



## Health Central Coast Local Health District

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Attention: Director - Kieran Thomas, Regional Assessments  
C/o Clay Logan [clay.logan@planning.nsw.gov.au](mailto:clay.logan@planning.nsw.gov.au)

Dear Mr Thomas

I write in response to your letter of 29 September 2022 regarding the Notice of Exhibition of Development Application – Mixed Use Development – 60-64 Showground Road, Gosford (DA 22/11444).

Thank you for the opportunity to provide comment on the proposed mixed use development at 60-64 Showground Road, Gosford, consisting of a health services facility (comprising 38 tenancies), retail premises, and a residential care facility (seven units) within a six storey building with over four levels of basement car parking.

Central Coast Local Health District (the District) responds as a neighbouring landowner/occupier, a health services facility, and as an advocate for built environments that protect and promote human health and wellbeing.

The District's submission comprises of collated responses (Attachment A) from the following departments:

- Health Planning
- Public Health Unit
- Health Promotion Service
- Acute Care Services.

Thank you in advance for considering and responding to our submission. If you wish to obtain further information, please contact Mr Adam Cruikshank, Director – Community Wellbeing and Allied Health, on Tel: 4320 5224.

Yours sincerely

**Scott McLachlan**  
Chief Executive

Date: 28 October 2022

***This correspondence will not be sent by post, unless requested***

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**Central Coast Local Health District (the District) Submission re Notice of Exhibition – Statement of Environmental Effects (SEE) for the Mixed Use Development – 60-64 Showground Road, Gosford (DA 22/11444)**

The District aims to keep people healthy and well, to prevent ill-health and tackle health inequality in our communities. To help achieve this, we advocate for built environments that protect and promote human health and wellbeing. Based on strong and emerging evidence, we support the planning, design, development, and management of healthy built environments, which enable communities to lead physically active, socially connected and healthy lives.

The 60-64 Showground Rd, Gosford development is a significant development of six floors located next to Gosford Hospital. The development includes several floors dedicated to health services, as well as a disability residential component and some retail on the lower floor. The health services to be accommodated include a general practice (GP) clinic, pharmacy, radiology, and pathology including ambulance bays on the ground floor, with four floors of medical suites above.

There are opportunities to address emergency department pressures by having a comprehensive GP clinic closely located to the hospital, as well as opportunities for a range of private medical services to be closely located.

Acute Care Services are very keen to support an expansion of health-related services as part of an expanded health precinct located in this area and in the vicinity of Gosford Hospital and note this is consistent with the District's recent master planning processes for the site.

Parking and accessibility for patients attending the services within the new development are critical to ensure that proximal health related parking facilities are available for patients, families and staff attending the hospital.

It is noted there are seven residential care units included and it would be useful to understand whether this would be expected to create any demand on hospital services due to proximity or whether other support would be available around the primary care needs.

Having reviewed the Statement of Environmental Effects (SEE) and other relevant application documents regarding this proposed development, we offer the following comments:

**Architectural Plans - Appendix A - 60 and 62 - 64 Showground Road Gosford - Architectural Drawings**

- On page 1, car parking numbers, including motorcycle parking, are summarised however no bicycle parking is detailed. On page 7, the plan for Basement 1 shows bicycle parking (11) however, 14 spaces are visible. Despite being shown on the plan, no bicycle parking numbers are quantified in the parking summary on page 1 or page 7. We recommend bicycle parking is quantified and qualified on the architectural plans.

**Statement of Environmental Effects - Statement of Environmental Effects - 60 to 64 Showground Road Gosford V3**

- 3.6 Access and Parking - *Short term bicycle parking (visitors) will be provided on the ground floor. Long term bicycle parking and end-of-trip facilities are provided on Basement 01.* Both short and long-term bicycle parking and end-of-trip facilities is a welcome inclusion in the development however, we recommend proposed bicycle parking and end-of-trip facility provision is quantified and qualified.

- 5.1.4.3 Section 2.121 Traffic Generating Development - *Section 2.121 of the SEPP requires that before granting consent to development of a type nominated in Schedule 3 of the SEPP, the consent authority must refer the application to the Transport for NSW for comment on various matters including: ... the potential to minimise the need for travel by car.* To support this requirement, we recommend proposed bicycle parking and end-of-trip facility provision is quantified and qualified and a sustainable/workplace travel plan is required as a condition of development approval (prior to occupation).
- Part 5.8 – Gosford City Centre – Design Excellence (table on page 35) - *Consideration (e) how the development addresses the following matters:*  
*(ix) pedestrian, cycle, vehicular and service access, circulation, and requirements. Comment - Cycle – short term bicycle parking (visitors) will be provided on the ground floor. Long term bicycle parking and end-of-trip facilities are provided on Basement 01.* Both short and long-term bicycle parking and end-of-trip facilities is a welcome inclusion in the development however, we recommend proposed bicycle parking and end-of-trip facility provision is quantified and qualified
- Built Form - Compliance with Gosford City Centre DCP 2018 - 7.4 On-Site Parking – We recommend proposed bicycle parking and end-of-trip facility provision is quantified and qualified

#### **Traffic Report - Appendix J - 60 and 62-64 Showground Road Gosford Traffic Impact Assessment**

- Council Parking Requirements (p.4) – the proponent, via consultant Northern Transport Planning and Engineering Pty Ltd, cites Central Coast Council's Development Control Plan (Gosford) for parking requirements related to Medical Centres. We understand the correct DCP for this development is the NSW Government's Gosford City Centre DCP 2018 – Chapter 7. Access and Parking (pp.63-74). Furthermore, the proposed development is more than a medical centre, being described in the DA as a mixed use development consisting of a health services facility (comprising 38 tenancies), retail premises, and a residential care facility (seven units) within a six storey building with over four levels of basement car parking and therefore, the proposed parking may not be accurately calculated. Motorcycle and bicycle parking and end-of-trip facilities have not been quantified or qualified. We recommend proposed bicycle parking and end-of-trip facility provision is quantified and qualified.

#### **Air Quality Impacts:**

Demolition and excavation work has potential to generate particulate matter. Adverse health effects can occur with any increase in particulate pollution and there is no threshold at which health effects are guaranteed to not occur. The project site is located on thoroughfares between multiple schools, Gosford Hospital and Gosford Railway Station, and outdoor spaces used by hospital patients, visitors, and staff. It adjoins and is near to various premises used by Central Coast Local Health District to provide health services to vulnerable community members.

We are unable to locate any assessment of air quality impacts that may arise from demolition and construction (including excavation) works. We suggest that a thorough assessment of potential impacts is necessary to quantify likely emissions and identify any necessary control measures.

Real time monitoring of particulate matter emissions during demolition and excavation, and if necessary, during construction, should be considered based on an impact assessment and any complaints received from the community. This monitoring could help inform proactive management strategies so that the health and wellbeing of the community is not at risk.

We request that any approval include conditions to address thorough assessment of air quality impacts and identification of appropriate control measures, to the satisfaction of the appropriate regulatory authority.

#### **Noise and Vibration Impacts:**

We seek confirmation that the noise and vibration impact assessment is to the satisfaction of the appropriate regulatory authority. The Acoustic Report identifies that construction noise and vibration impacts will occur and community consultation will be an important mitigation measure. We suggest that further assessment is required, and mitigation measures identified, to minimise impacts and protect the health and wellbeing of the surrounding community. We ask that the following concerns be addressed.

We are concerned that impacts to receivers at premises in Holden St may have been underestimated and we ask that this be reviewed. The Acoustic Report in Table 11 (RCA August 2022) classifies premises 67-77 Holden St, 69-71 Holden St and 73-75 Holden St as commercial receivers in determining acceptable project specific construction noise criteria. This may not be an appropriate classification since these properties are used by the District to provide healthcare services to vulnerable community members. We suggest that these properties be reclassified as 'health', with the appropriate health-based noise criteria identified in Table 14. Contrary to the Acoustic Report (p 12), the southern side of premises 77 Holden St (E1) has direct line of sight over the project site as do outdoor spaces used by staff and visitors of Gosford Hospital.

The nearest residential receiver (R1) will experience construction sound pressure levels above the residential 'highly noise affected level' (Acoustic Report Table 15). The health service premises C1, C2 and C3 are expected to experience construction noise sound pressure levels between 70 and 93 dBA. These levels exceed the 'commercial' project specific noise criteria and are a more significant exceedance of the health classification project specific noise criteria (45 dBA, LAeq 15 min). We request that these impacts be accurately assessed and effectively managed to as to avoid impacts on the health and wellbeing of the staff and users at these premises.

The preliminary noise and vibration assessment considers the impacts of noise and vibration on adjacent properties but does not appear to consider impacts on other residential and health service premises in Showground Rd and Holden St. Given the high level of affectation at the nearest receivers, the applicant should be required to undertake a thorough assessment of impacts and mitigation measures for all potentially affected receivers, not only adjacent properties.

Subject to consideration by the approval authority, we request that conditions are applied to any development approval to ensure that:

- premises 67-77 Holden St, 69-71 Holden St, and 73-75 Holden St be noted in the Acoustic report (Table 14) as receiver type 'Health' and project specific construction noise criteria set based on the use as health services
- demolition and construction (including excavation) noise and vibration impacts on the abovementioned health services in Holden St (classified as Health receivers) and on all potentially affected receivers be accurately assessed prior to work commencing
- mitigation measures to the satisfaction of the appropriate regulatory authority are identified based on this revised assessment, prior to works commencing. Mitigation measures are to be effectively applied so that the surrounding community is not adversely affected
- a detailed Construction Noise and Vibration Management Plan (including demolition and excavation) be prepared and implemented to the satisfaction of the appropriate regulatory authority
- occupants of the properties identified as nearest receivers (Acoustic Report Table 11) should be consulted rather than notified of works (Acoustic Report p13). The objective should be to

establish demolition and construction works programs that create the least possible disruption, noting hours of work for the project will overlap with hours of occupation for surrounding non-residential premises

- communication and consultation with affected receivers be extended to all potentially affected receivers
- ongoing noise monitoring at nearby receivers is undertaken during demolition and construction, in addition to the planned vibration monitoring
- if additional impacts are identified through reporting by the community, control measures must be identified and implemented.

### **Site Contamination**

The Preliminary Site (Contamination) Assessment notes that no indications of contamination or hazardous materials were detected. We seek confirmation that the appropriate regulatory authority agrees with this assessment. The assessment recommends an unexpected finds protocol be implemented with works ceasing if odours or visually impacted materials are encountered.

We suggest that any approval address the recommendation for an expected finds protocol to the satisfaction of the appropriate regulatory authority.

### **Green Space**

Our urban areas must be 'places for people'. We advocate for green spaces for their benefits to human health and wellbeing through contact with nature (flora and fauna). This demands high quality, best practice development. We note the inclusion of vertical vegetation and level 5 communal open space. The Project should include measures to ensure that the amenity of the local area is enhanced and should include attractive open spaces for use by the occupants as much as possible.

### **Solar Access and Overshadowing**

The project design and conditions applied to any approval should ensure that all apartments and open spaces will receive at least three hours of direct sunlight between 9am and 3pm during mid-winter. For specialist disability accommodation, the benefits from access to solar amenity should be considered especially important. We note the use of clerestory windows to achieve minimum solar access to the accommodation and seek confirmation that this is the best achievable design.

While it has been noted that the proposal will not overshadow any nominated open spaces, the shadow diagrams suggest substantial overshadowing of neighbouring properties on Showground Rd and Holden St during winter. We question whether this is reasonable and unavoidable and suggest the design should be revisited to reduce overshadowing.

### **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 screening to protect privacy, including appropriate location of windows and open spaces, and the screening of upper floor windows where overlooking these properties.

### **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. We request that this risk is addressed in any approval.

**Medical and Contaminated Waste Management**

Suitable secure facilities for management of this waste are required to ensure that these waste-streams are safely managed, particularly in a mixed use development. We request that this is addressed in any approval.

**Monitoring and Enforcement:**

Management of air quality and noise and vibration 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.

Thank you for considering our comments. We welcome the opportunity to be involved in future consultations regarding this development.