

7 April 2022

Andrew Watson  
DA Co-ordinator  
Key Sites and Regional Assessments  
NSW Department of Planning and Environment  
Locked Bag 5022  
Parramatta NSW 2150

By email: Michelle.Niles@planning.nsw.gov.au

Dear Andrew,

Re: the Residential Flat Building – 53-55 Donnison Street West, Gosford (DA 22/1307).

Thankyou for the opportunity to comment on the Statement of Environmental Effects (SEE) for this project. The District's Health Planning, Health Promotion and Public Health Units have collaborated to produce this response. Our comments are attached.

#### *Social Impact Assessment*

This application does not include a Social Impact Assessment. The District seeks confirmation from the Department of Planning and Environment that the lack of social impact assessment is consistent with the scale of the development.

#### *Aviation Impact Assessment*

It is important to note that hospital helipads (HLS) are listed by NSW Health as critical Health Infrastructure. As such, impediments by building developments to the safe and effective operation of the HLS must be closely scrutinised and impacts mitigated where necessary. As end users, NSW Ambulance have concerns when developments occur within a 5km radius of a hospital helipad (dependent upon topography and development height). This concern predominately revolves around height of the completed building, its impact on surveyed flight paths and the appropriate identification of all construction cranes, particularly at night.

This application does not include an Aviation Impact Statement. As such, the District and Ambulance Aeromedical Operations representative are not able to determine the impact of the development on the Gosford Hospital Helipads or the flight paths into the hospital helipad. It is requested that an Aviation Impact Assessment is urgently commissioned to enable our informed consideration before any approval can be given.

#### *Public Health Issues*

The Public Health Unit has raised a number of concerns including regarding the impact of the construction on air quality, noise and vibration impacts, site contamination, water cycle, Crime Prevention Through Environmental Design, open space, solar access and overshadowing, monitoring and enforcement and community feedback. Further details are outlined in Attachment A.

*Health promotion Issues*

Health promotion has identified lack bicycle parking spaces as a concern, and recommends the development provides nine (9) bicycle parking spaces in the basement parking area and at least two (2) bicycle parking spaces for visitors in a convenient space near the front entrance to the apartments. Further details are outlined in Attachment B.

*Impact on Health Services*

The potential cumulative impacts of development should be considered in light of this project and other significant current and future development within Gosford's centre and surrounds. Whilst this development is relatively small, any increase in population results in increased demand on Health Services. The District encourages the developer and planner to continue to note this increased demand.

If further information is required please contact Ms Kym Scanlon, Manager Health Planning, on Tel: 0411 259 932 or Ms Maya Smitran, Director Healthcare Improvement on Tel: 4320 9440.

Yours sincerely,



**Maya Smitran**  
Director Healthcare Improvement

**Attachment A: Public Health Unit (PHU) comments: Statement of Environmental Effects (SEE) Proposed Residential Flat Building at 53-55 Donnison St West Gosford (DA 22/1307).****Best Practice Built Form and Ecologically Sustainable Development**

The PHU advocates that development should be in accord with eco-city principles, built on principles of living within the means of the environment.<sup>1</sup> Planning for urban development should take account of the cumulative impacts on human health and the environment arising from the intensification of our built form. Urban heat, solar access, traffic, loss of contact with nature and the opportunity for the community to lead healthy lifestyles are examples of considerations.

While every development is assessed independently, cumulatively, all developments can contribute positively and negatively to urban form and function. The potential cumulative impacts of multi storey development in the Gosford area should be considered with ecologically sustainable development principles as a cornerstone. High rise buildings should follow sustainable and green architecture standards, considering the natural environment and other relevant ecological designs<sup>2</sup> to promote healthy, socially sustainable communities. The current application is for a development that is similar to others in the surrounding area, and we seek assurance that it achieves best practice in these terms.

**Air Quality**

The SEE (p87) notes potential air quality impacts from emissions from construction machinery and vehicle exhausts associated with excavation and construction. It does not provide any assessment of those impacts, nor of potential impacts from ground disturbance during excavation. A thorough assessment is required to identify potential impacts on air quality during construction, including excavation works, with appropriate mitigation measures identified, if required. Without pre-empting this assessment, it is possible that construction works may give rise to particulate matter emissions.

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.

We ask that this advice be considered in determining the current application with an appropriate impact assessment undertaken and conditions applied to any approval.

**Noise and Vibration Impacts**

The 'Noise Impact Assessment' (Spectrum Acoustics 2020) addresses road and rail noise and vibration, concluding that no further assessment is required. We seek assurance that this is a valid conclusion.

The SEE (p84) notes that 'some short term noise impacts will be experienced during the construction phase'. The SEE does not provide any assessment of potential noise and vibration impacts arising from construction and excavation. To avoid adverse effects on the local

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<sup>1</sup> The smart city journal. <https://www.thesmartcityjournal.com/en/articles/1042-eco-innovations-eco-cities-eco-towns>

<sup>2</sup> Razzaghian F, Rahnama MF, Shokouhi, MA (2016). Ecological Analysis of High-Rise Buildings by Eco City Theory (Case Study: Mashhad Metropolitan). April 2016. *International Journal of Humanities and Cultural Studies*, at: <http://www.ijhcs.com/index.php/ijhcs/article/view/565/515>

community's health and wellbeing, we suggest that a thorough assessment of these impacts is warranted, including as necessary, identification of mitigation measures for all potentially affected receivers. This assessment should be completed prior to work commencing, and to the satisfaction of the Appropriate Regulatory Authority. If approval is granted, we request that appropriate conditions be applied to this effect.

### **Site Contamination**

The Preliminary Geotechnical Assessment and Preliminary Site Contamination Report (Douglas Partners 2021, p12) and SEE (p98) recommend that an intrusive site investigation, a pre demolition hazardous building material survey, and potentially a groundwater quality study be conducted. We support these recommendations and seek confirmation that these investigations will be completed to the satisfaction of the Appropriate Regulatory Authority. If approval is granted, we request that appropriate conditions be applied to this effect.

### **Water Cycle**

The SEE refers to the use of rainwater tanks (p65). We support Water Sensitive Urban Design principles and note that the applicant may need to eventually seek various approvals for water reuse depending on water source and intended end use.

### **Crime Prevention Through Environmental Design (CPTED)**

We note and support the provision of public open spaces, especially when designed so that people feel safe using these areas. The SEE addresses CPTED principles and we request that any approval include conditions to underpin the adoption of appropriate design features.

### **Open Space, Solar Access and Overshadowing**

Our urban areas must be 'places for people' and it is imperative that the community has access to quality open space. The development should ensure that local amenity is protected and enhanced.

The SEE (p100) concludes that the development will not have any appreciable effect on biodiversity or ecological integrity. The enhancement and protection of native flora and fauna has benefits to human health and wellbeing through contact with nature, and improving our capacity to deal with climate change and extreme weather events. The development should address the opportunity to create an improvement in diversity and local ecology. To this end, we commend rooftop planting and the use of native species across the site, to help ensure a healthy and safe haven for wildlife.

All possible measures should be implemented to maximise solar access and minimise over shadowing within the development, and in relation to neighbouring properties and public open spaces. We seek confirmation that the current design provides the best possible outcome.

If approval is granted, we request that appropriate conditions be applied to this effect.

### **Monitoring and Enforcement**

Management of air quality and noise and vibration impacts on the local community, particularly during construction and excavation will depend on effective implementation and monitoring of control measures, and potentially, enforcement of approval conditions. Should approval be granted, we ask that conditions be applied to ensure appropriate monitoring of noise and air quality impacts, and that control measures are effectively implemented.

### **Community Feedback**

The applicant is encouraged to consult with the surrounding community to ensure that the

project does not impact on the community, for example to identify a construction schedule that will create least possible disruption. The applicant should provide a contact point for complaints if noise and vibration or air quality issues occur and an undertaking that a prompt and genuine response will be made to any complaints.

If further information is required, please contact Kerry Spratt, Senior Environmental Health Officer, on telephone 4320 9730.

**Attachment B: CCLHD Health Promotion Service submission re Notice of Exhibition – Statement of Environmental Effects (SEE) for the Residential Flat Building – 53-55 Donnison Street West, Gosford (DA 22/1307)**

Thank you for the opportunity to provide comment on the proposed new residential flat building at 53-55 Donnison Street West, Gosford.

To help achieve NSW Health's number one direction of 'keeping people healthy' and Central Coast Local Health District's vision of 'healthy people - vibrant community', based on strong and emerging evidence, the Health Promotion Service advocates for built environments that protect and promote human health and wellbeing. A key part of this involves advocating for the planning, design, development and management of healthy built environments, which enable communities to lead physically active, socially connected and healthy lives.

A major piece of active, healthy lifestyle enabling infrastructure is bicycle parking and end-of-trip facilities (lockers, showers, change rooms etc.).

Having reviewed the relevant application documents regarding this subject, namely the Statement of Environmental Effects (SEE) and Traffic Report, we offer the following comments:

**Statement of Environmental Effects (SEE)**

Under clause 12.1 – Parking Areas (page 70) it states *'The attached **Assessment of Traffic and Parking Implications** prepared by **Transport & Traffic Planning Associates** reviews the parking requirements for the proposed development which will comprise thirty eight (38) spaces in two basement and levels including two (2) accessible spaces. Provision is also made in the basement for four (4) resident bicycles.'*

Clause 12.1 of the SEE also acknowledges *'Parking requirements are specified in the Gosford City Centre Development Control Plan 2018 Chapter 7.4 – On Site Parking. The parking rate for residential flat building is shown below in **Table 5**.'* Table 5 (an extract from Table 2. Car parking requirements within the Gosford City Centre DCP) state for *Multi Dwelling Housing, Residential Flat Buildings*:

*Resident car parking: 1 Bedroom dwelling - 1 car space/dwelling  
2 Bedroom dwelling - 1.2 car spaces/dwelling  
3 or more bedroom dwellings - 1.5 car spaces/dwelling*

*Visitor car parking: 0.2 spaces/dwelling, provided on site and clearly marked for use by visitors only*

*Disability accessible car parking: Not less than 10% of the required resident and visitor spaces*

*Motorcycle parking: 1 space/15 dwellings (or part thereof)*

*Bicycle parking: 1 resident's space/3 dwellings + 1 visitor space/12 dwellings (or part thereof)*

On page 71 of the SEE in Table 6, the above car parking requirements are used to calculate car parking provision with conclusion made that the proposed development '**COMPLIES**'. However, on page 71 it also states *'Further, in line with contemporary transport planning objectives, which are increasingly aimed at reducing the reliance on private vehicles, it is proposed to provide for four (4) bicycle spaces within the basement together.'*

Using the same methodology as that used by the development proponent (via engagement of the *Transport & Traffic Planning Associates*) for calculating car parking but inputting the appropriate bicycle parking provision rates as detailed in the Gosford City Centre DCP, we calculate the following:

#### Bike Parking Calculations

Component	Rate
Residential Apartments (1 bedroom) x 4	1 resident's space/3 dwellings = $26/3 = 8.6$ spaces
Residential Apartments (2 bedroom) x 16	
Residential Apartments (3 bedroom) x 6	
Visitor	1 visitor space/12 dwellings (or part thereof) = $26/12 = 2.1$ spaces
<b>Total Required</b>	<b>10.7 spaces</b>

Based on the above calculation, we recommend the development provides nine (9) bicycle parking spaces in the basement parking area and at least two (2) bicycle parking spaces for visitors in a convenient space near the front entrance to the apartments.

Thanks in advance for consideration of our comments. We welcome the opportunity to be involved in future consultations associated with this development.