

Mixed Use Development at 10 Young Street, West Gosford

Amended Proposal (DA 10609)

Submission by Community Environment Network

This submission on behalf of the Community Environment Network is supplementary to CEN's original submission of October 2020 concerning the original version of this DA. CEN considers that the amendments to the proposal do not reduce our objections to it.

Furthermore, the information provided as part of the exhibition of the amended DA adds weight to CEN's argument that the proposal would not achieve design excellence and it should, therefore, not be approved:

- In Council's submission of November 2020, it was argued that the proposal does not achieve design excellence because it does not comply with the design controls in Gosford City Centre DCP 2018. In particular, the proposal does not meet the requirement for setbacks of the ground floor from street boundaries or the requirement for setbacks of the upper floors from the ground floor or podium. The Council submission also criticized the lack of articulation on the north elevation. There does not appear to be any serious attempt to rectify these deficiencies.
- The Council submission also had major concerns about the on-site management of stormwater and the management of flood risk. The applicant has dismissed Council's proposal for on-site stormwater detention because the site is below the Flood Planning Level, which is based on a 1% AEP flood event. However, in view of the site's proximity to Gosford Racecourse and its requirement for copious amounts of watering, the applicant could have devised a simple and efficient alternative to on-site detention, such as developing detention basins on the Racecourse. By diverting stormwater to a detention basin for more frequent rainfall events, the development would reduce the impact of the site on local flooding on Racecourse Road.
- The Council submission also raised the issue of climate change impacts on the specified Flood Planning Level. The Council's draft Floodplain Management Plan for the Woy Woy Peninsula (on public exhibition now) is based on a scenario which includes 40cm sea level rise by 2070 for Brisbane Water. This would imply that the 50 cm buffer in the Flood Planning Level will be just sufficient protection in a 1% AEP event from 2070 onwards. It also implies that the promised flood evacuation strategy will not be adequate for a flood event exceeding 1% AEP in the next 10 – 20 years, since the proposed new road is at RL 2.12 (just 3cm above the current 1% AEP level) at the hotel entrance.
- The Urban Design and Visual Impact study provides some useful illustrations of the visual impact of the proposed development. However, the study's qualitative assessment of the visual impacts on the views from the Central Coast Highway at West Gosford as Moderate or Low is very subjective.

- In View 1, the proposal would be so obtrusive to be of High magnitude because it extends 3 – 4 storeys above the main ridgeline of President's Hill and obscures more than 50% of the ridgeline. The study suggests this view is of Low sensitivity because of a lack of pedestrians; however, this ignores thousands of motorists for whom this is their first view of Gosford when they drive down the hill from Kariong. Furthermore, each day hundreds of these motorists stop at the McDonalds, get out of their cars and see a similar view across the Racecourse.
- In View 2, the study suggests again that this has Low sensitivity because of low pedestrian numbers along the Central Coast Highway. However, the view point on the south side of the Highway is actually on the shared pedestrian/bicycle pathway; the bicycle path is part of the Gosford – Woy Woy bike path, which is the very busy path along the western side of Brisbane Water. The Magnitude of the impact for pedestrians and cyclists would be Moderate because the proposed development would appear as high as the main ridgeline of President's Hill.

These issues demonstrate that the proposed development does not meet the criteria for design excellence in clause 8.3 of the SEPP Gosford City Centre 2018 because it has been designed to maximize the return to the developer and ignores the development controls etc. in Gosford City Centre DCP 2018.

Michael Conroy,

Community Environment Network.

6 February 2023