



OUT19/15079

Ms Megan Fu  
Planning and Assessment Group  
NSW Department of Planning, Industry and Environment

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Dear Ms Fu

**Tweed Valley Hospital Stage 2 (SSD-10353) (Tweed Shire)**

I refer to the above matter that was distributed to the Department of Primary Industries (DPI) for comment on 9 October 2019.

DPI has reviewed the project proposal and has the following comments.

The Agricultural Offset Plan submitted does not provide any committed agricultural offsets. The concept approval requires the strategy to include a program of physical works or an implementation program to offset agricultural impacts from the development. No agricultural offsets are committed to in the submitted Offset Plan. Formal consultation regarding the Offset Strategy has also not been finalised. Once the final community consultation meeting is completed on the 12 November, the Offset Strategy should be updated to discuss the results of this consultation and identify agricultural offsets or an implementation plan for offsets. Any implementation plan will require key performance indicators, ongoing monitoring and validation by the local agricultural industry.

The Offset Plan also does not include a local food procurement strategy as required by conditions. While it is acknowledged that State Procurement Guidelines must be complied with a commitment could be made to sourcing local produce where feasible. The document references a 'Buy Local' scheme but no detail is provided as to what this is, or how it could be or is proposed to be applied to the Tweed Hospital.

Concerns over the impact to truck movements associated with agricultural businesses opposite the hospital is evident from consultation processes identified in the EIS. The Land Use Conflict Risk Assessment indicates that this issue is addressed within the Traffic Impact Assessment however it is unclear from this assessment, what mitigation measures other than the provision/location of additional hospital access points have been provided. Further consultation with affected landowners should be undertaken to ensure their concerns have been adequately addressed.

The Traffic Assessment also indicates that agricultural vehicle movements on Cudgen Road are infrequent as confirmed during a number of site visits. This should be confirmed with local landowners as a number of rural properties have approvals to operate tractors and machinery on Cudgen Road and Tweed Coast Road and have genuine concerns over the potential impact that increased traffic will have on their ability to continue routine agricultural operations. Ongoing monitoring of the traffic impacts to tractor/machinery operations and truck movements within the vicinity of the development should be included as a consent



condition. This will require ongoing consultation with affected landowners, RMS and Tweed Shire Council to identify and implement further mitigation measures should this be required.

It is understood that a four-lane upgrade of Tweed Coast Road between the Pacific Highway and Casuarina is identified as part of the Tweed Shire Council's Transport Network Plan. Although this is potentially not a consideration for this development, the feasibility of an underpass or alternative measure to support agricultural machinery movements within the local area could be included as part of the Agricultural Offset Plan discussions.

For more information please contact Selina Stillman via [selina.stillman@dpi.nsw.gov.au](mailto:selina.stillman@dpi.nsw.gov.au).

Any further referrals to DPI can be sent by email to [dpi.cabinet@dpi.nsw.gov.au](mailto:dpi.cabinet@dpi.nsw.gov.au)

Yours sincerely

A handwritten signature in black ink, appearing to read 'C. McNamara'.

Cassandra McNamara  
Manager, Coordination  
**DPIE DPI – Strategy & Policy**  
6 October 2019