



ANGEL PLACE
[REDACTED]
SYDNEY NSW 2000

URBIS.COM.AU
Urbis Ltd
ABN 50 105 256 228

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Angela Hynes
Manager, North, East and Central Coast
Local Planning & Council Support
Planning, Land Use Housing and Infrastructure
[REDACTED]
[REDACTED]

Dear Angela,

GATEWAY REVIEW REQUEST - 310 TERRIGAL DRIVE, TERRIGAL NSW

1. INTRODUCTION

On behalf of Loftus Lane Capital Partners Pty Limited (**the Proponent**), we request a Gateway Determination Review of a Planning Proposal (**PP**) pertaining to land at 310 Terrigal Drive, Terrigal (**the site**). This request for the Gateway Review has been prepared in accordance with the 'Local Environment Plan Making Guideline' (August 2023) (**the Guidelines**).

This request should be read in conjunction with the letter prepared CSE Group which directly responds to the technical flooding matters.

The DPHI issued a Gateway Determination on 17 December 2024, stating that the PP should not proceed due to flood related matters.

The development footprint is located on a flood fringe, with the mapped flood hazard identified as "low hazard." The site is currently zoned R1 General Residential and permits residential land uses. The Planning Proposal sought to deliver a modest increase in density on the site through a confined building footprint that responded to the sites natural features.

The Gateway Assessment Report contains a number of inaccuracies that have led to a decision on the Planning Proposal. Namely, that the site is within a high hazard floodway and that the development results in a substantial intensity of the site.

Central Coast Council have recommended support for the Planning Proposal. The DPHI and BCD have reviewed the Flood Risk Assessment Report and following amendments to the Flood Emergency Response Plan (FERP), **all matters associated with this have been resolved and supported by both Council and BCD, as acknowledged in their letter.**

We do note that during the PMF, the area is subject to flood and shelter in place would be required for 44 minutes. BCD has supported the shelter in place given it is such a short period and all dwellings are above the PMF. The PMF is a very rare occurrence, with the chance of this happening being 1 in 10million years. PMF is designed as a measure for flood emergency response as represents the estimated upper limit in an extremely rare flooding event.

The site is located in a highly urbanised area and the proposed planning seeks to permit the vertical extension of a building, with all dwellings located above the flood freeboard levels.

The PMF is not intended to be a tool used to prohibit dwellings in low hazard areas. Rather, it is an emergency management response. All dwellings would be able to be excavated to flood free land via the road network, excluding the 44 minute window. During the 44 minute window, all residents will remain within their dwellings, which are located above the PMF.

The submitted FERP concludes that the site is suitable from a flood risk and impact perspective.

The Proponent requests that the Independent Planning Commission (IPC) recommend to the Minister that the Gateway Determination be altered to enable the PP to proceed.

2. THE SITE

The Planning Proposal relates to land at 310 Terrigal Drive, Terrigal within the Central Coast Local Government Area (LGA). The site is a vacant triangular lot at the intersection of Terrigal Drive and Charles Kay Drive, comprising a site area of 4,262m².

The site's immediate context includes a mix of low-density residential development predominantly in the form of townhouses and detached dwellings, Terrigal High School, Duffys Oval and a range of associated sporting fields, and a water course which runs along the eastern boundary, feeding into the Terrigal Lagoon.

An aerial image of the site location is illustrated in **Figure 1**.

Figure 1 Aerial image



Source: Urbis

3. BACKGROUND

The PP (PP-2023-1899) was submitted to Central Coast Council (**Council**) on 31 August 2023 after a long period of consultation with Council, which commenced in December 2021. Following amendments to the PP throughout the assessment process, the PP was supported by Council on 26 March 2024 and submitted to the Department of Planning Housing and Infrastructure (**the DPHI**) for Gateway Assessment on 2 April 2024.

The DPHI issued a request for further information, which Central Coast Council responded to. This was then followed by consultation with Biodiversity, Conservation and Science division, including the provision of additional and further flood modelling and a revised Flood Impact and Risk Assessment.

On 17 December 2024, a Gateway Determination was issued by the Delegate of the Minister for Planning and Public Spaces (**the Minister**) stating that the PP should not proceed due to insufficient strategic merit, inadequate site-specific merit based in relation to flooding risk, and inadequate demonstrating of improved social and economic outcomes.

The Proponent requests that the Independent Planning Commission (**IPC**) recommend to the Minister that the Gateway Determination be altered to enable the PP to proceed.

This request is submitted within 42 calendar days of notification of the Gateway Determination, with a 2 week extension granted due to the Christmas shutdown period. As per the Guidelines, this request includes justification for why an alteration of the Gateway determination is warranted, including responses to issues raised by the original Gateway decision make.

Separate to the above Planning Proposal, we note that a concurrent development application was lodged with Central Coast Council (DA/1928/2023). That application was referred to a number of State Agencies, including RFS, TfNSW, Ausgrid and DPHI – Water. Their comments have been addressed in the Planning Proposal and the Agencies have confirmed that the development was satisfactory.

3.1. PLANNING PROPOSAL

The PP seeks to amend the *Central Coast Local Environmental Plan 2022 (CCLEP 2022)* as it relates to the site by way of the following:

- Amend the maximum height of buildings to 25m;
- Amend the maximum floor space ratio to 1.3:1;
- Amend Schedule 1 Additional permitted use to enable a retail premise with a maximum GFA of 150sqm to be established on the site.

The PP retains the current R1 General Residential zoning of the site. The PP is accompanied by a draft site-specific Development Control Plan (DCP) which provides the detailed guidelines and controls for the delivery of the indicative concept.

The draft DCP also includes site specific provisions relating to flooding. Namely, the following requirements have been agreed with Council:

5.11.2.5 Flooding

Requirements

- a) *A site specific Flood Emergency Plan is required to be submitted with future development applications. The Plan is to be circulated, managed and adhered to by all occupants of the building.*
- b) *The Flood Emergency Plan is to be reviewed and updated as required once every five years.*

The PP will enable the site to be redeveloped from a vacant and underutilised land parcel to a six-storey residential flat building, with a café activating the corner of Charles Kay Drive and Terrigal Drive at the ground level, providing for added activation supporting the Oval, school and adjacent residential uses.

The objective is to deliver a residential flat building with a smaller building footprint by enabling vertical development on the site. The development has the ability to activate this prominent corner, delivering a high-quality development with strong connectivity to other local centres within the Central Coast region.

The concept drawings prepared by CKDS Architects demonstrate the potential for the site to accommodate 38 residential apartments and 85 car parking spaces across three basement levels.

3.1.1. Strategic Merit

The PP demonstrates strategic merit for the following reasons:

- Consistent with the **Central Coast Regional Plan 2041**, which seeks to conserve waterways and create 15-minute neighbourhoods and diverse housing to support inclusive and vibrant communities.

The Planning Proposal includes a commitment to revitalise the riparian corridor along the eastern boundary, with the draft DCP including site specific controls.

- The site is **located within Central Coasts major urban area** and is located 1km west of Terrigal Beach and Town Centre.

- **The site is zoned for residential purposes** and the proposed land use is permissible with consent.
- Consistent with the **Central Coast Community Strategic Plan 2018-2028 – One Central Coast**, which seeks to increase housing diversity, active transport and community safety.
- Assists Council in achieving housing targets identified in Council's draft Local Housing Strategy, which requires an additional 32,550 dwellings by 2041.
- Achieves a variety of housing typologies through the delivery of residential apartments which reflect the vision for Central Coast to deliver greater housing choice and diversity.
- Unlocks the development potential for the site and activates a prominent corner as the gateway to Terrigal, with 38 new dwellings and a café to activate the corner.

3.1.2. Site Specific Merit

The PP demonstrates site-specific merit for the following reasons:

- The site sits at the intersection of two major roadways, being Terrigal Drive and Charles Kay Drive, providing strong connectivity to the surrounding local centres and accessibility to the local bus network.
- The site is an island corner lot and substantially separated from adjoining properties, which makes it suitable for a vertical development, without overshadowing nearby properties or impacting on views or privacy.
- Active frontages and passive surveillance are provided along the site frontages and to the pedestrian pathway to the south-east through a café and residential uses.
- The concept design demonstrates that the site-specific considerations can be suitably managed and the site is capable of accommodating both the building footprint and the density without adversely impacting on the environmental qualities of the locality or the amenity of nearby residential properties.
- Extensive consultation was held with BCD in regards to the waterway and the flood impacts, prior to lodging the Planning Proposal. The advice received was reflected in the design of the building footprint and the flood freeboard levels. **Based on preliminary feedback, the flooding matters were considered resolved.**

3.2. CONSULTATION HISTORY

A summary of the matters discussed during the various meetings held between the proponent and the relevant local authorities are provided in **Table 1** below. It is noted that extensive engagement was held with all relevant authorities prior to the Proponent progressing with the Planning Proposal. All agencies provided in-principal support for the progression of the Planning Proposal.

Correspondence between the Proponent and Agencies is attached to this Gateway Review Request in **Attachment E**.

Table 1 Consultation history

Agency	Comment
Central Coast Council	December 2021 - ongoing Pre-Planning consultation with Council began in December 2021. The Pre-Planning Proposal advice received by Council confirmed that, in relation to flooding <i>Satisfied. As per email dated 30 May 2023 from Andrew Dewar –pre-lodgement comments have been addressed.</i>
BCD (Richard Murphy)	13-15 June 2023 The Proponent engaged with BCD prior to lodging the Planning Proposal. Richard Murphy, Senior Natural Resource Officer confirmed that BCD had no issues with what was presented in the flood modelling. The Proponent was advised that greater information was required in regards to Shelter in Place to better understand the risks. Further information was provided to BCD, of which Richard confirmed that the approach was reasonable. Richard also provided further guidance and details around what was required to be included in the Flood Emergency Response Plan (FERP) for the site. The FERP prepared by the flood engineer specifically addresses those items raised by Richard in June 2023. The FERP has been supported by the DPHI and Council. The DPHI also note that shelter in place is suitable for the site given the limited duration of the event.
TfNSW	21 July 2023 TfNSW reviewed the SIDRA files and TIA and advised that the proposal was supported on traffic grounds. Council notes that a Road Safety Audit is required as part of the DA. 9 October 2023 RFI was received and further updates were issued on the SIDRA files. 6 November 2023

Agency	Comment
	TfNSW confirmed that <i>TfNSW has reviewed the TIA and accompanying SIDRA files, and advises it is considered there will be no significant impact on the nearby classified (State) road network.</i>
RFS	19 October 2023 RFS wrote to Council and confirmed that the application was suitable to be approved, subject to relevant conditions of consent.

4. RESPONSE TO GATEWAY DETERMINATION

The Gateway Determination stated that the PP should not proceed due to insufficient strategic merit, inadequate site-specific merit based in relation to flooding risk, and inadequate demonstrating of improved social and economic outcomes.

The following sections provide a response to each of the key matters of the Gateway Determination to support the alteration of the Gateway Determination. The Gateway Determination is provided at **Attachment A** of this request.

4.1. STRATEGIC MERIT

Department's Gateway Assessment:

Item 1 of the Gateway Determination states the PP has not demonstrated sufficient strategic merit as it does not give effect to the Central Coast Regional Plan 2041 and has not provided sufficient justification to demonstrate consistency with:

- Objective 5: Plan for 'nimble neighbourhoods', diverse housing and sequenced development
- Objective 7: Reach net zero and increase resilience and sustainable infrastructure
- Narara District Planning Priority 5: Identify appropriate urban expansion opportunities to ensure a sufficient supply of safe, diverse and affordable housing.

The Gateway Assessment Report further notes the strategic direction of the area is to facilitate the delivery of resilient and vibrant places and ensure land use planning avoids and mitigate the effects of natural hazards, and that the proposal is inconsistent with the above matters.

Notably, the Department's Assessment Report acknowledges the PP will increase the supply and diversity of housing choice within the Central Coast LGA, which is a key strategic priority of Council and NSW due to the current housing crisis.

Council Assessment:

On 26 March 2024, the PP was considered at the Central Coast Council meeting. The supporting Assessment Report states:

*"The Planning Proposal is **considered to have strategic merit** as it is strategically located on key transport corridors into Terrigal. The amended provisions will uplift residential development*

potential, increase housing supply, diversity and choice, whilst utilising existing infrastructure services and transport connections in Terrigal.”

In relation to flooding and the natural environment, the Assessment Report further notes:

“A Floodplain Risk Management Plan was submitted to Council and was reviewed by Council’s Development Flooding Engineer. The report’s methodology, results and recommendations were supported, further modelling on the climate change and subsequent rainfall intensity is being undertaken to inform the Planning Proposal, however the existing Floodplain Risk Management Plan anticipates it is unlikely to have any significant impact. This matter will also be considered by the Department of Climate Change, Energy, the Environment and Water as part of agency consultation.”

“There have been no material risks identified to the natural and built associated with the proposed amendment to the CCLEP 2022, which cannot be easily mitigated.”

The modelling for climate change factor and subsequent rainfall was completed and issued to Council. As per the Council assessment report, the Council has assessed the Plan and provides support for the Planning Proposal to progress to Gateway.

Proponent Assessment:

The Proponent agrees with the assessment by Council that the PP has strategic merit.

The Central Coast Regional Plan 2041 identifies Terrigal as a key local centre with potential for additional infill housing and sufficient infrastructure, jobs, services and transport to support this growth. A response to objectives 5 and 7 of the plan is outlined in the table below.

Table 2 Response to strategic objectives

Objective	Response
Objective 5	The proposal seeks to deliver a diverse mix of residential apartments and a retail premise in a prominent location at the corner of two main connecting roads in Terrigal and located within cycling distance from Terrigal Town Centre, supporting the creation of an accessible, 15-minute neighbourhood.
Objective 7	The proposal seeks to restore the existing waterway along the site’s south-eastern boundary, which is currently full of weeds and is a low-quality water system. This will increase the resilience of the water system and the surrounding environment as per the priority. There are no threatened flora species and no significant fauna habitat on the site that may be impacted. The Flood Risk Management Plan demonstrates that flood impacts resulting from the proposed built form are generally isolated to the site and can be managed. The proposal will deliver a residential development in an accessible area with public transport available, thereby reducing private car use and achieving State government objectives of a low carbon city.

Objective	Response
Narara District Planning Priority 5	The PP transforms underutilised land which is zoned for residential purpose to provide increased housing supply and diversity for the region, in the form of apartment typologies. This will enable a better use of the site for a greater variety of housing choices, noting that this is one of few infill opportunities in Terrigal.

4.2. SITE SPECIFIC MERIT

4.2.1. Flooding

Department's Gateway Assessment:

Item 2 of the Gateway Determination states the PP has not adequately demonstrated site-specific merit in relation to flood risk and has not provided sufficient justification to demonstrate consistency with Section 9.1 Ministerial Direction 4.1 Flooding.

Council Assessment:

The Council Assessment Report states:

*"The proposal complies with the Section 9.1 Ministerial Direction for flooding. While the proposal will result in a **modest increase in density**, the proposal does not seek to change the land use zone. Thus, residential flat buildings are already permitted in the zone and the proposal would be contained in the permissible footprint. The Planning Proposal does not impose flood related development controls above the residential flood planning levels".*

The PP and the recommendation by the planning team was supported by Council.

Proponent Assessment:

The Proponent met with BCD prior to lodging the Planning Proposal. The flood model was provided to the Senior Floodplain Officer from the Hunter Central Coast Branch. The officer confirmed that

"the risks to life from residents sheltering in place is low. You also suggest a number of mitigation options to further reduce risk to life.

While I have not had a detailed look at your proposal, your approach looks reasonable. The Department will provide formal comments when we receive your proposal from Planning. However, my initial thoughts is that you will need to prepare a Flood Emergency Response Plan (FERP) for the site. The FERP will inform future managers of the site how to manage flood risk."

This preliminary engagement with BCD provided the Proponent with the necessary confirmation to progress with the planning proposal.

The flood planning for the site has not changed.

In reviewing the Planning Proposal as part of the Gateway Assessment, the BCD team requested a number of amendments and the submission of the additional information. That information was primarily in relation to additional modelling and understanding the structure integrity of the building (noting this is a planning proposal and the design of the building is a detailed DA matter). The BCD

were satisfied that the additional information met their requirements and that the residents can safely shelter-in-place for the 44minutes required during the PMF.

The DPHI however stated that the proposal was “inconsistent” with the Ministerial Direction because it result in a significant increase in the population.

The DPHI in their assessment have failed to recognise the existing capacity of the land under the current planning controls. A summary between the existing capacity of the site and the proposed capacity is provided below, confirming that the development **results in an additional 14 dwellings**.

Development Density

The PP seeks to increase the development capacity of the site by way of vertical extension. The proposal does not seek to change the existing residential land uses permissible on the site nor does it propose changes to land use zones. The site is located in a highly urbanised area.

Under the Central Coast LEP 2022, the site is permitted the following density:

- Height: 8.5m
- FSR: 0.7:1 (in accordance with Clause 4.4A(4)).

A compliant development on the site under the LEP and the in-fill affordable housing provisions of the *State Environmental Planning Policy (Housing) 2021* can result in:

- Height: 11.05m (base height of 8.5m + 30% permitted bonus).
- FSR: 0.9:1 (base FSR of 0.7:1 + 30% permitted bonus).

The total FSR permitted on the site under the current controls is 0.9:1 which equates to a GFA of 3,878.42m².

The Planning Proposal seeks to increase the FSR to 1.3:1 to deliver approximately 5,500m² of residential GFA. This is approximately 1,700m² greater than the current controls.

This is a **very MODEST increase** from what is permitted under the current planning controls.

When applying an 80% efficiency rate and adopting an average apartment size of 90m², the existing controls would yield 34 apartments. The proposed controls would yield 48 apartments, **resulting in 14 apartments in a vertical high-rise** with all units located above the flood freeboard levels.

In this regard, the Planning Proposal is consistent with the Ministerial Direction 4.1.

Flood Risk Management Study

Further to the above, we note that the planning proposal may be inconsistent ONLY if the planning proposal authority can satisfy the Planning Secretary that

“the planning proposal is supported by a flood and risk impact assessment accepted by the relevant planning authority and is prepared in accordance with the principles of the Floodplain Development Manual 2005 and consistent with the relevant planning authorities’ requirements.”

For further insurance, the planning proposal is support by a Flood Impact & Risk Assessment (FIRA) that has been agreed and endorsed by Council to mitigate impacts to future resident through a range of management measures. **The BCD has also supported the findings and outcomes of the FIRA.** The FIRA, provided at **Attachment B**, identifies:

- The site is considered a H4 hazard category for both pre and post development. As per the Flood Risk Management Guide FB03, **categories H1 to H4 are identified as low hazard**. Despite this, the proposed development has been designed to address risks associated for all storm events up to and including the PMF event.
- During the 1% AEP flood event, the development presents no changes to risk level on the site and surrounds, despite a change in minor afflux. The development will result in a reduction in flood levels within Terrigal Drive, however from 60 minutes – 104 minutes shelter in place is required for approximately 44 minutes. At 104 minutes, horizontal evacuation to Scenic Highway is available and emergency vehicles can access the site.
- **During the PMF flood event, the development presents no changes to risk level on the site and surrounds**, despite a change in minor afflux. The development **will result in a reduction in flood levels within Terrigal Drive**, however from 25 minutes – 99 minutes, shelter in place is required for approximately 74 minutes. At 100 minutes, horizontal evacuation to Scenic Highway is available and **emergency vehicles can access the site**.

The PMF is the largest flood that could conceivably occur at a particular location. The flood consultant notes that the probability of the PMF occurring in any one year at this location is 1 in 10 million (ARR, 2019). The PMF flood modelling also assumes that the surrounding stormwater network fails, and the catchment can not drain into the normal pit and pipe network.

- During all major flood events up to and including PMF, peak flood behaviour subsides in less than 2 hours, a shelter-in-place strategy has been supported as there is no need to evacuate during a flood.
- Section 6 of the FIRA provides a Flood Emergency Response Plan (**FERP**) which will guide management of flood impacts. This includes:
 - A Shelter-in-place strategy. This demonstrates that a safe refuge during all flood events is available on-site within every resident's individual homes. The proposed development has been designed with a finished habitable level of RL 5.80m AHD. The adopted level is set to achieve a level greater than PMF by approximately 320mm.
 - The future development on site will also include major warning systems to be made available to those residents in case they try to return home during a flood event, including 24/7 smart screen the lobby with BOM and major event warnings, ongoing education to future residents, installing of flood marker and water level gauges in and around the sites.
- Preparation of the FERP is consistent with advice provided by BCS in June 2023, which noted that the approach to shelter on site is reasonable where supported by a FERP.

The flood risk on this site can therefore be adequately mitigated through the FIRA and FERP.

A detailed response to the Section 9.1 Ministerial Direction – 4.1 Flooding is provided in Section 4.1 of the FIRA. Specifically, it is noted the proposal is not inconsistent with the Direction as:

- The FIRA is consistent with the relevant flood policies.
- The PP does not seek to rezone the land.
- The PP seeks to amend the height and FSR controls. This does not permit development that is in a floodway or high hazard area any more than the current zone facilitates such development. The proposal therefore does not contain provisions as listed under section 3 (a) – (h) or 4 (a) – (h).

- This FIRA is prepared in accordance with the principles and guidelines of the Flood Risk Management Manual 2023, and the planning proposal is in accordance with it.
- Most notably, the FIRA was revised in response to the BCS comments and letter of advice dated 4 October 2024 (**Attachment C & D**) was provided confirming that these matters have been resolved. The only contention between the parties was the intensity of the development, with the DPHI failing to recognise the existing capacity of the site.

4.2.2. Coastal Management

Department's Gateway Report:

Whilst not noted in the Department's Gateway Determination, the Gateway Assessment Report states the proposal is inconsistent with Direction 4.2 Coastal Management until consultation occurs with the Fisheries NSW and the NSW Environment Protection Authority.

Proponent Assessment:

A condition on the Gateway Determination can be imposed to require consultation with the Fisheries NSW and the NSW Environment Protection Authority as part of the exhibition period.

4.2.3. Bush Fire Risk

Department's Gateway Report:

Whilst not noted in the Department's Gateway Determination, the Gateway Assessment Report states the proposal is inconsistent with Direction 4.3 Planning for Bushfire Protection until consultation occurs with the Commissioner of the NSW Rural Fire Service (RFS).

Proponent Assessment:

RFS has reviewed the proposal as part of a concurrent development application that was lodged and subsequently withdrawn. RFS confirmed that the proposal was satisfactory, subject to relevant conditions of consent.

4.3. SOCIAL AND ECONOMIC OUTCOMES

Department's Gateway Assessment:

Item 3 of the Gateway Determination states the PP has not adequately demonstrated that the proposal would result in improved social and economic outcomes. The Gateway Determination Report notes this is primarily due to the site's flood affectation during the 1% AEP and PMF flood events.

Council Assessment:

The Council Assessment Report supported the proposal and noted the proposal has several social and economic benefits. Most notably, this included renewal and activation of a key site, improved ground plane, delivery of hosing supply and diversity, job creation and contributing to a 15-minute neighbourhood – as per the strategic planning provisions.

Proponent Assessment:

The proposal will deliver a range of social and economic impacts as outlined in the proponent's request for planning proposal and the Council Assessment Report.

In relation to the flood impact, flood damages would be minimal as future development will incorporate flood compatible materials and finished floor levels will be above the flood planning level. The proposal will therefore no result in any unsustainable social and economic cost.

There will be no adverse social impact on risk to life through the proposed FERP which will manage safety during flood events. Shelter-in-place is an acceptable strategy that has been adopted and accepted across many sites in Greater Sydney.

5. ALIGNMENT WITH GOVERNMENT PRIORITIES

The PP has a clear alignment with Government priorities, namely, to increase the supply, diversity and affordability of housing across the State.

The clear need for housing in the local government area is outlined in the Council Planning Proposal, which states:

“According to the draft Central Coast Local Housing Strategy (CCLHS), recent housing completions in the Central Coast have not kept pace with demand for projected housing need, creating a shortfall in housing supply and housing affordability issues. This lack of housing supply is partly attributable to alack of available and unconstrained land in the region. There is an immediate need to accommodate Central Coast’s growing population, and current stock is not diverse enough to meet housing demand.”

The delivery of housing is essential to the federal and State government in this current housing crisis.

The land at 310 Terrigal Drive has the potential to provide for immediate additional growth. The land has the capability to respond to the increasing diversity of housing needs through the provision of one- and two-bedroom apartments, providing suitable accommodation for empty nesters and the ageing population, who are driving the need for smaller dwellings. The concept design also provides three-bedroom apartments, which have the potential to service the continuing demand from younger families looking for more affordable housing options.

The future development will add to the variety of housing typologies in Terrigal, thereby improving the affordability and supply of housing in the region and delivering upon the priority. This Planning Proposal therefore supports this strategic direction and Government priority on increasing housing supply and diversity in NSW.

6. CONCLUSION

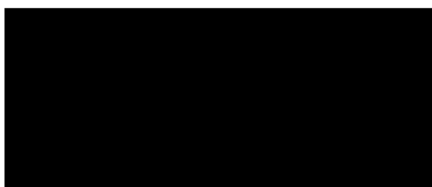
This letter has been prepared in support of a Gateway Determination Review request to DPHI in relation to the Proponent initiated Planning Proposal at 310 Terrigal Drive, Terrigal.

It is demonstrated that there is clear strategic and site-specific merit as outlined in ‘Local Environmental Plan Making Guidelines’ and thus warrants a favourable consideration by the IPC.

Any questions, please do not hesitate to contact the undersigned.



Kind regards,



Sophy Purton
Associate Director

