



Director, Regional Assessments
Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Ms Louise Starkey, Senior Planning Officer
louise.starkey@planning.nsw.gov.au

Dear Ms Starkey

**Re: State Significant Development Application - Mixed Use Development, 136-148
Donnison Street, Gosford (SSD-9813), known as Gosford Alive.**

Thank you for the opportunity to review the Environmental Impact Assessment (EIS) and supporting documentation for this project. The District's Health Planning, Health Promotion and Public Health Services have collaborated to produce this submission. Our comments are attached.

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. While every development is assessed independently, together over time all developments stand to contribute positively and negatively to urban form and function. We welcome dialogue on how this is, or could be, modelled to ensure the best possible outcomes.

Similarly, there will be a cumulative impact on the demand generated for health services from multiple developments within the Gosford area. This also needs to be considered in the context of health service capacity. It is noted that the current Socio-Economic impact statement suggest "no additional requirements" for either hospital or community health services". However, in the light of multiple significant developments in the area, this opinion will be challenged.

The community should not be adversely affected by air quality impacts and by noise and vibration arising from any stage of the project, including during demolition works. The site should be thoroughly assessed for contamination prior to demolition and site improvements commencing. Should the project proceed, appropriate approval conditions should be applied to manage these risks.

As the development is of significant height, assessment on the impact on helicopter flight paths to and from Gosford Hospital will be required. Contacts for this are:

Cameron Edgar, Director Helicopter Operations
Chief Superintendent Cameron Edgar
cameron.edgar@health.nsw.gov.au
Telephone: 0418 175 060

Central Coast Local Health District
ABN 88 523 389 096

Holden Street Gosford NSW 2250
Post Office Box 361 Gosford NSW 2250
Tel (02) 4320 2111 Fax (02) 4320 2477
Website www.cclhd.health.nsw.gov.au

Andrew Ryan, A/Zone Manager Helicopter Operations, Southern Zone
A/Superintendent Andrew Ryan
andrew.ryan@health.nsw.gov.au
Telephone: 0428 911 066

If you wish to obtain further information, please contact Kym Scanlon, Manger Health Planning,
on Tel: 0411 259 932 or Email: Kym.Scanlon@health.nsw.gov.au or Dr Peter Lewis, Director
Public Health on Tel: 4320 9730.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Fiona Wilkinson', with a long horizontal line extending to the right.

Fiona Wilkinson
District Director Quality, Safety and Improvement

Date: 11.11.19

This correspondence will not be sent by post, unless requested

ATTACHMENT A: CCLHD Public Health Unit submission on State Significant Development Application (SSD-9813), 136-148 Donnison Street, Gosford (Gosford Alive project) November 2019.

Noting this application is for the project concept plan and Stage 1 involving demolition and site preparation, the Public Health Unit provides the following comments.

Air Quality

The application does not appear to address potential impacts on air quality, for example dust, during Stage 1. Adverse health effects can occur with any increase in particulate pollution, so the proponent should take all necessary measures to ensure that works do not adversely affect local air quality and the community. We suggest that the Environment Protection Authority be consulted in relation to appropriate dust emission controls and the potential need for air quality monitoring.

Noise and Vibration Impacts

The Noise and Vibration Impact Assessment indicates that community reaction is possible due to exceedances of noise criteria during construction, and does not seem to specifically address noise impacts from demolition works. Since the predicted noise levels have potential to impact the community, including future residents of the site, the proponent should commit to a work schedule for all phases that creates the least possible disruption to the community. We ask that controls on noise emissions be included in any approval so that the community is not adversely affected at any stage of the development.

Site contamination

We note the previous land uses and possible site contaminants. Further investigation is required before demolition commences, in accordance with the recommendations contained in the report *Phase 1 Contamination Assessment-Site B 2015*. Stage 1 works should not proceed until a comprehensive site assessment is completed. All contamination risks must be identified and assessed, and management strategies developed to the satisfaction of the Environment Protection Authority and Central Coast Council.

Crime Prevention Through Environmental Design (CPTED)

We note and support commitment by the proponent to adhere to CPTED principles. The manner in which this will be achieved should be clearly described in subsequent applications.

Public Open Space, Solar access and overshadowing

It is imperative that the community has access to quality open space both within and outside the development. We note that the project complies with the requirements for solar access to Kibble Park (EIS page 60) and seek assurance that approval conditions will reinforce this compliance.

Monitoring and Enforcement

Should the project proceed, 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 the approval conditions. We seek confirmation that the Construction Management and Environmental Management Plans will be satisfactory to the Environment Protection Authority and Central Coast Council.

Community Feedback

Given the duration of the project, we encourage the proponent to consult with the surrounding community, for example Gosford Senior Citizens Centre, Douglas Hanley Moir Pathology, Gosford TAFE and Gosford Courthouse to ensure that the project does not impact on the community.

Central Coast Local Health District
ABN 88 523 389 096

Holden Street Gosford NSW 2250
Post Office Box 361 Gosford NSW 2250
Tel (02) 4320 2111 Fax (02) 4320 2477
Website www.cclhd.health.nsw.gov.au

There will likely be a need to manage noise impacts on residents of the site as construction proceeds. The community must have a contact point for complaints if noise or air quality issues occur and the proponent must guarantee a prompt and genuine response to all complaints.

Attachment B: CCLHD Health Promotion Service submission re State Significant Development Application (SSD-9813), 136-148 Donnison Street, Gosford (known as Gosford Alive on the Kibbleplex site) Environmental Impact Statement, November 2019.

Thank you for the opportunity to provide comment on the Environmental Impact Statement (EIS) for the Gosford Alive project; currently a concept and stage 1 mixed-use development, comprising commercial, retail and residential uses.

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', the Health Promotion Service advocates for 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.

There is strong and emerging evidence demonstrating how the built environment can support human health. For a summary of evidence, please refer to pages 3-4.

Having reviewed the EIS and accompanying documents, we offer the following comments:

Social impacts

- We note and commend the methodology used to audit existing social infrastructure services and facilities within a 400m (walkable catchment) and 2km radius of the Gosford Alive on Kibbleplex site. However, we suggest that topography and road/street design (presence of footpaths, crossings, off-road bike paths etc.) needs to be taken into consideration to establish actual walkability, bikeability and general accessibility to social infrastructure. Much of the mapped infrastructure falls outside the walkable catchment and/or has physical and topographical barriers to walking and cycling. If we are to reduce the dominance of cars within Gosford City, as per Government Architect of NSW design guidance and other Central Coast and Gosford City plans, this needs to be strongly considered
- Childcare facilities – We note the current, limited capacity of childcare facilities and the generated demand for places as a consequence of development. Accessible, quality childcare is important infrastructure for families and essential for child development. We encourage pursuit of the recommendation to 'Consider provision of a childcare facility on site to meet the demand generated by the incoming resident and worker population as well as other anticipated background growth.'
- Open Space – We note that the incoming resident and worker population will generate some additional pressure on public open space within the 400m (walkable) catchment of the site, namely Kibble Park and Rumbalara Reserve. Whilst walkable from the site (convenient), Kibble Park is not considered active open space, which is important for physical health. Rumbalara may be considered both active and passive open space, with both of these important for physical and mental health, however access is difficult and unattractive for most and impossible for some people living with a disability, due mainly to the topography (steep gradient and stair-only access). We encourage use of the Gosford City Centre Special Infrastructure Contribution (SIC) and other funding opportunities to ensure provision of a suitable quantity and quality of accessible public open space (active and passive) within Gosford City Centre.

Whilst there might appear to be an abundant quantity of open space within the 2km catchment much of this is difficult-to-access natural bushland or not-freely-accessible public open space e.g. Gosford Golf Club, the Entertainment Grounds race course and Central Coast Stadium. We note the proposal includes a network of private open space provided for the incoming resident and worker population and public open space which will alleviate some of this pressure on the local open space network. Any public open space provided as part of the

Central Coast Local Health District
ABN 88 523 389 096

Holden Street Gosford NSW 2250
Post Office Box 361 Gosford NSW 2250
Tel (02) 4320 2111 Fax (02) 4320 2477
Website www.cclhd.health.nsw.gov.au

development needs to be publicly welcoming in its design (obvious and actually publicly accessible).

Transport impacts

- Pedestrian and Cycle Access – The EIS states ‘In regard to cycle access, the road conditions in the surrounding area cater for cycle traffic but are limited in storage capacity. No formal bicycle storage arrangements existing on site.’ We suggest the road conditions in the surrounding area may cater for cycle traffic but due to a lack of on-road bike lanes (and off-road bike or shared paths), do not support or encourage cycling adequately. Additionally, formal bicycle storage needs to exist on site to meet best practice Australian, NSW, Central Coast and Gosford City design guidance and development controls.
- Green Travel Plan – We note an ‘Overview Green Travel Plan’ has been prepared to identify measures and initiatives that could be implemented to encourage more sustainable traffic modes, including: Limiting on-site parking; Provide a traffic access guide to residents and staff; Provide public transport information boards; Provide car share pods; Provide bicycle facilities; Encourage carpooling; and Provide regular newsletter with latest news of sustainable travel initiatives. This is a welcome initiative and one that we hope is delivered. We welcome monitoring of this deliverable by DPIE, TfNSW, RMS and/or Council.

Potential cumulative impacts of development – In light of this and other significant current and future development within Gosford City and surrounds, we highlight the need to consider the potential cumulative impacts of and on increased resident, worker and visitor populations, particularly on social and transport infrastructure. While every development is assessed independently, together over time all developments stand to contribute positively and negatively to urban form and function. We welcome dialogue on how this is, or could be, modelled to ensure the best possible outcomes.