

**From:** Matthew Bender <mbender@gcal.com.au>  
**Sent:** Monday, 10 December 2018 9:32 AM  
**To:** Aditi Coomar <Aditi.Coomar@planning.nsw.gov.au>  
**Cc:** Brett Curtis <bcurtis@gcal.com.au>; Ian Rigby <irigby@bigpond.net.au>  
**Subject:** RE: YBCG-MA-001 - Dev, Tweed Valley Hospital (SSD 9575) [SEC=UNCLASSIFIED]

Good afternoon Aditi,

Please consider the below comments and requests in relation to the Tweed Valley Hospital development. I note that at the time of this email you are awaiting aviation specific feedback from Airservices Australia and Gold Coast Airport will require review and comment of any information provided by that authority.

- The document *Appendix AA Aviation* does not include plans/drawings of site assessments against relevant prescribed airspace surfaces. Though the document states the Gold Coast Airport Manager Operations and Standards was consulted, this consisted of phone calls and email requests for reference material. An actual assessment of the development against the protected surfaces was not provided. The *AA Aviation* document makes reference (**pp1**) to the Gold Coast Master Plan (**Ref B**) which is an indicative or explanatory document rather than technical and it would be expected the CASA mandated OLS would be referenced directly as opposed to NSW Health GL2018\_010 Guidelines for NSW Hospital HLS (**Ref C**) in isolation. Despite an informal understanding the development sits below prescribed airspace a detailed assessment and drawing against the relevant protected surfaces has not been provided to GCA.
- General speaking the heavy reliance on the NSW HLS guidelines in *Appendix AA* and limited attention provided to CASA (Not yet consulted as noted in **PP8-9 (Consultation)** regulations and standards should be given further consideration given that authority ensures its regulatory framework is strictly adhered to regardless of how certain aspects may be reflected in other guidance material.
  - Secondly, what was the scope of consultation with Airservices? Did this include airspace, flight operations and air traffic control?
- **PP7 Key Issue: Noise and Vibration:** The report should take into account there may be significant public concern regarding aircraft noise associated with helicopter operations, particularly arrival and departure paths to the north of the site. GCA understands communities in the vicinity have a high engagement and awareness regarding aircraft noise and noted public concern could be expected if helicopter impacts are not assessed and communicated in detail.
- **PP8 Image 5:** What were the geographical and structural contexts of the UK study and were they comparable to conditions at the TVH hospital site: rural Vs built-up urban areas etc?
- **PP2 HLS Compliance and Standards:** Should be noted that “grandfathering” applies to instances in which compliance with a CASA standard was historically unachievable or due to post implementation amendments to standards. A non-standard facility or component constructed as such will not automatically be grandfathered and rectification may be requested.
- **PP6 Wind:** Although BOM may not produce specific wind rose data for Gold Coast there are a number of platforms with available data that could be extrapolated and reviewed.

Thank you for the opportunity to comment on this development and If you require anything further please let me know.

Regards,

**Matthew Bender**  
**Manager Operations and Standards**  
**Gold Coast Airport**

**t:** 07 5589 1264 | **m:** 0418 285 499

**e:** mbender@gcal.com.au | **w:** [www.goldcoastairport.com.au](http://www.goldcoastairport.com.au)

**a:** Level 1, Airport Central, 1 Eastern Ave, Bilinga, QLD 4225

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