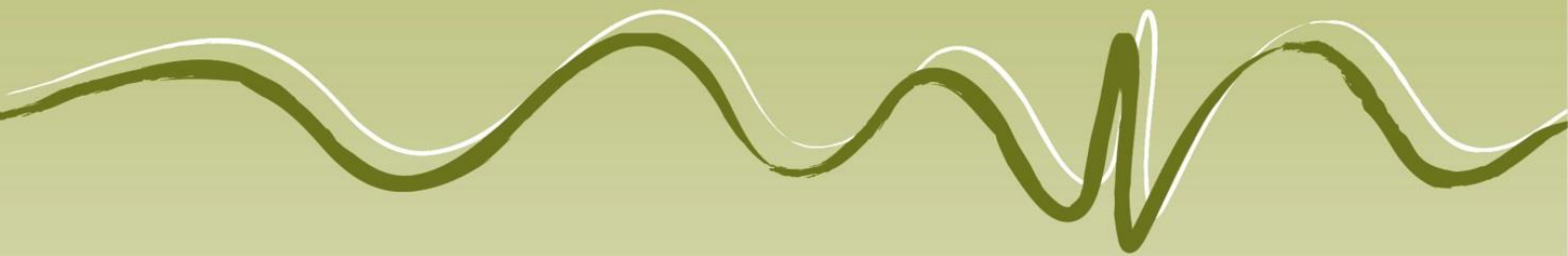


Response to Submissions Report

SSD-9575-Mod-2: Modification to New Tweed Valley Hospital



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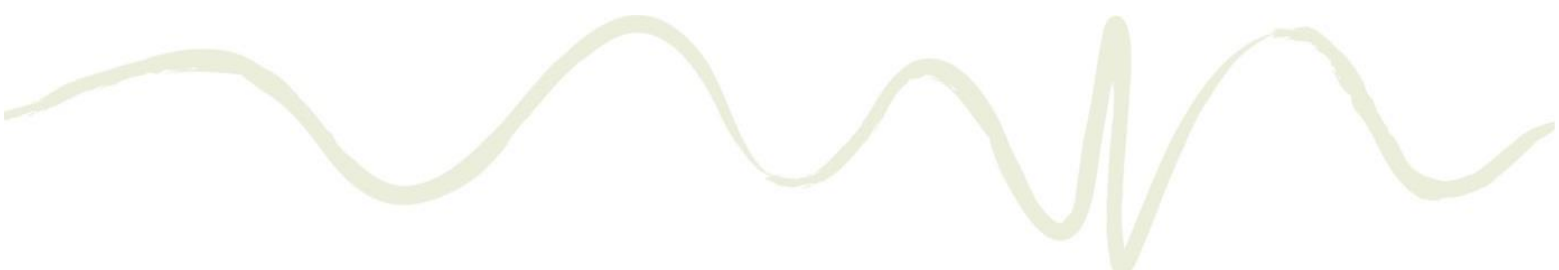
Appendix A	Public Submissions Coding Framework
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Appendix C	Architectural and Urban Design Response
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Glossary of terms and acronyms

Term	Description/Definition
Aboriginal Heritage Information Management System (AHIMS)	This holds information about Aboriginal objects, Aboriginal places with special significance with respect to Aboriginal culture, and archaeological reports.
Acid Sulphate soils (ASS)	Naturally acid clays, mud and other sediments usually found in swamps and estuaries. They may become extremely acidic when drained and exposed to oxygen and may produce acidic leachate and runoff that can pollute receiving waters and liberate toxins. ASS are classified as materials which are above the groundwater, are undergoing oxidation and have a pH of less than 4.0.
Amenity	The degree of pleasantness of an area or place.
Annual average daily traffic (AADT)	The total traffic in both directions at a specified location calculated from mechanically obtained axle counts.
Annual Exceedance Probability (AEP)	The chance of a flood of a given size (or larger) occurring in any one year, usually expressed as a percentage. For example, if a peak flood discharge of 500 m ³ /s has an AEP of 5%, it means that there is a 5% chance (i.e. a 1 in 20 chance) of a peak discharge of 500 m ³ /s (or larger) occurring in any one year (see also Average Recurrence Interval).
Archaeological site	A site with any material evidence of past Aboriginal activity that remains within a context or place that can be reliably related to that activity.
Australian height datum (AHD)	The standard reference level used to express the relative height of various features. A height given in metres AHD is essentially the height above sea level.
BAM	Biodiversity Assessment Methodology
BC Act	NSW <i>Biodiversity Conservation Act 2016</i>
BDAR	Biodiversity Development Assessment Report
Catchment	The area drained by a stream or body of water, or the area of land from which water is collected.
CBD	Central Business District
CEMP	Construction Environmental Management Plan
CIV	Capital investment value
Concept Development Application	A development application that sets out concept proposals for the development of a site, and for which detailed proposals for the site or for separate parts of the site are to be the subject of a subsequent development application or applications
Concept Proposal	Initial functional layout of a concept, such as a building, to provide a level of understanding to later establish detailed design parameters.
Council	Tweed Shire Council
CPTED	Crime Prevention Through Environmental Design Principles
CTMP	Construction Traffic Management Plan
Culvert	An enclosed channel for conveying a stream below a road.
dBA	Decibels using the A-weighted scale. Decibels are used to measure sound levels. dBA measures loudness according to the human perception of sound.
Decibel	Decibels are used to measure sound levels.
DPC	Department of Premier and Cabinet



Term	Description/Definition
DPIE	Department of Planning, Industry and Environment
Earthworks	The process of extracting, moving and depositing earth during construction.
Ecologically sustainable development (ESD)	Using, conserving and enhancing the community's resources so that ecological processes, on which life depends, are maintained and the total quality of life, now and in the future, can be increased. ESD incorporates four key principles: <ul style="list-style-type: none"> ■ the precautionary principle ■ inter-generational equity ■ conservation of biological diversity and ecological integrity ■ improved valuation and pricing of environmental resources.
EDT	Estimated Driving Time
EIS	Environmental impact statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979 (NSW)</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999 (Commonwealth)</i>
EPI	Environmental Planning Instrument
Flood immunity	Relates to the level at which a particular structure would be clear of a certain flood event.
FSR	Floor Space Ratio
Geotechnical	Application of the methods of engineering and science to construction that involves natural soil and rock materials.
Grade/gradient	Slope or steepness
Habitat	The place where an organism lives. Habitats are measurable and can be described by their flora and physical components.
Health and Education Campus	A site that allows health and education providers to collaborate, share resources and grow to their mutual benefit and benefit the community.
HI	New South Wales Health Infrastructure
HLS	Helicopter Landing Site
IPU	In Patient Unit
KLP	Kingscliff Locality Plan (exhibition draft)
LALC	Local Aboriginal Land Council
LEP	Local Environmental Plan
LGA	Local Government Area
Longitudinal section or 'long section'	The section drawn along the length of the route showing vertical elevation.
NCRP 2036	North Coast Regional Plan 2036
BCD	Biodiversity and Conservation Division of DPIE
Project	Development of a new hospital on a greenfield site in the Tweed, referred to as the Tweed Valley Hospital.
Project Site	The location of the Project, on land at 771 Cudgen Road, Cudgen, legally described as Lot 11 DP 1246853.
REDS	Regional Economic Development Strategy (referring specifically to the new Tweed Council doc)
RL	Reduced Level
RMS	Roads and Maritime Service
SEIA	Social and Economic Impact Assessment
SEPP	State Environmental Planning Policy



Term	Description/Definition
SIDRA	Signalised and un-signalised Design and Research Aid
SRD SEPP	State Environmental Planning Policy (State and Regional Development) 2011
SSD	State Significant Development
SSDA	State Significant Development Application
SSF	State Significant Farmland
TfNSW	Transport for New South Wales
Threatened ecological community (TEC)	An ecological community identified by relevant legislation as having endangered status under the NSW <i>Biodiversity Conservation Act 2016</i> or the Commonwealth <i>Environment Protection and Biodiversity Conservation Act 1999</i> .
Threatened species	Animals or plants listed as endangered or vulnerable under the NSW <i>Biodiversity Conservation Act 2016</i> or the Commonwealth <i>Environment Protection and Biodiversity Conservation Act 1999</i> .
TLEP	Tweed Local Environmental Plan
TRAC Kingscliff	Tweed Regional Aquatic Centres (used to refer to the pool, particularly by Bitzios)
TRDS	Tweed Road Development Strategy
TSTM	Tweed Strategic Transport Model
TTH	The (existing) Tweed Hospital at 14-34 Powell Street (Lot 628 DP755740), Tweed Heads on the far north coast of NSW
VIA	Visual Impact Assessment
VSR	Visually Sensitive Receiver



1. Introduction

1.1 Purpose of the Report

This Response to Submissions Report (Submissions Report) has been prepared following the public exhibition of Modification Application No. 2 to State Significant Development (SSD) 9575 (application number SSD-9575-Mod-2). The application is for modifications to the SSD 9575 consent that approved the Concept Proposal and Stage 1 Works of the new Tweed Valley Hospital (the Project). The Project is located at 771 Cudgen Road, Cudgen NSW, on land formally described as Lot 11 DP1246853 (the Project Site). The SSD-9575-Mod-2 application, including the associated Modification Report and supporting plans, was placed on public exhibition by the NSW Department of Planning, Industry and Environment (DPIE) from 10 October 2019 until 8 November 2019.

1.2 Summary of Public Submissions

The SSD-9575-Mod-2 application received a total of four unique submissions.

One late submission was received; for completeness this submission has been included in the Submission Report, however not reflected in quantitative analysis or coding.

Of the total four submissions received, two objected to the modification application, one supported it, and one provided comments.

The key themes raised in submissions related to:

- Visual impact
- Car parking ownership
- Traffic impact.

Public submissions have been considered and addressed in **Section 3**.

1.3 Summary of Government Agency Submissions

Submissions on the SSD-9575-Mod-2 application were received from the following government agencies:

Federal Government

- Civil Aviation Safety Authority (CASA)
- Airservices Australia.

State Government

- Department of Primary Industries (DPI) – Strategy and Policy
- Environment Protection Authority (EPA)
- Biodiversity Conservation Division (BCD) of DPIE (formerly Office of Environment and Heritage)
- Heritage Council of NSW
- Roads and Maritime Service (RMS)
- Transport for New South Wales (TfNSW).



A Statement of Key Issues and requests for additional information were also received from DPIE.

Local Government and Other

- Tweed Shire Council (TSC).

Government agency submissions and the issues/matters raised by DPIE have been considered and addressed within **Section 4** of this Submissions Report.

1.4 Additional Consultation and Engagement

Following concurrent submission of the SSD-9575-Mod-2 and the Stage 2 SSD-10353 applications, additional consultation and community engagement has been undertaken by Health Infrastructure (HI). This additional consultation, along with the public and government agency submissions, has helped inform and shape the responses contained in this Submissions Report. HI will continue to consult with relevant government agencies, other stakeholder groups, and the community through the ongoing planning, development and construction of the Project.

Section 2 of this report provides a summary of the engagement undertaken during the concurrent statutory public exhibition of the SSD-9575-Mod-2 and the Stage 2 SSD applications.

1.5 Amendment to Application and Response to Submissions

Health Infrastructure and its consultants have reviewed and considered all of the issues raised within the public and government agency submissions on the SSD-9575-Mod-2 application, including matters raised through additional consultation on the Project. Responses have been provided to all submission comments and, where applicable/warranted, changes have been made to the application, and updated plans are attached at **Appendix B**. The changes are a result of ongoing design refinement and in response to feedback received from government agencies, DPIE, and the community during the public exhibition of the SSD-9575-Mod-2 application (refer **Section 5**).

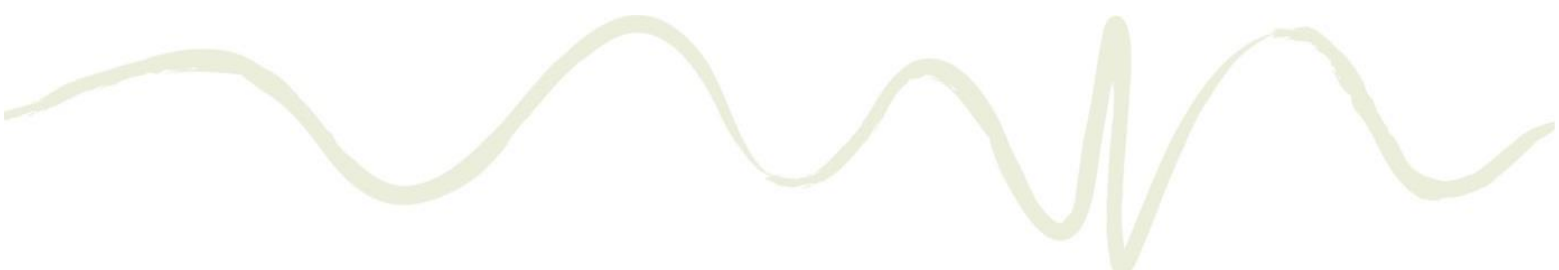
In accordance with clause 85A of the Environmental Planning and Assessment Regulation 2000 (NSW) (EP&A Regulation), this Submissions Report sets out the proponent's response to each of the issues raised in relation to the Project and amends the Modification Application, where necessary.

1.6 Project Team Input

This Submissions Report has been prepared for HI with input and assistance of a comprehensive project team, where applicable. The project team and their responsibilities are outlined in **Table 1.1** below.

Table 1.1 Project Team and Responsibilities

Name	Role/Responsibility
Health Infrastructure	Proponent and Project Director
TSA Management	Project Manager
STH + Bates Smart	Architects
Turf Design	Landscape Architects
GeoLINK	Town Planner and Bush Fire Consultant



Name	Role/Responsibility
Blackett Maguire Goldsmith	BCA and DDA Consultant
Elton	Consultation
Lendlease	Principal Contractor for Early and Enabling Works Contamination Geotech Surveyor
Robert Bird Group	Civil and Structural Engineers
LCI	Electrical, ICT, Security, Mechanical Engineering, ESD
JHA	Acoustics and Services
Altus Group	Cost Manager
Urbanite	Wayfinding and signage
ARC	Agronomist
Urbaine	Visual Impact Consultant
Avipro	Aviation Consultant
B&P Surveys	Surveyor
Bitzios	Traffic Engineers
BMT	Flooding Consultant
Greencap	Ecological Consultant
SMEC	Hydrology and wetland ecology
Niche	Heritage and Archaeology
SGS Economics & Planning	Social and Economic Assessment
Tim Fitzroy and Associates	Rural Land Use Conflict
Dr Stephanie Clark	Biodiversity Assessment and MNES (Mitchell's Rainforest Snail)

2. Summary of Engagement

Following concurrent submission of the SSD-9575-Mod-2 and the Stage 2 SSD applications, additional consultation and community engagement has been undertaken by HI. This additional consultation, along with the public and government agency submissions, has helped inform and shape the responses contained in this Submissions Report. HI will continue to consult with relevant government agencies, other stakeholder groups, and the community through the ongoing planning, development and construction of the Project.

This section outlines the engagement undertaken during the concurrent statutory public exhibition of the SSD-9575-Mod-2 and the Stage 2 SSD applications.

2.1 Community Engagement

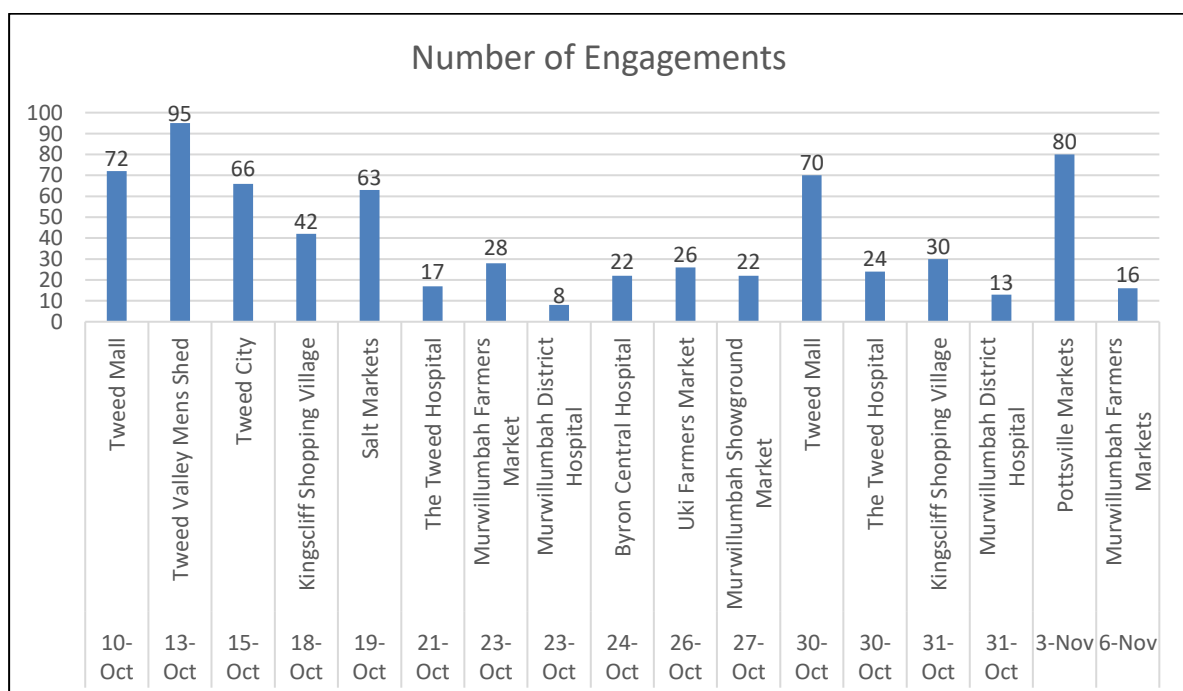
2.1.1 Scope

Face-to-face community engagement was undertaken through 17 pop-ups distributed across the region. Given the scope of the Stage 2 SSD, being focused on the final built form outcomes, an emphasis was placed on locations to engage communities directly impacted on by the Project, while also engaging at locations outside of the immediate catchment to ensure regional considerations were captured.

2.1.2 Number of people engaged

A total of 694 people were engaged across the 17 pop-ups. **Figure 2.1** shows the distribution of pop-ups and engagement.

Figure 2.1 Engagements by pop-up date and location



2.1.3 Sentiment

In general terms sentiment toward the hospital, including design, facilities and access arrangements was positive. There was also a high level of interest in the hospital project. Some comments relating to the original site selection process and location of the hospital were received, with ongoing negative sentiment toward this resolved issue expressed.

2.1.4 Comments and feedback received

The following key themes/areas were raised through the engagement process:

Table 2.1 Key comments and feedback received through community engagement

<i>Theme</i>	<i>Comments</i>
Existing Tweed Hospital	<ul style="list-style-type: none">■ What will happen to the old Tweed Hospital?■ Will there be any health services left in Tweed Heads?■ What will happen to the old building/site? Will it be sold?■ An emergency department is needed in Tweed Heads – residents are particularly concerned about the risk of heart attack.
Design	<ul style="list-style-type: none">■ The designs look great/so happy this is going ahead.
Access and Traffic	<ul style="list-style-type: none">■ Has traffic been considered?■ Will Tweed Coast Road be widened to four lanes?■ Will traffic increase on Cudgen Road?■ How will the site be accessed?■ What will the bus routes be like? I hope the frequency is increased.■ There needs to be safe pedestrian access from the hospital to the TAFE.
Parking	<ul style="list-style-type: none">■ Will the parking be free?■ How much parking will there be?■ How will parking be accessed?■ Concern that if parking is paid that the surrounding residential streets will be overcrowded with parked cars.
Ancillary Services	<ul style="list-style-type: none">■ Will there be any aged care or childcare facilities on-site?■ Will specialists have suites or a presence at the new hospital.
Clinical Services	<ul style="list-style-type: none">■ How many beds will there be?■ Will the same services currently offered at The Tweed Hospital continue to be provided?■ Will there be maternity?■ Will there be cancer care?■ Will a PET Scanner be provided?
Timing	<ul style="list-style-type: none">■ When will the hospital be open?■ Has work already started?
Location	<ul style="list-style-type: none">■ Where is it being built?
Other	<ul style="list-style-type: none">■ How do I get a job at the new hospital?■ There needs to be better signage than at other hospitals for wayfinding.■ The ambulance station in Tweed Heads should be retained to ensure access to ambulances for local residents.

The majority of these questions and comments are comprehensively addressed in existing Stage 2 SSD documentation. Written public submissions have been responded to in **Section 3**.



2.1.5 Future engagement

Based on the responses received during this round of engagement, the following recommendations are made:

- While location of the hospital is known at a local level, there is uncertainty at a regional level as to the exact location and how the site will be accessed. In advance of opening, a concerted engagement and communications response should:
 - Explain the location of the hospital
 - Explain transport options (public transport, road access by private vehicle including trip planning) and parking
 - Explain opening date and process.
- A comprehensive education and communications process should be undertaken to outline which services will remain in Tweed Heads.



3. Public Submissions

All public submissions have been considered and the key issues raised in relation to the Project's Modification are outlined in this section of the Submissions Report.

3.1 Introduction

This section provides a response to community submissions received in relation to the SSD-9575-Mod-2 application for Tweed Valley Hospital.

An application for Stage 2 SSD application and supporting Environmental Impact Statement (EIS) was exhibited simultaneously, and a separate Response to Submissions report has been provided addressing comments received applicable to that application.

3.2 Number of Submissions

The modification application, pursuant to Section 4.55 of Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act), of SSD 9575 for the new Tweed Valley Hospital received a total of four unique submissions.

One late submission was received; for completeness this submission has been included in this response, however not reflected in quantitative analysis or coding.

3.3 Feedback Raised in Submissions

All submissions were coded to consistently record and reflect views expressed, using the established coding framework (see **Appendix A**). This report makes reference to the number of submissions and the number of comments made on a particular issue. It is important to note that with regard to figures in this report, all submissions have the same weight.

3.3.1 Overall Sentiment

Of the total four submissions received, two objected to the proposal, one supported the proposal and one provided comments.

3.3.2 Key Themes

The key themes raised in submissions related to:

- Visual impact
 - The visual impact related to the 10-storey car park
- Car parking ownership
 - Understanding the cost structure and ownership of the multi-storey car park
- Traffic impact
 - Understanding changes to bed numbers, and impact on traffic generated.



3.3.3 Relationship to SSD9575 (Concept Proposal and Stage 1 Works) and Site Selection

A number of comments relate to aspects dealt with under the original SSD 9575 application, or through the site selection process. These are noted, however are considered to be resolved matters by virtue of the SSD 9575 Development Consent (Concept Proposal and Stage 1 Early and Enabling Works for the new Tweed Valley Hospital, SSD 9575, approved 11 June 2019).

3.4 Approach to Responding to Submissions

The application to modify SSD 9575 proposed the following amendments and inclusions to the Concept Proposal:

- Reconfiguration and provision of additional on-site parking, including a multi-deck car park (based on a maximum planning envelope) in conjunction with consolidated at-grade parking to better service the hospital.
- Design refinement of the on-site road network, including modifications to support the inclusion of the proposed multi-deck car park.
- Addition of an envelope to accommodate a temporary building for the 'Tweed Valley Skills Centre' which will include:
 - A Prototype and Simulation Suite to inform and verify the detailed design of key clinical spaces for the hospital, and in turn be used as a low-fidelity simulation space for TAFE NSW health education programs
 - A Skills and Employment Hub, including a drop-in facility for community and local industry, providing information on training and careers in the construction industry, jobs on the Project and support in developing business capability and tendering for subcontract work packages and supply contracts.
- An increase in the proposed number of hospital beds (day only and overnight beds) from 430 to 499 beds (excluding emergency treatment spaces (46)).
- Amendments to the approved maximum planning/building envelopes to accommodate the following design changes to the hospital and health hub:
 - Minor adjustments/refinements to the main hospital envelope (including addition of envelope for central energy plant)
 - Minor adjustments/refinements to the health hub envelope, and removal of reference in the consent to a single building, i.e. to allow for more than one building within the health hub envelope.
- Increase maximum Gross Floor Area (GFA) to approximately 65,050 m² (GFA, as defined in the Standard Instrument: Principal Local Environmental Plan as at the date of this development submission).
- Relocation/adjustment of the electrical switching station kiosk planning envelope and addition of an approximate envelope for the co-location of backup generators.
- Amendment to the Landscape Zonal Plan to reflect the detailed landscape design presented in the Stage 2 SSD application.

Responses have been collated and responded in alignment with these proposed amendments.

Submissions not related to these issues have been summarised in **Section 3.6**, and cross referenced to the relevant approval or application document.

3.5 Response to Community Submissions

This section summarises community responses to the application and provides a project response. The response is structured by modification component, described in break out boxes, followed by the related, categorised public submissions and the project response.

3.5.1 Multi-deck car park and reconfiguration of internal road network

- **Reconfiguration and provision of additional on-site parking, including a multi-deck car park (based on a maximum planning envelope) in conjunction with consolidated at-grade parking to better service the hospital.**
- **Design refinement of the on-site road network, including modifications to support the inclusion of the proposed multi-deck car park.**

3.5.1.1 Visual impact

The visual impact of the 10-storey car park has not been considered. It will be visible from all parts of the Valley. The images are misleading, as the 10-storey car park is lower than the hospital building in architectural renders.

An independent Visual Impact Assessment (VIA) was undertaken by Urbaine, attached to the EIS as Appendix J. The visual impact of the multi-deck car park envelope was assessed in Section 5.3.3 of the Modification Report, and the supporting VIA, however an updated report has been prepared, and is attached to the Response to Submissions as **Appendix D**. The updated report includes renders outlining the visual impact of the multi-deck car park.

Despite being 10 levels, the car park's comparative low floor to floor level ensures the structure remains low in height adjacent to the main hospital envelope, adding minimal additional low-level mass to the visible bulk of the development, including when viewed from the local vantage positions studied.

There are no set guidelines within Australia regarding the methodology for visual impact assessment. The methodology used is considered by the NSW Land and Environment Court as the preferred methodology for assessing visual impact, and has been developed through consideration of the following key documents:

- Environmental Impact Assessment Practice Note, Guideline for Landscape Character and Visual Impact Assessment (EIA-N04) NSW RMS (2013)
- Visual Landscape Planning in Western Australia, A Manual for Evaluation, Assessment, Siting and Design, Western Australia Planning Commission (2007)
- Guidelines for Landscape and Visual Impact Assessment, (Wilson, 2002)
- Tweed Shire Scenic Landscape Evaluation Volumes 1 and 2 (1995)
- Visual Management System Tweed Pilot 2004, Coastal Comprehensive Assessment
- Draft Kingscliff Locality Plan (2019)
- Draft Tweed Scenic Landscape Strategy (2019).

The assessment results are considered accurate and appropriate representations of the visual impact. The well-resolved design response, site integration, proposed site landscaping, and the physical separation from sensitive uses, would ensure an acceptable visual amenity outcome. Further responses to visual impact have been provided in response to agency and Council submissions at

3.5.1.2 Parking cost and ownership

It is noted the Tweed Valley Hospital Modification 2 application form states the Capital Investment Value (CIV) cost is zero. The construction of the additional building of a 10-storey multi-deck car park replacing the Concept approved at-grade parking will be at a significant additional cost. The cost of the multi-deck car park at no cost to the proponent suggests it will potentially be a private car park.

A modification to the Concept Proposal does not involve construction, therefore the CIV of the works associated with the Modification to the Concept Proposal are captured in the Stage 2 SSD/EIS application as construction of the multi-deck car park is proposed as part of Stage 2.

3.5.1.3 Noise impact

The multi-level car park will generate noise, affecting people on John Robb Way.

A Noise and Vibration Impact Assessment has been prepared by JHA (submitted with the concurrent Stage 2 EIS and referenced in the Modification Report) to ensure that any noise impacts comply with the Noise Policy for Industry (NSW EPA 2019) and the Interim Construction Noise Guidelines (DECC 2009). In addition, the Noise and Vibration Impact Assessment is conducted to ensure that noise from the hospital is minimised and sufficiently mitigated.

Potential noise sources identified and assessed include, but are not limited to:

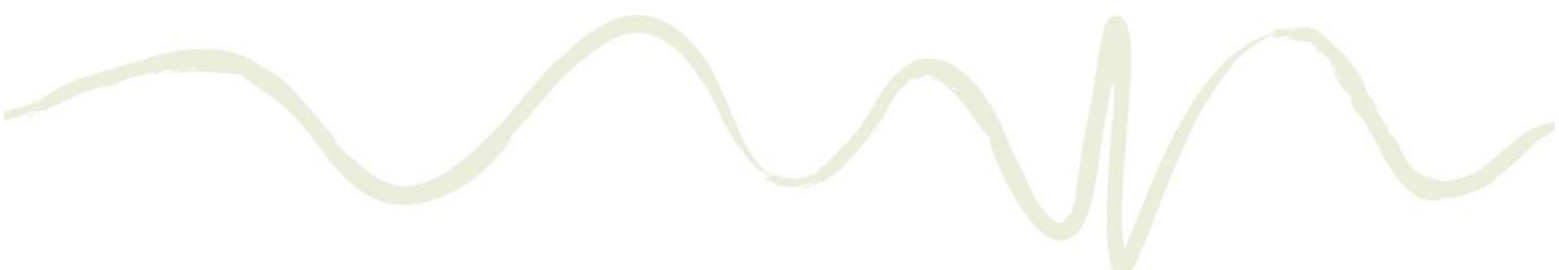
- Hospital operations
- Aircraft (helicopter)
- Machinery
- Air conditioning
- Vehicles (staff, patients, visitors, deliveries, waste collection)
- Generators
- Night work.

The assessment determined that the Project would be acceptable and can satisfy noise requirements. The proposed modifications to the Concept Proposal are supported by the findings of the detailed assessments that accompany the concurrent Stage 2 SSD application and are acceptable. On this basis no significant noise or vibration impact is expected. Refer to Section 5.9 of the Modification Report and Section 5.12 of the Stage 2 EIS for further detailed assessment and findings regarding noise and vibration, including that associated with vehicles and operation of the car park.

3.5.1.4 Community expectation and commencement of construction

The community had the expectation that there would be four low rise car parks, and this has been amended to a multi-storey car park without due planning.

Following further demand analysis, design development and consultation in the lead up to preparing and lodging the Stage 2 SSD application, a combined multi-deck and at-grade car parking solution, rather than entirely tiered at-grade car parking on the site, is considered the most suitable and efficient solution to cater for the hospital's parking needs. The construction of a multi-deck car park to service the hospital in conjunction with at-grade parking has been proposed in the Stage 2 SSD application.



Hence an amendment to the Concept Proposal is proposed to ensure consistency and permit the multi-deck car park. This modification application provides the opportunity to make the community aware of the proposal and provide the community with the opportunity to comment.

It is noted that the overarching master plan contained in the original Concept Proposal submission, approved as SSD 9575, foreshadowed the potential future incorporation of a multi-storey car park in this location. SSD 9575 (Concept Proposal and Stage 1 Works) has confirmed/approved the general site layout for the proposed facilities of the new Tweed Valley Hospital and that application, as well as the Stage 2 application, have adequately demonstrated future expansion/ancillary development potential/site arrangements. Adequate and appropriate assessment of the modified Concept Proposal, including the parking reconfiguration, has been provided and justifies the change.

Construction has commenced on the car park, pre-empting approval.

Stage 1 early works has commenced in accordance with SSD 9575.

Health Infrastructure takes compliance with conditions of consent seriously. Condition 24 of Schedule 3, Part A (conditions of consent for Stage 1 Works) has been satisfied, with information kept up to date as required. The relevant documents are available on the Project website - <http://www.tweedvalleyhospital.health.nsw.gov.au/delivery/early-works/early-works-documents>

No works have commenced on the multi-deck car park.

Consultation has not occurred in accordance with the Environmental Planning and Assessment Act 1979 (EP&A Act).

Extensive agency, stakeholder and community consultation and engagement activities have been and continue to be undertaken for the Tweed Valley Hospital Project, including that specific to the Modification and Stage 2 applications, as well as the preparation of the EIS. Section 4 in the Stage 2 EIS (concurrently submitted with the Modification Application) is a high-level overview of this consultation, with thorough documentation in Appendix G (Consultation Report). Additional community engagement has occurred since lodgement of the Stage 2 application and this is outlined in **Section 2** of the Response to Submissions report.

3.5.2 Tweed Valley Skill Centre

Addition of an envelope to accommodate a temporary building for the 'Tweed Valley Skills Centre'.

No submissions received specific to the skills centre. **Section 3.5.5.1.1** responds to matters regarding an increase in the scope of the Concept Proposal.



3.5.3 Hospital bed numbers

An increase in the proposed number of hospital beds (day only and overnight beds) from 430 to 499 beds (excluding emergency treatment spaces (46)).

3.5.3.1 Traffic impact

Amended bed numbers will take immediate effect, however traffic estimates are based on a 391-bed hospital at 2023, and 499 in 2033. Traffic has not been adequately assessed.

As outlined in the Modification Report and EIS for Stage 2, the application proposes 545 hospital beds/treatment spaces (comprising 48-day beds, 451 in patient unit (IPU) beds, and 46 emergency treatment spaces); inclusive of 56 additional IPU beds to be constructed as Stage 2B subject to demand and funding.

Section 5.5 of the Modification Report and Section 5.7 of the Stage 2 EIS address traffic. The traffic assessment outlines that assessment (sensitivity testing) has been undertaken for Year 2033 with the inclusion of the additional 56 beds (499 overnight and day only bed scenario by Year 2033 – i.e. excluding the 46 emergency treatment spaces). The sensitivity test includes approximately 1330 staff on-site during the day shift in Year 2033. The assessment considers traffic and transport conditions on the surrounding road network at the opening of the Tweed Valley Hospital and at the 10-year horizon to ensure the road network can accommodate the operation and expected traffic generation.

It is explained in the Traffic Impact Assessment (TIA) that the total number of beds/treatment spaces included in the application is 545, which in addition to the abovementioned 499 overnight and day only beds, includes 46 emergency treatment spaces. However, emergency treatment spaces are typically a point of initial treatment, with patients then transferred to overnight or day only beds. On this basis, and consistent with the Concept Proposal and Stage 1 assessment, emergency treatment spaces have therefore not been included as part of the traffic assessment.

People attending the Health Hub are captured in the overall traffic/parking calculations for the hospital. This is because traffic and parking associated with hospitals (being a health services facility) is calculated and assessed on a beds and staff numbers basis as per standard RMS and Council requirements. This ratio/calculation accounts for ancillary uses that may be typically associated with a hospital and is therefore an appropriate method.

Traffic and parking have been thoroughly assessed in the Stage 2 TIA submitted with the Modification Report and Stage 2 EIS. Additional responses to traffic and parking matters raised by agencies and Council have been addressed in this Submissions Report (refer to **Section 4** and **Appendix F**).

Potential future development and consideration of master planning on the site has been adequately addressed previously, demonstrating capacity for future development as required, and informing a suitable development layout. The Concept Proposal and Stage 1 Works have been approved under SSD 9575. This approval (subject to the proposed modifications) confirms the hospital's development envelopes and associated infrastructure layouts, which have been further defined and designed in the Stage 2 application. Any future development applications would integrate with the health campus and be required to consider all relevant design and environmental factors, including any additional traffic/parking impacts, and any required mitigation measures. Such applications would be assessed on their merits.

3.5.4 Amendments to planning/building envelopes

Amendments to the approved maximum planning/building envelopes to accommodate the following design changes to the hospital and Health Hub:

- ***Minor adjustments/refinements to the main hospital envelope (including addition of envelope for central energy plant)***
- ***Minor adjustments/refinements to the Health Hub envelope (and removal of reference in the consent to a single building, i.e. to allow for more than one building within the Health Hub envelope).***

No submissions received.

3.5.5 Increase to maximum Gross Floor Area

Increase maximum Gross Floor Area (GFA) to approximately 65,050 m² (GFA, as defined in the Standard Instrument: Principal Local Environmental Plan as at the date of this development submission).

3.5.5.1 Increase in original concept

The development has been amended to be almost 20% larger than the original concept.

The consent for SSD 9575 granted approval for a maximum GFA of 65,000 m². An increase in the permitted maximum GFA of the hospital and support building (excluding helipad) to approximately 65,050 m² is proposed (GFA, as defined in the Standard Instrument: Principal Local Environmental Plan as at the date of this development submission).

This change is minor and as a result of Stage 2 detailed design and to accommodate expansion of the hospital for additional inpatient units (subject to demand and funding) and expansion of the Health Hub.

The development of the site in accordance with an overarching master plan accommodating future expansion was contemplated through the Concept Proposal and Stage 1 SSD application and is in keeping with expectations established through SSD 9575.

3.5.6 Services planning envelopes

Relocation/adjustment of the electrical switching station kiosk planning envelope and addition of an approximate envelope for the co-location of backup generators.

3.5.6.1 Noise Impacts

There will be increased noise caused by the back-up electrical generator on the western side of the hospital.

A Noise and Vibration Impact Assessment has been prepared by JHA (submitted with the concurrent Stage 2 EIS and referenced in the Modification Report) to ensure that any noise impacts comply with the Noise Policy for Industry (NSW EPA 2019) and the Interim Construction Noise Guidelines (DECC 2009). In addition, the Noise and Vibration Impact Assessment is conducted to ensure that noise from the hospital is minimised and sufficiently mitigated.

Potential noise sources identified and assessed include, but are not limited to:

- Hospital operations
- Aircraft (helicopter)
- Machinery
- Air conditioning, aircraft (helicopter)
- Vehicles (staff, patients, visitors, deliveries, waste collection)
- Generators
- Night work.

The assessment determined that the Project would be acceptable and can satisfy noise requirements. The proposed modifications to the Concept Proposal are supported by the findings of the detailed assessments that accompany the concurrent Stage 2 SSD application and are acceptable. On this basis no significant impact associated with noise or vibration is expected. Refer to Section 5.9 of the Modification Report and Section 5.12 of the Stage 2 EIS for further detailed assessment and findings regarding noise and vibration, including that associated with back-up generators.

3.5.7 Landscaping zonal plan

Amendment to the Landscape Zonal Plan to reflect the detailed landscape design presented in the Stage 2 State Significant Development (SSD) application.

No submissions received.

3.6 Additional comments

A number of comments were received not directly related to the modification application. **Table 3.1** summarises these comments, relates them to the correct application/approval and where relevant provides a cross reference to the response in the Stage 2 application response to submissions or the Stage 2 EIS.

Table 3.1 Comments received not related to the Modification 2 application

Comment	Relevance	Document Cross Reference
Agricultural Impact/Land Use Conflict		
No consideration has been given to the 'SHED' operating opposite the site.	SSD 9575 Tweed Valley Hospital Stage 2 SSD/EIS	Stage 2 EIS, Appendix I – Agricultural Offset Report. Stage 2 EIS, Appendix H – Land Use Conflict Risk Assessment
Site Selection/Principal of Development		
The development is gross overdevelopment of a semi-rural area.	SSD 9575	N/A
The hospital is not suitable on or consistent with State Significant Farmland.	SSD 9575	N/A
Visual Impact Assessment		
The visual impact assessment images are deceptive/misleading. They do not adequately demonstrate the impact of a nine-storey building on the scenic plateau.	Tweed Valley Hospital Stage 2 SSD/EIS	Stage 2 EIS, Appendix J – Visual Impact Assessment. Stage 2 Response to Submissions, including Appendix E – Updated Visual Impact Assessment.
Traffic and Access		
The development will increase traffic. Turnock Street/Cudgen Street Roundabout is at Capacity.	Tweed Valley Hospital Stage 2 SSD/EIS	Stage 2 EIS, Appendix K -Traffic Impact Assessment. Stage 2 Response to Submissions, including Appendix O - Updated Traffic Impact Assessment
Noise and Vibration		
The helicopter pad will generate noise and flashing lights at night.	Tweed Valley Hospital Stage 2 SSD/EIS	Stage 2 EIS, Appendix C – Architectural and Design Report. Stage 2 EIS, Appendix O – Noise and Vibration Assessment Stage 2 Response to Submissions.
Sirens and flashing lights from ambulances will affect sleeping conditions on John Robb Way.	Tweed Valley Hospital Stage 2 SSD/EIS	



4. Government Submissions

4.1 Government Agency Submissions

All government agency and Council submissions have been considered and the key issues raised in relation to the Project's modification are summarised and addressed in **Section 4.3 to 4.5** of this Submissions Report. Supporting responses from relevant Project specialist consultants are attached as appendices. It has been noted where agencies have made general comments that do not require a more detailed response.

4.2 Summary of Government Agency Submissions

Submissions on the SSD-9575-Mod-2 were received from the following government agencies:

Federal Government

- Civil Aviation Safety Authority (CASA)
- Airservices Australia.

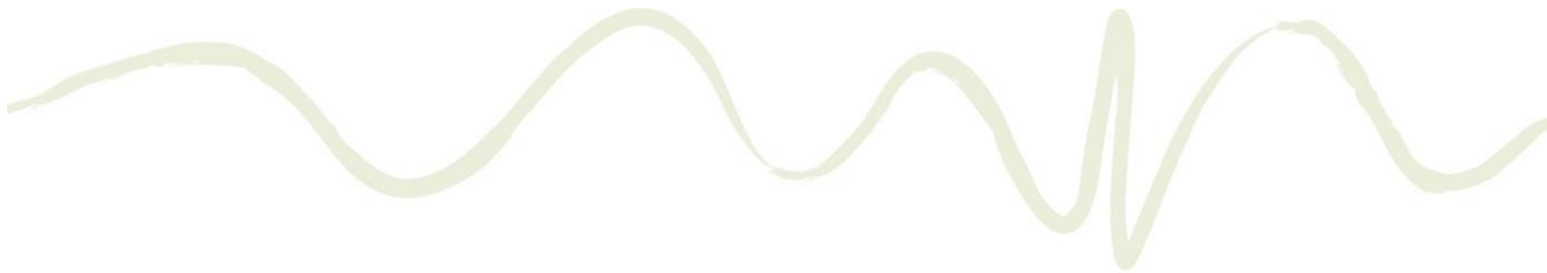
State Government

- Department of Primary Industries – Strategy and Policy
- Environment Protection Authority (EPA)
- Biodiversity Conservation Division (BCD) of DPIE (formerly Office of Environment and Heritage)
- Heritage Council of NSW
- Roads and Maritime Service (RMS) (recently renamed as Transport for NSW)
- Transport for New South Wales (TfNSW).

A Statement of Key Issues and requests for additional information were also received from DPIE. These are also addressed within the Submissions Report at **Section 4.4**.

Local Government and Other

- Tweed Shire Council (TSC).

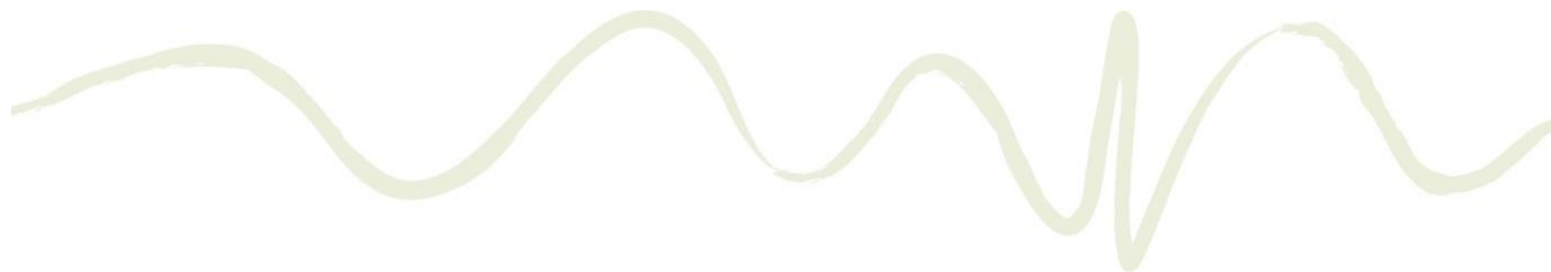


4.3 Response to Government Agency Submissions

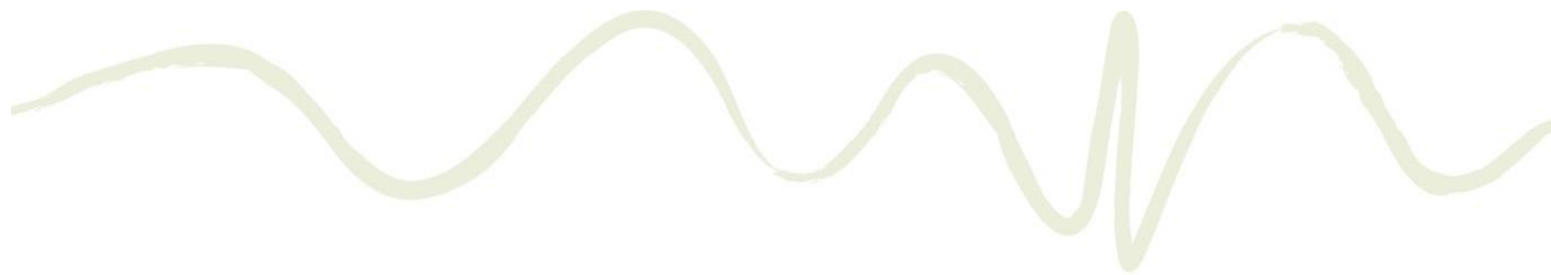
Table 4.1 provides a summary of the government agency submissions received, the issues or comments raised, and provides responses to these. Where relevant, additional/supporting detailed responses from specialist consultants are provided in the appendices.

Table 4.1 Response to Government Agency Submissions

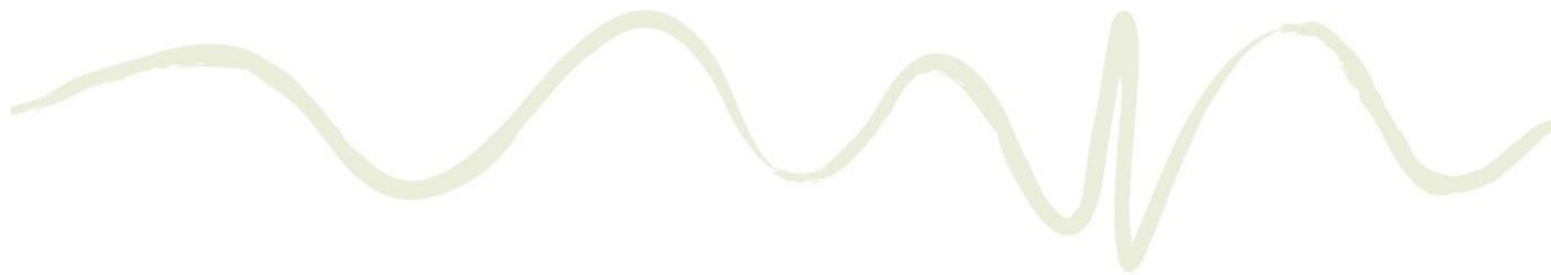
<i>Agency</i>	<i>Issue/Comment/Recommendation</i>	<i>Response</i>
Federal Agencies		
Civil Aviation Safety Authority (CASA)	<p><i>Comments</i></p> <ul style="list-style-type: none">■ CASA has reviewed the relevant aspects of the applications including the updated Aviation Report and CASA has no issues with the report and no objections to the project.■ I am advised that the comments provided by CASA on SSD 9575 on 26 November 2018 remain extant and a copy is attached for your information.	Noted
Airservices Australia	<p><i>Comments</i></p> <p>Airservices advised that their previous assessment for this application is still applicable (key previous comments below):</p> <p>Airspace Procedures</p> <ul style="list-style-type: none">■ The maximum height of the hospital will not affect any sector or circling altitude, nor any instrument approach or departure procedure at Gold Coast Airport.■ The hospital development will not affect any RTCC.■ Procedures not designed by Airservices at Gold Coast Airport were not considered in this assessment.	Noted and agreed



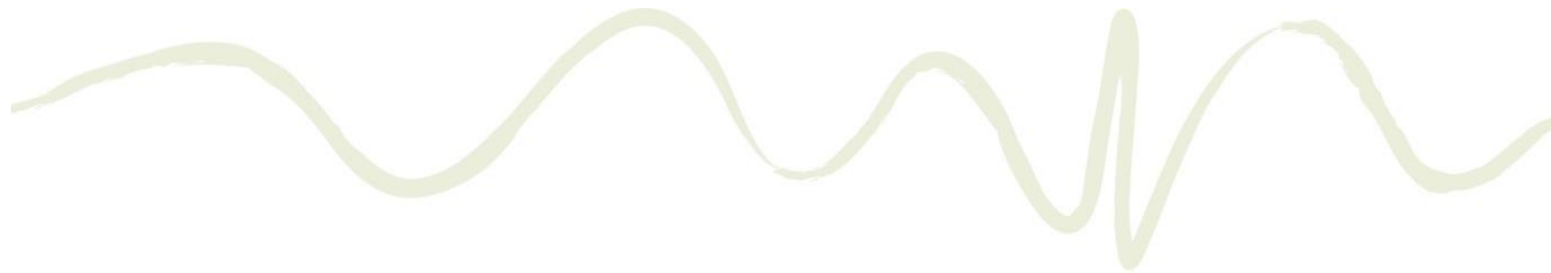
Agency	Issue/Comment/Recommendation	Response
	<p>Communications/Navigation/Surveillance (CNS) Facilities</p> <ul style="list-style-type: none"> This proposal for a property development at the maximum height of 67.1 m (221 ft) AHD will not adversely impact the performance of any Airservices Precision/Non-Precision Nav Aids, Anemometers, HF/VHF/UHF Comms, A-SMGCS, Radar, PRM, ADS-B, WAM or Satellite/Links. 	
State Government Agencies		
<p>Department of Primary Industries – Strategy and Policy</p>	<p><i>Comments</i></p> <p>DPI has reviewed the modification and has the following comments and recommendations.</p> <p>DPI notes the proposed modification for a multi-deck car park on the western boundary of the hospital development. As indicated the condition of consent requires a 10 m vegetated buffer along the western boundary which will not be altered as a result of this modification. The previous concept plan allowed for the potential to increase this buffer to between 22-30 m should future intensification of agricultural production occur on the adjoining land. It is understood that the inclusion of the multi-deck car park will reduce this potential distance for part of the western boundary.</p> <p>As such, DPI recommends that consideration be given to include some form of screening within the car park design that will assist with reducing any potential land use conflict risk with agricultural activities on the adjoining land parcel in the future.</p>	<p>As outlined in Section 5.9.1 of the Stage 2 EIS, should intensification of agricultural activity occur on the adjacent lot to the west, the master plan has capacity to accommodate the widening of the vegetated buffer from 10 m to a maximum width range of 14-30 m, with the exception of a length of approximately 40 m in the location of the bypass lane where an above ground Bulk Oxygen Storage and an underground Liquified Gas Cylinder will be located, as required. The bypass lane is to be located directly opposite a 10-storey car park. The car park consists of a range of materials, including concrete panels, metal cladding and mesh. The car park would have a shielding effect on air and noise impacts should there be any intensification of adjoining agricultural production. The arrangement is considered acceptable and would achieve appropriate interface management, as required (refer to Appendix H of the EIS (the LUCRA) for details).</p> <p>Furthermore, the civil design of the essential road network which allows emergency, service and staff vehicles access to the site reduces the ability to plant additional vegetated buffer zones in this location. The topography of the western boundary is steep, allowing for a very effective vegetated buffer to exist in order to</p>



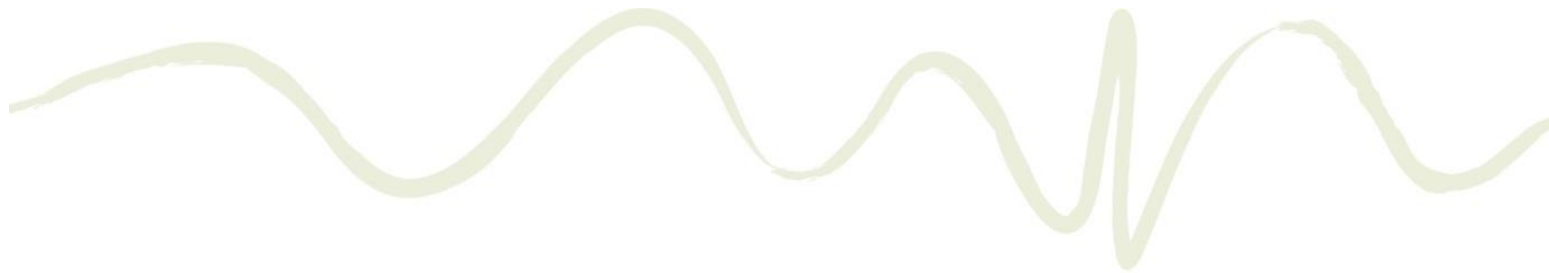
Agency	Issue/Comment/Recommendation	Response
		<p>mitigate any potential future farming activity on the adjoining property.</p> <p>Introducing additional screening to the multi-deck car park will restrict the car park from being naturally ventilated, therefore requiring a redesign of the other three facades to accommodate the open area needed. Under the Building Code of Australia (BCA) car park buildings may be naturally ventilated providing minimum open area to ensure adequate ventilation crossflow. The alternative is for a mechanical ventilation system running full time.</p> <p>The current combination of vegetated buffer, topographic differentiation, and shielding by the car park structure is considered to be an adequate response to this interface. This is especially the case as the likelihood of the western adjoining property being farmed intensively in the future is considered to be very low.</p>
NSW Environmental Protection Authority (EPA)	<p><i>Comment</i></p> <p>The EPA has reviewed the document entitled 'Modification Application – Tweed Valley Hospital – Concept Proposal (SSD 9575)' (GeoLINK 26/09/2019) and associated appendices and has determined that the EPA has no comments or concerns in relation to the proposed concept proposal modifications.</p>	Noted
Biodiversity Conservation Division of DPIE (BCD - formerly part of OEH)	<p><i>Comments:</i></p> <p>We have reviewed the documents supplied in relation to biodiversity matters as discussed in Attachment 1 to this letter and advise that we have no issues to raise in relation to this modification proposal.</p>	Noted



Agency	Issue/Comment/Recommendation	Response
Heritage Council of NSW (Department of Premier and Cabinet)	<p><i>Comments</i></p> <p>The subject site is not listed on the State Heritage Register (SHR), nor is it in the vicinity of any SHR items. The site also does not contain any known historical archaeological sites. Therefore, no further heritage comments are required. The Department does not need to refer subsequent stages of this proposal to the Heritage Council of NSW.</p> <p>Please note that the Greater Sydney Planning Team within the Climate Change & Sustainability Division may provide separate comment in relation to Aboriginal cultural heritage.</p>	Noted
NSW Roads and Maritime Services	<p><i>Roles and Responsibilities</i></p> <p>The key interests for Roads and Maritime Services are the safety and efficiency of the road network, traffic management, the integrity of road infrastructure and the integration of land use and transport.</p> <p>Tweed Coast Road (MR450) is a classified (Regional) road and Cudgen Road is a public (Local) road. Tweed Shire Council is the Roads Authority for these roads pursuant to Section 7 of the <i>Roads Act 1993</i>. Council is responsible for setting standards and carrying out works on local and regional roads in accordance with the Roads Act. Roads and Maritime is the Roads Authority for the Pacific Freeway (HW10), which is a classified road (a freeway) in the subject area. Roads and Maritime consent is required for the installation of, or modification to, traffic control signals (TCS) on any road under Section 87 of the Roads Act and consent is provided under the terms of a Works Authorisation Deed (WAD).</p>	Noted



Agency	Issue/Comment/Recommendation	Response
	<p>In accordance with Clause 104 of State Environmental Planning Policy (Infrastructure) 2007 (ISEPP) Roads and Maritime is given the opportunity to review and provide comment on the subject development application as it meets the requirements under Schedule 3.</p>	
	<p>Roads and Maritime Response</p> <p>Roads and Maritime acknowledges that Tweed Shire Council and Department of Planning are the lead agencies for the development of the Tweed Valley Hospital. We wish to support those entities in respect to construction of the hospital. As such, we have reviewed the Modification to the concept approval and Stage 1 (early and enabling works) and make the following comments:</p> <p>1. Roads and Maritime has no objection to the modification proposed, which increases the number of hospital beds; redefines parking and road network on-site (including multi-storey car parking); includes a temporary building on-site; increases the GFA for the hospital; and includes associated works.</p> <p>However, we have some comments and concerns in relation to traffic matters associated with construction and operation of the development. These are set out in detail in our response to the review of the EIS for Stage 2 of the hospital. This will be provided under separate cover, and while the letter sets out concerns related to Stage 2, the Department may wish to consider and note matters raised in that letter, as relevant to the Modification.</p>	<p>Noted. Refer to the Stage 2 Submissions Report (SSD-10353) for Roads and Maritimes comments and responses applicable to Stage 2 of the Project, and in turn the modifications to the Concept Proposal. For reference, the traffic and transport response to submissions prepared by Bitzios (the Project's traffic engineers) for the Stage 2 Submissions Report, and hence the relevant modifications, are attached at Appendix F.</p>



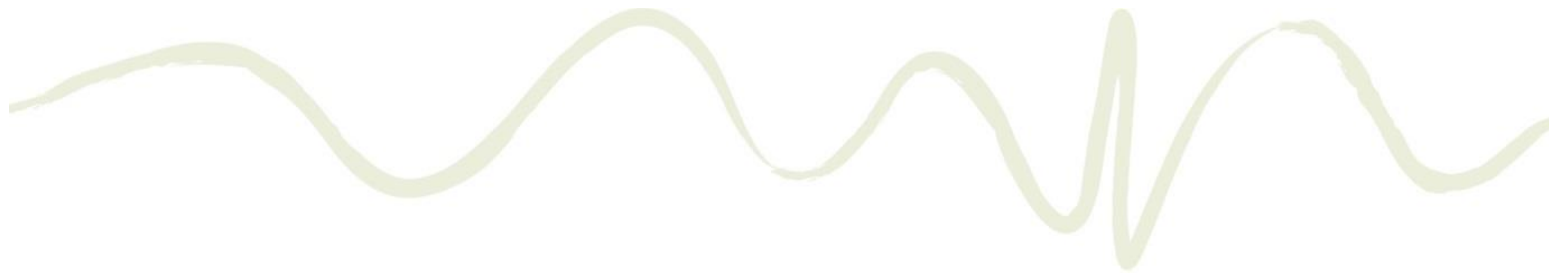
Agency	Issue/Comment/Recommendation	Response
	2. It is noted in the Traffic Impact Assessment, that in addition to the original consent conditions "Traffic and transport B22 (c)," the existing north-bound right-turn lane requires extending by 50 m. This is also referred to in our Stage 2 response.	Noted. Refer to the Stage 2 Submissions Report (SSD-10353) and Appendix F .
Transport for NSW	<i>Comment</i> The Modification report in support of the above proposal has been reviewed and no comments are raised at this stage. It is noted that the above modification addresses the additional components and changes that do not form part of the approved Concept Proposal but essentially the proposal of the Stage 2 SSD. This modification is therefore submitted as a concurrent application to the Stage 2 SSD. On this note a separate submission will be provided for the Stage 2 SSD.	Noted

4.4 Response to DPIE Key Issues

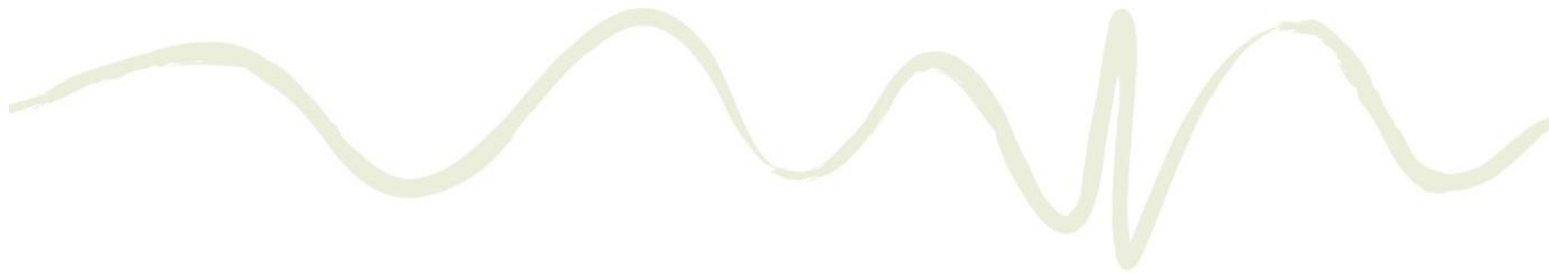
Table 4.2 provides responses to the key issues raised by DPIE.

Table 4.2 Response to DPIE Key Issues

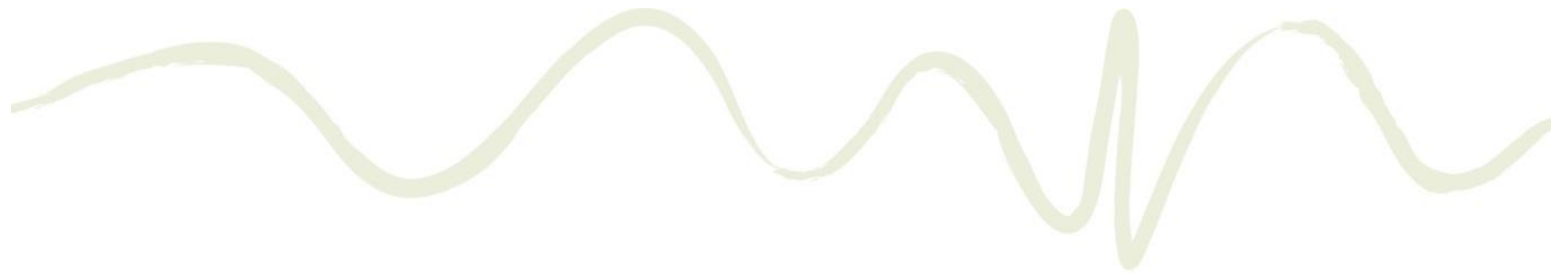
Agency	Issue/Comment/Recommendation	Response
Department of Planning, Industry and Environment (DPIE) – Key Issues		
DPIE	The submitted Traffic Impact Assessment Report (TIA) should be amended in accordance with the comments from Transport for NSW (Roads and Maritime Services) (RMS) in relation to SSD-10353 (Tweed Hospital Stage 2).	A detailed response and clarification to each of the RMS items has been provided in the Stage 2 Response to Submissions prepared by Bitzios Consulting. For reference, these traffic and transport responses to submissions (prepared by Bitzios) are also attached at Appendix F . The TIA report is acceptable and identifies sufficient infrastructure upgrades to mitigate against the hospital's traffic impacts. Acknowledgment of this has also been specifically noted in Council's submission.
	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 and the details to be provided as part of the Modification application (SSD-9575-MOD-2).	<p>Consultation was undertaken with Council and RMS as part of Stage 2 (and in turn the modifications to Concept Proposal), in which the proposed intersection upgrades and design was discussed.</p> <p>Specifically, the status of the design, summary of the assessment findings and any changes from the previous Stage 1 TIA were discussed with the RMS assessing representative and Council at a meeting held on 31 July 2019. This included an on-site walk-thru with RMS for Cudgen Road and Tweed Coast Road/Cudgen Road intersection. Council noted that the works were appropriate and commensurate with Council's ultimate planning.</p> <p>This was reflected in Council's response dated 8 November 2019. In Item 10 of Council's response, the following has been noted:</p> <p><i>"The proposed road upgrades including existing and new intersection works, cater for the proposed development and all</i></p>



Agency	Issue/Comment/Recommendation	Response
		<p><i>accesses and intersections operate within acceptable limits, with the exception of the Tweed Coast Road/Cudgen Road intersection. However, the proposed upgrades to this intersection are expected to improve current levels of service."</i></p> <p>In Item 12 of Council's response, the following has been noted: <i>"The proposed upgrades to the Tweed Coast Road and Cudgen Road intersection are generally acceptable, given they were initially proposed as part of Council's Tweed Road Development Strategy."</i></p>
	<p>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.</p>	<p>Refer to Appendix F for the traffic and transport response prepared by Bitzios in relation to the Stage 2 application, and in turn also applicable to the proposed concept modifications. The 2033 background volumes are presented in the Network Diagrams (included as Appendix B of the previously submitted Stage 2 TIA). These volumes are consistent with Council's most recent Tweed Road Development Strategy forecast, in which RMS was a stakeholder in the development of the model and report.</p> <p>SIDRA modelling of the existing intersection form with 2033 background traffic modelling was not undertaken as part of the Stage 2 TIA. This is due to Health Infrastructure's commitment to upgrade the intersection prior to commencement of operations in 2023 and consultation between the project team, Council and RMS in which it was confirmed that the proposed upgrades adequately mitigate against the hospital's traffic impacts at the intersection and that the proposed upgrades are commensurate with Council's ultimate planning for Tweed Coast Road. Comparison of operations can be made between the 2023 background modelling and 2023 design modelling.</p>



Agency	Issue/Comment/Recommendation	Response
	<p>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.</p>	<p>The four-lane upgrade of Tweed Coast Road is nominated in Council's Tweed Road Development Strategy (TRDS) and the Tweed Road Contributions Plan (TRCP).</p> <p>Council has undertaken a series of design investigations of the upgrade, with funding subject to Council's S94 Contribution priorities and other funding sources available to Council.</p> <p>It is re-iterated that the proposed upgrades are in addition to that planned by Council as part of the four-lane upgrade for the corridor, and more than cater for the development's traffic impacts at the intersection as is demonstrated when comparing the operation performance between the existing geometrical layout (with background traffic volumes) to the proposed upgraded layout (with design traffic volumes).</p> <p>While the proposed upgrades are commensurate with the hospital's traffic impacts, it is in the interest of the hospital that major access roads such as Tweed Coast Road are of adequate capacity for future years. As such, HI will continue to work with Council and RMS representatives in expediting planned road upgrades through available funding sources.</p>
	<p>The submitted plans indicate that the amended building envelope for the hospital and the car park would result in modifications to the volume of cut and fill that was previously approved under the Stage 1 Works.</p> <p>Having regard to the above, an amended plan should be provided that identifies the modifications to the cut and fill volumes and the need for any further retaining walls (or variation to the heights of the retaining walls) within the site.</p>	<p>Section 5.1.1 provides an outline and assessment of the proposed cut/fill and retaining wall changes. In summary, the alterations to the building envelope and other modifications results in the following adjusted bulk earthworks quantity estimates and retaining wall lengths (as identified in the civil plans at Appendix B):</p> <ul style="list-style-type: none"> ■ Total cut volume: 71,730 m³. ■ Total fill/reuse of won material on-site: 59,600 m³. ■ Excess material/spoil for removal from site: 12,130 m³. ■ Total combined length of retaining walls has decreased from 654 m to 642 m.



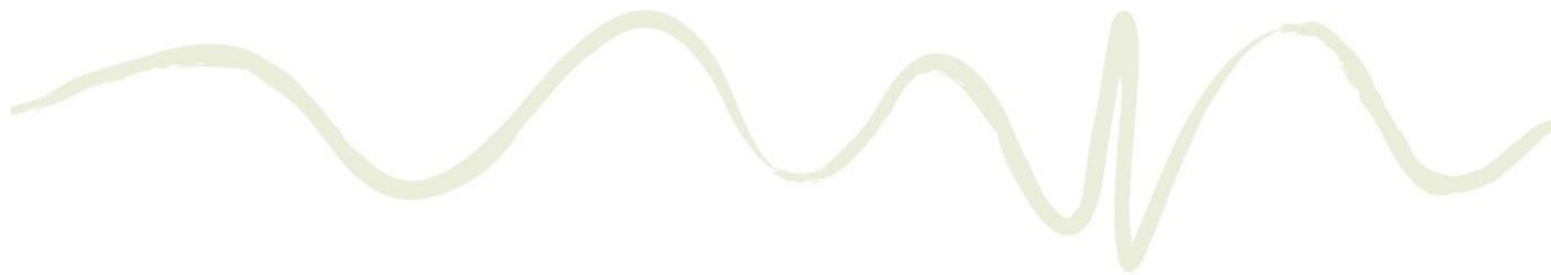
Agency	Issue/Comment/Recommendation	Response
		<p>Retaining wall heights have also been varied and revised following further design refinement, however none exceed a maximum height of 3.4 m above ground level as per the conditions of SSD 9575.</p> <p>Updated bulk earthworks (showing cut and fill and final landform formation) and retaining wall drawings have been provided with the response to submissions (refer to Appendix B). The changes are as a result of the amendments to the Concept Proposal and design refinements. They are not significant and would support development of the hospital in Stage 2.</p>
	DPIE also requested that reference be made to the new State Environmental Planning Policy (SEPP) (Koala Habitat Protection) 2019 and that any transitional arrangements be identified/addressed.	<p>It is noted that SEPP Koala Habitat Protection 2019 commenced on 1 March 2020 and replaces the former SEPP 44 – Koala Habitat Protection. However, savings and transitional arrangements are in place. Pursuant to clause 15 of SEPP Koala Habitat Protection 2019, <i>a development application made, but not finally determined, before the commencement of this Policy in relation to land to which this Policy applies must be determined as if this Policy had not commenced</i>. Given the modification application (SSD-9575-Mod-2) was lodged before 1 March 2020, SEPP Koala Habitat Protection 2019 does not apply. SEPP 44 has been addressed in the previously submitted Modification Report and no further consideration is required.</p>

4.5 Response to Tweed Shire Council Submission

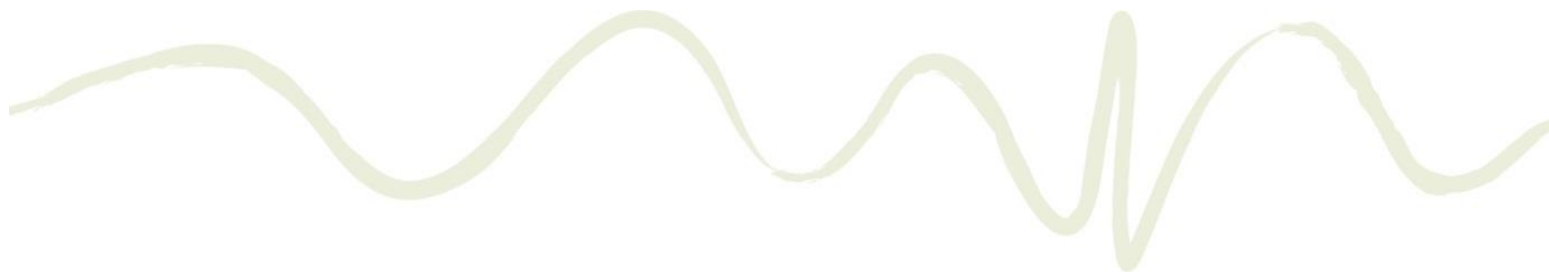
Table 4.3 provides responses to the matters raised in the submission from Tweed Shire Council (TSC) relevant to the Modification Application.

Table 4.3 Response to TSC Submission

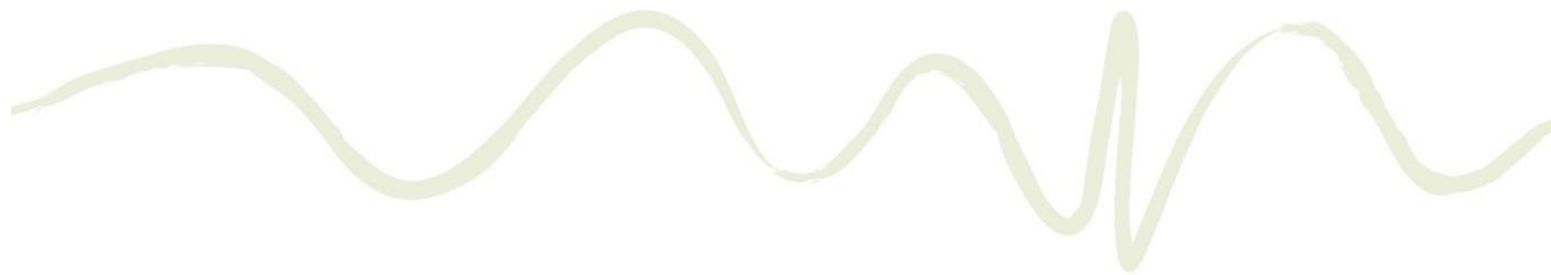
Agency	Issue/Comment/Recommendation	Response
<p>Tweed Shire Council</p> <p><i>Note that the adjacent column lists Council's position and technical staff main comments/recommendations.</i></p> <p><i>For full comments/detail, refer to full submission letter from Council on the DPIE website.</i></p>	<p><i>The matter was reported to the Planning Committee meeting of 7 November 2019 where the following was resolved:</i></p> <p>"RECOMMENDED that:</p> <p>1. Council in regard to Development Application DA19/0683 for the construction of the new Tweed Valley Hospital (NSW Planning & Environment App No. SSD 10353) and DA18/0685.01 Modification to the Concept Plan (NSW Planning & Environment App No. SSD 9575) at Lot 11 DP 1246853 No. 771 Cudgen Road, Cudgen endorses the Draft Council Submission at Attachment 1 with the following additions:</p> <p>a. Tweed Shire Council notes the commitment in February 2019 by NSW Deputy Premier John Barilaro and Member for Tweed, Geoff Provest that parking at the new Tweed Valley Hospital will remain free.</p> <p>https://www.tweeddailynews.com.au/news/tweed-heads-hospital-tobe-retained-for-medical-se/3643074/</p> <p>b. Council notes with grave concern recent media reports that this commitment may be abandoned by the NSW State Government and the Member for Tweed Geoff Provest.</p> <p>c. Council's requirement for Health Infrastructure to pay water and sewer developer contributions for this</p>	<p>Noted.</p> <p>Sustainability matters, traffic/parking and visual impact considerations/responses (amongst other matters) are provided in more detail throughout this table in response to specific comments and recommendations identified in Council's submission.</p> <p>Alternatively, where such matters have been raised in relation to the Stage 2 SSD application, these have been addressed in the separate Response to Submissions report applicable to Stage 2 (which has been concurrently submitted with this Submissions Report).</p>



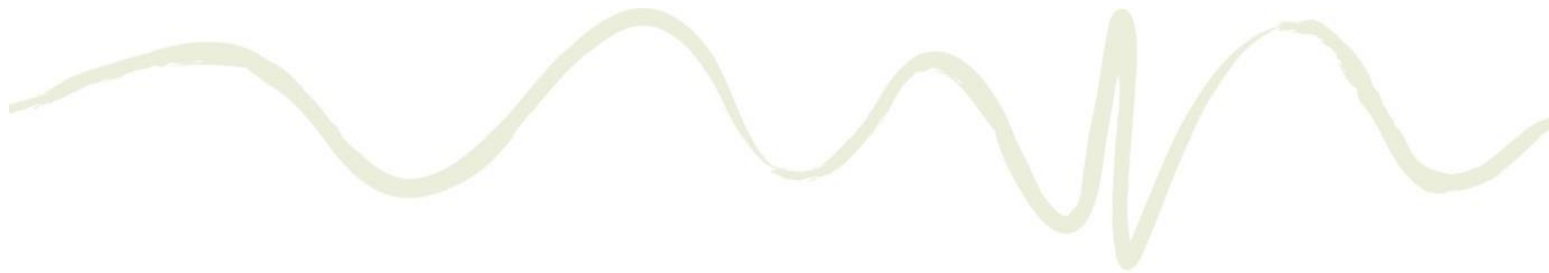
Agency	Issue/Comment/Recommendation	Response
	<p>development based on their impact on Council's water and wastewater systems.</p> <p>d. An improved outcome for sustainability should be required over and above the proposed 4 Star Green rating as was achieved by the recently built 6 Star rated Sunshine Coast University Hospital, and the visual impact of the hospital building should be softened with living walls and a green roof in this highly prominent and visually sensitive site.</p>	
	<p>2. Council writes to the NSW Premier Gladys Berejiklian, NSW Deputy Premier John Barilaro and Member for Tweed Geoff Provest requesting on behalf of residents of the Tweed Shire that they keep their commitment for no paid parking at the new Tweed Valley Hospital."</p>	Noted
	<p>Traffic access changes facilitate better separation of operational and staff vehicles from patient/visitor vehicles and spread turning movements across the various entries and exits for the site.</p>	Noted
	<p>Car parking has been increased from 700 spaces under the approval to about 1200 initially, and over 1500 ultimately via the introduction of a 10-storey multi-deck car park. The additional spaces are pleasing to Council, and address concerns that the original estimates for parking were conservative. The application does not provide anything definitive regarding management of on-site parking (e.g. paid parking or time restrictions) but flag an intent to consider these options to limit long-term parking on-site and promote public and active transport. Similarly, off-site parking impacts are acknowledged but not explored in depth, other than an intent to provide high quality and convenient parking at the facility which will limit desirability of more remote options. While internal</p>	<p>Noted and agreed. It is expected that hospital management will continue liaison with Council throughout the design, construction and operational phases of the project.</p> <p>Further to this, HI provide the following responses:</p> <ul style="list-style-type: none"> ■ While there is expected to be some impact to local roads, the new Tweed Valley Hospital facility will provide immediate and ongoing economic and social benefits for the community which far outweighs any impact in this regard. ■ HI interact with Council in respect of their infrastructure projects in planning and delivery and put in strategies to mitigate the impact on surrounding roads. However, HI do not have jurisdiction over matters in respect of local streets/roads which would fall under the mandate, for instance, of Council.



Agency	Issue/Comment/Recommendation	Response
	<p>parking management is a matter for Health Infrastructure, potential impacts on surrounding streets will ultimately come back to Council to manage. This would include requirements for parking restrictions, enforcement, complaint handling, and maintenance in surrounding streets. Council would like the opportunity to continue dialogue with the hospital regarding ongoing management of parking issues in the locality, should they eventuate, with a commitment that the hospital will be engaged in solutions.</p>	<ul style="list-style-type: none"> ■ HI allowed for gross projected visitors and staff parking for the future build requirements. Accordingly, it is not expected that there will be any material impact on local streets. Whilst it is expected that there will be a proportion of visitors and staff who may park off-site, NSW Health will continue to work with Council in assessing local conditions once the hospital is commissioned in order to minimise impacts. ■ Parking impacts will also be mitigated through the implementation of demand management strategies (such as the Green Travel Plan (GTP) and end-of-trip facilities). ■ If parking fees are implemented, concessional parking will be available, with parking < 3 hours provided free of charge for eligible patients and their carers.
	<p>Increased GFA and patient numbers would normally trigger recalculation of s7.11 Contributions. However, the hospital is exempt from contributions, but will carry out external works in kind (under SSD2).</p>	<p>Noted</p>
	<p>The main element of the modification that Council wants the Department to further investigate is the introduction of the 10 storey multi-deck car park on the western side of the development site. This will be the first element of the site for anyone visiting the hospital from the main Tweed Coast Road and M1 Highway. To date the application has not demonstrated a western photomontage of the multi-deck car parking area or suggested sufficient mitigation measures to soften the impact of this structure. The multi-deck car park appears to represent a solution for on-site parking however it could be better incorporated into the site with softer design elements (green walls), an air bridge connecting to the main hospital, and further site consideration for additional covered awnings throughout the site.</p>	<p>Additional western photomontages, including near to the western site boundary and those from Tweed Coast Road, have been provided along with an updated Visual Impact Assessment (VIA). Please refer to the updated TIA and the detailed architectural and urban design response at Appendix C and D respectively, for further detailed response on this matter.</p> <p>Overall, a comprehensive level of visual impact assessment has been provided and it is considered that the Project's impact is not significant and is acceptable. The design response is considered, well-resolved, and of high architectural merit. Additionally, the measures to address visual amenity, including material variation, solid-to-void ratios, and incorporation of creeping/climbing plants to facilitate 'greening' of the car park façade, are considered adequate. The additional photomontages provided in Appendix B of the updated VIA, including those that depict the site's landscaping</p>



Agency	Issue/Comment/Recommendation	Response
	<p>The below image (refer to TSC submission) is an example of a green wall car park at Manly Vale which could be considered for the multi-deck to ensure it is more reflective of the Kingscliff coastal character.</p> <p>From an agricultural perspective the main concern with the multi-deck car park is that it will remove the opportunity to increase the western boundary vegetation buffer should intensive agriculture occur in the future on the parcel to the west. The proponent should be providing some form of additional screening in that side of the car park. The car park itself provides some additional screening to the hospital but even users of the car park can be a sensitive receiver.</p>	<p>response and vegetated buffers, demonstrate that the landscape design response will be of substantial benefit to visual amenity. This, combined with the architectural merit and physical separation distance of the development from surrounding sensitive viewpoints would ensure that the impact is not significant, and the proposal suitably integrates into the site and landscape.</p> <p>As outlined in Section 5.9.1 of the Stage 2 EIS, should intensification of agricultural activity occur on the adjacent lot to the west, the master plan has capacity to accommodate the widening of the vegetated buffer from 10 m to a maximum width range of 14-30 m, with the exception of a length of approximately 40 m in the location of the bypass lane where an above ground Bulk Oxygen Storage and an underground Liquified Gas Cylinder will be located, as required. The bypass lane is to be located directly opposite a 10-storey car park. The car park consists of a range of materials, including concrete panels, metal cladding and mesh. The car park would have a shielding effect on air and noise impacts should there be any intensification of adjoining agricultural production. The arrangement is considered acceptable and would achieve appropriate interface management, as required (refer to Appendix H of the EIS (the LUCRA) for details).</p> <p>Furthermore, the civil design of the essential road network which allows emergency, service and staff vehicles access to the site reduces the ability to plant additional vegetated buffer zones in this location. The topography of the western boundary is steep, allowing for a very effective vegetated buffer to exist in order to mitigate any potential future farming activity on the adjoining property.</p> <p>Introducing additional screening to the multi-deck car park will restrict the car park from being naturally ventilated, therefore requiring a redesign of the other three facades to accommodate the open area needed. Under the Building Code of Australia (BCA) car park buildings may be naturally ventilated providing minimum open</p>



Agency	Issue/Comment/Recommendation	Response
		<p>area to ensure adequate ventilation crossflow. The alternative is for a mechanical ventilation system running full time.</p> <p>The current combination of vegetated buffer, topographic differentiation, and shielding by the car park structure is considered to be an adequate response to this interface. This is especially the case as the likelihood of the western adjoining property being farmed intensively in the future is considered to be very low.</p>



5. Changes to the Modification Application

Department of Planning, Industry and Environment has provided correspondence to HI as the applicant confirming the receipt of submissions and that, in accordance with clause 85A(2) of the EP&A Regulations 2000, the Secretary (DPIE) requires the applicant to respond to all issues raised in these submissions and government agency advice, and where necessary revise documentation. In addition, DPIE have undertaken a preliminary assessment of the Modification Report/Application and, in addition to matters raised by agencies, require a number of issues to be addressed (refer to **Section 4.4**). On this basis, and also to facilitate some design refinements, a number of changes have been made to the modification plans and revised/supporting documentation is provided in response to the DPIE request and public and government agency submissions. This includes refinements to plans associated with the Concept Proposal and Stage 1 Works, and the provision of additional information where required.

An amended plan package has been prepared and is provided at **Appendix B**. A summary of the main changes in response to submissions, requests for information, and design refinement include:

- Updated bulk earthworks and retaining wall plans for Stage 1 Works, showing amended cut and fill (including final landform formation), and retaining wall requirements. These changes are largely due to the proposed building envelope and other modifications. Updated plans have been provided as requested by DPIE. Estimated quantities and retaining wall lengths (as per the civil plans) are as follows:
 - Total cut volume: 71,730 m³
 - Total fill/reuse of won material on-site: 59,600 m³
 - Excess material/spoil for removal from site: 12,130 m³
 - Total combined length of retaining walls has decreased from 654 m to 642 m.
- Request for a temporary increase in truck movements from 70 to 120 (two-way movements) per day for a period of six weeks, for removal of the excess spoil from site (given the current heavy vehicle movement condition applicable to Stage 1 Works).
- Minor amendment to the concept landscape zonal plan to remove the previously proposed community garden opportunity (previously identified as 12b on the plan).

These changes are considered in more detail in the following subsections. A set of updated plans is attached at **Appendix B**.

5.1 Assessment of Changes

This section provides an assessment of the main changes, including amended plans. None of the changes would result in a significant transformation of the proposal and the development remains substantially the same as the approved development, with no new or additional significant impacts created as a result of the changes proposed.



5.1.1 Bulk Earthworks and Retaining Wall Changes

As outlined by DPIE in their correspondence and addressed in **Section 4.4**, the submitted modification plans indicate that the amended building envelope for the hospital and the car park, along with the overall on-site parking reconfiguration, would result in modifications to the volume of cut and fill that was previously approved under the SSD 9575 Stage 1 Works. DPIE identified that changes to retaining walls may also be required. DPIE have therefore requested amended plans that identifies the modifications to the cut and fill volumes and the need for any further retaining wall variations.

The alterations to the building envelopes and other modifications results in the following bulk earthworks quantity estimates and retaining wall changes:

- Total cut volume: 71,730 m³
- Total fill/reuse of won material on-site: 59,600 m³
- Excess material/spoil for removal from site: 12,130 m³
- Decrease in total combined length of retaining walls from 654 m to 642 m. Retaining wall heights have also been varied and revised following further detailed design and refinement, however none exceed a maximum height of 3.4 m above ground level and remain consistent with the relevant conditions of consent SSD 9575.

Updated bulk earthworks (showing cut and fill, and final landform formation) and retaining wall drawings have been provided with the Response to Submissions (refer to **Appendix B**).

As originally proposed, cut material will be reused on-site as fill. Consistent with the previously submitted application material, top soil would continue to be reused on-site for landscaping and other appropriate uses. Other cut material (e.g. below the top soil horizon) would be used as engineered fill where required to achieve relevant design/site levels, and in designated strategic locations on the site. Based on the revised cut and fill quantities, two additional locations have been identified for reuse of excess material on the bulk earthworks plan at **Appendix B** (i.e. fill). These fill locations occur adjacent to the multi-deck car park and adjacent to the at-grade car park. The final landform formation has been designed to integrate into the site's topography and be appropriate in the context of the site. Refer to the civil engineering response from RBG at **Appendix E** for further detail.

It has also now been determined that it is not feasible or practical to reuse all of the excess cut/spoil on the site. Excess spoil that cannot practically be reused will be removed from the site for disposal. Any excess spoil required for removal will be removed to an authorised site/licensed facility. All necessary testing and remediation prior to removal from site will be undertaken in accordance with EPA requirements and guidelines, including the requirements under the *Natural Excavated Material Order 2014*.

To facilitate the removal of the excess spoil, additional truck movements for the Stage 1 Works are required. As discussed in **Section 5.1.2** and to efficiently facilitate removal of excess spoil, HI is seeking a temporary variation to SSD 9575 Schedule 3, Part B, Condition 27(i) to allow an increase from 70 to 120 two-way truck movements per day for a period of six weeks. All haulage movements would be managed under the Construction Traffic Management Plan. Traffic advice (refer to **Appendix F**) has confirmed that the increase can be accommodated and would not result in significant traffic impacts.

The individual retaining wall changes can be seen in **Plates 5.1** and **5.2** and are provided in **Table 5.1** below for comparison (the text indicates approved retaining wall detail compared to modified/revised wall detail in red text).

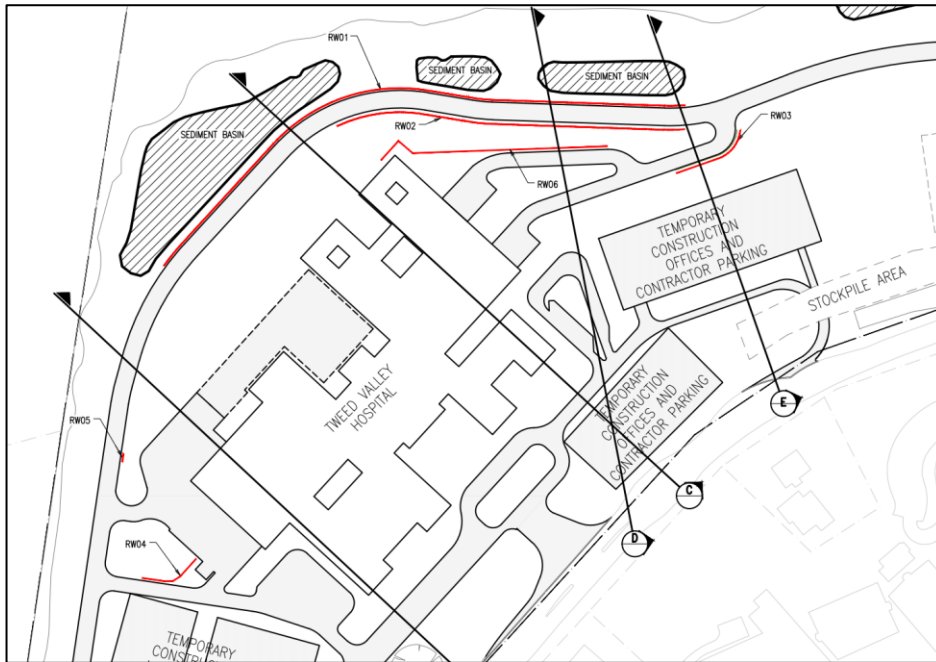


Plate 5.1 Approved Retaining Wall Layout

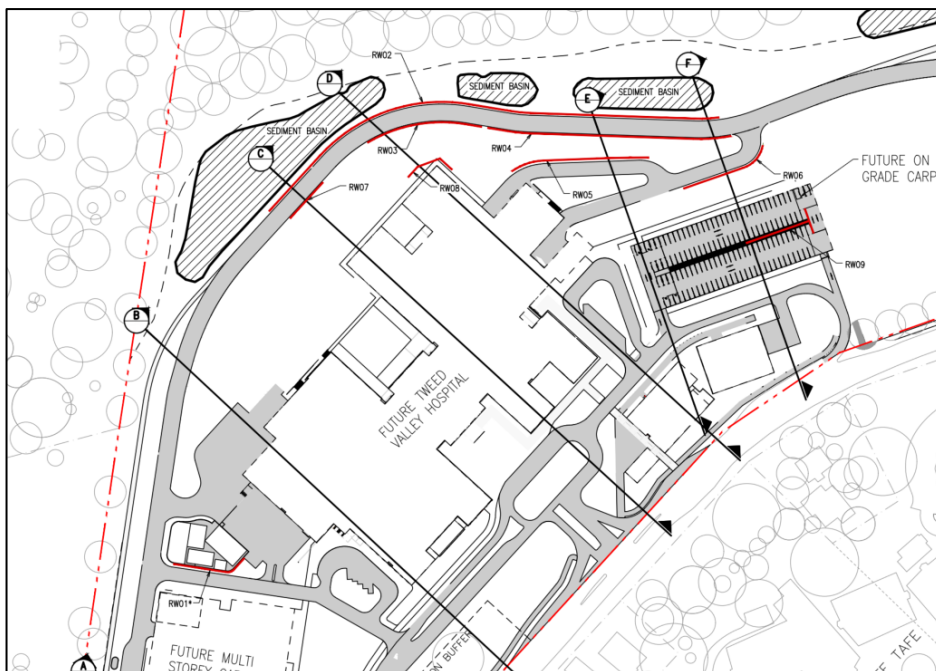


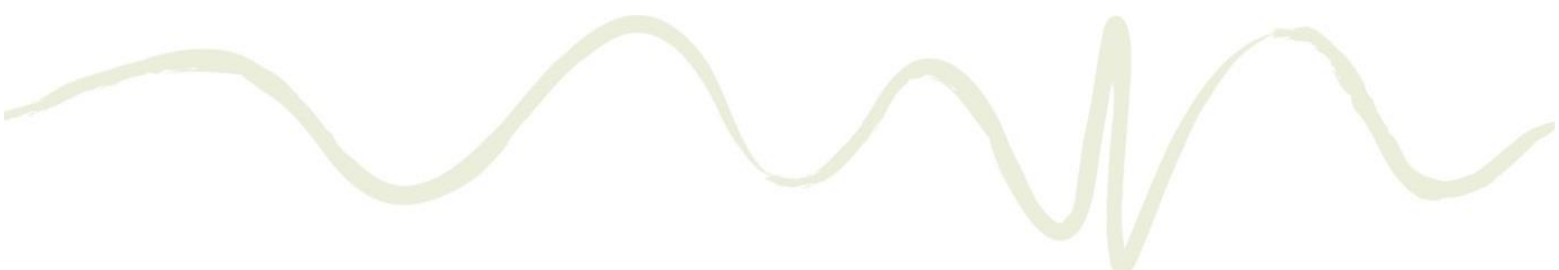
Plate 5.2 Proposed/Revised Retaining Wall Layout

Table 5.1 Proposed Changes to Retaining Walls

<i>Revised Wall Ref - note wall reference numbers have changed between the approved and revised plan.</i>	<i>Original SSD1 Wall Ref</i>	<i>Approved Approx. Length</i>	<i>Modified Approx. Length</i>	<i>Approved Probable Max Height</i>	<i>Modified Probable Max Height</i>
RW01 *now forms part of the building retaining wall (not part of the civil design)	RW04	30 m	*	Up to 3.0 m	
RW02	RW01	290 m	250 m	Up to 3.4 m	3.4 m
RW03	RW02 (now broken into two walls: RW03 and 04)	170 m	60 m	Up to 2.5 m	1.5 m
RW04			124 m (RW03 above and RW04 combined = 184 m)		3.4 m
RW05	RW06 (now broken into two walls: RW05 and 08)	120 m	67m (RW05 and RW08 below combined = 95 m)	Up to 1.5 m	2.2 m
RW06	RW03	40 m	48 m	Up to 2.4 m	3.0 m
RW07 (new wall)	N/A	-	25 m	-	1.6 m
RW08	RW06 (now broken into two walls: RW05 and 08)	120 m	28 m (RW05 above and RW08 combined = 95 m)	Up to 1.5 m	3.4 m
RW09 (new wall)	N/A	-	40 m	-	2.5 m
N/A	RW05 – Original RW05 wall deleted (RW05 has been renumbered as a different wall – see plan)	4.0 m	-	Up to 0.5 m	-

As shown in the above table, the total combined length of proposed retaining walls has reduced from 654 m to 642 m. With regard to the Stage 1 Works approval and proposed changes, the determining authority included a specific condition limiting the height of retaining walls on the site to a maximum of 3.4 m. The proposed changes to the retaining walls are either under or do not exceed this height requirement.

The main impact associated with retaining walls would be potential visual impact. It should be noted that the retaining walls, that are proposed to be altered, are all facing towards land that will not be visible from public areas as they all face north or north-west to adjoining vegetated land. Spatially, and as depicted in **Plates 5.1** and **5.2**, most of the changes to retaining wall locations/extents are generally concentrated around the areas where the majority of retaining walls were previously approved (for example around the northern extent of the hospital building envelope and adjacent ring/access roads). Therefore, there is a reasonable expectation for retaining walls to occur in these areas and be refined as a consequence of detailed design. Consequently, it is considered that the proposed changes will not have any additional adverse visual impacts.



Condition B43 of SSD 9575 required that detailed drawings of certain elements of Stage 1 Works be submitted to the Certifying Authority prior to commencement of works on the site. In accordance with this condition, detailed drawings were submitted to and approved by the Certifying Authority prior to Stage 1 Works commencing. The amended drawings are considered to be consistent with the requirements of Condition B43 in that:

- All retaining walls on the site are at or below the stipulated maximum height of 3.4 m above ground level
- The requirement for battered embankments proposed on the western boundary in lieu of retaining walls remains unchanged
- The identified additional landscape treatment measures to reduce the adverse visual impacts of the retaining walls on the site remain unchanged
- No changes conflict with the recommendations of the Preliminary Geotechnical Investigation prepared by Morrison Geotechnics dated September 2018 and the addendum dated December 2018, in the construction of the retaining walls.

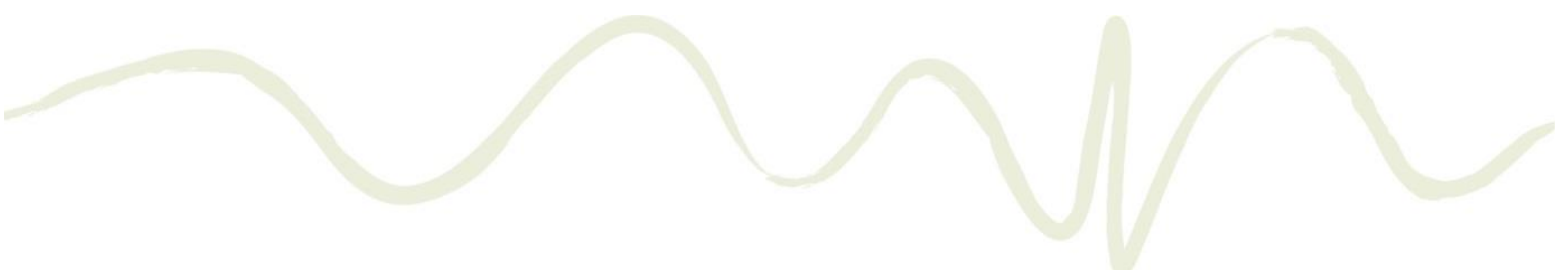
The changes to the design of the retaining walls are therefore in accordance with the requirements of SSD 9575, specifically Condition A2 and B43.

The changes are as a result of the amendments to the Concept Proposal and design refinements. They are not significant and would support development of the hospital in Stage 2. Standard construction management measures as outlined in the originally submitted EIS and conditions of consent would ensure that earthworks, including erosion, sedimentation and dust, would be effectively controlled and managed during works. The changes are therefore acceptable.

5.1.2 Request for Temporary Increase in Truck Movements Associated with Stage 1 Works to Remove Excess Spoil

As outlined in **Section 5.1.1**, modifications to bulk earthworks have occurred and an excess of spoil in the order of around 12,130 m³ needs to be removed from site. The Development Consent and conditions (associated with SSD 9575), specifically Schedule 3, Part B Condition B27(i), for the Stage 1 Works specifies a limit of 70 heavy vehicle movements per day. This was based on initial construction vehicle estimates and was prior to the inclusion of a multi-deck car park and associated modifications, which have resulted in car parking and landform (cut/fill) reconfigurations. It was also prior to a contractor being engaged to undertake construction works. This also considered initial cut/fill estimates, which estimated a balance between cut and fill (i.e. no spoil removal required).

It is understood that the construction site currently operates with around 60-65 heavy vehicle movements per day. Considering the existing heavy vehicle movements and the limitation of 70 heavy vehicle movements per day, the capacity to remove spoil from the site is limited. Under the current restriction of truck movements, there is limited float to allow for up to 10 trucks per day to be used for removal of spoil. The estimated time required for removing the volume of excess spoil off-site is approximately 18 weeks with this restriction in place. This timeframe is not favourable as the lag time to remove the excess soil would delay other works and activities occurring on-site. It has been estimated that the excess spoil could be effectively removed within approximately six weeks if an additional 50 heavy vehicle movements per day are permitted. Therefore, HI seeks a temporary variation from DPIE to Schedule 3, Part B, Condition B27(i), to allow for an increase in the number of heavy vehicle movements (two-way) from 70 to 120 per day over six weeks to efficiently remove the excess spoil from site. The six-week period would start from when HI advise DPIE and TSC of its commencement.



Bitzios (consulting traffic engineers) has considered this change and any associated traffic impacts. As detailed in **Appendix F**, Bitzios outline that the additional 50 heavy movements will be distributed across a typical day. The approved weekday construction hours are between 7:00 am and 6:00 pm. This equates to an additional 100 trips across an 11-hour period or approximately nine additional trips per hour. This is not expected to have any significant capacity impacts on the surrounding road network, nor will it require mitigation measures to increase capacity.

Further, all construction traffic will be managed under a Construction Traffic Management Plan (CTMP) which is required to be prepared in accordance with the RMS Traffic Control at Work Sites manual. The CTMP specifies management requirements for site accesses as well as signage for the surrounding road network to inform road users of construction activity and heavy vehicle movements. An updated CTMP is attached as part of **Appendix F**.

On this basis, there are no significant traffic or transport impacts associated with the proposed increase in heavy vehicle movements and a temporary variation to the relevant condition granted by DPIE would be acceptable. No further assessment or update to the Traffic Impact Assessment associated with Stage 1 Works is required.

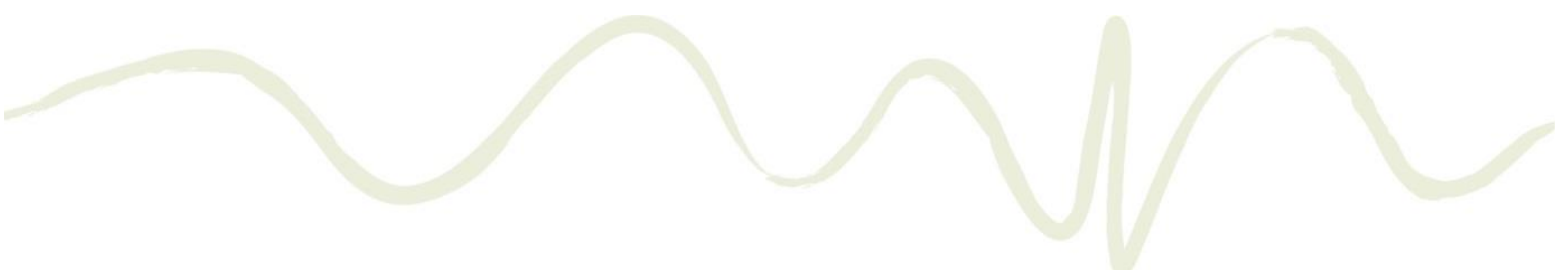
5.1.3 Amended Concept Landscape Zonal Plan to Delete the Community Garden Opportunity

An opportunity for a community garden was identified in the previously submitted modified landscape plans contained with the SSD-9575-Mod-2 application. The development of a community garden opportunity on the Project Site was contingent on the identification of a suitable community organisation and establishment of a licence agreement and general support from the community, including local farmers.

The community garden opportunity (previously identified as 12b on the landscape zonal plan submitted with the EIS) was identified as a small area/plot located adjacent to the at-grade car park. Subsequent additional consultation has confirmed that the local farming community does not support the community garden proposal and would prefer that it not be included. Furthermore, there were unresolved maintenance and management issues associated with this feature. Following this further analysis and consultation, it has been decided to remove the community garden from the plan. The change has also been reflected in the updated Agricultural Offset Plan that has been submitted with the Stage 2 Response to Submissions.

The landscape zonal plan prepared by Turf Design has been amended accordingly following further consideration and taking in account the consultation with local farmers and the established agricultural working group (refer to LS-DWG-10-1003 Rev 10 attached at **Appendix B**).

Nonetheless, to continue to satisfy the conditions of consent from SSD 9575 and as detailed in the Agricultural Offset Plan at Appendix L of the Stage 2 Response to Submissions, the landscape zonal plan shows that the existing orchard would be retained, edible plant varieties would be included in the hospital landscape where appropriate, and there is a therapy garden opportunity depicted on the site, conveniently located proximal to the hospital building. As originally described, the planting palette would incorporate species with sensory values, and culinary uses to encourage meaningful engagement with the landscape. Edible plant varieties are proposed for inclusion in various areas of the hospital. Options range from a diverse mix of seasonal species and herbs, to native bush tucker plantings focused around key outdoor Aboriginal meeting places (species palettes would be developed in consultation with the Indigenous community). Edible plants will also be integrated into the courtyards where appropriate.



All these features adequately contribute to providing a practical and meaningful reference to the past agricultural land use, complement the healing environment to be fostered at the Tweed Valley Hospital, and support the range of actions that comprise the Agricultural Offset Plan that has been prepared as part of the Stage 2 application. On this basis, deletion of the previously proposed community garden opportunity is necessary and acceptable.



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Appendix A

Public Submissions Coding Framework



Appendix B

Updated Project Plans (Concept Proposal and Stage 1 Works)



Appendix C

Architectural and Urban Design Response



Appendix D

Updated Stage 2 Visual Impact Assessment (inclusive of modifications)



Appendix E

Civil Engineering Response



Appendix F

Traffic and Transport Response