

15/11/2019

Ms Leone McEntee
Manager Planning
Level 14
77 Pacific Highway
North Sydney New South Wales 2060

Dear Ms McEntee

Tweed Valley Hospital Stage 2 (SSD-10353)
Response to Submissions

The exhibition of the development application including the Environmental Impact Statement (EIS) for the above proposal ended on 8 November 2019. All submissions received by the Department of Planning, Industry and Environment (the Department) during the exhibition of the proposal are available on the Department's website at:

<https://www.planningportal.nsw.gov.au/major-projects/project/14746>.

The Department requires that you provide a response to the issues raised in those submissions, in accordance with clause 85A(2) of the Environmental Planning and Assessment Regulation 2000. Please note that the comments from NSW Rural Fire Service and Gold Coast Airport Authority are outstanding. The Department will provide you with a copy of their submissions when received.

The Department has also undertaken a preliminary assessment of the EIS and, in addition to the issues raised in submissions, requires that the matters at **Attachments 1 and 2** be addressed in full. Please provide a response to the issues raised in the submissions and the attachments to this letter by 18 January 2020.

Note that under clause 113(7) of the Environmental Planning and Assessment Regulation 2000, the days occurring between the date of this letter and the date on which your response to submissions is received by the Planning Secretary are not included in the deemed refusal period.

If you have any questions, please contact Aditi Coomar, who can be contacted on 8217 2097 or via email at aditi.coomar@planning.nsw.gov.au.

Yours sincerely



Karen Harragon
Director, Social And Infrastructure Assessments
Social & Infrastructure Assessments

as delegate for the Planning Secretary

ATTACHMENT 1

KEY ISSUES

1. Built form and landscaping

- The design of the proposed hospital building requires further refinements to improve the visual impact of the development on the surrounding areas and the internal amenity of the patients / visitors / staff.
- The proposed landscaping on the site should also address the amenity of the users and improve the legibility of the “Green Spine” within the building as well as the car parks, consistent with the Concept Proposal.
- Having regard to the above, the Department considers that the internal layout of the hospital building should be amended to address the following concerns that were raised by the State Design Review Panel, prior to the lodgement of the application:
 - absence of courtyard at the Basement Level.
 - absence of an internal courtyard on the north-western side of the Lower Ground Floor.
 - absence of light voids on the Ground Level and Level 1.
 - overly long and narrow corridors on the Lower Ground Floor and Ground Floor with no provisions for natural light.
 - inadequate size of the internal courtyard on the north-eastern side of the Lower Ground Floor.
 - no presence and legibility of the ‘Green Spine’ within the building.
- The proposed multi-decked car park should introduce further articulation through changes in massing, greater variation in materials and / or additional use of green walls.
- As recommended by the State Design Review Panel, the Department considers that the following elements should be introduced to connect the building with outdoor spaces and contribute towards a landscaped appearance of the building:
 - sky gardens to the north-west / north-east of the shared administration area on Level 2.
 - increase in the size of the Level 2 sky gardens catering for the ‘Child & Adolescent’ and ‘Older Persons’ in-patient units (a minimum of 50% increase above the proposed size).
 - sky gardens to the north-west of the shared administration zone on Level 3.
 - multiple sky gardens on Levels 4 and 5.
 - use of shared stairs between floor levels in lieu of the current emphasis on lifts.
 - additional planting / canopy trees and landscaped elements to offset and mitigate the visual impacts of the hospital building, roads and carparks.
 - additional landscaping at the ground level improved outdoor amenity areas for patients, staff and visitors.
 - a feasible walking loop within the site.

2. Traffic Impacts

- The submitted Traffic Impact Assessment Report (TIA) should be amended to further improve the intersection design, phasing and resulting levels of service at the Cudgen Road / Tweed Coast Road intersection, having regard to the comments from Transport for NSW (Roads and Maritime Services) (RMS). In this regard, the Department recommends that consultation be undertaken with RMS and Tweed Shire Council (Council) to resolve the design of the key intersections near the site to the satisfaction of the public authorities.

- The TIA should include background traffic volumes for the Cudgen Road / Tweed Coast Road intersection (without the hospital development) for 2033 so that a comparison of the background data and the traffic modelling with the hospital, can be undertaken.
- A confirmation from Council on timing for delivery of the Tweed Coast Road four lane upgrade should be provided to the Department. If Council cannot confirm delivery of the Tweed Coast Road four lane upgrade by 2033, additional modelling without this upgrade should be provided and alternative solutions considered to improve the level of service at the key intersections and this road.
- Further consideration should be given to left turn / deceleration lane lengths and designs to address the concerns raised by RMS.
- As required by the Concept Proposal conditions, the following details should be provided:
 - additional details of the proposed bus stops (design, location and associated pedestrian access).
 - assessment of impacts of agricultural vehicle movements on the hospital traffic including the frequency of the movements (in consultation with the surrounding community) and the mitigation measures to minimise the identified impacts.

3. Agricultural Offsets

- The Concept Proposal conditions required that an Agricultural Offset Plan be provided including evidence of consultation with the relevant stakeholders. However, the submitted Agricultural Offset Plan submitted with the Stage 2 application does not address the requirements of the conditions of consent satisfactorily.
- Having regard to the above, the Department considers that the Agricultural Offset Plan is required to be amended to include:
 - a clear outline of implementation plans and programs and / or physical works.
 - commitments to undertake the physical works.
 - details to demonstrate how those proposed plans / works will offset the adverse agricultural impacts on State Significant Farmland as a result of the development.
 - an updated 'Offset Strategy' to discuss the results of community consultation.
 - a local food procurement strategy or a commitment to review and change any relevant State Purchasing policies to accommodate this requirement.

4. Biodiversity Management

- The submitted landscape plans should be updated to include:
 - details of all proposed koala food trees, including location, species and number of plantings.
 - the mitigation measures outlined in the Concept Proposal Biodiversity Assessment Report including new and additional stepping stone habitats for the fauna in the locality, in the form of raingardens within the cleared areas of the site.
- The submitted Biodiversity Management Plan should be amended to:
 - provide details of tree translocation.
 - remove the recommendation that Duckweed and Azolla can be introduced to suppress the growth of Salvinia.
 - define areas of environmental concerns in relation to pet restrictions.

- provide details of the responsibilities for long term monitoring of the Mitchell's land snail.
- The proposed dam infill operations should be staged to ensure adequate salvage of animals during the infill works.

ATTACHMENT 2

OTHER MATTERS

1. Aviation Report

- The submitted Aviation assessment must be updated to consider the impacts of the helicopter movements on potential locations for flying fox camps surrounding the site.

2. Visual Impact Assessment

- The submitted Visual Impact Assessment Report (VIA) should be updated to include the recommended amendments to the building design and landscaping.
- The VIA should be updated having regard to the recommendations made by Council including more detailed consideration of key landscape character elements and qualitative discussion of impacts on those elements, consideration of light pollution and night time views and consideration of impacts from additional identified locations on Kingscliff Hill.

3. Photomontage

- An additional photomontage with the view of the building and the car park from the western side of the site should be submitted for assessments.