



Health
Central Coast
Local Health District

File: CF19/14700-4
Our Reference: CD20/17275
Document No: CD20/23301

Regional Assessments
Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Attention: Silvio Falato
Team Leader, Regional Assessments

Dear Mr Falato

I write in response to your letter of 20 February 2020 concerning the State Significant Development (SSD) application (SSD-10159) for Northside Private Hospital on the corner of Faunce Street West and Racecourse Road, West Gosford in the Central Coast local government area.

Thank you for the opportunity to review the exhibition, and provide comment on the proposed development. The Central Coast Local Health District's (CCLHD) Health Planning, Health Promotion Services, Public Health Unit and Clinical Operations Directorate have collaborated to prepare this response. Specific comments from the CCLHD Health Promotion Service (Attachment A) and Public Health Unit (Attachment B) are attached. Other items raised for consideration include:

- **Potential clinical impacts and opportunities from hospital development** - upon confirmation of the operator, CCLHD welcomes further consultation in order to discuss the potential clinical and operational impacts that the private hospital and medical precinct may have on existing services as well as the opportunity for synergies between the two services.
- **Cumulative impact of developments in the Gosford area**- it is noted that the potential cumulative impacts of 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. We welcome further consultation on how this is, or could be, modelled to ensure the best possible outcomes.

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

Yours sincerely

Maya Smitran
A/Director Quality, Strategy and Improvement
Central Coast Local Health District
Date: 18/03/2020

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Attachment A: CCLHD Health Promotion Service submission re State significant development application (SSD-10159), including Environmental Impact Statement (EIS), for Northside Private Hospital, West Gosford, March 2020.

Thank you for the opportunity to provide comment on the Development Application, including Environmental Impact Statement (EIS), for the Northside Private Hospital.

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', based on strong and emerging evidence, the Health Promotion Service advocates for built 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.

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

SEARs

We note welcome additions to the SEARs (issued 5/4/19) and trust that these have been, or will be, addressed by the proponent in all relevant stages of development, in particular:

- Key Issue 8. Transport and Accessibility (Construction and Operation)
 - Address the impact of trips generated by the proposed development on nearby intersections having regard to the cumulative impacts from other existing surrounding developments in the vicinity including Henry Kendall High School and Gosford Public School.
 - Assess road and pedestrian safety in the immediate vicinity of the proposed development and the details of road safety measures.
 - Detail the proposed walking and cycling access arrangements and connections to public transport services.
 - Describe the measures to be implemented to promote sustainable means of travel, including public transport use, pedestrian and bicycle linkages in a preliminary Green Travel Plan and specific Workplace Travel Plan and identify any proposed facilities to increase the non-car mode share for travel to and from the site.
- Attachment A – Guidelines and policies – Safer by Design - Crime Prevention Through Environmental Design (CPTED).

EIS – Part F Environmental Risk Assessment

6.8 Transport and Accessibility

- 6.8.1 Parking – On page 93 it states “Section 7.4 of the GCC DCP sets out applicable car parking rates for hospitals. The proposed control sets out 1 car parking space for every 3 beds for patients which equates to 75 car parking spaces. Additionally, the rates set out that **1 car parking space should be provided for every employee.**” In actual fact, the GCC DCP requires parking for hospitals to be provided at the rate of 1 car parking space per 3 beds and **1 car parking space per 3 employees**. This may change the proposed car parking provision significantly.
- On page 94 it states “GCC DCP does not provide bicycle parking rates and therefore the proposed bicycle parking would be provided in accordance with Cycling Aspects of Austroads Guide. The bicycle parking required is demonstrated in the extract below **(Figure 56)**.” Further to Cycling Aspects of Austroads Guides (2017), and more specifically, Appendix I - Bicycle Parking Provision Rates, we suggest the proponent is directed to Austroads Research Report AP-R527-16 Bicycle Parking Facilities: Guidelines for Design and Installation and Austroads Research Report AP-R528-16 Bicycle Parking Facilities: Updating the Austroads Guide to Traffic Management. In addition or as an alternative to Cycling Aspects of Austroads Guides 2017 and associated publications, we suggest the proponent is directed to the NSW Planning Guidelines for Walking and Cycling (DIPNR & RTA, 2004) as listed in Attachment A of the SEARs. Where the calculated bicycle parking (and end of trip facility) provision rates may differ between the two sources of guidance, we suggest the proponent

should be directed to use the methodology which yields the most optimal outcome (quantity and quality) for staff and public benefit.

- On page 95 it states “The proposed development is nominally required to provide a total of 49 bicycle parking spaces for Stage 1 and 19 bicycle parking spaces for Stage 2. This represents a total of 68, comprising 22 spaces for the private hospital and 46 spaces for supporting services. In addition, it is noted that the development will provide appropriate end of trip facilities for staff members to encourage the use of sustainable means of travel to and from the site.” We suggest the proponent should be required to quantify and qualify the proposed provision of the end of trip (EOT) facilities and confirm the stage or stages at which these facilities will be provided. Should EOT facilities not be provided in Stage 1, active transport will not be a viable option for staff.
- 6.8.3 Green Travel Plans – On page 103 it states “A Green Travel Plan (GTP) and Workplace Travel Plan (WTP) **can** be developed for the proposed development to encourage the use of alternative transport modes for staff and visitors.” Further it states “It is considered that a GTP and WTP **should** be implemented to reduce the reliance on private transportation and thus reducing the traffic generating impacts of the development.” We draw attention to the words “can” and “should” and the fact that the SEARs require a preliminary Green Travel Plan and Specific Workplace Travel Plan to be prepared as part of the Traffic Impact Assessment (TIA). We welcome monitoring of this deliverable by DPIE, TfNSW, RMS and/or Council.

6.14 Social & Economic Impact Assessment

- Community – on page 114 under the sub heading of Health it states “increased traffic movement could potentially increase emissions, however, **owing to the lack of pedestrian areas and relative isolation from other uses** it is considered that this is a low level risk.” This statement seems counter to some of the other impact assessments detailed above under the sub headings of Access, Parking and Public Domain, which present the project favourably on the basis of being “within close proximity (walkable) of public transport such as buses and trains”, providing bicycle parking and a shared cycle and pedestrian path (all of which are intended to support active travel).
- On page 114 under the subheading of Safety it states “a crime hot spot was identified approximately 300m east of the site, near Gosford train station.” Within the **Social and Economic Impact Assessment report (Appendix 14)**, on page 28 it goes further to state “According to data from the Bureau of Crime Statistics and Research (BOSCAR), there is a significant high-density crime hot spot over the Gosford CBD. This subject site is directly connected to the hot spot area in accessing public transport nodes via Faunce St W. Consideration of the safety of employees and visitors to the hospital who will commute by train, particularly at night, should be considered in the development proposal.” We concur with this finding and in order to support use of public and active transport, suggest a solution should be required of the proponent prior to occupation and operation of the hospital e.g. provision of a shuttle bus for night shift workers.
- Within the Social and Economic Impact Assessment report under 6.0 Stakeholder Views (pages 31-32), we note from the summarised list of issues raised by stakeholders that parking, movement around and between the public and private hospitals and schools, separated cycling and walking paths and shuttle bus access between Gosford train station and the private hospital are seen as important. We strongly encourage due consideration of these issues by the proponent, relevant State agencies and Council.
- Within the Social and Economic Impact Assessment report, under 2.2 Proposal (page 13) it states “Stage 2 detailed built form approval will be sought later and does not comprise part of this submission. As such the associated socio-economic impacts have not been assessed within this report.” We trust that any associated impacts, particularly cumulative impacts, will be addressed appropriately at the next stage of development.

Thanks in advance for consideration of our comments. We welcome the opportunity to be involved in future consultations associated with the development. If further information is required, please contact Niki Kajons, Director, Health Promotion and Public Health Improvement Nicole.Kajons@health.nsw.gov.au.

ATTACHMENT B: CCLHD Public Health Unit submission on State Significant Development Application (SSD-10159), Northside Private Hospital, Faunce St West, West Gosford March 2020.

General

- Our comments are based on the position that the application involves only the Stage 1 and Stage 2 works. Referring to areas of the site to be developed by other developers, we request confirmation that impacts connected to development of the remainder of the site, including demolition of the remaining structures will be assessed and addressed under separate development applications.
- There appears to be discrepancy between the Preliminary Construction Management Plan (Section 3.1) and the Air Quality Management Plan (Section 2.2) in relation to Saturday work hours. Impact assessment should address the entire spread of work hours.
- The surrounding area includes daytime users such as schools and the Local Health District offices at 6 Racecourse Road. It must be acknowledged that the site construction work hours coincide with those activities, and that impacts must be assessed and mitigated accordingly, in particular noise and vibration and air quality impacts.
- Noting that construction of Stage 2 could be some years away, we seek confirmation that impacts have been, or will be, assessed prior to commencement, and taking into account development that occurs in the intervening period.

Air Quality/ Air Quality Assessment

- Potentially sensitive receivers such as Gosford Public School, Henry Kendall High School and Gosford Hospital are in close proximity to the development site. The Air Quality Assessment notes on page 16 that fugitive particulate emissions are typically experienced by neighbours as amenity impacts rather than health related impacts. It concludes that the health effects on identified receptors, including Gosford Public School is low (p21). To the contrary, adverse health effects can occur with any increase in particulate pollution and children can be particularly vulnerable to the effects of air pollutants. Assessment of impacts should consider these issues.
- In addition to other health effects, dust emissions that are not effectively managed on site have potential to cause operational implications for nearby premises, with resultant increased risk to public health. Of concern in this regard is the risk of particulate contamination of the water cooling systems (cooling towers) on the Gosford Hospital and Henry Kendall High School sites.
- We seek confirmation that the Air Quality Assessment and Management Plan are to the satisfaction of Central Coast Council and NSW Department of Planning, Industry and Environment.
- The range of mitigation measures discussed in Table 9 should be reviewed for their practicality and effectiveness in managing impacts. Definite commitment should be made to the measures that are to be relied on.
- Conditions imposed on any approval must ensure that air quality impacts are managed so as to avoid impacts on the health and amenity of surrounding areas, particularly during construction in relation to daytime users. Provisions should be included for monitoring of air quality impacts, particularly particulate matter and dust during construction. Monitoring locations should be representative of emissions from the site as a whole, and positioned so they can remain in place for the duration of construction.

Noise and Vibration Impact Assessment

- The Noise and Vibration Assessment (p23) notes that the assessment is preliminary and without information about construction plant/equipment, work activities and duration. We suggest that a more comprehensive assessment of noise impacts is required to enable proper consideration of potential effects on the community and required mitigation measures. Regardless, the Noise and Vibration Assessment and subsequent Construction Noise and Vibration Management Plan to which it refers must be to the satisfaction of Central Coast Council and NSW Department of Planning, Industry and Environment.
- The Noise and Vibration Impact Assessment does not appear to include any specific assessment of ambient noise levels near the boundary with Gosford Public and Henry Kendall High Schools. We seek confirmation that the monitoring locations are representative of the ambient noise levels at the schools and that the project noise trigger levels are appropriate.
- We note the reference to daytime work as a construction noise impact mitigation measure. Considering that nearby sensitive receivers include daytime operators, we seek confirmation that noise mitigation measures will address impacts during daytime hours.
- Conditions imposed on any approval must be effective in preventing offensive noise emissions and managing impacts to the surrounding community, including daytime users, during both construction and operation phases for Stages 1 and 2.

Report: Preliminary Site Investigation for Contamination

- We note the conclusion that the site has a low to medium potential for contamination and is generally compatible for its intended use, subject to further investigations. Table 5 lists potential contaminants of concern. We support a comprehensive site investigation to confirm the low to medium risk rating and identify the nature of any remediation required. Further site investigations should be to the satisfaction of Central Coast Council and NSW Department of Planning, Industry and Environment.

Services Report: Drinking Water

- We note the proposal to store drinking water on site. The potable water supply, including treatment, must be managed to ensure that the requirements of the *Australian Drinking Water Guidelines* are met at all times.

Services Report: Warm Water System (Thermostatic Mixing Valves)

- The warm water system must be designed, installed, operated and maintained in accordance with the relevant industry standards, the *Public Health Act 2010* (NSW), the *Public Health Regulation 2012* (NSW) and NSW Health Policy Directive 2015_008 *Water – Requirements for the Provision of Cold and Heated Water*. On completion, the system must be registered as a regulated system with Central Coast Council.

Services Report: Water Cooling Systems (cooling towers)

- The water cooling systems must be designed, installed, operated and maintained in accordance with industry standards, the *Public Health Act 2010* (NSW), the *Public Health Regulation 2012* (NSW) and NSW Health *NSW Guidelines for Legionella Control in Cooling Water Systems*. On completion, the systems must be registered as regulated systems with Central Coast Council.

Crime Prevention Through Environmental Design (CPTED)

- The success of public spaces can depend on people feeling safe in these areas. To create a safe environment, the project design should consider and adhere to CPTED principles. The manner in which this will be achieved should be clearly described and effectively implemented.

Monitoring, Enforcement and Community Feedback

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, during both construction and operation phases. We encourage the proponent to consult with the surrounding community, to ensure that the project does not adversely impact 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.

If further information is required, please contact Ms Kerry Spratt, Senior Environmental Health Officer, on 4320 9730 or email kerry.spratt@health.nsw.gov.au