



Department of Industry

OUT18/16643

Aditi Coomar
Social and Other Infrastructure Assessments
NSW Department of Planning and Environment

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Dear Ms Coomar

Tweed Valley Hospital (SSD 9575) EIS Exhibition

I refer to your email of 29 October 2018 to the Department of Industry (DoI) in respect to the above matter. Comment has been sought from relevant branches of Lands & Water and Department of Primary Industries. Any further referrals to Department of Industry can be sent by email to landuse.enquiries@dpi.nsw.gov.au.

The department provides the following comments and recommendations for consideration in assessment of the proposal at this time. DoI Water advice will be forwarded separately, once available.

- If approved, the proposal sets a precedent for development of land on a highly important agricultural resource that both the government and community have indicated should be protected for primary production purposes into the future.
- DPI Agriculture has previously advised it is concerned that the rezoning of this land to SP2 Infrastructure for the purposes of the hospital development may lead to further development into State Significant Farmland adjacent to the hospital for associated health and medical developments.
- DPI Agriculture does not consider that the agricultural assessment for the proposal is adequate. The soils information and land capability assessment does not provide sufficient detail to undertake a credible assessment of the impact of the loss of this resource. The assessment focuses on sweet potato production but does not consider the loss of agricultural potential in the locality given the range of biophysical parameters applicable to this area.
- Section 3.8 of the Environmental Impact Statement (EIS) states that 103.15ha of State Significant Farmland in the locality is potentially underutilised and that the loss of the area in question could be effectively offset by other areas being brought into production. If the proposal proceeds, any commitment to investment or strategies that will lead to increased agricultural production in this locality would be strongly supported. DPI Agriculture would welcome further involvement in developing incentives/strategies for increasing agricultural production in this area.

- DPI Agriculture considers that greater integration of local agriculture within the built form and environment of the hospital will assist with meeting the 'community asset' project aspiration outlined on page 28 of the EIS. DPI Agriculture considers that a Statement of Commitment to utilise local produce as part of the hospital's food procurement would assist in maintaining agricultural production in the region. Hospital grounds could also be designed to include edible gardening opportunities for rehabilitating patients.
- DPI Agriculture supports the development of well vegetated buffers on the western, south-western and southern boundaries of the hospital. These buffers are to be maintained through the life of the hospital in an effort to minimise conflicts arising from the hospital and its users around standard agricultural practices. The proposed buffer width of 10m on the western and south-western boundary is considered insufficient to prevent land use conflict risk should intensification of agricultural production occur on the adjoining land.
- DPI Agriculture requests the hospital design factor in possible changes in land use (intensification of use) on the block of land on the western boundary of the hospital site. The consultants in their various reports only consider how it has been used in the past, not how it could be used in the future with a change in ownership or enterprise.

Yours sincerely



Alex King
Director Cabinet and Legislation Services
Lands and Water - Strategy and Policy
4 December 2018