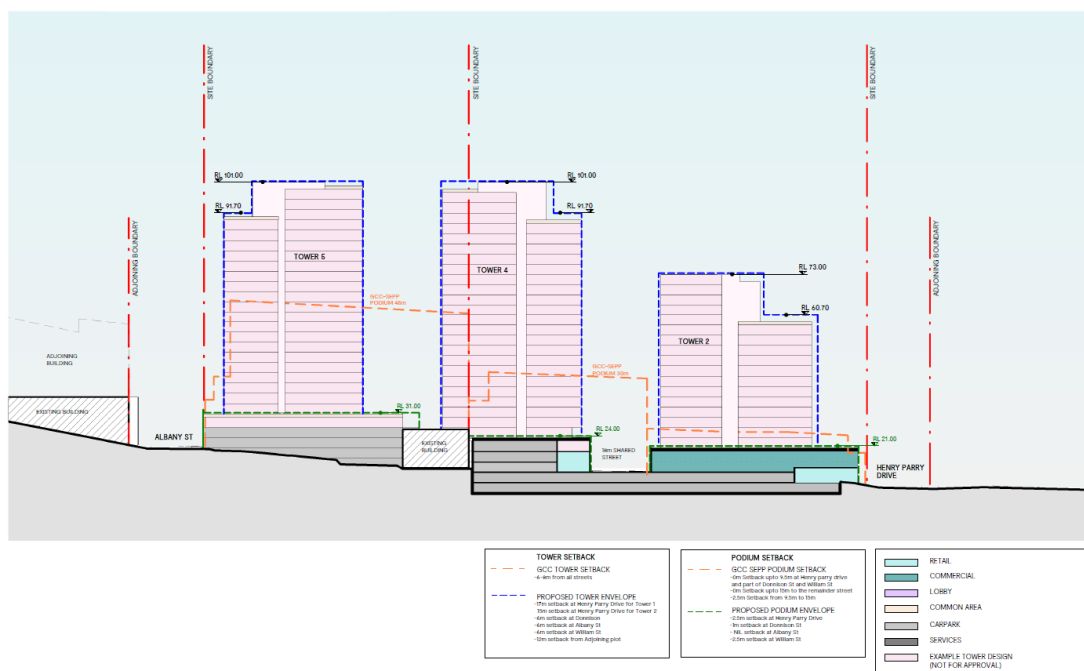
**Figure 6** Amended William Street Elevation  
Source: Buchan



**Figure 7** Amended Donnison Street Elevation  
Source: Buchan

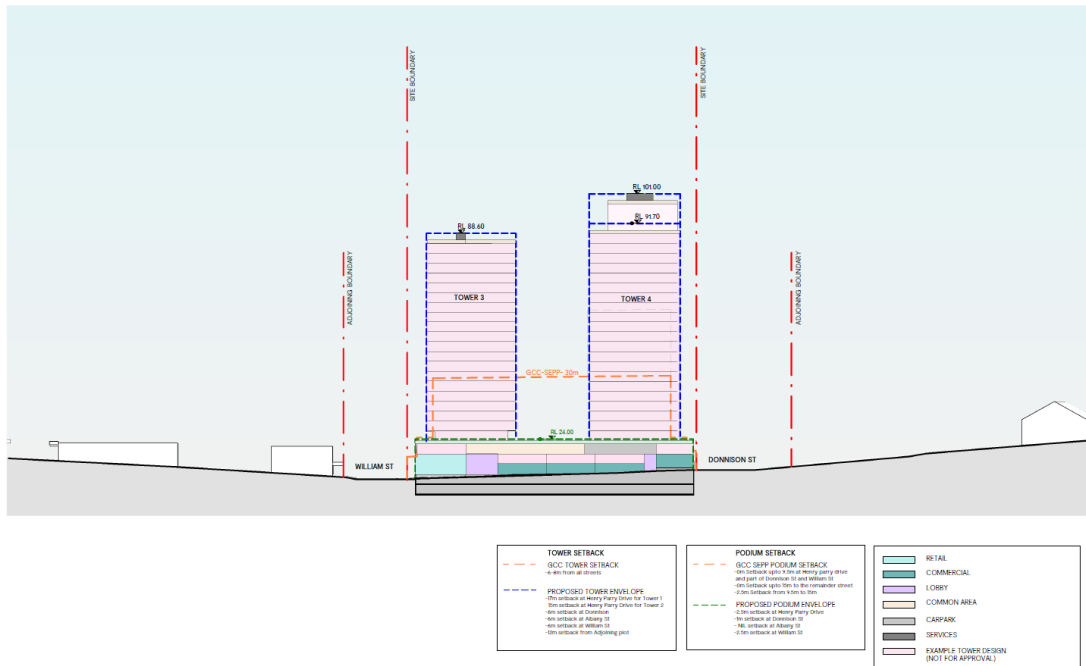


**Figure 8** Amended Albany Street North Elevation  
Source: Buchan



**Figure 9** Amended Section A  
Source: Buchan





**Figure 10** Amended Section B  
Source: Buchan

## 4.1 Amended and additional documentation

The following provides a summary of what documentation has been amended or newly provided as a part of this process.

### 4.1.1 Architectural Package

The following amendments have been made to the architectural design by Buchan, captured at Appendix 2:

1. Tower envelopes improved as follows:
  - a. Envelopes tightened and reduced, to minimise perceived bulk & scale, especially from Kibble Park.
  - b. Tower 1 envelope reduced in height by 6.6m.
  - c. Tower 5 envelope reduced in height by 9m and stepped down towards Albany.
  - d. All envelopes stepped to codify top building form articulation into the envelopes.
  - e. Towers 1 & 5 articulation adjusted to present more vertical proportion.
2. Podium envelope height increased on Albany Street to better respond to Albany Street existing built form and street frontage heights.
3. Commercial areas significantly increased – now covering podiums of Buildings 1 & 2 and providing activated frontages all around, then transitioning to SOHO under podiums 3&4, then into townhouses with direct street access.
4. Street activation improvements, including:
  - a. (SOHO & townhouses) continued along the full length of Donnison and around onto Albany.
  - b. All street frontages are now fully activated

- c. Shared street and pedestrian link frontages also activated.
  - d. All carparking is now sleeved from public view.
  - e. All SOHO and townhouses provided with min 2.5m private terrace.
- 5. Public Domain landscaping within the site improved and updated, including:
  - a. Improving the “civic” qualities of the Henry Parry Drive frontage.
  - b. Providing for future access directly across Henry Parry Drive through to the shared link.
- 6. Street landscaping improved and updated, including:
  - a. Removal of planted median strip on William St as requested.
  - b. Removal of all existing street trees as requested and replacement with new plantings.
  - c. Kerb realignments to improve truck turning at intersections and retain more of the existing kerb alignments.
- 7. Provision of additional architectural information, including:
  - a. Architectural Design Report, Envelopes & Reference Scheme updated to align with above.
  - b. Shadow Diagrams updated and added to, including:
    - i. Provision of hourly assessments for Winter, Equinox & Summer
    - ii. Additional detail for properties to the south
    - iii. 6th potential future tower to NW corner dotted, but not included in calculations
  - c. Staging Diagrams increased in detail, and provision made for up to 170 temporary public car spaces during construction
  - d. Additional SEPP65 detail provided for example scheme, including unit sizes, solar access & cross-ventilation diagrams.

#### 4.1.2 Visual Impact Assessment

A Visual Impact Assessment has been prepared by Urbaine and accompanies this report at Appendix 11. The findings of the assessment indicate that the proposed development is consistent with the aims and objectives of the SEPP (GCC), in that it is a suitable development for the area in terms of visual impact. It also assists in enhancing the cultural fabric of the area by providing additional, high quality accommodation.

Although development within Gosford CBD, in particular, is varied and mixed, the existence of key heritage buildings and local community amenity areas requires a sensitive approach to any development, particularly at the ground level. As such, Urbaine have determined that the scale, built form and planning of the proposed development provides a respectful response to the site and surroundings, whilst remaining within the designated volumetric and height limit controls defined in SEPP (GCC).

Table 3 overleaf provides a comparative overview of the existing view quality and proposed visual impact associated with the development from ten (10) different vantage points across the city centre. It is noted that the proposal will not result in an impact greater than a “medium” rating, and only minor increases to the existing visual impact.

Table 3 – Visual Impact Assessment		
Viewpoints	Existing visual assessment	Proposed visual impact
7	7 – Medium	8 – Medium
8	2 – Low	4 – Low
14	8 – Medium	4 – Low
16	5 – Low	7 – Medium
22	5 – Low	6 – Medium
30	6 – Medium	4 – Low
37	11 – High	4 – Low
40	5 – Low	6 – Medium
44	3 – Low	5 – Low
47	3 – Low	5 – Low

#### 4.1.3 Traffic Impact Assessment

A traffic impact assessment response has been prepared by GTA Consultants and accompanies this report at Appendix 6. GTA's document includes detailed responses to the concerns raised by DPIE, CCC, TfNSW and RMS in relation to traffic impacts. Refer to relevant tables in Chapter 6 for detailed responses to these concerns.

#### 4.1.4 Social and Economic Impact Assessment

An amended Social and Economic Impact Assessment has been prepared by Urbis and accompanies this report at Appendix 3.

There are a range of economic benefits associated with the proposed development:

- Deliver 76 direct jobs and 120 indirect jobs, and contributing \$180.7 million in direct and indirect value added, to New South Wales over the 10-year development phase;
- Deliver 267 direct jobs through the ongoing operation of the non-residential (commercial) components of the development and a further 193 indirect jobs from flow-on effects; and
- Contribute \$55.9 million in value added to the New South Wales economy on an annual ongoing basis.

In addition to supporting additional employment and economic growth, the proposed development will provide a range of other benefits for existing and future Gosford residents, workers and visitors, including:

- The proposed development will bring \$24.4 million in additional retail spending into the Gosford CBD and support the growth of local businesses. This is likely to help offset any potential impact from the loss of parking at the subject site.

- Strengthening the role of the Gosford CBD by housing future residents in an area with significant and growing employment opportunities and creating opportunities for live work synergies. The development will also contribute to the urban renewal of the eastern precinct of Gosford CBD by increasing passive surveillance and through ground floor activation that will enhance street level vibrancy.

#### 4.1.5 Aviation Impact Statement

An Aviation Impact Statement has been prepared by Aviation Projects and accompanies this report at Appendix 5.

The Project development and its highest towers:

- Will not infringe the obstacle clearance heights applicable to any of the instrument procedures at Gosford Hospital helicopter landing site (HLS);
- Will not penetrate the obstacle identification surfaces of Gosford Hospital HLS;
- Will not impact air routes and is outside restricted areas;
- Will not impact any aviation facilities; and
- Will not impact any aviation radars and BoM radars.

Aviation Projects have recommended that the rooftops of towers 4 and 5 should be lit with a low intensity red steady light at night (as per Section 9.4.2.2 and Section 3.12.2). The provision of marking is not necessary as the building size and the rooftop colour (in white) will be noticeable during the day.

#### 4.1.6 Construction Management Plan

A Construction Management Plan (CMP) has been prepared and accompanies this report and can be found at Appendix 7. The CMP has been developed to address a range of safety, health, traffic and environmental considerations associated with the construction of the proposed development. Included as part of the CMP is a detailed demolition management plan for the initial stage of works. Refer to CMP prepared by Husky Demolition Pty Ltd.

#### 4.1.7 Arboricultural Assessment Report

An Arboricultural Assessment Report has been prepared by Tattersall Lander Pty Ltd and accompanies this report at Appendix 4.

The following recommendations are made regarding the street trees:

- **Remove all trees assessed** – this is an opportunity for Council to have inappropriately located trees removed as part of the redevelopment by the proponent.
- **Replace the removed trees with species more appropriate for the location** –this is an opportunity for Council to have these works undertaken at the cost of the developer. Such replacement/compensatory plantings should be determined with consultation of Council and an appropriately qualified landscape consultant.

Accordingly, the updated landscape concept plan prepared by Arcadia (Appendix 13) incorporates these recommendations.

#### 4.1.8 Design Guidelines

This report is accompanied by a set of design guidelines (refer to Appendix 8).

The guidelines set out the key principles and design parameters that inform the detailed design of the buildings within the envelopes. The guidelines as well address the massing, modulation, heights, articulation and building materiality. In addition to this, the parameters to protect views and vistas, as well as solar access to public places has been addressed. Overall, the Gosford Alive project provides a unique opportunity to revitalize Gosford CBD through the planned redevelopment of derelict buildings. The design is centered around the strategic location, breaking down the site establishing through links and sight lines, and promoting activation.

#### 4.1.9 Design Excellence Strategy

A Design Excellence Strategy accompanies this report at Appendix 9. The strategy sets out the intended process to ensure design excellence will be exhibited in future detailed applications for the site.

#### 4.1.10 ESD Commitments

A consolidated list of ESD commitments has been provided, refer to Appendix 10.

The supplementary report provided by Efficient Living lists best practice initiatives to be implemented into the Gosford Alive project as a minimum commitment to achieve the sustainability objectives.



## 5 City of Gosford Design Advisory Panel

In amending the above information, consideration has been given to the comments and recommendations provided by the City of Gosford Design Advisory Panel in late 2019. This section provides an overview of the response to those issues raised by CoGDAP. The following table provides an overview of the design response to each comment/recommendation.

Table 4 – City of Gosford Design Advisory Panel	
Comments	Response
The western end of the proposal is well-resolved, the eastern end needs further refinement.	<p>Significant refinement to the eastern end of the proposal has taken place, to ensure a better transition to Albany Street and adjoining development on the other side of the street, and improve the public realm.</p> <p>Specifically, this has included:</p> <ul style="list-style-type: none"> <li>Reducing the maximum tower height of Tower 5 by 9m, or approximately 3 storeys, from RL110.0 to RL101.0;</li> <li>Adding a step in Tower 5 at the easternmost edge of the site, reducing height here to RL 91.7, which minimises the scale of the transition between Tower 5 and any likely development outcome on the opposite side of Albany Street;</li> <li>Amending podium heights and setbacks at the Donnison Street &amp; Albany Street end of the development, creating a stronger ground plane / human scale presence, which will provide for a more relative interaction with existing or future buildings on the eastern side of Albany Street; and</li> <li>Ensuring activation at the eastern edge podium through the sleeving of car parking with residential dwellings.</li> </ul>
The Panel recommends that the through-site link should be designed as if the link across Henry Parry Drive has been resolved so pedestrians can access the development from the length of the Henry Parry frontage.	The amended 'Example Scheme' and accompanying landscape scheme allow for a crossing of Henry Parry Drive to be pursued by other government agencies in the future.
The Panel recommends that the ground level apartments fronting the north-south through-site link have sufficient of a set-back from the new road to provide privacy e.g. could be done through the addition of courtyards.	Ground level apartments throughout the project, including the north-south link, are set back a minimum of 2.5m to permit a courtyard interface with the street.
The Panel recommends further refinement of Tower 5 at the corner of Donnison and Albany Streets. The tower needs a stronger relationship to	As outlined in the response to Item 1 above, significant changes to Tower 5 have taken place from reducing the overall height, implementing a 'step' in the height, and redistributing massing to

Albany Street and existing development on the eastern side of Albany Street and greater articulation towards the top of the tower should be considered (including stepping down towards Albany Street).	lower within the tower form by increasing the podium heights, all of which will better interact with current and potential future developments at this frontage.
The Panel recommends further refinement of the Donnison Street frontage with consideration given to further residential development, at street level, whilst appropriately screening car parking. Consideration could be given to a skin of residential development along the Donnison Street frontage.	The suggestions of the CoDAP have been implemented. Car parking along Donnison Street has been screened with residential development.

Further to the responses to the CoGDAP's 2019 advice, it is noted that further consultation with the panel in April 2020 prior to this resubmission. This included the panel's review of:

- revised architectural envelopes and example scheme
- draft Design Guidelines
- draft Design Excellence Strategy
- shadow diagrams.

The CoGDAP's response to these documents was provided on 17 April 2020 (see **Appendix 14**). In this advice, the panel expressed satisfaction with the design amendments that had been made and that the proposal now exhibits design excellence. Several matters were recommended for assessment in future detailed applications.

One key question raised by the panel relates to solar access; in response, it is noted the SEPP65 Report submitted alongside this document now contains additional solar access analysis, including views from the sun, and confirms the scheme's ability to comply with the solar access requirements of SEPP 65.

A suite of recommendations were also made by the panel with respect to minor updates to the draft Design Guidelines and Design Excellence Strategy. It is recommended that these items be conditioned for resolution post-approval.

## 6 Consultation

The SSD was publicly exhibited from 11 October to 7 November 2019 in accordance with Schedule 1(9) of the NSW Environmental Planning and Assessment Act 1979 (EP&A Act) to all relevant stakeholders, including nearby landowners. Prior to lodgement, community and stakeholder engagement was conducted, as outlined in the Environmental Impact Statement. This included:

- Agency consultation:
  - Central Coast Council;
  - NSW Office of Environment and Heritage;
  - NSW Environment Protection Authority;
  - NSW Department of Primary Industries;
  - NSW Roads and Maritime Services;
  - NSW Rural Fire Services;
  - Ausgrid;
  - Transport for NSW; and
  - Central Coast Local Health District.
- Community consultation:
  - conducted over a 2-week period that included community information sessions at the Imperial Shopping Centre, advertised via newspaper and radio.

### 6.1 Summary of submissions

Eleven (11) submissions were received during exhibition:

- 10 submissions from government agencies:
  - Department of Primary Industries (DPI);
  - Environment Protection Authority (EPA);
  - Office of Environment and Heritage (OEH);
  - Roads and Maritime Services (RMS);
  - Transport for NSW (TfNSW);
  - Central Coast Local Health District (CCLHD);
  - Crown Lands;
  - Department of Industry;
  - Central Coast Council (CCC); and
  - NSW Rural Fire Service (NSW RFS).
- 1 submission was received from a community interest group:
  - Community Environment Network Inc.

## 7 Response to Government Authorities

### 7.1 Department of Planning Industry and Environment

Table 5 – Response to Department Planning Industry and Environment

Issue	Response
<b>Design Excellence</b>	
<p>In order to demonstrate that the proposal exhibits design excellence, and qualify for the additional height and floor space, the Department requires the following:</p> <ul style="list-style-type: none"> <li>• Refinements to the proposal in line with the Departments built form comments below and the Panel's advice dated 19 November 2019</li> <li>• A strategy setting out the process to ensure the detailed design of buildings (which will be subject to future development applications) exhibit design excellence, including opportunities for design review and design integrity</li> <li>• The preparation of draft design guidelines, setting out the key principles and design parameters to inform the detailed design of the buildings within the envelopes, addressing: <ul style="list-style-type: none"> <li>○ Massing, modulation, heights, articulation and building materiality</li> <li>○ Extent to which the buildings fill the proposed envelopes, such as through a comparison of the gross floor area</li> <li>○ Response to Gosford's natural setting, existing and future character and relationship to adjacent built form</li> <li>○ Parameters to protect views and vistas and solar access to public spaces</li> <li>○ Fine grain frontages, street activation, servicing, access and loading arrangements and amenity</li> <li>○ Landscape design and public domain.</li> </ul> </li> </ul>	<p>The amended design package is supported by a comprehensive draft Design Guideline which has been prepared to consider the key principles and design parameters to inform the detailed design of the buildings within the revised envelopes. The design guideline has addressed those requirements requested by DPIE. A Design Excellence Strategy is also included, setting out the intended process to ensure design excellence in future applications.</p>

Table 5 – Response to Department Planning Industry and Environment

Issue	Response
<b>Built form</b>	
<p>In order to support the proposed variations to the height and floor space controls, the Department requires a detailed visual and solar access/overshadowing analysis of the impacts arising from the proposed variations (compared to a scheme that does not rely on the variations) and additional information justifying the land use mix.</p>	<p>The amended bulk and scale, which has resulted in revised and reduced building heights and GFA, has duly considered the impact the built form will have on visual and solar access with a comprehensive overshadowing analysis having been undertaken. It is considered that the reduced built form of many of the towers warrants justification to varying the maximum building height and FSR controls.</p>
<p>As approximately 5% of the gross floor area is allocated for commercial premises, the Department requests that the land use mix be reviewed to increase the proportion of commercial floor space proposed.</p>	<p>It is understood concerns have been raised with regard to the limited floor space being allocated for commercial premises. The amended design has increased non-residential floor space by around 50%, now representative of for approximately 7.5% of the development which is considered a positive outcome for the Gosford City Centre.</p> <p>Justification provided in a supporting Economic Impact Assessment (EIA).</p>



Table 5 – Response to Department Planning Industry and Environment

Issue	Response
<p>Noting the advice from the Panel and issues raised in submissions, the Department also requests that the overall height, bulk and scale of the proposal be reviewed, and consideration given to:</p> <ul style="list-style-type: none"> <li>reducing the height and bulk of the Tower 1 envelope and improving the setback to reduce its visual dominance and enhance solar access to Kibble Park</li> <li>reducing the height and bulk of the Tower 5 envelope to create a scale transition between Tower 4 that integrates with the existing and future built form character on Albany Street and the lower portions of Rumbalara Reserve</li> <li>reducing the podium heights to reduce the visual dominance of the proposal and ensure street walls create an appropriate human scale</li> <li>providing additional vertical articulation in all the buildings, to reduce the perceived bulk and scale of the buildings when viewed from key vantage points (this may be specified in the design guidelines above)</li> <li>refining tower setbacks, siting, separation and floorplate sizes across the site to improve future (residential and environmental) amenity and reduce visual impacts.</li> </ul>	<p>The proposed built form has been reviewed, as requested, and subsequently amended reflecting a significantly reduced bulk and scale. The change in building heights are as follows:</p> <ul style="list-style-type: none"> <li>Tower 1 has been reduced from RL89 to RL82.4;</li> <li>Tower 3 has been reduced from RL92 to RL88.6; and</li> <li>Tower 5 has been reduced from RL 110 to RL 101.</li> </ul> <p>Significant changes to Tower 5 have taken place from reducing the overall height, implementing a 'step' in the height, and redistributing massing to lower the tower form by increasing the podium heights, all of which will better interact with current and potential future developments at this frontage.</p> <p>An improved relationship to Kibble Park has been created through slightly reduced podium heights along Henry Parry Drive and the reduced Tower 1 envelope.</p>
<p>The Department notes that the proposed above ground car parking significantly increases the bulk and scale of the development, but the floor area is not included in the overall GFA for the proposal. As this, together with any variation to the control, results in the development being significantly larger than contemplated, the Department requests that the proposed above ground car parking be reconsidered and/or further justification be provided that no alternative option exists. Should above ground car parking be justified, the Donnison Street frontage shall be redesigned to increase the amount of activation and improve the visual appearance of the car park.</p>	<p>Car parking along Donnison Street has been screened with residential development. It is considered that providing for parking above-ground is a commercial reality in Gosford and that complete excavation for basement parking on a site of this size is not a viable option in the Gosford market.</p>
<p>The Department requests amended plans that clearly show the proposed building envelopes and include any important dimensions, including all heights (RL), the width of towers, width of through site links and length of podium street walls. In addition, the Department requests long (east-west and north-south) street elevations or sections illustrating the proposal's relationship to adjacent sites and built form, particularly on Albany Street.</p>	<p>Noted. Amended package includes requested detail.</p>

Table 5 – Response to Department Planning Industry and Environment

Issue	Response
Having regard to advice from the NSW Health Central Coast Local Health District, and the Department's guideline on Safeguarding Strategically Important Helicopter Landing Sites in NSW, the Department requires an Aviation Impact Statement to assess the potential aviation impacts of the proposal (during construction and operation) including helicopter flight paths servicing Gosford Hospital.	An AIS has been prepared and provided with the amended package addressing the Department's guideline on Safeguarding Strategically Important Helicopter Landing Sites in NSW.
<b>Visual impacts, solar impacts and amenity</b>	
The Department requests further justification that the proposal is capable of achieving compliance with the SEPP 65 and associated Architectural Design Guide (ADG) principles and controls, noting that the proposal is concept stage only (for the built form).	The amended package is supported by a draft design guideline which will support and justify the design in relation to SEPP 65 and NSW ADG.
The Department requests further visual analysis through a comprehensive Visual and View Impact Assessment (VIA) that provides additional vantage points (to be agreed with the Department) and precise photomontages or perspectives and further consideration of view loss impacts for surrounding (existing or approved) developments.	A comprehensive visual and view impact assessment has been prepared and provided. The VIA considers view loss impacts from surrounding (existing or approved) developments.
Noting Council's concerns about potential solar and amenity impacts associated with the proposal, the Department requests amended shadow diagrams showing the solar access impacts (for summer and winter solstice and spring and autumn equinox, at hourly intervals between 9am and 3pm), including Kibble Park and likely solar access to the proposed through site links.	Amended shadow diagrams have been provided demonstrating sufficient solar access is to be provided to Kibble Park and to the proposed through site links. A maximum of 1 hour of overshadowing to the south-east corner of Kibble Park will occur.
The Department also requests further assessment and justification, including predicted shadow and solar access diagrams, demonstrating that the future development of the north-east of the site (within the same city block) will not adversely affect the amenity of the proposal.	Shadow diagrams indicate overshadowing from the adjoining site will not adversely affect amenity to the proposed towers, including communal areas.
The Department also requests shadow diagrams showing potential solar access impacts of the proposal to properties south of Donnison Street, together with further assessment demonstrating that these properties will not be adversely impacted by the proposal.	Amended building form, including reduced building heights ensure sufficient solar access will be provided to those residential properties to the south of Donnison Street.
<b>Ecological Sustainable Development (ESD)</b>	
A consolidated list of ESD commitments is required to set building sustainability and environmental performance targets for future development. In providing these, the Department encourages a high level of sustainability and environmental performance in line with current industry leading practice.	A consolidated list of ESD commitments has been provided, refer to Appendix 10.

Table 5 – Response to Department Planning Industry and Environment

Issue	Response
<b>Social &amp; Economic Impacts</b>	
<p>The proposal is of a significant scale, and results in the loss of approximately 600 public parking spaces, which may have implications on the commercial viability of developments and businesses in the city centre. Noting Council's advice that a full assessment of the economic impacts has not been completed, the Department requests a comprehensive Economic Impact Assessment.</p>	<p>A Social and Economic Impact Assessment has been prepared by Urbis supporting the amended documentation. It is envisaged that the proposed development, once constructed, will generate \$24.4 million in additional retail spending into the Gosford CBD and support the growth of local businesses. This will likely help offset any potential impact from the loss of parking at the subject site. It is intended to create a walkable environment. The location of the mixed-use development, within the CBD, adjacent to open space and existing retail and commercial facilities and incorporating residential apartment buildings will encourage walkability and reduce car dependency. This should assist in reducing traffic generation within the CBD, and thereby reduce the need for carparks.</p>
<p>Noting advice from NSW Health Central Coast Local Health District, the Department requests further consideration of the cumulative impacts of the proposal having regard to other developments in Gosford City Centre, in particular the cumulative demand on any increased pressure on existing health services, infrastructure, community facilities and child care centres.</p>	<p>The supporting social and economic impact assessment found that there would be no additional demand for health facilities driven by the proposal. It is noted that there is generally a high demand on community health services across the LGA, with a focus on the northern region. There should also be adequate access to primary care services to alleviate any pressure on hospital emergency departments.</p> <p>The existing community centre is outdated and only has capacity for 80 people. Therefore, there is currently a gap in the current supply of a contemporary multipurpose space in Gosford. It is noted that this is an existing gap, not driven by the proposal. This gap has also been identified by Central Coast Council as outlined in the Draft Community Facilities Review.</p>

Table 5 – Response to Department Planning Industry and Environment

Issue	Response
<b>Transport and Accessibility</b>	
The Department requests further consideration be given to the impacts of the proposal on traffic, parking, transport, pedestrian and road networks, including consideration of cumulative impacts arising from other significant proposals in the city centre. In addition, consider any further mitigation measures, infrastructure or upgrades required to accommodate the proposal and how these might be linked with future development stages.	This comment is noted. Refer to response to responses to Council's submission.
Noting the proposal is disconnected from Gosford's commercial core by a classified road (Henry Parry Drive), the Department requests further investigation into measures to improve pedestrian connectivity from the site to the commercial core (across Henry Parry Drive).	The amended package and accompanying landscape scheme allow for a crossing of Henry Parry Drive, assumed to be pursued by other government agencies in the future.
As the proposal will result in the loss of 600 public parking spaces in the city centre, the Department requires further consideration of potential impacts and measures to mitigate the loss of public car parking. In doing so, the Department requires further consultation with Council to consider the implications of the Gosford City Centre Carparking Strategy and details of new bus routes that may service the city centre.	A Social and Economic Impact Assessment has been prepared by Urbis supporting the amended documentation. In addition, the resubmission pack will include an amended traffic impact assessment providing justification including consideration of potential impacts and measures to mitigate the loss of public car parking.
<b>Staging and Consents</b>	
Provide additional details regarding the proposed staging of the development and confirm the accuracy of the indicative timing provided.	<p>A detailed amended staging plan has been prepared. A temporary use for car parking is indicated on the balance of the site whilst earlier stages are developed (note that it is intended that approval for this use would be sought separately).</p> <p>The indicative timing is accurate in that it represents the proponent's current thinking regarding future development of the site. The actual timing of development will be dependent on market demand and construction schedules.</p>
Noting the Construction Management Plan submitted does not include any specific details on how demolition works will be controlled or mitigated, the Department requests a detailed Construction Management Plan, including detailed assessment against Council's waste control guidelines in a detailed Waste Management Plan, to support the proposed stage 1 works.	A construction management plan has been prepared, refer to Appendix 7.
Noting Council's advice that the proposal may have adverse impacts on existing street trees surrounding the site during stage 1 and future stages, the Department requires an Arborist Report that surveys the health and viability of these trees and provides suitable mitigation and management measures.	An arborist report has been prepared addressing the existing street trees surrounding the site.

Table 5 – Response to Department Planning Industry and Environment

Issue	Response
<b>Public benefit and contributions</b>	
Given the scale of the proposal and the extent of variations proposed, the Department requests that the public benefit offer be reviewed and expanded, to include for example facilities for local community groups, public domain improvements and pedestrian connections surrounding the site.	<p>It is considered that an appropriate contribution will be effectively made through the SIC levy which will be used for a range of public outcomes.</p> <p>The SIC levy and associated amendments to the local contributions framework were established to encourage development investment in Gosford, whilst ensuring adequate infrastructure for the community. The SIC is applied based on a cost of works, which for this project is substantially higher than what would be required on a development to the 'base' SEPP controls. Therefore, the existence and structure of the SIC is such that it acts as a public benefit offer associated with this development.</p>
<b>Site investigation and geotechnical report</b>	
As the Phase 1 Site Investigation and Geotechnical Desktop Study are dated 2015, the Department requests confirmation from the respective author that the reports are relevant and up to date for the purposes of the proposed development.	Coffey's have provided advice on both reports indicating they may still be relied on for this assessment.



## 7.2 Central Coast Local Health District

Table 6 – Response to Central Coast Health District

Issue	Response
<p><u>Air quality</u></p> <p>The application does not appear to address potential impacts on air quality, for example dust, during Stage 1. Adverse health effects can occur with any increase in particulate pollution, so the proponent should take all necessary measures to ensure that works do not adversely affect local air quality and the community. We suggest that the EPA be consulted in relation to appropriate dust emission controls and the potential need for air quality monitoring.</p>	<p>It is expected that relevant conditions of consent applied by Council with respect to air quality will be complied with. It is noted EPA were consulted and responded with no concerns regarding impacts on air quality.</p>
<p><u>Noise and Vibration Impacts</u></p> <p>The Noise and Vibration Impact Assessment indicates that community reaction is possible due to exceedance of noise criteria during construction and does not seem to specifically address noise impacts from demolition works. Since the predicted noise levels have potential to impact the community, including future residents of the site, the proponent should commit to a work schedule for all phases that creates the least possible disruption to the community. We ask that controls on noise emissions be included in any approval so that the community is not adversely affected at any stage of the development.</p>	<p>As above. It is expected that relevant conditions of consent applied by DPIE with respect to acoustic impacts will be complied with.</p>
<p><u>Site contamination</u></p> <p>We note the previous land uses and possible site contaminates. Further investigation is required before demolition commences, in accordance with the recommendations contained in the report <i>Phase 1 Contamination Assessment-Site B 2015</i>. Stage 1 works should not proceed until a comprehensive site assessment is completed. All contamination risks must be identified and assessed, and management strategies development to the satisfaction of the EPA and CCC.</p>	<p>Appropriate investigations have been undertaken.</p>
<p><u>Crime Prevention Through Environmental Design (CPTED)</u></p> <p>We note and support commitment by the proponent to adhere to CPTED principles. The manner in which this will be achieved should be clearly described in subsequent applications.</p>	<p>Noted.</p>

Table 6 – Response to Central Coast Health District

Issue	Response
<p><u>Public Open Space, Solar access and overshadowing</u></p> <p>It is imperative that the community has access to quality open space both within and outside the development. We note that the project complies with the requirements for solar access to Kibble Park and seek assurance that approval conditions will reinforce this compliance.</p>	<p>The proposal will have no adverse impact on public open space, solar access and overshadowing. Amended building design, including a reduced built form will improve amenity outcomes for the community.</p>
<p><u>Monitoring and Enforcement</u></p> <p>Should the project proceed, management of air quality and noise and vibration impacts on the local community will be dependent on effective implementation and monitoring of control measures, and enforcement of the approval conditions. We seek confirmation that the Construction Management and Environmental Management Plans will be satisfactory to the EPA and CCC.</p>	<p>It is anticipated that conditions of consent will require such monitoring and enforcement.</p>
<p><u>Community Feedback</u></p> <p>Given the duration of the project, we encourage the proponent to consult with the surrounding community, for example Gosford Senior Citizens Centre, Douglas Hanley Moir Pathology, Gosford TAFE and Gosford Courthouse to ensure that the project does not impact on the community.</p> <p>There will likely be a need to manage noise impacts on residents of the site as construction proceeds. The community must have a contact point for complaints if noise or air quality issues occur and the proponent must guarantee a prompt and genuine response to all complaints.</p>	<p>The project has undergone extensive consultation with the surrounding community with feedback received and considered during the design process. Any associated noise impacts on residents as construction proceeds will be managed in accordance with relevant requirements, including any conditions of consent imposed by DPIE.</p>

## 7.3 Transport for NSW

Table 7 – Response to Transport for NSW

Issue	Response
<p>Table 3.2 of the Transport Impact Assessment (TIA) report provides the public transport summary in the vicinity of Gosford Station. Bus route number 41 which operates on Donnison Street at the front of the site is not included in the table.</p> <p>Section 6.4 states that <i>"the site is well served by several high frequency rail services and bus routes"</i>. It is advised that the bus stop on Donnison Street at the front of the site is currently served by one low frequency route.</p> <p>The information in the TIA report including any ramifications to the proposal should be revised accordingly.</p>	<p>Route 41 provides a loop bus service through Gosford Station via Gosford Hospital, Gosford Public School, along Donnison Street West, past the site and Imperial Centre. The travel time between the site and Gosford Station is eight minutes and it is likely that some residents/ visitors (and the less mobile) may use this service to travel between the site and Gosford Station. This service has a low frequency (seven services per day) and with the city centre being within a 500-metre walk of the site it is unlikely to attract the same level of patronage as the high frequency public transport services at Gosford Interchange itself. For these reasons it is not considered as important to overall public transport provision in the area as these other more frequent public transport services.</p>
<p>Clarification should be provided to discuss the implications on the surrounding transport infrastructures (i.e. intersections, shared paths, etc.) as a result of the forecasted demand of public transport and active travel trips. Improvements should also be identified, if necessary, to support this demand and active travel connectivity between the site and Gosford Station.</p>	<p>Gosford City Centre caters well for high pedestrian activity with established pedestrian networks, footpaths, through site connections and provision of ample formal crossing facilities with adequate site permeability. The pedestrian network is well established and would link the site well with Gosford Interchange in Gosford CBD a 650 metre walk from the site.</p> <p>Refer to response to Council Traffic comment that reviews the capacity of the Henry Parry Road/ William Street intersection to accommodate significantly increased pedestrian volumes during peak periods. As discussed, increased pedestrian volumes do not have a material effect on intersection operation during any peak hour, primarily due to the high existing weekday pedestrian volumes associated with the on-site car park. It is also important to consider that active travel and public transport trips starting as active travel are likely to be spread across a two to three-hour period. For example, residents commuting to Sydney by train will likely start their journey between 6:30am and 7:30am and those working locally travel much later.</p> <p>Therefore, even if all public transport trips commence as active trips the pedestrian network between the site and Gosford City Centre and Gosford Interchange can (and already do) clearly accommodate this demand.</p>
<p>It is requested that the applicant be conditioned to prepare a detailed Construction Pedestrian and Traffic Management Plan prior to construction activities being carried out on site.</p>	<p>Noted. A CPTMP to be completed prior to construction activities being carried out on site.</p>

Table 7 – Response to Transport for NSW

Issue	Response
Prior to occupancy, a comprehensive Travel Plan should be prepared in consultation with Council and TfNSW.	It is requested that a condition of consent be included requiring the completion and submission of a Travel Plan to be prepared in consultation with Council and TfNSW.
A factor of 0.5 has been applied to the weekday PM retail peak traffic generation rate in order to determine the AM trip rate. Clarification is required on why this factor has been used.	The proposed retail space is minor and considered ancillary to the other primary land uses. Small specialty retail tenants are typically either not open in the mornings, or at least not trading at their peak. As such, it is broadly accepted that a reduction factor of 0.5 can be applied to the morning road network peak hour to accurately consider the likely traffic generated by retail tenants during this time.
Currently the ratio of the retail and office/medical floor space is split 50:50. As offices and medical centres generate significantly lower trips compared to speciality stores, this may lead to an underestimation of trip generation volumes if ratio of retail is higher. A conservative assessment is to be undertaken to account for the worst-case scenario of 100% retail. Further information on expected land uses is required, or a more conservative ratio used.	It is important to note that the retail component of the proposal intends to complement rather than compete with The Imperial Centre located close to the site. Retail tenants could include café/ restaurants together with a small medical centre or specialist health services etc. The split of these is not confirmed however recognising that there is likely to be a genuine mix of tenants is considered appropriate. The assessment therefore reflects a realistic mix and one that accurately considers the associated traffic and mix of internal and external trips.
A residential trip generation rate of 0.35 trips per apartment has been stated in the report. The RMS Guide to Traffic Generating Development states a regional average of 0.53 trips per unit in the AM peak hour and 0.32 trips unit in the PM peak hour. Clarification is required as to why these values have not been adopted.	<p>The regional average trip rate of 0.53 is based on two sites, one in Charlestown and the other in Wollongong. The Wollongong site includes just nine apartments and the Charlestown site 109 apartments. The Charlestown site is afforded less access to high frequency public transport and is not within a practical daily commute of Sydney. That said, it has an average generate rate of about 0.4 trips per apartment. This is consistent with the adopted rate of 0.35 trips per apartment. Gosford should also be considered a sub-regional centre as opposed to regional per se, thus attracting a lower trip rate.</p> <p>The proposal is also significantly larger than the two regional example sites and within a convenient walk of frequent express rail services that travel through Gosford station. As such, the proposal will tend to attract residents that prefer to commute by train on a daily basis.</p> <p>A residential trip generation rate of 0.35 trips per apartment strikes an appropriate balance between the Sydney average of 0.15 and 0.19 trips per apartment in the respective peak hours and the regional rates. In this regard, the trip rates could also be considered conservatively high, with a rate of 0.25 trips per apartment also broadly considered accurate for such developments in similar locations.</p>

Table 7 – Response to Transport for NSW

Issue	Response
<p>A background traffic growth rate of 1.5% has been adopted. Clarification is required for the use of this rate. Furthermore, it is not clear from the SIDRA files how the growth has been applied. The SIDRA files have not been run to account for 1.5% compound growth year on year, so a manual calculation appears to have been done. Clarification is required of the use of this growth rate and the methodology for calculating the 1.5% growth year on year is requested.</p>	<p>The 1.5 per cent growth rate is broadly accepted by stakeholders in such locations. This rate was applied to existing traffic volumes and is considered to account for local developments (under construction or in planning) and broader growth on the network.</p> <p>RMS count stations also show that background traffic volumes have had minimal growth between 2006 and 2017. The count stations are on The Entrance Road (500 metres north-east of Russell Street) and Pacific Highway (20 metres west of Berrys Head Road).</p> <p>The data indicates no discernible growth along The Entrance Road, with a growth rate of just 0.6 per cent per annum between 2006 and 2014. The Pacific Highway has shown a minor reduction in traffic volumes (-0.12) between 2006 and 2016.</p> <p>Similarly, there has been only modest growth in traffic volumes on The Entrance Road during the road network AM and PM peak periods, with growth rates between 0.5 and one per cent per annum between 2006 and 2014. The Pacific Highway was even lower with between 0.4 and -0.3 per cent growth between 2006 and 2016.</p> <p>Based on this, a 1.5 per cent per annum growth rate is conservatively high and readily accounts for background growth and future local development.</p> <p>Turning movements in and out of the existing site have been deducted from the background traffic volumes and distributed through the study intersections based on existing directional distributions of traffic. The compound growth rate of 1.5 per cent was applied to all background volumes, without existing site traffic for a period of 10 years.</p>
<p>The report details which development access point vehicles are expected to use, however, it does not detail where these vehicles are approaching from. It appears from Figure 8.1 that the majority of vehicles are approaching from the east, with minimal traffic coming from the west. However, there appears to be significant development to the west, including industrial, retail and an entertainment ground and other significant employment generators. Clarification is required for the trip distribution assumptions used.</p>	<p>The directional distributions have primarily been influenced by the existing turning movements at the study intersections, the broader local and regional road network and review of Journey to Work data. Overall, the west (Donnison Street) accounts for 23 per cent of all development traffic, the south and east (Henry Parry Drive) 34 per cent and the north (Henry Parry Drive) 43 per cent.</p>

Table 7 – Response to Transport for NSW

Issue	Response
The intersections of Henry Parry Drive / Donnison Street and Henry Parry Drive / William Street are signalised intersections. It is not clear if site observations along with SCATs data were used to calibrate and validate the base year intersection models. Please provide further commentary or alternatively please update modelling using SCATs data. SCATs data can be obtained from <a href="mailto:SCATs.Traffic.Signal.Data@rms.nsw.gov.au">SCATs.Traffic.Signal.Data@rms.nsw.gov.au</a> .	GTA recorded traffic signal phase times for all study intersections at the time of the traffic surveys (in mid-May 2019). Vehicle queuing, lane utilisation and driver behaviour were recorded on-site to assist with the calibration and validation of the base year intersection models. The survey video data was also reviewed to confirm accuracy.
Pathways and landscaping are proposed to channel pedestrians through the development and towards the signalized intersections of Henry Parry Drive / William Street and Henry Parry Drive / Donnison Street. Transport for NSW has concerns that pedestrians will still seek to cross Henry Parry Drive mid-block. The adequacy of the existing fencing along Kibble Park on Henry Parry Drive is to be addressed.	The existing fencing and landscaping along the western side of Henry Parry Drive is considered an adequate deterrent to pedestrians crossing mid-block (see figure 1).
The TIA has only sought to address impacts for the fully developed site and not provided any data regarding anticipated traffic generation for each stage of the development. The provision of data regarding the traffic generation of each stage allows for an assessment for each stage of the development to address the staged provision of infrastructure to mitigate impacts of the development.	<p>The Transport Assessment (GTA, 2019) considered the traffic impacts of the development following full development of the site. SIDRA intersection modelling results indicate that all study intersections will continue to operate similar to existing (LOS C or better) indicating that the proposal will not inherently change traffic conditions in Gosford city centre. This is mostly due to the proposal removing trips generated by the existing on-site car park and mostly reversing the flow of traffic during peak hours.</p> <p>Given this, modelling is not required for each stage, especially given that traffic conditions would likely improve.</p>
A cumulative assessment which outlines future year intersection performance including surrounding approved developments is required.	It is understood that Council is preparing a Gosford city centre traffic model to accurately assess the traffic impacts of all future developments, including Gosford Alive. In this regard, it is not prudent for each development site to do the same as this would likely result in conflicting distribution and, hence modelling outputs. Notwithstanding, the applied 1.5 per cent growth rate does account for background growth and other developments and is considered appropriate as part of the proposal.

## 7.4 Crown Land

Crown Land provided no comments for the proposal.

## 7.5 NSW Environmental Protection Authority

Based on the information provided, the EPA noted that the proposal did not appear to require an environment protection licence under the *Protection of the Environment Operations Act 1997*, is not being undertaken by or on behalf of a NSW Public Authority, nor does it include other activities for which the EPA is the Appropriate Regulatory Authority.

In view of these factors, the EPA indicated it has no further interest in the proposal and no further consultation is required.

## 7.6 NSW Rural Fire Service

NSW Rural Fire Service undertook an independent assessment of the proposal to determine compliance with Planning for Bush Fire Protection 2006. As such, the recommended construction conditions for the missed use towers is based on an alternate modelling solution. Conditions of consent have been provided by NSW RFS.

## 7.7 Department of Primary Industries

Table 8 – Response to Department of Primary Industries	
Issue	Response
The project must obtain the relevant Water Access Licenses should the project intercept groundwater.	The relevant licenses will be obtained.
Please provide detailed construction designs, including geotechnical information, to DPIE Water so that we can determine potential impacts on groundwater.	All relevant construction designs, including geotechnical information will be provided as part of a future DA for construction work, including each individual tower and associated works.
Please undertake a groundwater assessment outlining all potential impacts on groundwater, including mitigation and management measured where required. This would also include any information on groundwater in the locality (including bore logs), dewatering requirements and approvals required and potential contamination issues by acid sulfate soil issues.	As above. To be undertaken and provided with the lodgement of a future DA for the proposed towers and associated works.

## 7.8 Biodiversity and Conservation Division

Biodiversity and Conservation Division provided comments that they were satisfied with the flooding assessment provided and no further assessment is required.

BCD also noted that, due to the biodiversity development assessment report waiver that was issued for the project on 6 September 2019, no further biodiversity assessment was required.

## 8 Response to Special Interest Groups

### 8.1 Community Environment Network Inc

Table 9 – Response to Community Environment Network Inc.

Issue	Response
Non-compliance with height and floor space ratio limits	<p>The proposed building height and envelopes have been revised, providing for a reduced building height and gross floor area. The proposal has undergone the required processes under Clause 8.4(4) of the SEPP to be allowed to achieve relevant bonuses.</p> <p>Refer to Part 4 of the report for breakdown of changes to height and FSR.</p>
Lack of design excellence	<p>The proposal has been revised to consider the concerns raised by DPIE and Gosford DAP with regard to achieving design excellence. As such, a design guideline has been prepared in support of the application. In addition to this, the massing and built form has been amended to achieve appropriate building heights, envelopes, setbacks, and podium levels.</p>
Inadequate Environmental Impact Statement	<p>It is anticipated that the issues raised in relation to the asserted inadequacies of the EIS will be addressed through the submission of amended information requested by DPIE.</p>
State and Regional Development SEPP. The objection raises concern regarding the Central Coast Council's role being diminished with respect to the assessment and determination of development applications over \$10 million in capital value, including the removal of LEP and DCP controls from the assessment process. The objection also raises concern relating to the risk of corruption throughout the process.	<p>Concerns raised with respect to the role and aim of SEPP (State and Regional Development) 2011 is a matter to be directly dealt with by the Department of Planning Industry and Environment. Notwithstanding the removal of Council as the consent authority, Council has been invited to provide comments in response to developments of this nature and is noted comments have been received by Central Coast Council. These comments have been considered with many addressed in this revised package to DPIE.</p>



## Conclusion

This Report has been prepared in response to the submissions received following the public exhibition of the EIS for the proposed concept DA and Stage 1 works changes to the application for 'Gosford Alive'. The EIS was publicly exhibited from 11 October to 7 November 2019.

A total of 11 submissions were received, including 10 submissions from government agencies and 1 submission from a community group. This report provides a direct response to the issues raised in the submissions and is supported by a range of specialist reports as outlined above.

Proposed changes to the 'Gosford Alive' development will, if approved, further reduce the environmental impact of the project (including by reducing the building envelopes and bulk and scale) and provide for increased commercial floor space, in turn providing job opportunities, including providing for an increased housing supply for the Gosford City Centre.

The project will bring an array of social and economic benefits at the local, regional and state level, including:

- The proposed development will deliver 727 apartments which are expected to accommodate around 1,380 new residents. These new residents in the heart of the Gosford CBD will bring additional spending that will support the existing and proposed businesses in the CBD.
- The resulting increased resident population in the CBD will also attract new businesses seeking to cater to this growing population (e.g. services, child care, medical, retail, gyms), and the commercial space provided at the subject site will have the flexibility and capacity to accommodate these businesses.
- Contribute \$55.9 million in value added to the New South Wales economy on an annual ongoing basis.
- The proposed development will bring \$24.4 million in additional retail spending into the Gosford CBD and support the growth of local businesses.
- The location of the mixed-use development, within the CBD, adjacent to open space and existing retail and commercial facilities and incorporating residential apartment buildings will encourage walkability and reduce car dependency. This should assist in reducing traffic generation within the CBD, and thereby reduce the need for carparks.
- Investment stimulus in the Gosford CBD and broader Central Coast LGA.
- Strengthening the role of the Gosford CBD by housing future residents in an area with significant and growing employment opportunities and creating opportunities for live work synergies. The development will also contribute to the urban renewal of the eastern precinct of Gosford CBD by increasing passive surveillance and activation that will enhance street level vibrancy.



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# Appendices

# Appendices

Appendix 1: Central Coast Council Submission Response

Appendix 2: Architectural Package

## Appendix 4: Social & Economic Impact Assessment

Appendix 5: Arboricultural Assessment Report

## Appendix 6: Aviation Impact Assessment



## Appendix 7: Traffic Impact Assessment

## Appendix 8: Demolition & Construction Traffic Management Plan

Appendix 9: Design Guidelines

## Appendix 10: Design Excellence Strategy

Appendix 11: Ecological Sustainable Development (ESD)  
Commitments

## Appendix 12: Coffey Advice

## Appendix 13: Updated landscape package

## Appendix 14: Design Advisory Panel Advice