

23 November 2010

Sam Haddad  
Director General  
Department of Planning  
23-33 Bridge Street  
Sydney NSW 2000

Attention: Michael Woodland

Dear Mr Haddad,

**Re: Coogee Bay Hotel - Part 3A Request for Minister's Opinion and Preliminary Environmental Assessment**

We are writing to you on behalf of Oakstand Property Group (the Proponent) regarding a Concept Plan application for a mixed-use development in Coogee (the Proposal).

The purpose of this letter is to seek the following:

1. The Minister's opinion in accordance with Clause 6 of the *State Environmental Planning Policy (Major Development) 2005* (Major Development SEPP) that the proposed development is a development of the kind described in Schedule 1 of the Major Development SEPP so that the proposed development is declared to be a project to which Part 3A of the *Environmental Planning & Assessment Act, 1979* (the Act) applies; and
2. Pursuant to section 75M(1) of the Act, the Minister's authorisation for the Proponent to apply for approval of a Concept Plan.

Should the Minister form the above opinion and authorise the submission of a Concept Plan, we request that the Director-General issue the requirements as to the level and scope of the necessary documentation and assessment for the preparation of an Environmental Assessment to accompany a Concept Plan application for the Proposal.

To support the request for the Minister's opinion under Clause 6 of the Major Development SEPP, this letter includes a Preliminary Environmental Assessment which provides details of the site location and an outline of the proposed development, its background, and identifies the key likely environmental and planning issues associated with the Proposal.

**1. Site context**

**1.1. Local and regional context**

The Coogee Bay Hotel site is located at Coogee, a beach side suburb in the Randwick Local Government Area. The suburb is located approximately 6km from the Sydney Central Business District.

Coogee is within the eastern suburbs and in a strategic planning context forms part of the East Sub-region of the Sydney Metropolitan Area. The eastern suburbs are characterised by relative higher urban densities, higher frequency public transport links and relative ease of access to the Sydney CBD.

Figure 1. Site in its regional context



Figure 2. Coogee facing Sydney CBD



The Coogee Bay Hotel site is located in the commercial centre of Coogee and adjacent to Coogee beach and a major bus transport hub providing access to the Sydney Central Business District, Bondi Junction and the eastern suburbs. The main business district of Coogee is an area generally characterised by 3-4 level commercial and mixed-use buildings with taller buildings of up to 8-9 levels and a more dense urban form to the immediate south of the site.



Figure 3. Coogee Business District



## 1.2. The site

The site is the largest privately held parcel of beach-front land on the eastern suburbs and hence represents a unique development opportunity.

The site is generally rectangular in shape with frontages on Coogee Bay Road to the north, Arden Street to the east and Vicar Street to the west. A medium-high density residential area is located to the south. Overall, the site has an area of approximately 8,269.8 sq.m.

The site comprises the following main land parcels:

Table 1. Land Parcels

Lot and DP	Area (sq.m)
Lot I DP872553	7,241
Lot A DP337724	340.8
Lot A DP 437308	688
TOTAL	8,269.8

Figure 4. The site



Source: Mecone 2009, Department of Lands 2009

### 1.3. Existing Development

The Coogee Bay Hotel site currently contains a mix of pub, hotel, retail and residential uses including:

- Licensed premises for 3,250 people including 9 bars, a nightclub and beer garden
- 7,248 sq.m, 120 key boutique hotel
- 28 apartments
- 7 retail shops including a drive through bottle shop.

### 1.4. Planning and Approvals History

The following changes to planning controls and approvals have previously affected the site:

Table 2. Planning summary

Period	Planning Detail
1988 - 1995	REP 14 Eastern Beaches permitted an FSR of 3:1 for the site (this was repealed in 1995 by Randwick LEP 71)
1989	Approved demolition of the existing hotel buildings and construction of a new 7 storey hotel with 2 levels of car parking (FSR 2.91:1)
1996	DA Masterplan approval (FSR 1.84:1) with substantial commencement for: <ul style="list-style-type: none"> <li>Development of the existing hotel building for a 5 storey hotel including <ul style="list-style-type: none"> <li>Development of a hotel above Selina's</li> <li>An entertainment/convention centre</li> <li>Refurbishment of Selina's</li> <li>Refurbishment and rationalisation of existing hotel rooms</li> </ul> </li> </ul>
2004	Masterplanned refurbishment of the hotel

Figure 5. 1996 Development Approval

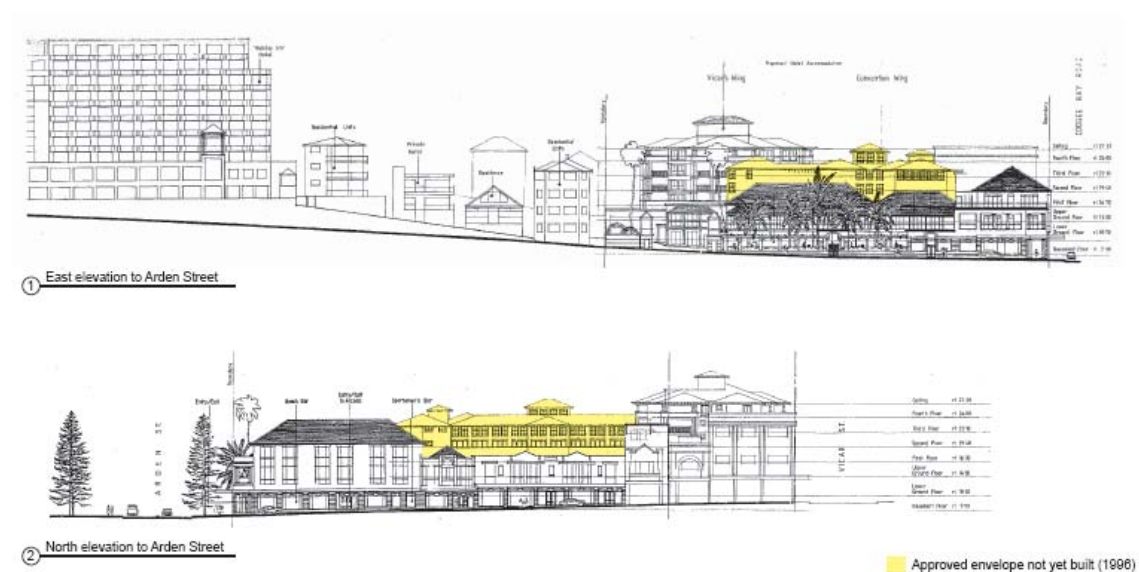




Figure 6. Existing site and improvements



Source: Mecone 2009, Google Earth 2009

## 2. The proposal

### 2.1. Description of concept

The proposed concept design seeks to retain the heritage significant pub/hotel building and beer garden at the eastern portion of the site and demolish all other site improvements, thus creating a unique opportunity for the comprehensive redevelopment of this town centre block, which is currently somewhat disjointed from an urban design perspective. A 3D rendering of the concept is at Figure 7 and a detailed description of the proposal can be found at **Appendix A** to this submission.

Through this comprehensive design approach land uses and activities may be optimally distributed for the vitality of the centre. The concept responds sympathetically to neighbouring development, both in terms of potential amenity impacts and to the existing built form characteristics in the locality.

Retail and commercial uses will be located at the lower levels of the scheme providing activation and visual interest along the street edges and along internal site linkages, which will further augment this development as a desired centre destination for local residents and those visiting this established tourist destination.

The built form is proposed to include three new buildings varying in height of between 4-7 storeys, modulated to respond to and define the surrounding street network. A retail/commercial level would be placed in the centre of the site with private open space above.

Vehicle servicing of the site will be via the existing routes at the south-west corner of the site from Arden Street and the south Western corner of the site from Vicar Street. The concept will improve on the current access situation in terms of potential amenity impacts by capping internal routes by a raised slab. Parking will be at basement levels and no excavation will occur beneath the existing pub building.

Proposed land uses will consist of:

- the retention of the pub, bars and beer garden but in a more contemporary style including smaller bars and restaurants;
- retail uses including a full-line supermarket and speciality stores;
- residential flat building and communal open space courtyard;
- Potential 120-130 room hotel; and,
- function suite facility associated with existing pub.

An indicative breakdown of floor space is as follows:

Proposed Use	Gross Floor Area	Percentage of space
Above ground Retail/commercial	4,600 sq.m	17.5%
Below ground retail	4,025 sq.m	15.5%
Function centre	1,670 sq.m	6.5%
Residential	8,515 sq.m	32.5%
Heritage pub	2,530 sq.m	9.5%
Hotel/residential	4,910 sq.m	18.5%
<b>TOTAL</b>	<b>26,250 sq.m</b>	<b>100%</b>

Figure 7. The Project Vision



### 3. Government Architect Expert Review

The Government Architect was retained in August 2010 to review previous concepts provided to the Department of Planning for its consideration. The Government Architect in his report of 20 October 2010 developed a number of recommendations and guiding principles for the future development of the site.



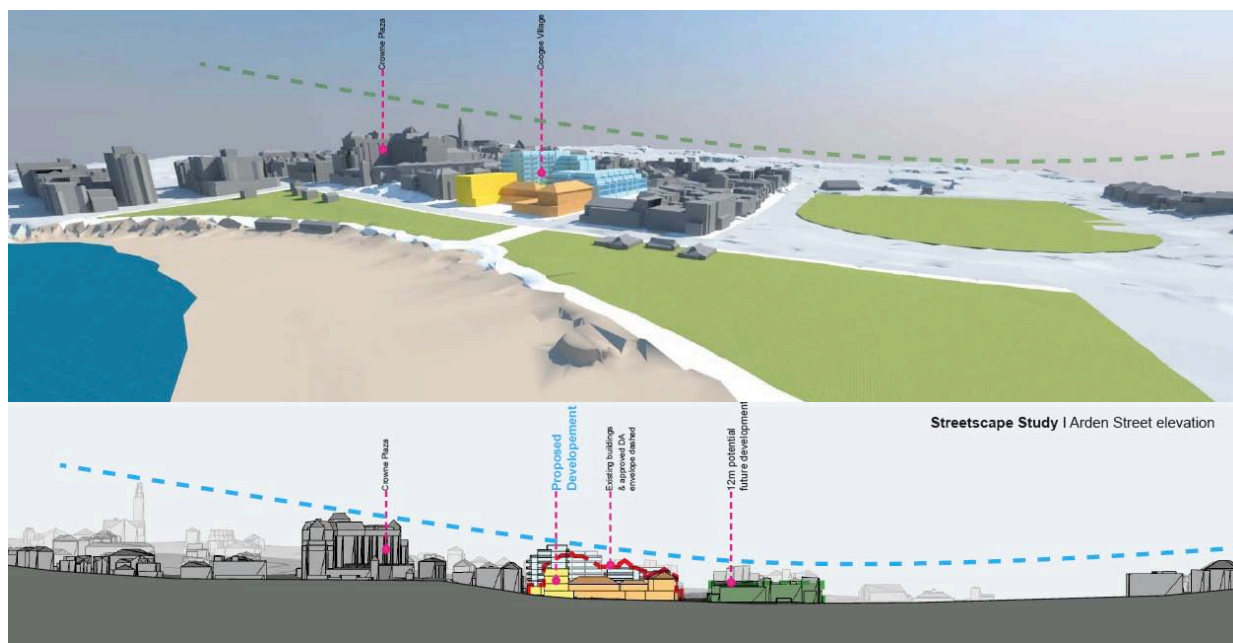
The Government Architects Expert Review is addressed in detail in the Urban Design Statement at **Appendix A** to this letter. The following key recommendations were made by the Government Architect:

- *Built form should reinforce the valley and its topography;*
- *Development should not intrude into important views or vistas from public places;*
- *Low buildings in the valley floor allow view sharing;*
- *Height should be consistent with the prevailing built form;*
- *Buildings should be built to the street or continue the established street wall pattern;*
- *The heritage 'pub' and beer garden should be retained on Arden Street;*
- *Mixed uses are appropriate for the site;*
- *Retail activity should be encouraged along Coogee Bay Road;*
- *Internal public spaces should be activated by commercial uses;*
- *Corners should be reinforced by buildings;*
- *Openings between buildings should be placed mid block, not on street corners.*

In the view of the proponent and supporting consultants, the revised development concept scheme is guided by a design rationale which generally addresses those matters raised by the Government Architect and which introduces significant public benefit while allowing for an economically viable approach to the redevelopment of the site.

As described above and indicated by Figure 8, the revised design concept excludes the earlier higher tower element, minimises potential view impacts and responds sympathetically to the valley topography and surrounding built form.

Figure 8. Concept reinforces valley floor and considers important views

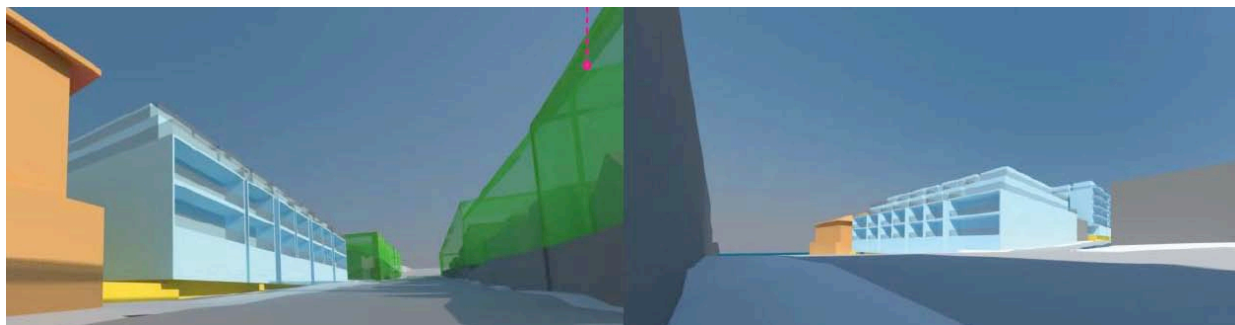


In response to the design critique, the revised concept better defines the street edges and promotes street activation and site permeability. As shown by Figure 9, the Concept reflects scale of Coogee, activates street frontages and places opening mid block.





Figure 9. Concept along Coogee Bay Road facing west and east



#### 4. Major Development SEPP Criteria

This project meets the following Part 3A criteria under *State Environmental Planning Policy (Major Development) 2005*:

- Clause 13 of Schedule 1 of the Major Development SEPP identifies development for the purpose of residential, commercial or retail projects with a capital investment of more than \$100 million to be a Part 3A Project. The project overall will have a capital investment value of \$148.9 million (refer to Quantity Surveyors certificate at **Attachment B**).
- Clause 17 of Schedule 1 of the Major Development SEPP identifies development for the purpose of tourist related facilities, major convention and exhibition facilities or multi-use entertainment facilities that employs 100 or more people to be a Part 3A Project. The tourist components of the project including the pub and hotel of up to 120 beds will employ approximately 188 full-time equivalent workers (refer to supporting information at **Appendix C**).

#### 5. Relevant State and Local Planning provisions

##### 5.1. Sydney Metropolitan Strategy

The Sydney Metropolitan Strategy (Metro Strategy) was adopted in 2005 and is part of the Sydney: The City of Cities Plan. The Metro Strategy establishes targets and measures to accommodate the growth of Sydney to 2031. It also identifies key cities or centres which have been given a hierarchical status including global, regional, major, specialised centres and employment lands, neighbour, villages and town centres. The labelling of these centres is based on the following factors, which include but are not limited to land area, population size, economic activity and transportation links.

The site development has the potential to assist the State Government meeting a range of aims of the Metropolitan Strategy including:

- Assisting in providing employment and economic growth,
- Assisting in dwelling supply in an area of housing demand,
- Providing development in the vicinity of high capacity public transport
- Providing a high standard environmentally sustainable development,
- Upgrading public domain and open space.

##### 5.2. Draft East Sub-regional Strategy

The Draft East Subregional Strategy identifies a housing target of 8,400 additional dwellings and a target of 5,900 jobs for Randwick Local Government Area by 2031. The Strategy plans for increasing housing capacity in existing areas, focused around centres and corridors that take advantage of public transport and existing services. Whilst the Strategy does not indicate where the additional dwellings are to be located within Randwick, it is proposed that the majority of future dwelling growth be located in centres, or following past trends where a growing proportion of development has occurred within centres that are defined as being within 800m of a train line or 400m from a high frequency bus route.



Coogee is identified as a “village” in the Draft Subregional Strategy. The proposed scale and uses in the concept will reinforce Coogee’s place in the subregional hierarchy of centres.

### 5.3. State Environmental Planning Instruments

The following state level planning instruments apply to the site:

- *State Environmental Planning Policy (Major Development) 2005*
- *State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004*
- *State Environmental Planning Policy No. 71 - Coastal Protection*
- *State Environmental Planning Policy No. 65 - Design Quality of Residential Flat Development*
- *State Environmental Planning Policy No. 64 - Advertising and Signage*
- *State Environmental Planning Policy No. 55 - Remediation of Land*
- *State Environmental Planning Policy No. 32 - Urban Consolidation (Redevelopment of Urban Land)*
- *Draft State Environmental Planning Policy (Competition)*

### 5.4. Randwick Local Environmental Plan 1998

The site is zoned 3A General Business under *Randwick Local Environmental Plan 1998 (Consolidation)* (Randwick LEP). This zone permits a range of commercial and residential uses. Randwick LEP provides a maximum floor space ratio of 1.5:1 and heights of 12m. Parts of the site are listed as local heritage items (refer to S5.3).

### 5.5. Development Control Plans

The following Development Control Plans (DCPs) apply to the site:

- Multi Unit Housing Development Control Plan 2003
- Parking Development Control Plan 1998
- Development Control Plan for Public Notification Of Development Proposals And Council Plans 2003

An initial assessment of the concept scheme against the key requirements of these DCPs shows general compliance or the potential to comply with all relevant provisions.

## 6. Preliminary Environmental Assessment

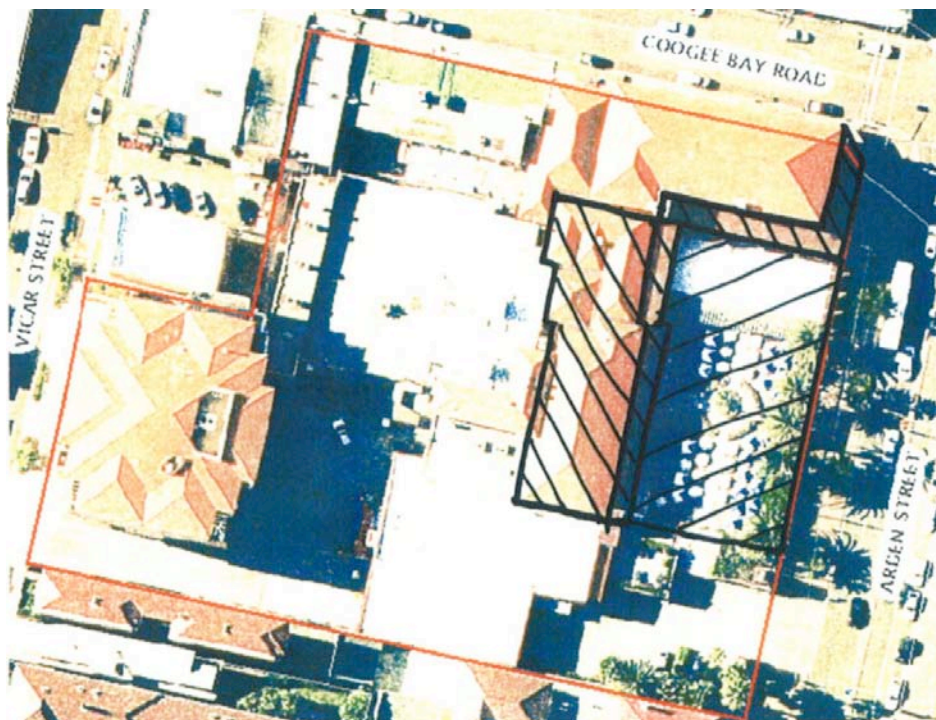
### 6.1. Heritage and conservation

The site is a listed heritage item under Randwick LEP. Preliminary heritage advice identifies important elements the area and buildings hatched in Figure 10. The proposal is to retain and restore the existing pub buildings facing Arden Street and the corner of Coogee Bay Road.

A heritage impact assessment is proposed to accompany the environmental assessment.



Figure 10. Locally significant heritage (hatched)



#### 6.2. Access

The two points of entry and exit to the site have from Arden Street and Vicar Street. These reflect current access arrangements. The Arden Street access point would cater for service vehicles while the Vicar Street entry/exit would cater to the public and residents. The above ground access arrangements would be removed as a result of the proposal with these places underground.

A full Traffic and Transport study is proposed to accompany the Environmental Assessment.

#### 6.3. Retail Sustainability

The proposed retail uses will significantly enhance the vibrancy and long term sustainability of the Coogee Town Centre retail offer, providing an anchor tenant in a convenient location for local residents, as well as a greater provision of retail facilities to cater for the visitors to Coogee. Overall the retail uses are expected to provide an additional 247 jobs or \$8.3 million in additional wages.

An Economic Impact Assessment is proposed to accompany the Environmental Assessment.

#### 6.4. Community Consultation

It is envisaged the community and Council will be further consulted during the preparation of the environmental assessment for the concept plan. Consultation methods could include web based feedback, community consultation sessions and local paper advertisements. The scope of consultation will be further discussed with the Department of Planning.

#### 6.5. Environmentally Sustainable Development

The incorporation of passive sustainability strategies will lay the foundation upon which more active sustainability strategies will be based. It is proposed to investigate relevant Environmentally Sustainable Development (ESD) measures as part of the preparation of the Concept Plan and Environmental Assessment. The investigation will determine which measures are most appropriate and which would achieve the best outcomes for the site and future development. It is our design intent to achieve a development that meets a high standard of ESD benchmarks.





## 7. Conclusion

The proposed concept is one that meets the relevant criteria of Clause 13 and Clause 17 of Schedule 1 the Major Development SEPP being a mixed-use development above \$100 million in capital investment value and provides employment for more than 100 people in tourist related facilities. Effort has been made to address the recommendations and principles put forward by the Government Architects Office in its review of the site and previous proposals. This has resulted in a concept that addresses the existing scale of the Coogee Town Centre, important views and appropriate placement of active uses.

We trust this Preliminary Environmental Assessment is sufficient to enable the Minister to form an opinion that the proposed development is a project to which Part 3A of the Act applies, authorise a Concept Plan submission, and to allow the Director General to issue requirements for the preparation of the necessary Environmental Assessment.

Should you have any queries about this matter, please do not hesitate to contact me on 8667 8668 or [bhendriks@mecone.com.au](mailto:bhendriks@mecone.com.au)

Yours Sincerely



Ben Hendriks

Enclosed:

Appendix A – Urban Design Statement

Appendix B – QS Certificate – Capital Investment Value

Appendix C – Hotel employment information









