

Ms Louise Starkey
Senior Planning Officer
Department of Planning, Industry and Environment
PO Box 1148
GOSFORD NSW 2250

Attention: louise.starkey@planning.nsw.gov.au

Dear Ms Starkey,

Re: State Significant Development Application – SSD9813 – Gosford Alive, Response to Response

Thank you for the opportunity to review the Developer's Responses to the initial response provided by the Central Coast Local Health District. The District's Health Planning, Health Promotion and Public Health Services and NSW Ambulance have collaborated to prepare this response.

Cumulative impact on health services in the Gosford area

P26 – in Department Planning Industry and Environment response notes Central Coast Local Health District response.

The response provided does not consider the cumulative impact of multiple developments in the Gosford area on health services as previously requested. Further clarification is required. Multiple significant developments are proposed for the Gosford CBD. Together these developments have a cumulative impact on the need for health services for residents of the Gosford area. Central Coast Local Health District encourages the Developer to consider the impact of their development in the context of multiple significant developments proposed for the Gosford CBD and their combined impact on the need for health services for the Gosford area.

Social impacts transport impacts and potential cumulative impacts

The response provided does not consider the initial submission provided by Central Coast Local Health District in relation to social impacts on transport and other cumulative impacts (refer to Appendix B of the initial submission and attached again for reference below). Further clarification is required.

Public health issues

For Public Health issues of air quality, noise and vibration, site contamination, public open space, solar access and overshadowing, monitoring and enforcement and community feedback further clarification is required. Please refer to attachment B below for issues raised by Public Health requesting further clarification.

Helicopter flight paths

The Developer sought an Aviation Due Diligence Report through Aviation Projects, regarding the impact of the development on helicopter flight paths to and from Gosford Hospital. In summary, Aviation Projects supported that the proposed development will not adversely affect aviation safety. The report did, however, acknowledge the need for lighting of towers 4 and 5, seeking approval for the use of cranes during construction through NSW Health and reporting the project to Airservices Australia. It is the expectation of Ambulance NSW and Central Coast Local Health District that this advice will be followed.

Further information provided by Ambulance NSW regarding the lighting of cranes during construction follows. During the construction period the cranes that will be used to construct the buildings and surrounds will probably cause concern for safe operations and will need to clearly illuminated to assist in identification at night. From this perspective the reasoning and minima are detailed below (sourced from AviPro):

- The crane tower and jib are to be illuminated in the following manner for the duration of the period the crane is erected – including periods where the site is inactive.
- From recent crane/helicopter scenarios across the health network, the following crane lighting requirements have been developed that provide good situational awareness to Helicopter pilots/crew with and without NVG.
 - Lesser lighting gets lost in the background lighting (houses, traffic lights, vehicle break lights) when viewed from above.
 - As a minimum for all tower cranes:
 - Top of crane A frame or cabin: medium intensity red obstruction light (night) and white by day
 - Both ends of Jib: medium intensity red obstruction light (night) and white by day
 - Along Jib: line of white LED fluro on a PE cell along the full length of the jib
 - Tower section: stairway lights or spot lights attached to the top of the tower pointing down and onto the tower (not up into pilot eyes)

The LED jib Fluro details are:

- Lights used: LED WEATHER PROOF EMERGENCY FLUROS (minimum 90-minute battery back-up)
- Lights are controlled via a PE Cell.

Coordinates of the Helicopter Landing Site at Gosford Hospital were referred to in the Aviation Project assessment report. The Local Health District will follow up to ensure the coordinates for the most recent Helicopter Landing site are registered in all relevant systems.

If further information is required, please contact Ms Kym Scanlon, Manager Health Planning, Mob: 0411 259 932 or Email: Kym.Scanlon@health.nsw.gov.au.

Yours sincerely



Fiona Wilkinson

District Director Quality, Strategy and Improvement

Date: 6-5-2020

**ATTACHMENT A: from Initial Submission from Central Coast Local Health District
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

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- network. Any public open space provided as part of the development needs to be publicly welcoming in its design (obvious and actually publicly accessible).
- 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.

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

ATTACHMENT B: CCLHD Public Health Unit, response to Proponent’s Response to Submissions (RTS), SSD 9813 (Gosford Alive Project), 136-148 Donnison St Gosford

The Proponent responds to our concerns relating to air quality and noise and vibration by noting that conditions of consent are expected, which will be complied with (RTS p29). The health and wellbeing of the community requires thorough assessment of potential impacts and identification of necessary controls, in addition to conditions of consent. The application is still missing key information and we do not consider that the Proponent has adequately addressed all the concerns raised in our submission. We provide the following comments.

Air Quality: (RTS page 29).

The updated Construction Management Plan (CMP) does not adequately assess the potential for air quality impacts (CMP p 19), and does not describe management strategies. The CMP advises that air quality and dust controls will be included in a future Environmental Management Plan (EMP). We suggest that this is inadequate and that a proper assessment of air quality impacts (including dust), is required prior to consent, with all necessary impact management strategies identified and committed to by the Proponent. This assessment should include all intended activities and equipment, for example large excavator, semi tippers and cranes (Asbestos Removal Management Plan section 6). The future EMP must address all potential impacts and be to the satisfaction of Central Coast Council.

Noise and Vibration: (RTS page 29)

Our submission raised concern about potential impacts from demolition works. The CMP does not provide an assessment of noise and vibration impacts from demolition nor any management strategies. The CMP (p7) notes that ‘noise during demolition will be monitored and controlled/reduced as necessary’. A definitive strategy is required based on realistic impact assessment, prior to work commencing. The assessment should include all activities and equipment relevant to this phase of the project. All necessary mitigation measures, monitoring and response protocols should be incorporated into the future EMP and the EMP must be to the satisfaction of Central Coast Council.

Site Contamination (RTS p29)

Our submission suggested that further site assessment is required. The Proponent’s response is that this work has been undertaken. We are unable to locate any further reporting on site contamination within the available application documents. We note that Paul Wright of Coffey

Services Australia Pty Ltd has confirmed that the *Phase 1 Contamination Assessment –Site B 2015* report is still valid. That report recommends further site investigation. In the absence of contrary advice, we reiterate that a comprehensive site investigation is required before consent is granted. If necessary, a proactive management plan is requested, in addition to consent conditions

Public Open Space, Solar Access and Overshadowing (RTS p30)

We note recent design alterations. The proposed building heights and floor space ratios still exceed the current zoning controls. We reiterate that overshadowing and impacts on solar access should be strictly minimised with consent conditions to assure this.

Monitoring and Enforcement (RTS p 30)

The Proponent's response is that consent conditions will require monitoring and enforcement. We suggest that a proactive strategy to which the Proponent commits, is required in addition to conditions of consent. The updated CMP does not provide adequate information to enable confidence in the adequacy of impact assessment or management strategies. We reiterate our request that the Construction and Environmental Management Plans are to the satisfaction of Central Coast Council.

Community Feedback (RTS p30)

The CMP (p16) notes that 'proposed communication may include a contact telephone number, that all complaints will be managed and resolved as quickly and efficiently as possible and that Complaint Management Protocols and Procedures may be set out via letter box drops'. We suggest that this response is too vague and that a more definitive commitment is required in relation to management of community concerns. There must be a contact point for the community to use if air quality or noise issues arise and the Proponent must guarantee a prompt and genuine response to community concerns. In the absence of a definitive commitment, we ask that conditions of consent be applied accordingly.

