PLANIT CONSULTING

5 March 2015

Ms Carolyn McNally
Secretary
NSW Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2000

Attention: Kate MacDonald

Dear Kate,

Cobaki Estate – Proposed Modification 2
Request for Secretary's Environmental Assessment Requirements

We are writing on behalf of our client, Leda Manorstead Pty Ltd, the owner of the lands comprising Cobaki Estate, in relation to a proposed further modification (Mod 2) to the Cobaki Concept Plan (as modified). The purpose of this letter is to request the Secretary's Environmental Assessment requirements (SEARS) for the preparation of an Environmental Assessment for the proposed Mod 2.

To support the request for the SEARS this letter provides an overview of the proposed modification and identifies the key likely environmental and planning issues associated with the proposal.

BACKGROUND

Early Development Approvals and Construction Certificates

Since 1995 the Cobaki site has been the subject of a number of development approvals for the subdivision of the land to create residential lots and a town centre area. Numerous construction certificates for the carrying out of bulk earthworks have also been issued in relation to these consents and substantial bulk earthworks across the site carried out.

Concept Plan

In December 2010 a Concept Plan was approved pursuant to Part 3A of the *Environmental Planning and Assessment Act 1979*. The application number given by the Department of Planning and Environment is 06_0316.

The Concept Plan approval provides for the carrying out of:

- Residential development for approximately 5,500 dwellings;
- Town Centre and neighbourhood centre for future retail and commercial uses;
- Community facilities and school sites;
- Open space;

- Wildlife corridors;
- Protection and rehabilitation of environmentally sensitive land;
- Road corridors and utility services infrastructure;
- Water management areas; and
- Roads and pedestrian and bicycle network

A modification to this approval (Mod 1) was approved on 29 May 2013.

A copy of the approved Concept Plan is provided at **Annexure 1**.

Project Approval

A Project Application was determined under Part 3A of the *Act* on 28 February 2011. The application number given by the Department of Planning and Environment is 08_0200.

This approval provides for the carrying out of:

- Subdivision of the entire Cobaki Estate site into seven (7) lots (including one residue lot for future urban development – Lot 807);
- Staged bulk earthworks to create the central open space, riparian corridor, structure open space, and future stormwater drainage area;
- Road forming works and culverts crossing the central open space (including Lot 802);
- Road forming works across saltmarsh areas, including culverts and trunk sewer and water services (Lot 804);
- Revegetation and rehabilitation of environmental protection areas for coastal saltmarsh (Lots 805 and 806); and
- Establishment of freshwater wetland and fauna corridors (Lots 801 and 803).

Subsequently, three modifications (Mod 1, Mod 2 and Mod 3) to the above consent were approved.

Construction Certificates have been issued in relation to this approval (as modified) and substantial earthworks carried out.

Development Approvals

A development approval for the subdivision of Precincts 1 & 2 into 475 residential lots was determined by the Joint Regional Planning Panel on 26 May 2011.

An amendment to this consent was subsequently approved.

A development approval for the subdivision of Precinct 6 into 441 residential lots was also determined by the Joint Regional Planning Panel on 26 May 2011 and an amendment to this consent has also subsequently been approved.

No works have commenced under these consents.

UNIVERSITY PRESENCE

The Concept Plan approval did not contemplate the inclusion of a university presence at the Cobaki site. Leda is in discussions with Southern Cross University about establishing such a presence at Cobaki.

Origin and growth of the university

Southern Cross University originated from Lismore Teachers College (1970), later the Northern Rivers College of Advanced Education (1973), and was formally established as an independent university on 1 January 1994.

It has grown considerably since then, with some 9,000 Full Time Equivalent students today from over 60 countries and campuses at Lismore, Coffs Harbour, the southern Gold Coat and the Hotel School Sydney.

Students study on-campus, via distance education, and with educational collaborators overseas. The University delivers a comprehensive suite of undergraduate and postgraduate courses across a broad range of disciplines.

The University undertakes research in specialised areas, with world-leading expertise in plant science and geoscience.

The Gold Coast campus

The University holds several long-term leases with the Gold Coast Airport authority. Two buildings of some 14,000m2 GFA have been constructed, whilst a third building of some 9,700m2 GFA has been approved and its funding secured. The Gold Coast campus has approximately 3.400 students and staff and offers courses in allied health, law, business and tourism, education and arts. The University has experienced strong growth since opening its southern Gold Coast campus in 2010, and is looking to secure land on which to expand in the Gold Coast Tweed region.

The vision for the Cobaki site

The University is interested in constructing the third building at Cobaki as an alternative to the airport site, with future options on land to accommodate growth in response to demand. Planning approvals are now being sought with a final decision subject to the University Council's approval.

The longer term and ultimate vision is for a campus at Cobaki that is an integral part of the town centre, close by retail and sporting facilities, with conveniently located student accommodation developed and operated by others.

About 9ha of land will be required for the campus which over the next planning horizon is expected to comprise approximately 60,000m2 GFA, including buildings up to 8 storeys in height,

accommodating some 9,000 domestic and international students and staff. Parking for approximately 2,500 cars will be required, initially at grade but converted to multi-storey as the university buildings roll out. In addition, the concept plan facilitates pedestrian and bicycle networks and efficient road networks to support public transport in order to reduce car dependency.

As previously advised, the existing approval for Cobaki contains no limitations on the GFA of various land uses contemplated within the town centre. Through the design of the new town centre incorporating the University, we will be able to quantify the GFA for the various land uses to be integrated within it.

The University has recently obtained from relevant Federal authorities, agreement to the construct the third building at Cobaki, should it choose to do so.

CONCEPT PLAN MODIFICATION

Land use zones and building heights

The modified concept will seek a more integrated town centre with complementary commercial, community and educational uses and proposes an expanded area for the town centre to achieve these uses.

The southern commercial and educational uses will be consolidated into a single designation.

The new concept will not affect or change open space and environmental protection areas.

Changes proposed include;

- Designated commercial hierarchy of commercial centres with the distinction between the 'Town Centre' and the 'Neighbourhood Centre'.
- Expanded Town Centre / Community Facilities / Education designation of part Precinct 6 which is noted as 'Residential' to 'Town Centre / Community Facilities / Education'. The exact location will be determined through further design development of the town centre.
- Designating 'Community Facilities' area within the new town centre area. The exact location will be determined through further design development of the town centre.
- Identification of the former 'Community Facilities' area adjacent to Precinct 17 as 'Residential'.
- Having utilities identified singularly.
- Consolidating the 'Neighbourhood Centre' / 'Education' uses adjacent to Precinct 8 within a single designation, and
- Increased building height limit within the expanded Town Centre/Community Facilities/Education zone to maximum 8 stories, the exact location of buildings up to that height to be determined through further design development.

These changes result in minor changes to the area of each of the approved concept uses as detailed in the table below. These are approximate areas, to be determined through the detailed design phase.

Table 1 - Comparison of the Approved and Proposed Concept Plans Land Use Areas and Land Use Designations.

LAND USE CATEGORIES	APPROVED CONCEPT PLAN LED006 / SK1.01 GROSS AREA (HA)	LAND USE CATEGORIES	PROPOSED CONCEPT PLAN PLANIT 01 GROSS AREA (HA)	AREA CHANGE (HA +/-)
TOWN CENTRE/ NEIGHBOURHOOD CENTRE	19	TOWN CENTRE/ COMMUNITY FACILITIES / EDUCATION	25	+10
		NEIGHBOURHOOD CENTRE / EDUCATION	4	
RESIDENTIAL	297	RESIDENTIAL	294	-3
COMMUNITY FACILITIES/ EDUCATION / UTILITIES	8	UTILITIES	1	-7
OPEN SPACE AREA	87	OPEN SPACE AREA	87	0
ENVIRONMENTAL PROTECTION AREA	194	ENVIRONMENTAL PROTECTION AREA	194	0
TOTAL	**605**		**605**	**0**

These outcomes are indicated in the draft modified Concept Plan at **Annexure 2.**

Development lot yield

It is not anticipated that the lot yield will change as a result of these changes. The loss of yield in Precinct 6 arising from its reduction in area is easily accommodated over the rest of the site.

Integration with town centre

The vision is to create a well-connected town centre with convenient links between its defining points to create synergy between the various activities, venues and spaces across the central area. A key driver to the vitality, character and appearance of streets and areas in the town centre will be the embedded University.

Complementary uses during day and night will reinforce each other, making the town centre more attractive to residents, students, shoppers and visitors. This diversity and activity will be designed to appeal to a wide range of age and social groups.

The intent of including the University within the town centre is to create an engaged campus, achieved through careful design elements ensuring the university is not merely adjacent to facilities, but integrated into the functioning of the town centre. Design elements will be incorporated whereby the University integrates with the surrounding town centre horizontally, vertically, spatially and socially.

Horizontally

The inclusion of the University within the Cobaki master plan will provide for a consolidated town centre and functioning 'main street' alongside larger format commercial outlets. Integration of commercial aspects of the town centre with the University precinct will strengthen the core precinct to allow fluid movement internal and external to the precinct. High accessibility will be achieved through a grid-like structure, ensuring a highly accessible, functional precinct.

Additionally, the area will be framed by open space networks and new private open space plazas creating a legible, cohesive, and inviting series of connected public spaces.

The town centre location on level land facilitates the pedestrianisation of its streets and accessibility from the surrounding residential areas. A series of regular grid streets will be designed to enhance mobility for vehicles and cyclists through and within the town centre.

Vertically

The development will incorporate vertical aspects to its place-making whereby commercial facilities provided at pedestrian level create an activated streetscape. Some student accommodation and/or professional offices will be located above these designated commercial areas. Massing and height of the town centre will be utilised to define the town centre from the surrounding residential Precincts.

A range of building heights to maximum eight storeys will visually signify the entrance to the town centre from Cobaki Parkway and the estate. It is envisaged taller and iconic built form will define the university buildings and establish a semi tropical, urban character. These character principles will be reflected throughout the town centre.

Built to boundary and continuous building frontages will be utilised to frame streets and open spaces. This will contrast with visible car parking bays which provide relief to the building mass. Active frontages are to be provided to street and high pedestrian routes to facilitate CEPTED principles. These active frontages will convey character and vitality of the town centre.

Spatially

The design will incorporate strong spatial dimension, thus optimising the relationships between the town centre, open spaces and networks. The design of the University will also be adaptive, recognising an evolving relationship between people, land, culture and the wider environment.

The University precinct in conjunction with the town centre is envisaged to be an economic hub, attracting a range of businesses and creating a diversity of employment opportunities. These aspects will be further discussed in the modification.

The design will provide accessible services and a variety of integrated transport options, including walking and cycling.

The placement of the University facilities will enable students, staff, residents and visitors to navigate around the town centre easily.

Socially

The University will incorporate urban design qualities that facilitate face to face contact, including walkable streets, quality public places and accessible public transport.

The inclusion of commercial aspects such as cafes and bars in and near the University precinct will create neutral territory that will enable people to network and interact seamlessly within the community.

Cultural activities will be facilitated through the community centre and associated usable spaces for social and communal group meetings, including university events and functions, with socially interactive land uses such as restaurants, cafes, a gym etc meshing the estates population.

These urban designs objectives and visions for the town centre will be able to be illustrated through the detailed design of the town centre which will be presented in the modification document.

Development Code

It is intended to modify the Development Code controls (Part B Section 4) which relate to the town centre. These modifications will incorporate specific objectives and controls, together with relevant plans, to guide the design of buildings, car parking and the mix of uses required to facilitate the proposed integrated precinct.

OVERVIEW OF LIKELY ENVIRONMENTAL AND PLANNING ISSUES

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

- Urban design and built form
- Streetscape and public domain
- Retail impacts
- Transport management impacts
- Sewer and water services
- Zonings

Given the existing approvals in place, in hindsight it's considered the outstanding issues will be reasonably resolved in order to facilitate the proposed modifications.

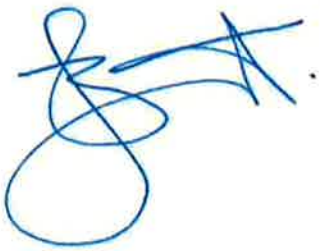
As illustrated within this document, the proposed modifications are relatively comparable with the approved development and don't deviate from the original intent. The modifications simply facilitate the ability to develop a community that will provide exceptional living, working and educational opportunities.

Cobaki will be a newly emerging and integrated community offering a range of living options, diverse working opportunities, high quality education facilities and a variety of active open space areas.

Cobaki will be a place for people to live, work, learn and enjoy a real sense of belonging.

Should you wish to discuss this submission further, please don't hesitate to contact the undersigned on telephone number (07) 5526 1500.

Yours Sincerely,



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