



Health Central Coast Local Health District

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Ms Louise Starkey
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

I write in response to your request of 3 September 2020 concerning the State Significant Development Application 10414, Mixed use development at 8-16 Watt St, Gosford (Gateway site).

Thank you for the opportunity to review the Environmental Impact Statement for the Gateway development, Gosford project. The Central Coast Local Health District's Health Planning, Health Promotion, Public Health Services and Clinical Services have collaborated to prepare this response.

Overall the Application for the Gateway site, Gosford project provides a broad outline of 3 towers of significant height (of 24, 33 and 18 levels respectively, that incorporate the existing Gateway building in Tower 3 in Stage 4). The 3 towers are bordered by Mann, Faunce and Watt Streets, Gosford and surround a plaza area. A staged development approach is proposed, with potential use of the "towers" stated as student accommodation, retirement/ independent living, hotel, commercial/ retail, education and car parking spaces.

Impact on Health Services Needs

The Social and Economic Impact Statement makes reference to the health needs and health service requirements generated through the Gateway Development. However, a more detailed analysis of the health service requirements is needed. This includes exploring the health needs of residents (particularly older age cohorts for independent living, those residing in "affordable housing" as well as students) and the additional health and community service requirements generated. Consideration should also be given to workers attending to the site either during the construction phases (estimated between 527-1,300 people, p27) as well as the workforce who will be accommodated within the Gateway Development when finalised (in the commercial, education, entertainment and other zones).

Consideration should be also be given to the cumulative impact of multiple developments in the area and the impact on existing services including the additional impact on health care demand on Gosford Hospital and CCLHD Community Health facilities.

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CCLHD Services Accommodated within existing Gateway Complex

CCLHD services are currently accommodated within the Gateway complex. Consultation with the CCLHD relevant services was held earlier in 2020. These points are noted within the EIS, and correspondence between the two parties included in Attachment U, Appendix J. The correspondence by the CCLHD also outlines concerns.

The CCLHD supports the acknowledgement of CCLHD services accommodated within the Gateway complex within the EIS documentation and the importance of maintaining tenancies.

"The proposal aims to maintain existing tenancies throughout construction of the development to ensure existing community and cultural facilities vital to the Gosford City Centre are available throughout construction and at completion of the development."

The CCLHD acknowledges the potential need for service relocation during times of disruption during the Gateway development (p33).

"The concept proposal aims to maintain existing tenancies throughout construction of the development. The development is to be constructed in a series of four stages. Throughout construction of Stages 1A, 1B and 2 the existing commercial building will remain. It is proposed current tenants will remain within the existing mixed-use building throughout these stages of development. Prior to construction of Stage 3 existing tenancies will be relocated to the newly completed commercial spaces within Stage 1A, 1B and 2 towers. This will ensure existing community and cultural facilities which are vital to the Gosford City Centre continue to operate throughout construction and at completion of the development. Further detail will be provided at subsequent development application stages."

(Attachment U, p25)

"Any social impacts to existing tenants and public health services are likely to be generated within the preliminary works phase of construction where excavation and partial demolition of the car park will be undertaken."

(Attachment M, p16)

"Contingencies for NSW Health tenants should construction impact the use of the existing building". Response: "...the concerns to be addressed in the Construction Management Plan to be prepared at subsequent detailed DA stage".

The CCLHD also acknowledges the need for early discussions regarding the operation of CCLHD services from the Gateway site during the development stages, including potential relocation, as well as the following issues:

- Advice on the timeframes for the stages of development for the Gateway Development.
- Maintaining ease of access to services from transport hubs (train station, bus or car parking) for patients and their families/ carers. Consideration needs to be given to the dismantling of the current pedestrian walkway to Gosford Station from the existing Gateway complex that provides ease of access for many patients among others including those who are attending CCLHD services in the Gateway complex. Patients requiring access to CCLHD services within the Gateway complex include parents with children in strollers or prams, children and adults with disabilities and/or other health issues, children and adults that have experienced traumatic events.
- Maintaining ease of access to street frontages of Mann, Faunce and Watt Streets for patients and staff attending CCLHD services at the Gateway complex.
- Maintaining ease of access to car parking within the Gateway complex for CCLHD services accommodated within the Gateway complex (including for staff, CCLHD car fleet and for patients) is important throughout the development stages. CCLHD service staff regularly need to carry significant loads to/ from fleet vehicles, therefore ease of access to fleet vehicles from the services is required for loading and unloading materials, generally with the aid of trolleys. This is also important for patients visiting services on the site.
- Formulating a contingency plan in advance for CCLHD services accommodated within the Gateway complex, if early works or building works are too disruptive for the continuation of CCLHD services. This is particularly important given the sensitive nature of the services

accommodated within the Gateway complex and the cost and complexity involved in relocating health care services and associated premises.

- Advance planning and consultation regarding the potential relocation of impacted CCLHD services within the existing Gateway building to Stages 1A, B or Stage 2.
- It is noted that the current lease arrangements for CCLHD services within the Gateway complex contain “Make good obligations” clauses. These clauses will need to be reviewed and possibly amended in the context of the development.
- Forward information regarding proposed rental arrangements for the future premises for CCLHD services.

Helicopter Flight Paths to and from Gosford Hospital

The CCLHD notes and acknowledges that an Aviation Impact Statement has been prepared by AviPro and included in the EIS, Appendix W. As per the report recommendations, the inclusion of lighting requirements for cranes during construction and permanent aviation obstruction lighting for one the towers (RL 133.887) are supported to ensure safe helicopter flights to and from Gosford Hospital.

Cumulative Impact of Developments in the Gosford area

It is noted that the potential cumulative impacts of commercial/ residential developments should be considered in light of this project and other significant current and future developments 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, as well as generating additional cumulative demands on existing community and health services.

Public Health Unit response to the Development at 8-16 Watt Street, Gosford (Gateway site) (SSD-10414)

Gosford should be developed according to eco-city principles i.e. built off the principles of living within the means of the environment. An eco-city is an ecologically healthy city¹. High rise buildings should follow sustainable and green architecture standards and include planning with nature and other relevant ecological designs² to promote healthy, socially sustainable communities.

We note that the current application is a Concept Development Application involving no physical works, and that impact assessments of air quality, noise and vibration and site contamination are to be submitted with applications for the subsequent stages. These Air Quality and Noise and Vibration impact assessments should consider cumulative impacts from the development of this site and any other simultaneous development.

Air Quality

The current application does not involve any activities with potential to create air quality impacts (Environmental Impact Assessment p37) (EIS), and thorough assessment of air quality impacts is required for the subsequent stages, with appropriate mitigation measures if required. Without pre-empting these assessments, it appears likely that demolition and construction stages may give rise to particulate matter emissions. Whether or not impacts fall under the relevant assessment criteria, we suggest that they could present an increased risk to the health of the community. Our advice is that epidemiological studies have been unable to identify a threshold below which exposure to

¹ The smart city journal. <https://www.thesmartcityjournal.com/en/articles/1042-eco-innovations-eco-cities-eco-towns>

² Razzaghian F, Rahnama MF, Shokouhi, MA (2016). Ecological Analysis of High-Rise Buildings by Eco City Theory (Case Study: Mashhad Metropolitan). April 2016. *International Journal of Humanities and Cultural Studies*, at: <http://www.ijhcs.com/index.php/ijhcs/article/view/565/515>

particulate matter air pollution (PM) is not associated with health effects. Therefore, any increase in exposure must be assumed to have an adverse impact, even at levels below the assessment criteria. We ask that this advice be considered in determining the current application and in subsequent applications.

Noise and Vibration Impacts

We note that the preliminary Construction Noise and Vibration Management Plan (CNVMP) is based on a theoretical assessment since future construction timelines and methodologies are unknown, and that exceedances of noise affected and heavily noise affected levels are possible. To avoid impacts on the health and wellbeing of the community, future noise and vibration assessments must be based on realistic timelines, equipment choices and methodologies, and identify all reasonable and feasible mitigation measures.

The CNVMP (Figure 3.1) appears to include 139 Faunce Street within the site but the EIS (p16) states that the proponent has been unsuccessful in acquiring this lot. Unless this lot becomes part of the site, the noise and vibration assessment should include impacts to the users 139 Faunce St. Likewise the CNVMP fails to assess noise and vibration impacts on non-residential receivers around the site, who may be impacted during business hours. The noise and vibration assessments for subsequent development stages must include thorough assessment of impacts and mitigation measures for all potentially affected receivers and must be to the satisfaction of the appropriate regulator.

Site contamination

We note that the Stage 1 Preliminary Site Assessment identified potential contamination sources. As recommended in that report, a Stage 2 Detailed Site Investigation undertaken to the satisfaction of the appropriate regulator, should be submitted with the Stage 1A development application.

Water use

We commend water conservation measures. The EIS notes the intent to capture rain and storm water for use in toilet flushing and irrigation (EIS p53). Subsequent DAs should demonstrate that any recycled water projects have been subject to human health risk assessment, that the water quality will be fit for the intended end use and that the appropriate approvals can be obtained.

Crime Prevention Through Environmental Design (CPTED)

The success of public open space can depend on people feeling safe in these areas. The CPTED Assessment (Appendix T) indicates that the site is located within the hotspot area for various crime types. We note and support the commitment to adhere to CPTED principles, this commitment should be adopted in any approval for the current application and clearly reinforced in subsequent applications.

Project Scale

We note that the application seeks substantial increases on the building heights (36m to 135m) and floor space ratios (5:1 to 8:1) currently permitted under SEPP (Gosford City Centre) 2018. We suggest that any variation to the SEPP to permit intensification of development on this site requires careful consideration of potential adverse effects on the amenity of the surrounding area. A net benefit for the community as whole should follow if variations are granted.

Cumulative Impact of Developments in the Gosford Area and Urban Form

Urban areas with high rise buildings can impact local aerodynamics and temperature conditions with environmentally unfavourable zones with poor quality air developing in public open spaces. High rise buildings can be an effective system of solar heating of vertical surfaces of buildings and horizontal surfaces of roofs, footpaths and roads, accumulating heat and resulting in the formation of urban heat islands³. Each development stands to create energy demands. While every development is assessed independently, together over time, all developments stand to contribute positively and negatively to urban form and function. The potential cumulative impacts of multi-

³ Giyasov B, Giyasova I (2018). The Impact of High-Rise Buildings on the Living Environment. *E3S Web of Conf.* Vol. 33, 2018. <https://doi.org/10.1051/e3sconf/20183301045>

storey development in Gosford should be considered with ecologically sustainable development principles as a cornerstone.

Public Open Space, Solar access and overshadowing

Our urban areas must be 'places for people'. This demands high quality, best practice development. The Project should include measures to ensure that the amenity of the local area (in the form identified as desirable by the community) is protected and enhanced.

It is imperative that the community has access to quality open space both within and outside the development. While the project creates 'very minimal' overshadowing of Burns Place (between 15% and 51% between 9am and 11am at the winter solstice) and provides 'adequate' solar access to open spaces within and outside the site, we suggest that the project should provide better than adequate outcomes.

The EIS (p86) predicts overshadowing to properties to the south and east of the site, and that the change in solar access to those properties will be 29% to 44%, after 2 to 3pm at the June solstice. We seek confirmation that this is the best possible design, and that this result is both unavoidable and acceptable. We suggest that all possible measures should be implemented to improve solar access and minimise over shadowing in relation to neighbouring properties, public open spaces, including Burns Place and street frontages and the open spaces within the site.

Community Feedback

At this Concept Plan stage, the proponent should demonstrate commitment to consulting with the community to identify a construction schedule that will create least possible disruption. This commitment should include provision of a contact point for complaints if noise and vibration or air quality issues occur and an undertaking that a prompt and genuine response will be made to any complaints.

If you wish to obtain further information, please contact Ms Kym Scanlon, Manager, Health Planning on telephone 4320 3143 or by email on kym.scanlon@health.nsw.gov.au or for the Public Health Unit response please contact Paul Cook, Acting Director Public Health Unit, or Kerry Spratt, Senior Environmental Health Officer, on telephone 4320 9730.

Yours sincerely



Fiona Wilkinson

District Director, Quality, Strategy and Improvement

Date: 29 September 2020

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