

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

By email: Andrew.Watson@planning.nsw.gov.au and NSW Planning Portal

Re: Residential Flat Building 182-186 Gertrude St North Gosford DA 23/3021

Dear Mr Watson

Thank you for the opportunity to review this development application. Please find the response provided by Central Coast Local Health District below and in the following Appendix. Comments are also included from NSW Ambulance in relation to aviation.

Impact on Health Services

The proposed development includes 39 new dwellings and is a significant residential development. This will result in an increase in the population in this area, and an increase in demand for local services and facilities including health services. The proposed development is one of many significant developments proposed for the Gosford area. Given this, the developer is encouraged to consider the cumulative impact of multiple developments on health services within the Gosford area.

Aviation Impact Assessment

The application documents do not include an aviation risk assessment by a registered provider. The proposed development is of a significant height (8 storeys). The development is located approximately 550 metres (flight distance) from Gosford Hospital and is in the vicinity of the helicopter approach and departure lanes to the PC1 helipad at the hospital. There is potential to impact helicopter flight paths both during the construction period and on completion. To address this, we request that an Aviation Impact Assessment be provided for this development, with opportunity to provide feedback.

If further information is required, please contact Ms Kerry Spratt, Senior Environmental Health Officer by email at Kerry.spratt@health.nsw.gov.au.

Yours sincerely,



Nicole Kajons
A/District Director
Community, Wellbeing and Allied Health
Central Coast Local Health District

Air Quality Impacts

The proposed works (demolition, excavation and construction) have potential to generate airborne particulate matter, including dust, and are in close proximity to surrounding residential and commercial development. 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 applicant should take all necessary measures to ensure that the works do not adversely affect local air quality and the health and wellbeing of the local community.

The application documents do not appear to include any assessment of potential risk to ambient air quality. We suggest that a thorough assessment of potential air quality impacts is required to quantify likely emissions and present appropriate control measures, prior to any approval being granted.

We request that consent conditions address appropriate assessment of air quality impacts, the assessment being to the satisfaction of the appropriate regulator. Consent conditions should address control measures to ensure that air quality impacts, particularly particulate matter, do not extend beyond the site boundaries.

Noise and Vibration Impacts

The acoustic report (PKA Acoustic Consulting) primarily considers traffic and mechanical plant noise and building design requirements. It does not appear to adequately assess ambient noise levels and potential for noise and vibration impacts on the surrounding community during demolition, excavation and construction works. It does not identify whether any impact mitigation measures are required. Further, the proposed hours of work are unclear.

We request consideration be given to consent conditions addressing the following:

- clear constraint of work to usual hours, for example 7am to 6pm Monday to Friday, 8am to 4pm Saturdays with no work on Sundays.
- a requirement to conduct a thorough assessment of potential noise and vibration impacts during demolition, excavation and construction works, to the satisfaction of the appropriate regulator. The assessment must include identification of control measures as necessary, to ensure that the health and wellbeing of the community is not adversely affected.
- a detailed Construction Noise Management Plan (all phases of work) be prepared and implemented, to the satisfaction of the appropriate regulatory authority.
- any affected receivers should be consulted on works programs. The objective should be to establish works programs that create the least possible disruption to the community, noting the project hours of work will overlap with hours of occupation for surrounding premises.

Site contamination and Hazardous Materials

The Preliminary Site Investigation Report (Cardno/Stantec), p9 indicates a likelihood that asbestos containing materials may be present in the original buildings, and that contaminant impacted soil is potentially on the site and exposed. The report concludes that the risk to health is low.

We request that consent conditions requiring appropriate management of asbestos containing material and an unintended finds protocol be applied.

Water Reuse

The Water Cycle Management Report states that rainwater will be used for toilet flushing, washing machines, irrigation and car washing. To manage risk to public health, all water reuse systems must be subject to risk assessment to ensure that water quality is suitable for the proposed end uses and that risk management strategies are developed. The applicant should undertake this risk

assessment. The applicant must also establish which regulatory provisions apply to this system and obtain all necessary approvals.

A robust and ongoing communication strategy must be in place to ensure that residents and visitors are aware that all rainwater supplied is non potable and not fit for drinking. A potable water backup supply must be provided for toilet flushing and laundries.

We request that consent conditions are applied to support these comments.

Crime Prevention Through Environmental Design (CPTED)

Safe usage of public open space and building access points are essential, particularly at night, and should be effectively addressed. The Crime Risk Assessment Report notes that the site is located within an area where some crime rates are higher than the Central Coast and NSW generally. We agree that given the density of the development, crime protection measures are recommended to ensure safety of residents and the public (p22). We note that the Statement of Environmental Effects (SEE) discusses dim lighting of communal areas including the roof open space (p18). Dim lighting may not be consistent with safety.

Consent conditions should be applied to ensure best practice adoption of CPTED principles, including lighting, to address user safety in all communal areas including the roof open space.

Solar access and overshadowing

The SEE (p51) notes that 38 units will achieve at least 2 hours of direct sunlight between 9am and 3pm at mid winter and one unit will receive zero hours. The development is located outside the Sydney Metropolitan area. For the Central Coast local government area, the design criteria for direct sunlight under *State Environmental Planning Policy No 65* (SEPP 65) seems to be three hours minimum at mid winter (*Apartment Design Guide*, NSW Department of Planning and Environment 2015).

Accordingly, we ask that the design be revisited to achieve compliance with the relevant SEPP 65 criteria, prior to consent being given. We also question whether the modelled overshadowing of the southern neighbouring property is reasonable and whether a design of less impact can be achieved.

Monitoring and Enforcement

Management of air quality and noise and vibration impacts on the community depends on effective implementation and monitoring of control measures, and enforcement of consent conditions. We seek confirmation on how this will occur.

The applicant should provide a community liaison contact point to facilitate communication, and for the community to lodge concerns or complaints. Response to any issues raised by the community should be rapid and genuine and if complaints indicate additional control measures are needed, these must be implemented. We request that consent conditions be applied accordingly.

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