



## Health Central Coast Local Health District

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Director, Regional Assessments  
Department of Planning, Industry and Environment  
GPO Box 39  
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Attention: Ms Louise Starkey, Senior Planning Officer  
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Dear Ms Starkey

**Re: State Significant Development Application - Mixed Use Development 26-32 Mann Street, Gosford (SSD-10114), known as Gosford Quarter.**

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. Obvious concerns include increased traffic and need for access to quality public open space. While developments are assessed independently, over time all developments stand to contribute positively and negatively to urban form and function. We welcome dialogue on how the best possible outcomes can be achieved.

The current application does not include built works and accordingly, does not address air quality and noise and vibration impacts. Should the project proceed, approval conditions should be applied to ensure that these impacts are assessed and managed under subsequent development applications. Any project approval should also require more comprehensive assessment of site contamination risks and management.

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.

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](mailto:cameron.edgar@health.nsw.gov.au)  
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If you wish to obtain further information, please contact Kym Scanlon, Manager Health Planning,  
on Tel: 0411 259 932 or Email: [Kym.Scanlon@health.nsw.gov.au](mailto:Kym.Scanlon@health.nsw.gov.au) or Dr Peter Lewis, Director  
Public Health on Tel: 4320 9730.

Yours sincerely



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-10114), 26-32 Mann St, Gosford (Gosford Quarter project) November 2019.**

Noting the application is for the project concept plan and not any construction works, we provide the following comments.

**Air Quality**

The current application does not include built works and accordingly, does not address air quality impacts. Adverse health effects can occur with any increase in particulate pollution as may occur during construction works. Subsequent Development Applications should consider potential for impacts on air quality, including any necessary management strategies.

**Noise Impacts**

The Noise Impact Assessment acknowledges the uncertainty of the current assessment. Subsequent Development Applications should consider potential for the community, including future residents, to be impacted by construction and operational noise. Subsequent Development Applications should contain detailed noise assessments and recommendations on noise impact management strategies. The proponent should commit at an early stage to consultation with the local community to ensure that the work schedule creates the least possible disruption.

**Site contamination**

The Detailed Site Investigation (Executive Summary page v) notes potential areas of environmental concern. Any project approval should include conditions to appropriately manage the work required to make the site suitable for the intended use, including an Unintended Finds Protocol as recommended by the report.

**Wastewater Reuse**

The EIS (page 41) notes the intention to collect stormwater and where possible, reuse waste water. No further detail is provided. To protect public health it is essential that waste water quality is appropriate for the proposed end uses. Depending on the water source and end uses, the proponent may be required to seek approvals and comply with Guidelines including but not limited to, the *Australian Guidelines for Water Recycling 2006* (NHMRC). Subsequent development Applications should provide more detail on proposed water reuse.

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

The success of public open space can depend on people feeling safe in these areas. To create a safe environment and encourage use of open space, the project design should consider and 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 Leagues Club Field and nearby open spaces (EIS page 35). Approval conditions should reinforce this compliance.

**Monitoring and Enforcement**

Should the project proceed, management of future impacts on the local community will be dependent on effective implementation and monitoring of control measures, and enforcement of approval conditions. We seek confirmation that suitably comprehensive Construction Management and Environmental Management Plans will be developed and provided with subsequent Development Applications.

**Community Feedback**

Given the duration of the project, we encourage the proponent to consult with the

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surrounding community, to ensure that the project does not impact on the community. A contact point must be provided 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-10114), 26-32 Mann Street, Gosford (known as Central Coast Quarter) Environmental Impact Statement, November 2019.**

Thank you for the opportunity to provide comment on the Environmental Impact Statement (EIS) for the Central Coast Quarter project; a mixed use development comprising commercial, retail (including food and drink premises), hotel accommodation and residential accommodation.

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 some of the accompanying documents, we offer the following comments:

**Transport and Accessibility**

- Parking – We welcome commitment to provision of bicycle parking and end of trip facilities in accordance with Gosford City DCP 2018 and look forward to more details with the future development application stage.
- Pedestrian and Bicycle Connectivity – Reference to the 'Gosford Bike Strategy 2014' needs to be updated to the Central Coast Bike Plan 2019-2029.
- Green Travel Plan – The Environmental Impact Statement for State Significant Development Application (SSD-9813), 136-148 Donnison Street, Gosford (known as Gosford Alive on the Kibbleplex site) details preparation of an 'Overview Green Travel Plan 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.' A Green Travel Plan would be a welcome initiative for the Central Coast Quarter site, with delivery ideally monitored by DPIE, TfNSW, RMS and/or Council.

**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 Central Coast Quarter 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.

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- **Childcare facilities** – We note additional demand for childcare places based on the incoming resident and worker population and ongoing future demand based on the projected growth for Gosford. We welcome the suggestion ‘A childcare facility could be considered as part of any future planning agreements’ and strongly encourage this is pursued. Accessible, quality childcare is important infrastructure for families and for child development.
- **Open Space** – Whilst demand for open space is expected to be met by the proposed local open space upgrades (namely Leagues Club Field), public plaza and private open space within the development, we suggest the incoming resident and worker population will generate some additional pressure on public open space within Gosford City Centre and surrounds. Active and passive public open space is important for physical and mental health and needs to be increased in quantity and quality as the population increases.

We welcome recognition of the need for additional open space north of Kibble Park as identified in Gosford City Centre Development Control Plan and the suggestion that this could be considered as part of any future planning agreements. 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.

We welcome inclusion of the proposed public plaza within the development and trust that it will be publicly welcoming in its design, so as to be a genuine part of the public open space network.

**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.