

Attention: Mr Andrew Watson
Project Officer
Key Sites and Regional Assessments
NSW Department of Planning and Environment
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2150

Email: Andrew.Watson@planning.nsw.gov.au
Cc: meg.dsouza@planning.nsw.gov.au

Re: DA 25/2293 Residential Flat Building - 80-82 Showground Road, Gosford

Dear Mr Watson

Thank you for the opportunity to provide feedback on the development application – DA 25/2293, which was circulated to our Public Health Unit, Health Promotion Service and Health Planning teams, and in relation to aviation, NSW Ambulance.

The Central Coast Local Health District responds as a neighbouring landowner/occupier, a health service facility and an advocate for healthy built environments that protect and promote human health and wellbeing.

Public Health Unit

Our Public Health Unit have provided feedback (refer Appendix A).

Health Service Planning

The number of units whilst small, presents an increase in the local population that will access Central Coast Local Health District Health services. This will impact Gosford Hospital and Community Health Services located in the Gosford area. It should also be noted that there are multiple housing developments within the Gosford area. The cumulative impact of multiple housing developments on demand for health services should be considered, particularly Gosford Hospital and Community Health Services.

Aviation Impact Assessment

The proposed development is located approximately 230 metres from Gosford Hospital. Increased building heights therefore have potential to impact helicopter flight paths to and from the hospital, both during construction and after building completion. Accordingly, a comprehensive Aviation Impact Assessment is required to assess and address impacts on the Gosford Hospital Helicopter Landing Site. The assessment is to be completed by an industry recognised consultant.

Health Promotion

Our Health Promotion team have nil feedback.

If further information is required about Public Health feedback, please contact Kerry Spratt, Senior Environmental Health Officer on email kerry.spratt@health.nsw.gov.au or phone 4320 9730.

If further information is required about Health Service Planning feedback, please contact Brooke Sinderberry on brooke.sinderberry@health.nsw.gov.au

Yours sincerely



Scott McLachlan
Chief Executive

Appendix A: Public Health Unit comments: Proposed Residential Flat Building at 80-82 Showground Rd Gosford (DA 25/2293).

The site is located on thoroughfares between schools, Gosford Railway Station and Gosford Hospital. It adjoins and is near to premises in Holden Street used by the Central Coast Local Health District to provide health services to vulnerable community members. To protect the health and wellbeing of the surrounding community, the site's location will have implications for project management in terms of air pollution, noise and vibration and traffic.

Air Quality

Demolition and excavation works have potential to generate particulate matter. Our advice is that epidemiological studies have been unable to identify a threshold below which exposure to particulate matter air pollution (PM) is not associated with health effects. Therefore, any increase in exposure must be assumed to have an adverse impact on the health of the community, even at levels below the accepted assessment criteria.

The Statement of Environmental Effects (SEE) notes potential for temporary and localised air quality impacts and undertakes to implement mitigation measures (p59). We are unable to locate any assessment of the extent of these impacts and suggest that such assessment is necessary to underpin planning for effective impact mitigation measures.

We request that any approval include conditions to ensure that air quality impacts are assessed to the satisfaction of the Appropriate Regulatory Authority, and that the surrounding community is not adversely affected by air quality impacts.

Noise and Vibration.

The community health services provided at premises at the rear of the site and nearby (89, 91, 97 and 99 Holden Street) operate during the project's proposed work hours. The undertakings in relation to noise in the SEE (p60) are noted, however we are unable to locate any assessment of potential impacts on these potentially sensitive receivers.

We suggest that a Noise and Vibration Impact Assessment is required which considers potential impacts arising from demolition, excavation and construction works. The assessment should recognise the daytime health service usage of the Holden Street premises. The assessment and any necessary mitigation measures should be to the satisfaction of the Appropriate Regulatory Authority. We request that conditions to this effect be applied to any approval.

Site contamination

The SEE notes low potential for contamination but that no site inspection has been conducted (p49). We request that conditions be applied to any approval to ensure that site investigation and strategies to manage contaminants including unexpected finds, are to the satisfaction of the Appropriate Regulatory Authority.

Water Use

The SEE refers to the collection and storage of rain water for reuse for toilets and landscaping irrigation (p47). We support appropriate adoption of Water Sensitive Urban Design principles. To protect public health, the quality and management of reused water must be consistent with the proposed end uses, and water collection and distribution systems must be installed and operated according to the relevant standards. The applicant may need to seek approvals for the proposed

water reuse. We request that conditions be applied to any approval to ensure that the water reuse system is managed so as to protect public health and all necessary approvals are obtained.

Crime Prevention Through Environmental Design (CPTED)

The Compliance with Design Principles for Residential Apartment Development report refers to CPTED principles (p8). We seek confirmation that the project design incorporates CPTED principles to best practice. Conditions to this effect should be applied to any approval, if necessary.

Construction traffic management

The site is located on a walking route between Gosford Hospital, schools and Gosford Railway Station. Traffic associated with the site will need to be managed to avoid safety risk to pedestrians. This risk should be addressed in any approval.

Privacy for users and staff at health service properties

We request that the privacy of staff and users of the health services at the previously mentioned Holden St properties be observed. Any approval should require ground level screening to protect privacy.

Monitoring and Enforcement:

Management of impacts on the local community will be dependent on effective implementation and monitoring of control measures, and enforcement of approval conditions. Any approval should contain provisions to ensure this will occur.

If further information is required about Public Health feedback, please contact Kerry Spratt, Senior Environmental Health Officer on email kerry.spratt@health.nsw.gov.au or phone 4320 9730.