

Council Reference: DA19/0683 & DA18/0681.01 LN84310
Your Reference: SSD-10353



8 November 2019

Customer Service | 1300 292 872 | (02) 6670 2400

The Director Urban Assessments
Department of Planning, Industry & Environment
GPO Box 39
SYDNEY NSW 2001

tsc@tweed.nsw.gov.au
www.tweed.nsw.gov.au

Fax (02) 6670 2429
PO Box 816
Murwillumbah NSW 2484

Please address all communications
to the General Manager

ABN: 90 178 732 496

Attention: Aditi Coomar

Dear Sir/Madam

TSC COMMENTS MOD 2 State Significant Development SSD 9575 (Council Reference DA18/0685.01) - Concept Application, & DA19/0683 Stage 2 for the construction works for the new Tweed Valley Hospital (NSW Planning & Environment App No. SSD 10353) at Lot 11 DP 1246853; No. 771 Cudgen Road CUDGEN

Thank you for the opportunity to comment on Health Infrastructure's application for the new Tweed Valley Hospital.

The matter was reported to the Planning Committee meeting of 7 November 2019 where the following was resolved:

"RECOMMENDED that:

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:*
 - 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.*

<https://www.tweedailynews.com.au/news/tweed-heads-hospital-to-be-retained-for-medical-se/3643074/>
 - 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.*
 - c. *Council's requirement for Health Infrastructure to pay water and sewer developer contributions for this development based on their impact on Council's water and wastewater systems.*

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.

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).

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 onsite 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.

The below image 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.



B-Line Commuter Car Park Manly Vale Credits Simon Freeman 2019 C/O Google

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.

Stage 2 – Hospital Construction

Water & Sewer Infrastructure

1. Consistency across the documentation is sought regarding the beds in the proposed Hospital. The EIS document refers to 499 beds seeking an exemption of the additional 46 emergency treatment beds from loading calculations (transport & water and wastewater). However Appendix R uses a figure of 545 beds. Please confirm and update with a consistent figure.
2. Despite loadings for the proposed Skills Centre being temporary, the water and wastewater loadings from this use shall be estimated. Further information is required to outline to Council how the developer proposes to discharge to Council's sewerage system during this staging/construction period.
3. Errors have been made within the water and wastewater loading estimates in Appendix R. The EP to ET ratio has not been considered within the average dry weather flow (ADWF) calculations, which has led to an underestimation of flows provided within the report.
4. Despite proposing a gravity sewerage system internally within the hospital lot, the developer has not provided peak wet weather flow (PWWF) estimates. Industry and Council standards require that PWWF calculations are provided as part of the assessment within Appendix R.
5. The 24 hour ADWF emergency storage of 200kL at the sewer pumping station outlined in Appendix R is insufficient due to the incorrect calculations outlined above.
6. The Water demand load estimate is incorrect. The EP to ET ratio has not been considered Appendix R and are underestimated – please update.
7. Water Storage tanks may be undersized as a result of the underestimated water demand and should be reviewed and updated in Appendix R.
8. The Plans and Drawings in Appendix B (Part 5) shall update the connection shown to the Council sewer rising main to include a boundary kit at the Hospital property boundary and a connection to Council standards within the road reserve.
9. As outlined within Stage 1 approvals, prior to any approval being issued for connection to Council's water and wastewater infrastructure, an agreement to provide services is to be in place. The agreement will address the conditions under which the applicant may connect to and use Council provided water supply and sewerage services and any fees to be paid by the proponent to Council or any works to be done by the proponent to satisfy Council's requirements. This requirement is recommended to stand as a **condition** of consent for Stage 2.

Parking & Traffic

10. The proposed road upgrades including existing and new intersection works, cater for the proposed development and all 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.
11. The increases in right turn traffic movements at the Cudgen Road/Turnock Street roundabout, due to internal reconfiguration, has been modelled and does not significantly affect its level of service.
12. 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.
13. At a meeting held between Council staff and the hospital project team on 21 October 2019, the potential to undertake additional infrastructure works at this intersection in conjunction with the hospital works was discussed. A 500mm sewer rising main is required through the intersection to connect the future Kings Forest development to the south to the Chinderah Waste Water Treatment Plant to the north. A significant upgrade to a transverse stormwater drain north of the intersection is also required, and has been discussed with consultants for Gales Holdings to facilitate residential development in Cudgen/West Kingscliff. Council will continue to negotiate with Health Infrastructure on this matter.
14. While parking will be provided at a rate commensurate with Tweed DCP Section A2 – Car Parking and RMS guidelines, the implementation of a paid parking scheme may result in long term parkers, i.e. patients admitted for several days or months, parking on the adjacent street network. This may result in Council demands for timed parking on streets and public car parks in close proximity to the hospital.
15. Service Vehicle Access is considered appropriate and caters for the design vehicle.
16. Pedestrian access and alternate transport linkages are considered appropriate.
17. The following conditions of consent are specifically recommended for parking traffic:
 - a. Any proposed paid parking scheme should be implemented in consultation with Tweed Shire Council to ensure that parking associated with the Tweed Valley Hospital does not adversely impact on adjacent residences or businesses.
 - b. All road works are subject to assessment and approval under s138 Roads Act and are to include street lighting plans complying with AS1158 V4 Category.
 - c. Applications shall be made to Tweed Shire Council under Section 138 of the Roads Act 1993 for any works pursuant to this consent located within the road reserve. Applications shall include (but not limited to) engineering plans and specifications undertaken in accordance with Council's Development Design and Construction Specifications for the following required works:
 - Cudgen Road is to be upgraded to an urban type road with kerb and gutter, street lighting, drainage, signage, line marking etc. from the existing kerb near the intersection of Tweed Coast Road/Cudgen Road to the existing kerb and gutter near the Kingscliff Tafe.

- Two new bus bays to be provided on Cudgen Road to include all weather shelters and seating. A pedestrian refuge crossing to be provided near the bus stops including applicable footpath connections for pedestrians.
- All intersection upgrade works including road works, stormwater, road furnishings, sediment and erosion control etc.
- Relocation of existing services (i.e. relocation of electrical poles).
- All Permanent site access provisions into the Hospital Site.
- An ultimate urban road design shall be provide to cater for traffic volumes taking into consideration any future additions/extensions to the hospital.

The above mentioned engineering plan submission must include copies of compliance certificates relied upon and details relevant to but not limited to the following:

- Road works/furnishings
- Stormwater drainage
- Sediment and erosion control plans
- Traffic Control Plan (as applicable)
- A combined services plan indicating location of all new / existing service conduits (water, sewer, electricity supply, landscaping, gas and telecommunication infrastructure, as applicable).
- Including submission of electrical reticulation plans clearly identifying the location of streetlights), underground cables and all other electrical infrastructure including transformers and substations.

Application for the Section 138 of the Roads Act 1993 shall be made to Tweed Shire Councils Development Engineering Unit where an invoice will be provided for assessment based on the rates contained in Council's current Fees and Charges at an hourly rate.

Equal Access Issues

18. All drop off zones are to be conveniently located near necessary medical services.
19. These drop off zones are to have sufficient time restrictions to allow carers sufficient time to escort patients to the particular medical unit and return to the car for parking purposes.
20. Whilst it is practise to locate kerb ramps to the rear of shared zones of accessible parking spaces to allow to discharge and entry from the side of vehicles the discharge and entry from the rear of vehicles the area should be considered. Therefore the rear of the accessible parking space is to be on grade or have a kerb ramp.
21. All accessible parking spaces are to be conveniently located near necessary medical services with a focus on reduced distance to medical services.
22. The internal road system is to be of sufficient dimension to allow the use of buses in the future access to convenient drop off locations to medical services.
23. Required Accessible parking spaces are prescribed in Part D3 of the BCA as follows:

Table D3.5 Carparking spaces for people with a disability

Class of building to which the <i>carpark</i> or carparking area is associated	Number of <i>accessible</i> carparking spaces <i>required</i>
Class 9a	
(a) Hospital (non-outpatient area)	1 space for every 100 carparking spaces or part thereof.
(b) Hospital (outpatient area)—	
(i) up to 1000 carparking spaces; and	1 space for every 50 carparking spaces or part thereof.
(ii) for each additional 100 carparking spaces or part thereof in excess of 1000 carparking spaces.	1 space.
(c) Nursing home	1 space for every 100 carparking spaces or part thereof.
(d) Clinic or day surgery not forming part of a hospital.	1 space for every 50 carparking spaces or part thereof.

Stormwater Management

24. The SMEC Hydrology Assessment recommends various modifications to the Stormwater Management at the time of the report. The RBG SWMP appears to have been updated to incorporate the SMEC recommended modifications, but the design drawings pre-date the SMEC report. It is unclear if/when the SMEC recommendations are to be incorporated into the current design. Recommend this be conditioned with a typical condition referring to the SWMP and Hydrology Assessment.
25. The SMEC report notes that: Capture and re-use of rainwater is proposed with roof runoff rainwater tanks (400ML) and recycling for on-site irrigation (14ML/yr). The JHA Integrated Water Management Plan outlines a basic plan to incorporate rainwater reuse for landscape irrigation and cooling tower uses. Recommend this be conditioned with a typical condition referring to the IWCMP.
26. The SWMP and associated Hydrologic Assessment do not provide any information on the changes to the Cudgen Road external catchments. Robert Bird Group drawings 350 and 351 show the catchments significantly reduced, however drawings 300-302 show increased impervious area. The impact of the development on stormwater discharges to adjacent private land must be quantified to confirm no worsening.
27. The SMEC Hydrology Assessment notes that, whilst peak flow discharges can be mitigated to pre-development levels, the volumetric annual flow from the site will increase by over 50% (with mitigation) due to the development. Ultimately the consent authority must satisfy itself that the potential for stormwater nuisance has been reasonably mitigated (see Gales Holdings Pty Ltd vs Tweed Shire Council).
28. The SWMP and associated Hydrologic Assessment rely upon DRAINS and MUSIC software models. Only screenshots, not program files, have been provided with the submission and therefore these cannot be verified. Further information is required to verify the data.
29. Catchment EX.1, from Cudgen Road, drains through the site via an open drain along the western boundary. As this is stormwater from public land draining through private (albeit Government), this should be formalised with an easement.
30. A condition should be applied requiring the stormwater treatment drain to be designed and constructed in accordance with the relevant Water by Design Guidelines. Suggested wording: “Bio-retention basins, or any other vegetated stormwater management measures, shall be designed, constructed and maintained in accordance with the relevant “Water By Design” guidelines (being a program of the South East Queensland Healthy Waterways Partnership).”

Urban Design

The following urban design comments are provided in response to the review of the submitted *Architectural and Urban Design Report* (dated 23rd September 2019) and architectural drawings (dated 6th September 2019).

Site Master Planning

31. Whilst it is acknowledge the development application is limited to the proposed building and site configuration as documented in the application, reference is made to previous TSC comments made (SEARS, DA Stage 01) highlighting the need to master plan the entire hospital site. Whilst it is recognised that the *Architectural and Urban Design Report* includes a section on potential future stages, a whole of site master plan as part of a development application would provide a greater degree of certainty in terms of the ultimate site road and pedestrian network and future development blocks particularly across the eastern side of the site and configuration and interrelationship of different land uses within this health precinct more holistically. Importantly this would also provide an understanding of how the hospital site will integrate with the surrounding urban fabric including TAFE and low density residential on the opposite side of Cudgen Road.
32. Site Master Planning Recommendation:
 - a. That a holistic and hospital site master plan should be prepared which nominates future development stages and demonstrates how the overarching site configuration;
 - b. Has been designed as an extension of the existing urban structure (rather than separate from) to consider ultimate road and pedestrian networks, development blocks, activity nodes, connections, areas of public domain, landscape corridors, legible access and egress points that will inform current and future stages of development across the site;
 - c. Acknowledges the surrounding land use interfaces and nominate appropriate building form and envelopes which will be of a compatible scale with regard to character and view sharing; and
 - d. Identifies opportunities for street edge and interface land uses which will have mutual benefits for the hospital and surrounding residential and education precinct catchment. This may include ease of access to small retail convenience stores, pharmacy, food and beverage outlets and public domain areas which may service hospital users as well as the TAFE and immediate residential areas within the hospitals walkable catchment.

Site Planning and Floor Plate Configuration

33. The submitted design report alludes to site and building planning being ordered largely around the creation of strong visual (and physical) connections across the site and from the building to the surrounding landscape and views beyond. However based on the submitted site and floor plans the central north facing axis appears to be the only strong physical and visual axis that has been established.
34. Whilst this strong north-south formal entry axis has been strongly incorporated, there is less legible east-west access along public entry corridors. The corridors currently appear to be internalised, not adjoining any landscape courtyards and thereby with no access to natural light or way points to break the relatively long circulation routes. To enhance the physical and legible connection between the car park and main hospital there is opportunity to include a sky-bridge connection.

35. In relation to the hospital floor plate configurations, due to the depth of the lower levels, lack of larger internal courtyards or light wells only a relative small proportion of floor areas would have access to natural light and views. It is however conceded that there are substantial components of a hospital's operational program which are more conducive to or require internalised spaces.
36. The quadrant floor plate configuration of the upper levels would open up floor plates to multiple view and natural light opportunities, there is also a significant western and south western elevation surface area which would be subject to significant heat load. The relative flat elevation finish would provide little shading opportunity.
37. It is also noted that on some floor plates (ground, level 02, level 03) service plant areas have been nominated to the north / north-eastern edges of the building which would have the optimum opportunities for solar aspect and views towards the ocean.
38. Site planning and floor plate configuration recommendation:
 - a. Incorporation of additional opportunities to open up visual and physical connections across the site and buildings floor plates to the surrounding landscape and views in keeping with the original design intent.
 - b. Create more legible east-west axis for pedestrian circulation considering width of circulation, height/volume, integration of landscape and natural light along its route(s).
 - c. Consider the incorporation of a sky-bridge link between the car park and main hospital building.
 - d. Review floor plate configurations to incorporate greater opportunities for courtyards and light wells which will draw in natural light and ventilation opportunities as well as open up more external and internal views.
 - e. Review location of service plant areas which currently on some floors would occupy the best access to views and solar orientation.

Built Form and Design Response

39. The submitted Architectural and Urban Design Report discusses the design response drawing influence from the regions rich agrarian tradition and connection to place and land.
40. How rather than pursuing a more landscaped style campus configuration, the proposed hospital presents as a more compact and vertical floor plate configuration in a four-quadrant arrangement which would total nine storeys. In this regard it is noted that the proposed building envelope would now exceed the proposed building envelope by way of height and as nominated as part of SSD Stage 1 proposal and approval.
41. Given the more compact tower configuration, the proposed massing presents as a series of intersecting and stacked volumes (refer submitted renders and elevations). These volumes are in turn articulated with materials which are predominantly set out in a strong vertical alignment. With little horizontal or 'landscape' reference across the buildings elevations, the combination of the proposed stacked volumes, verticality of materials and no capping roof form accentuates the buildings overall visual perception of height, scale and mass. This in turn presents the building as a 'heavier' volumetric form and one which could be interpreted as having a more distinct urban character rather than regional north coastal character.

42. It is also noted that apart from some reduced landscaped courtyards on the ground floor, the overall design has moved away from incorporating external areas, and landscaped terraces at the upper level. Incorporation of landscape areas vertically would serve to improve the overall amenity of the various hospital users in alignment with the proponent's original biophilic design intent. Integration of larger external and landscaped areas across upper levels would also serve to soften the buildings elevations and more strongly articulate the integration of built form and landscape. This would significantly improve contextualising the building with its Kingscliff coastal subtropical context.
43. Given the multi-storey car park will be the first building element which is view when approaching the site from Tweed Coast Road, it would be helpful to appraise a photomontage from this aspect. In terms of the other provided montages, it would also be useful if they were more contextualised with base locational photographs to get a greater sense of scale and relationship to streetscape. For example the view point for the buildings main front render would be from within the front setback of the TAFE campus.
44. In terms of building finishes and materials it will also be important to maintain design intent and consistency between approved elevations and material palette and how the building progresses to construction stages. Images attached below of the Northern Beaches Hospital illustrate that submitted photomontages and nomination of building materials at development application stage can be substantially value managed to the point of the overall building form and material palette being substantially different.
45. Built Form and Design Response Recommendation:

There is an opportunity to explore architectural forms and material finishes to be more reflective of the Kingscliff coastal subtropical context. This could include:

- a. Greater diversity in elevation articulation and material finish. This could include more layered and or screened elevations relating to solar orientation aimed at reducing heat loads on elevations which would also introduce an additional layer of design detail.
- b. Exploration of a stronger horizontal rather than vertical elevation composition to further break down the buildings overall mass, scale and height and more fully explore the topographic and landscape relationship between the site and building. This could include cantilevering floor plate edges to create shaded overhangs and further articulation of the glazed facades transom and mullion configuration.
- c. Revisiting previous ideas of integrating external landscape terrace and large balcony areas to upper floor areas to improve hospital user amenity and soften the buildings overall volumetric form and elevations.
- d. Updating photomontages with locational photographs to give a greater sense of scale and relationship between the building form, material finish, site and streetscape.
- e. Include a montage of the western approach to include the multi-story car park and any landscape screening proposed.
- f. Proposed Tweed Valley Hospital (below): Presents as a series of stacked volumes with strong vertical alignment of elevation and materials which accentuates overall height, mass and scale. This could be interpreted as having a 'heavy' visual presentation and not overly reflective of the subtropical coastal character.



- g. Reference Image (below): Sunshine Coast Hospital – The layered and shaded elevations combined with stronger horizontal planes and floor plate overhangs, material diversity and use of colour presents as a more articulated building form with a sub-tropical character.



- h. Reference Images (below x 2): Northern Beaches Hospital – Montages presented as part of concept and development application stages alludes to a material diversity and strong integration of land scape (first image) however the built form outcome (second image) represents a departure from original material and building form concepts. It will be imperative to maintain design integrity of approved building materials and details of the Tweed Valley Hospital throughout the approvals and construction process.



Pedestrian and cycle pathways

46. It is acknowledged the Architectural and Urban Design Report presents an overlay of pedestrian as well as vehicular circulation, however proportionally the site plan is substantially more car centric than pedestrian orientated. This is most evident with the concentrated vehicular access point off Cudgen Road which is also the public transport drop-off and main pedestrian access point. Pedestrian routes in this regard are less direct (longer), often needing to cross multiple roads and mostly uncovered.
47. Apart from the entry courtyard and the northern courtyard there are few other public domain spaces of varying scales and functions for the use by patients, visitors, hospital staff as well as surrounding land uses including TAFE. Rather than being located along circulation paths between the car parking areas and hospital these should be in higher amenity areas as places of retreat and relaxation to enjoy view and aspect.
48. It is also important to consider passive movement and ease of access for users beyond the site. This will include ensuring safe and legible access between the hospital and TAFE as well as between the hospital and existing town centre. This would necessitate the construction of a pathway fronting Cudgen Road and in part Turnock Street.
49. Pedestrian and cycle pathway recommendations:

- a. That additional public domain areas be included within the site plan as high outdoor amenity areas of retreat and relaxation to enjoy the view and aspect.
- b. Consider all pathways linking car parks to the main building to be covered walkways.
- c. In addition to internal pedestrian and cycle routes, a pedestrian and cycle pathway should extend across the length of the sites Cudgen Road and in part Turnock Street frontage. This would then connect the hospital's passive movement network into Council's broader pathway network thereby linking the hospital site with the existing town centre. This is a key strategy within the draft Kingscliff Locality Plan and Development Control Plan.

Visual Impact Assessment (VIA)

50. The VIA makes reference to a suite of visual impact methodologies however settles on a highly technical method for placing accurately measured rendered images of the proposed development into photomontages, with the intent of giving the most realistic visual representation of the proposal when viewed from a certain location.
51. The complexity of development of the photomontages presented in the VIA is commended, and it is noted that this methodology is being considered by the Land and Environment Court as the preferred methodology for assessing visual impact. However, the complexity and accuracy of such photomontages are only as useful as the appropriateness of the viewing locations from which they are presented, and the methodology used to determine what level of impact the visualisation represents.
52. The VIA states that it draws on a range of key documents, however settles on a numerical analysis of the percentage of view loss and measuring visual sensitivity via distance of viewing location from proposal as the key considerations in determining 'visual impact'. It provides limited qualitative analysis of the specific visual elements of the existing visual environment or the proposed development for each viewing location for which a photomontage was created.
53. It is noted that whilst the VIA identifies the Draft Tweed Scenic Landscape Strategy (dSLS) within its list of guiding methodologies, nowhere within the remainder of the document is the qualitative methodology for describing level of visual impact, or the Priority Viewing locations identified within the dSLS specifically addressed. "Landmark views from the western side of Kingscliff, across the proposed site, to Mount Warning and the distant hinterland and mountain ranges" are noted with reference to the dSLS as representing the most valuable views. Page 17 of the VIA openly demonstrates that distant views to Wollumbin (which are highly significant in visual value) are interrupted or removed from multiple locations along McPhail Avenue and Oceanview Crescent.
54. The VIA refers to 'street context' as being a frame of reference for viewing the development from adjoining pedestrian spaces, nearby buildings and public spaces within the same street. It states this frame of reference is composed of 'low density residential nestled within parcels of open space' and 'a mixture of retirement parks and residential development occupy the immediate surrounds'. Describes it as 'urban context'. This fails to identify and address the immediately adjoining highly characteristic farmland and the large education facility (TAFE) which are fundamental in forming the primary character context of the immediate area, particularly when entering the Kingscliff locality from Tweed Coast Road, far beyond any 'retirement or residential' urban forms.

55. No consideration has been given to light pollution or visual impact on night / dark sky views, particularly from elevated locations in Kingscliff, Cudgen and surrounding areas that have a clear view of the proposal and sky view loss.
56. The VIA concludes:
- a. the scale, built form and planning of the proposed development provides a respectful response to the site and surrounds, whilst remaining within the designated volumetric and height limits controls defined in Stage 1 Concept Proposal (question as to the validity of statement's such as this when modifications to the Concept Proposal are forthcoming, and further modifications could be proposed)
 - b. From the roads and streetscapes it is clear that the proposed development, because of its lower elevation and proposed landscaping will not have an impact on significant views from within the local area.
 - c. From high points including Kingscliff and Cudgen middle and distant views to the west and to the mountains in the distance will be impacted from a small number of locations.
 - d. The proposed development is consistent with the aims and objectives of the TLEP because it is a suitable development for the area and the quality of the development is compatible with the primary function of the zone.
 - e. Mitigation of visual impact will be achieved through:
 - i. "use of 'appropriate materials of natural hues and non –reflective", (the concept shows a significant proportion of each elevation is glass, which is considered highly reflective at certain times of the day).
 - ii. "native vegetation and landscaped retaining walls to north and west of site" (the proposed building 9 storeys in height, which 'ground level' landscaping will do little to screen. Opportunity exists to include / incorporate green walls / landscaping at elevation).
57. The VIA states that 'because of its lower elevation and proposed landscaping will not have impact on significant views from within the local area", however contradicts itself by also clearly identifying that distant views to Wollumbin (which are highly significant in visual value) are interrupted or removed from multiple residential properties along McPhail Avenue and Oceanview Crescent.
58. Previous comments provided to the initial concept plan that remain valid include:
- The assessment of affected views and viewers (visually sensitive receivers) is for the most part limited to locations within a local fore-ground viewing catchment 12 to 1000m from the development site. The assessment does not comprehensively consider affected views from or viewers of more distant, elevated or highly accessible viewing locations with mid-ground or background views of the site. These locations include highly trafficked tourist lookouts and destinations; and places of interest that are identified as having significance to the local community, or to the regional tourism economy as assets promoted as part of "Australia's Green Cauldron" within the National Landscapes Program. One distant view from Terranora Road (4.7km) is included however is a poor example with highly restricted view field that is not representative of the more scenic views available from Terranora Road.*

The visual quality assessment of both the existing views and those impacted by the proposed development have been derived based on a consultant's subjective assessment of change impacts on visual elements, but do not factor affected viewers' perceptions or preferences. Best practice Visual Impact Assessment of proposed developments of this scale and potential visual alteration typically include early consultation with affected viewers on their likes and dislikes to ensure visual impact mitigation and management options effectively respond to community and viewer priorities in the early concept design stages.

59. Council is recommending that:
- a. More detailed consideration of the key landscape character elements of each viewing location and qualitative discussion around the visual impact on those elements from each of the identified viewing locations.
 - b. Consideration of light pollution and visual impact on night time views.
 - c. Incorporation of green elements into the building design, on the vertical planes, such as landscaped terraces, vertical gardens or other elements that soften the appearance of the overall development, and are more aligned with the subtropical architectural designs expected in this area. .
 - d. Consideration of the visual impact on views from intersections on Kingscliff Hill where vehicles are stopped at give way or stop signs and have full view of the development sit. These are key publically accessible and moderately trafficked viewing locations with significant and highly valued views of Wollumbin (Mt Warning).
 - e. Engage with affected viewers to consult on their visual quality values, and identify their preferences for specific visual elements as seen in the existing view and the conceptual view including the proposed development. This should comprise the following matters:
 - f. Information sessions and discussion of the development site / area and the nature of the proposal with affected landholders and community
 - g. Confirmation of which viewpoints are considered important by affected viewers and validation of their viewsheds;
 - h. Capture community values about scenic qualities – that is, the landscape features and visual elements that viewers prefer (like / dislike); and
 - i. Provision of photomontages generated from each viewing point to facilitate an understanding and discussion of potential visual impacts of the proposed development.

Heritage Impact

60. The plans and drawings set and the suite of Appendix M Heritage Assessment documents have been reviewed, within the context of the current approvals, and comprising:
- Historic Heritage Assessment by Niche Environment and Heritage, dated 23 September 2019
 - Appendix B Heritage Consultation communication by Niche Environment and Heritage
 - Heritage Archival Recording by Niche Environment and Heritage, dated 23 September 2019
 - Interpretation Strategy by Niche Environment and Heritage, dated 23 September 2019
61. The following comments are provided:
- Drawings LS-DWG-10-001 7

- a. Dry stone Wall 1 be retained insitu and made sound with extracted dry stone wall material from walls 3 and 4 and that any new retaining wall is constructed behind the dry stone wall.

Note: Since originally writing this recommendation Dry Stone Wall 1 has now been demolished.
- b. Local South Sea Islander artists be engaged to assist in the development of the interpretation material in a culturally appropriate manner.
- c. All copies of Heritage Assessments and the Archival Recording be provided to the South Sea Islander Community representative groups and copies provided to the Tweed Regional Museum.

Agricultural Offset Plan B28

- 69. The proponent is required to provide an Agricultural Offset Plan with the Stage 2 application. The Agricultural Offset Plan is meant to include a strategy of physical works and / or implementation plans and programmes addressing how the development will offset the adverse agricultural impacts on the State Significant Farmland (SSF) of Cudgen Plateau and the land use risks associated with the siting of the hospital adjoining the agricultural uses (as identified in the Land Use Conflict Assessment Report prepared by Tim Fitzroy and Associates dated 18 October 2018).
- 70. The Plan includes no work program or commitment to do anything. No strategy or plan of implementation has been specified apart from referencing the objectives of the Tweed Productive Land Use Working Group.
- 71. It is noted that the Tweed Productive Land Use Working Group was established by the interagency committee in response to the need to address concerns about the loss of agricultural land and impacts on agriculture from the development and to focus on opportunities to support growth of local industries. Whilst the proponent is involved in the Working Group, it is chaired by Regional NSW with strong involvement from Tweed Shire Council and NSW DPI staff. In meetings of the Working Group, Health Infrastructure representatives have indicated that the purpose of the working is not to inform development of the Agricultural Offset Plan, despite the Agricultural Offset Plan indicating that this plan 'is a dynamic document that will be updated following consultation programme through the Productive Land Use Project sub-committee' (p.5).
- 72. No adequate consultation has occurred with local farmers during development of the Offset Plan as required by condition B28(a). Appendix G – Consultation report includes reference to a discussion with a single farmer in close proximity to the development site. The Plan has not been informed by any consultation with local farmers or farm industry groups.
- 73. The Plan provides no commitment to develop a local procurement strategy to supply fresh food to the hospital or provide a commitment to review and change any relevant State Purchasing policies to accommodate this new supply chain.
- 74. Support to improve the production capacity of underutilised land in the Cudgen Plateau has not been considered or committed to as required by B28(h).
- 75. Council is unsure of the way forward with this. Perhaps a new condition to require the Agricultural Offset Plan to be rewritten to include an agricultural offset work plan including implementation plan, detailing who is responsible for what and by when.

Condition B7

76. Condition B7 states *“The site plan and the landscape masterplan for the Stage 2 application must include the following as identified in the approved Landscape Zonal Plan prepared by Turf Design Studio dated 03/05/2019:*
- (i) *details of ‘Koala food trees’ to be planted in proximity to the identified potential koala habitat locations in vegetation Zone 6 of the Biodiversity Development Assessment Report prepared by Greencap dated January 2019.”*
77. This condition is not clearly addressed. Koala food trees appear in broad planting species lists, but the Landscape Plans and BMP do not provide specific detail or direction on the use of these trees in the location required by this condition. It is suggested that the relevant plans are revised to provide this detail.

Acid Sulfate Soils

78. The hospital footprint and infrastructure is located within Class 5 acid sulfate soil on planning maps. Disturbance is not expected.

Aircraft Noise

79. Aviation Report (AviPro, 12/9/19) addresses aircraft noise during the operation of the hospital. The report addresses potential noise and vibration impact on sensitive neighbouring land uses in particular avoiding built-up and sensitive areas. Noted.

Air Pollution

80. Preliminary Stage 2 Construction Air Quality and Dust Management Plan (Landlease Building Management System, 12/9/19 Revision 4.0) addresses strategies and mitigation measures to minimise and control the generation of dust, odour and emissions during construction of the Stage 2.
81. Recommendation - It is noted that dust monitors will be installed for Stage 2 if required. It is recommended that air quality monitoring systems are installed for the duration of Stage 2 to monitor key air quality parameters as outlined in the National Environment Protection (Ambient Air Quality) Measure including particulates (PM10 and PM2.5).

Contaminated Land

82. The applicant has engaged NSW EPA Accredited Site Auditor Andrew Lau of JBS&G Australia Pty Ltd to address contaminated land matters for the site. An Interim Audit Advice (0503-1914-002) dated 30/8/19 has been provided that includes remedial and validation strategies. Following completion of remediation and validation works, a Site Audit Statement will be provided certifying suitability for the proposed use. Noted.
83. The Infrastructure Master Plan (LCI Consultants, 12 September 2019 Revision SSD2) confirms underground petroleum storage systems (UPSS) are proposed including diesel fuel storage (for generators) in accordance with AS 1692 (double-walled tank with leak detection). Above-ground fuel storage will be in accordance with AS 1940.
84. This was discussed with James Allen of NSW EPA 02 9995 5510 who confirmed the Appropriate Regulatory Authority (ARA) for UPSS on this site (public utility) will be NSW EPA. It is also noted that there is an exemption for complying with the Protection of the Environment (Underground Petroleum Storage Systems) Regulation 2019 for storage systems that are only used as a back-up generator in commercial or residential premises until 31 August 2021.

Food Premises

85. Although limited information has been provided with respect to the preparation of food, hospitals typically have both retail sale of food (Council regulated) and kitchens for the preparation of food for patients (NSW Food Authority regulated).
86. Plans for food areas are assessed and approved by Council (Application fees apply – See Council’s Fees and Charges).
87. Recommendation - Discussion with Julie Crawford, Audit and Verification Officer of Department of Primary Industry (NSW Food Authority) confirmed that she is available to review and comment on plans in the food preparation areas that will require a licence from NSW Food Authority. Julie can be contacted on 0429 410 022 or juliecrawford@dpi.nsw.gov.au.
88. The following food premises conditions shall apply:
- a. Prior to the construction certificate being issued for Stage 2, plans drawn to a scale of 1:50 detailing the following with regards to all food related areas shall be provided to Council for assessment and approval, accompanied by a completed Application for Approval of Food Premise Fitout and the adopted fee in Council’s Fees and Charges. Evidence of the plans being approved shall be provided prior to release of the construction certificate:
 - i. Floor plan and elevations;
 - ii. Layout of kitchens and all equipment;
 - iii. All internal finish details including floors, wall, ceiling and lighting;
 - iv. Hydraulic design in particular method of disposal of trade waste; and
 - v. Mechanical exhaust ventilation as per the requirements of AS1668 Pts 1 & 2.
 - b. All walls in the food preparation and storage areas shall be of solid construction. For this purpose walls in such areas may be of masonry or stud wall construction. If stud wall construction is used then the wall shall be lined as a minimum with high impact resistant material eg. Villaboard or Versilux lining or other suitable material(s) approved by Council’s Environmental Health Officer and tiled to a height of at least two (2) metres.

Masonry walls where not tiled may be cement rendered to provide a smooth faced impervious finish up to the underside of the ceiling.

Metal stud wall framing in lieu of timber framing shall be used in areas where the walls and floor surfaces will be subjected to high levels of moisture or alternatively as directed by Council’s Environmental Health Officer.

All penetrations of the wall surface in food preparation areas shall be effectively sealed to the satisfaction of Council’s Environmental Health Officer.
 - c. All flooring materials in the food preparation and storage areas are to be impervious, non-slip, non-abrasive and capable of withstanding heavy duty operation. Where tiling is to be used epoxy grout finished flush with the floor surface is to be used in joints or alternatively all tiles are to be butt joined and free of cracks or crevices.
 - d. Windows and doors opening into food handling, preparation and storage areas shall be pest proofed in accordance with the provisions of Food Safety Standard 3.2.3.
 - e. Separate hand washing facilities must be provided with warm water and located in a position where it can be easily accessed by food handlers and

be of a size that allows easy and effective hand washing to the satisfaction of Council's Environmental Health Officer.

- f. A floor waste connected to the drainage system shall be provided within 1.5 metres of the opening of each cool room.
- g. During the course of the construction and fitout of the kitchen/food premises periodic inspections must be arranged with Council's Environmental Health Officer to ensure compliance with all health related conditions of approval and respective legislation.
- h. Prior to commencement of operations and on completion of fitout an inspection is to be arranged with Council's Environmental Health Officer for final approval.
- i. The proprietor of retail food premises shall provide appropriate notification to Council prior to commencement of operations by completing the "Food Premises Registration" form at www.tweed.nsw.gov.au or alternatively by contacting Council on 02 6670 2400.
- j. Facilities that provide food services to vulnerable persons shall provide appropriate notification to the NSW Food Authority prior to commencement of operations on 1300 552 406.
- k. The premises is to be treated on completion of fitout and prior to commencement of trading and thereafter on a regular basis by a Licensed Pest Control Operator. A certificate of treatment is to be made available for Council inspection on request.
- l. Any premises used for the storage, preparation or sale of food shall comply with the Food Act 2003, FSANZ Food Safety Standards, AS 4674, AS 1668, and requirements of the NSW Food Authority and Council's Environmental Health Officer.

Land-use conflict

89. A Land Use Conflict Risk Assessment (Tim Fitzroy & Associates, 23 September 2019) addresses proposed mitigation measures including vegetated buffers, supplementary plantings, orientation of hospital buildings, open spaces, and restrictions on the use of roof water, pest and vermin management, and recommendations for traffic and access, noise impacts and stormwater management in association with various consultant reports. Noted.

Lighting

90. An External Lighting Strategy Report (LCI Consultants, 12/9/19 Revision P5) has been prepared. Light spill to adjacent areas will be minimised with the use of directional fittings and shielding to direct light to appropriate locations. Helipad lighting will include red flashing aviation warning lighting. Noted.

Mosquito and Biting Midge

91. Design consideration has been given to minimise the impacts of mosquito (including mosquito breeding) and biting insects on the users of the hospital including earth works and landscaping affecting ground water drainage, landscape design proposals, the planning and design of usable outdoor space.
92. As mechanical ventilation is required, the provision of openable windows will be limited. Where opening windows will occur, integration of a fine meshed fly screen will be provided. At operational stage the Hospital will need to implement a range of maintenance and control procedures to safeguard the wellbeing of all its users.

93. The following condition shall apply:
- a. Mosquito and biting insects management measures shall be incorporated into the final development in accordance with the Tweed Shire Development Control Plan - Section A6 – Biting Midge and Mosquito Controls.

Noise

94. Stage 2 Construction Noise and Vibration Management Plan (Landlease Building, 20/919 Revision 3.0) and Stage 2 Noise and Vibration Impact Assessment (JHA Services, 19/9/19 Revision F) is noted. The reports establish relevant noise criteria, predicted noise impacts on nearest sensitive receivers, and construction and operational noise mitigation measures. Noise levels are expected to meet the criteria for construction, operation, and road traffic noise. Noted.

Onsite Sewage Management

95. The sewer pump unit and rising mains for the development will be owned, maintained and operated by the property owner.
96. The design of sewer pumping station shall comply with the Water Services Association (WSA) standards WSA02-2002-2.3 or WSA07-2007 for Pressure Sewerage.
97. The sewer pumping station is to be constructed in a flood proof well with electrical equipment located above 1 in 100 ARI. Pumps should be designed to pump a minimum of less than every 8 hours to reduce septicity in the pump well and rising mains. Pump system shall be sized for industrial/ commercial and not domestic requirements.
98. At least 24 hours emergency storage capacity shall be provided within the sewer pump system, or hours of storage equivalent to the operating hours of the commercial property per day.
99. The maximum flow rate discharge from the sewage pump station shall not exceed 5L/sec.
100. The following conditions shall apply:
- a. Prior to the issue of any Construction Certificate for Stage 2 the applicant shall provide a hydraulic design report certified by a qualified hydraulic engineer. The report should include but not be limited to:
 - i. detailed hydraulic drawings;
 - ii. design specifications including the maximum flow rate of discharge from the pump station;
 - iii. the retention holding capacity of the pump-well; and
 - iv. details of operation and maintenance.
 - b. Prior to the issue of any Construction Certificate for Stage 2, the applicant is required to obtain approval to install a private sewage ejection pump station under Section 68 of the Local Government Act 1993.
 - c. Prior to the occupation of any building and prior to the issue of any occupation certificate approval to operate the on-site sewage management facility under Section 68 of the Local Government Act 1993 shall be obtained from Council.

Public Health - Microbial Control

101. Four (4) cooling towers are proposed at the site and it is anticipated that many warm-water systems will also be required. Water cooling systems and warm-

water systems require registration with Council and compliance with the Public Health Act 2010 and Public Health Regulation 2012.

102. The following conditions shall apply:

- a. Any 'regulated system' as defined in Section 26 of the Public Health Act 2010 shall be installed, operated and maintained in accordance with the Public Health Regulation 2012.
- b. Within one (1) month of installation and prior to the systems operating, all cooling water systems and warm-water systems shall be registered with Council using Approved Form 6 available at <https://www.health.nsw.gov.au/environment/legionellacontrol/Pages/legionella-protocols.aspx>.
- c. A Risk Management Plan for each cooling water system must be completed prior to the cooling water system operating. The Risk Management Plan and Certificate of Risk Management Plan Completion shall be prepared using Approved Form 1 available at <https://www.health.nsw.gov.au/environment/legionellacontrol/Pages/legionella-protocols.aspx> and submitted to Council within seven (7) days of completion.

Waste – Including spoil (VENM + ENM)

103. An Operational Waste Management Plan (TTM, 23 September 2019 Revision RP01_04) confirms that all waste will be collected via the dirty loading dock on the western side at basement level.

104. Cut and fill is also proposed for the site where the applicant will be required to address the NSW EPA Waste Classification Guidelines.

Water Supply

The Integrated Water Management Plan (JHA Services, 20 September 2019 Revision F) confirms that potable water for human consumptions, hygiene purposes, cistern flushing and process equipment will be supplied from Council's reticulated water supply. Non-potable water will be used for supplementary landscape irrigation and cooling tower makeup water. Noted.

Static Water Supply (Water Tank) For Fire Fighting Purposes

105. The static water supply (water tank) required for firefighting purposes was previously identified on previous site plans.

106. The applicant confirmed the capacity of the combined fire hydrant/ sprinkler tank located in the Central Energy plant is 424 Kilolitres. The Department will need to assure themselves that such storage is sufficient.

Building Code of Australia & Certification Requirements

107. A construction certificate is not required for Crown building work which Section 6.7 of the EP&AA 1979 No 203 which requires building work to be certified to comply with the Building Code of Australia. However the Crown is not exempt from inspections under the Plumbing and Drainage Act 2011 and accordingly the following conditions are recommended:

GENERAL

- a. The issue of this Development Consent does not certify compliance with the relevant provisions of the Building Code of Australia.
- b. Approval is given subject to the location of, protection of, and/or any

[GEN0115]

necessary approved modifications to any existing public utilities situated within or adjacent to the subject property. Any necessary adjustment or modification of existing services is to be undertaken in accordance with the requirements of the relevant authority, at the Developer's expense.

[GEN0135]

- c. An application (Application for Approval of Plumbing and Drainage Work on Private Land or Crown Land) shall be lodged together with hydraulic drainage and water supply details and any prescribed fees including inspection fees and approved by Tweed Shire Council under Section 68 of the Local Government Act for any water, sewerage, on site sewerage management system prior to works commencing including temporary structures containing sanitary facilities.

[PCC1195]

PRIOR TO COMMENCEMENT OF WORK

- d. A temporary builder's toilet is to be provided prior to commencement of work at the rate of one closet for every 15 persons or part of 15 persons employed at the site. Each toilet provided must be:
 - i. a standard flushing toilet connected to a public sewer, or
 - ii. if that is not practicable, an accredited sewage management facility approved by the council

[PCW0245]

- e. Please note that while the proposal, subject to the conditions of approval, may comply with the provisions of the Building Code of Australia for persons with disabilities your attention is drawn to the Disability Discrimination Act which may contain requirements in excess of those under the Building Code of Australia. It is therefore recommended that these provisions be investigated prior to start of works to determine the necessity for them to be incorporated within the design.

[PCW0665]

DURING CONSTRUCTION

- f. All proposed works are to be carried out in accordance with the conditions of development consent, any approved Management Plans, approved Construction Certificate, drawings and specifications.

[DUR0005]

- g. During construction, all works required by other conditions or approved management plans or the like shall be installed and operated in accordance with those conditions or plans.

[DUR0015]

- h. Should any Aboriginal object or cultural heritage (including human remains) be discovered all site works must cease immediately and the Tweed Byron Local Aboriginal Land Council (TBLALC) Aboriginal Sites Officer (on 07 5536 1763) are to be notified. The find is to be reported to the Biodiversity and Conservation Division of the NSW Department of Planning, Industry and Environment. No works or development may be undertaken until the required investigations have been completed and any permits or approvals obtained, where required, in accordance with the National Parks and Wildlife Act, 1974.

[DUR0025]

- i. Commencement of work, including the switching on and operation of plant,

machinery and vehicles is limited to the following hours, unless otherwise permitted by Council:

- i. Monday to Saturday from 7.00am to 6.00pm
- ii. No work to be carried out on Sundays or Public Holidays

[DUR0205]

- j. The proponent is responsible to instruct and control subcontractors regarding hours of work.

[DUR0205]

- k. All building work (other than work relating to the erection of a temporary building) must be carried out in accordance with the requirements of the Building Code of Australia as required by Part 6 Division 6.3 Section 6.7 of the Environmental Planning and Assessment Act 1979 No 203.

[DUR0375]

- l. Provision shall be made for the collection of builder's solid waste in accordance with the following requirements:

- i. A temporary builder's waste chute is to be erected to vertically convey builder's debris to a bulk container.
- ii. The chute shall be located in a position approved by the Principal Certifying Authority.
- iii. A canopy shall be provided to the chute outlet and container to reduce the spillage of materials and nuisance caused by dust.

[DUR0385]

- m. Building materials used in the construction of the building are not to be deposited or stored on Council's footpath or road reserve, unless prior approval is obtained from Council.

[DUR0395]

- n. It is the responsibility of the applicant to restrict public access to the construction works site, construction works or materials or equipment on the site when construction work is not in progress or the site is otherwise unoccupied in accordance with WorkCover NSW requirements and Work Health and Safety Regulation 2017.

[DUR0415]

- o. Excavation

- i. All excavations and backfilling associated with the erection or demolition of a building must be executed safely and in accordance with WorkCover 2000 Regulations.
- ii. All excavations associated with the erection or demolition of a building must be properly guarded and protected to prevent them from being dangerous to life or property.

[DUR0425]

- p. If the work involved in the erection or demolition of a building:
 - is likely to cause pedestrian or vehicular traffic in a public place to be obstructed or rendered inconvenient; or
 - building involves the enclosure of a public place,a hoarding or fence must be erected between the work site and the public place in accordance with the WorkCover Authority of NSW Code of Practice

and relevant Australian Standards.

Where necessary the provision for lighting in accordance with AS 1158 - Road lighting and provision for vehicular and pedestrian traffic in accordance with AS 1742 shall be provided.

Any such hoarding, fence or awning is to be removed prior to the issue of an occupation certificate/subdivision certificate.

Application shall be made to Tweed Shire Council including associated fees for approval prior to any structure being erected within Councils road reserve.

[DUR0435]

- q. All work associated with this approval is to be carried out so as not to impact on the neighbourhood, adjacent premises or the environment. All necessary precautions, covering and protection shall be taken to minimise impact from:
- Noise, water or air pollution.
 - Dust during filling operations and also from construction vehicles.
 - Material removed from the site by wind.

[DUR1005]

- r. Pursuant to the provisions of the Disability Discrimination Act, 1992 (Commonwealth) the design of the proposed development shall facilitate access for the disabled in accordance with the relevant provisions of AS1428- Design for Access and Mobility.

[DUR1725]

- s. The builder must provide an adequate trade waste service to ensure that all waste material is suitably contained and secured within an area on the site, and removed from the site at regular intervals for the period of construction/demolition to ensure no material is capable of being washed or blown from the site.

[DUR2185]

- t. Council is to be given 24 hours notice for any of the following inspections prior to the next stage of construction:
- internal drainage, prior to slab preparation;
 - water plumbing rough in, and/or stackwork prior to the erection of brick work or any wall sheeting;
 - external drainage prior to backfilling.
 - completion of work and prior to occupation of the building.

[DUR2485]

- u. Plumbing
- A plumbing permit is to be obtained from Council prior to commencement of any plumbing and drainage work.
 - The whole of the plumbing and drainage work is to be completed in accordance with the requirements of the Plumbing Code of Australia and AS/NZS 3500.

[DUR2495]

- v. Back flow prevention devices shall be installed wherever cross connection occurs or is likely to occur. The type of device shall be determined in accordance with AS 3500.1 and shall be maintained in working order and

inspected for operational function at intervals not exceeding 12 months in accordance with Section 4.7.2 of this Standard.

[DUR2535]

- w. Overflow relief gully is to be located clear of the building and at a level not less than 150mm below the lowest fixture within the building and 75mm above finished ground level.

[DUR2545]

- x. All new hot water installations shall deliver hot water at the outlet of sanitary fixtures used primarily for personal hygiene purposes at a temperature not exceeding:
- 45°C for childhood centres, primary and secondary schools and nursing homes or similar facilities for aged, sick or disabled persons; and
 - 50°C in all other classes of buildings.

A certificate certifying compliance with the above is to be submitted by the licensed plumber on completion of works.

[DUR2555]

Council would welcome the opportunity to review the requested additional information and provide further comments specifically having regard to the water and sewer information given Council's position as Water Authority.

For further information regarding this matter please contact the undersigned on (02) 6670 2423.

Yours faithfully

Vince Connell
DIRECTOR PLANNING AND REGULATION