

22 August 2018

Ms Carolyn McNally  
Secretary  
Department Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001

Dear Ms McNally

**Request for Secretary's Environmental Assessment Requirements and the making of a Site-Specific State Environmental Planning Policy to rezone the land for the new Tweed Valley Hospital Development**

On 13 June 2017, the NSW Government announced the allocation of \$534 million for the development of a new state-of-the-art hospital on a greenfield site in the Tweed, to be known as the Tweed Valley Hospital (Project). The Project is located on a portion of 771 Cudgen Road, Cudgen, legally described as Lot 102 DP 870722 (Project Site), refer to **Figure 1**.

The Project is a "hospital" with a capital investment value greater than \$30 million. Accordingly, pursuant to clause 14 of Schedule 1 of the State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP), the Project is State significant development that requires the preparation of an environmental impact statement (EIS).

The development application pathway for the Project will consist of a staged State Significant Development Application under section 4.22 of the *Environmental Planning and Assessment Act 1979* (EP&A Act), which will consist of:

- (a) a concept development application and detailed proposal for stage 1 works (early and enabling works); and
- (b) a second development application for stage 2 works, which will include detailed design, construction and operation of the Tweed Valley Hospital.  
(Project Application)

Health Infrastructure  
ABN 89 600 377 397

In this context, this letter seeks the issue of the Secretary's environmental assessment requirements (SEARs) for the proposed Tweed Valley Hospital, in accordance with clause 3 of Schedule 2 of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation).

Health Infrastructure (HI) also requests that the Department of Planning and Environment (DPE) prepare a site-specific State Environmental Planning Policy (SEPP), pursuant to Divisions 3.2 and 3.3 of the EP&A Act, to amend both the *Tweed Local Environmental Plan 2000* (TLEP 2000) and the *Tweed Local Environmental Plan 2014* (TLEP 2014) to rezone part of the Project Site to SP2 Infrastructure to facilitate the determination of the Project Application. Refer to **Figure 1** below.

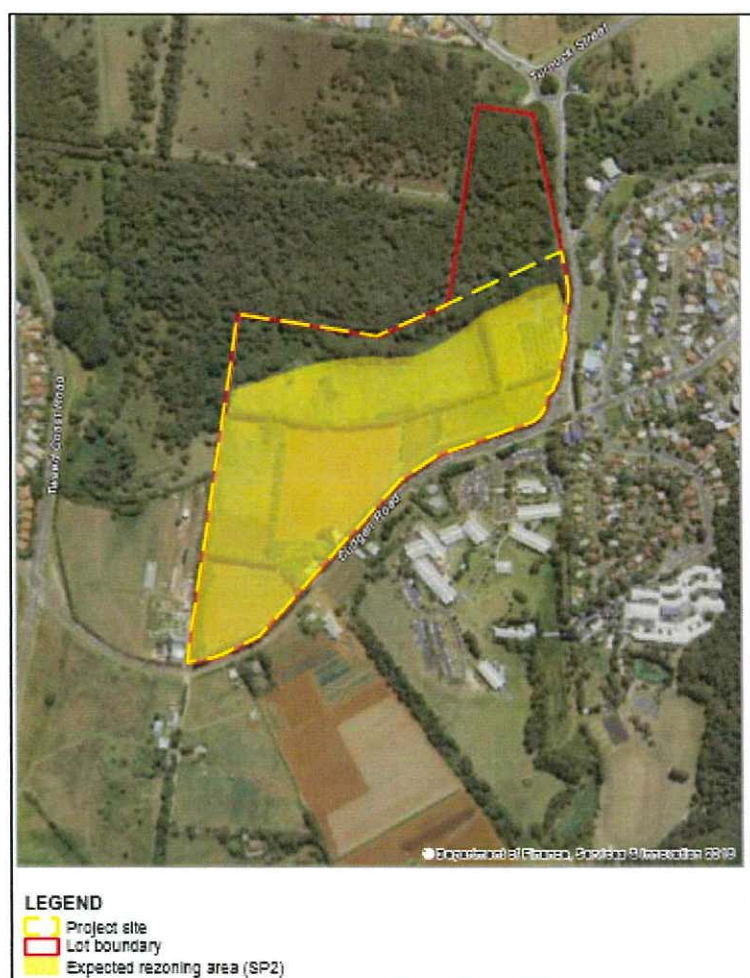


Figure 1 Project Site

Source: Prepared by GeoLINK using DSF&I base data

Clause 1.8(2) of the TLEP 2014 provides that all local environmental plans applying to land to which the TLEP 2014 applies cease to apply to that land. As such the TLEP 2000 does not, strictly, need to be amended. However, the amendment of the



TLEP 2000 has been proposed to facilitate greater clarity between the operation of the two LEPs.

The area where the hospital campus will be developed is a 16-hectare portion of the Project Site that is above the Probable Maximum Flood (PMF) level. This area comprises the current agricultural land, which is zoned RU1 Primary Production and identified as State Significant Farmland (SSF), and a small sliver of land at the eastern end zoned R1 General Residential.

No change to the zoning is required for the remainder of the Lot. This includes a nature reserve, zoned 7(l) Environmental Protection (Habitat), which is mapped as Coastal Wetlands and will be preserved outside of the development area to protect the environmental biodiversity and provide views and amenity for the hospital campus. There is also a separate area of land zoned R1 General Residential to the north of the nature reserve, which is flood prone and is not required for the Project.

It is proposed that the draft SEPP and Project Application be considered and determined in accordance with Division 3.5 and Section 4.38 (5) of the EP&A Act. These provisions allow an SSD application, involving development that is wholly or partly prohibited, to be considered in conjunction with a proposed environmental planning instrument (in this case a site-specific SEPP) which proposes to permit the carrying out of the wholly or partly prohibited development on the subject land. Pursuant to Section 3.40 of the EP&A Act, the Project Application, an Environmental Impact Statement (EIS) and proposed SEPP would be jointly exhibited.

The purpose of this letter is to provide a preliminary environmental assessment and other supporting documentation to allow for the SEARs to be issued to enable the preparation of an EIS, the Project Application to be lodged and the preparation of the site-specific SEPP to commence.

## **1 Background to the Tweed Valley Hospital and Site Selection**

The existing Tweed Hospital (TTH) is located at 14-34 Powell Street (Lot 628 DP755740), Tweed Heads on the far north coast of NSW.

TTH is a Level 5 Major Non-Metropolitan Principal Referral Hospital and is a facility of the Northern NSW Local Health District (NNSW LHD), which provides services to the northern NSW. TTH catchment includes Tweed and Byron Local Government Areas (LGAs). Murwillumbah District Hospital, a Level 3 hospital, is closely networked to TTH (24.5 km from TTH), as is Byron Central Hospital (53.2 km from TTH), which is also a Level 3 hospital.

NNSW LHD's service planning for TTH catchment identifies that a substantial increase in capacity is required to meet the growth in demand for healthcare services, which includes significant growth forecast for the southern part of the catchment. NNSW LHD and HI undertook a number of clinical services and master



planning studies between 2012 and 2017, which concluded that TTH is at capacity and the four-hectare site is inadequate to support the long-term healthcare needs of the community and is not well placed in relation to overall population catchment, it is therefore unsuitable for this redevelopment.

On 13 June 2017, the NSW Government announced \$534 million for a new state-of-the-art hospital on a greenfield site, including an expanded emergency department, inpatient care and enhanced surgical and outpatient services. New services, including interventional cardiology and radiotherapy, will also be provided in response to clinical service planning priorities.

The project consists of:

- Delivery of a new Level 5 major referral hospital to provide the health services required to meet the needs of the growing population of the Tweed-Byron region, in conjunction with the other hospitals and community health centres across the region.
- Master planning for additional health, education, training and research facilities to support these health services, which will be developed with service partners over time. These areas will be used initially for construction site/compound and at-grade car parking.
- Delivery of the supporting infrastructure required for the new hospital, including green space and other amenities, campus roads and car parking, off site road upgrades and connections, utilities connections, and other supporting infrastructure.

The need for the new hospital is being driven by:

- The significant forecast population growth in the Tweed-Byron region, and in particular the increase in the ageing population
- The need for the health services in the Tweed-Byron region to be more self-sufficient, to give residents access to more services locally, without travelling outside the region
- The need to implement modern healthcare models, to deliver high quality health services into the future
- The constraints of current infrastructure at TTH, which is at capacity - a program of interim upgrade works has commenced to assist in meeting the needs of the community until the new hospital opens, and services are transferred
- The physical limitations of the existing TTH site, which has inadequate space to develop new buildings and access is impacted by flooding
- The need for equitable access arrangements, and the advantages of a more central location for the future Tweed Valley Hospital in relation to the broader Tweed-Byron region.

The 2017 floods demonstrated that access to the current hospital site is impacted by flooding. As a result the existing and growing population centres to the south of Tweed River became cut off from access to the full range of acute hospital services.



Subsequent modelling has also confirmed that TTH would need to be evacuated under a Probable Maximum Flood (PMF) scenario.

These drivers strongly support the decision to construct a purpose-built referral hospital on a new site and will ensure that the growing and changing healthcare needs of the Tweed-Byron community are provided for in the years to come.

## 2 Site Selection

Selecting the right site for the Tweed Valley Hospital is vital to building the future of healthcare and servicing the health needs of the Tweed-Byron community now and into the future.

The Project Site is located immediately to the west of the Kingscliff urban area, opposite Kingscliff TAFE and between the existing residential areas of Kingscliff and Cudgen. The site selection process identified this site as the most suitable location for a major referral hospital serving the Tweed-Byron community.

More than 50 sites were assessed in total, including those submitted through a publicly advertised expression of interest (EOI) process and those nominated through the subsequent community consultation process.

The site selection process has been undertaken in two phases:

### ***Phase 1 (August 2017 to March 2018):***

An EOI process sought available land suitable for development of the new Tweed Valley Hospital, that:

- Was located within an area extending from Tweed Heads to Pottsville and up to 15 km inland, indicated by the red dotted line in **Figure 2** below
- Has a developable area of between eight and 16 hectares
- Is easily accessible and close to a main arterial road link
- Is available for development from late 2018.

35 sites were considered, including around 20 submitted by landowners through the EOI process. Due diligence investigations were undertaken by independent experts and cross-government consultation informed the evaluation process and identification of the proposed site at 771 Cudgen Road, opposite Kingscliff TAFE. This was announced by the NSW Minister for Health on 4 April 2018.

Sites were evaluated (in both Phases) against the same Assessment Criteria in the following categories:

- Location, Access and Traffic
- Urban Context
- Built Forms and Landscaping
- Environment, Heritage and Culture

- Time, Cost and Value.

The evaluation was informed by due diligence investigations undertaken by independent experts in each of the following disciplines:

- Aboriginal Heritage
- Architecture
- Bushfire
- Flooding
- Acoustic
- Surveyor
- Town Planner
- Utilities
- Aviation
- Cost Management
- Ecological and Natural Heritage Constraints
- Health Service Planning
- Traffic/ Transport
- Topography/ Stormwater
- Geotech/ Environmental/ Contamination/ HAZMAT

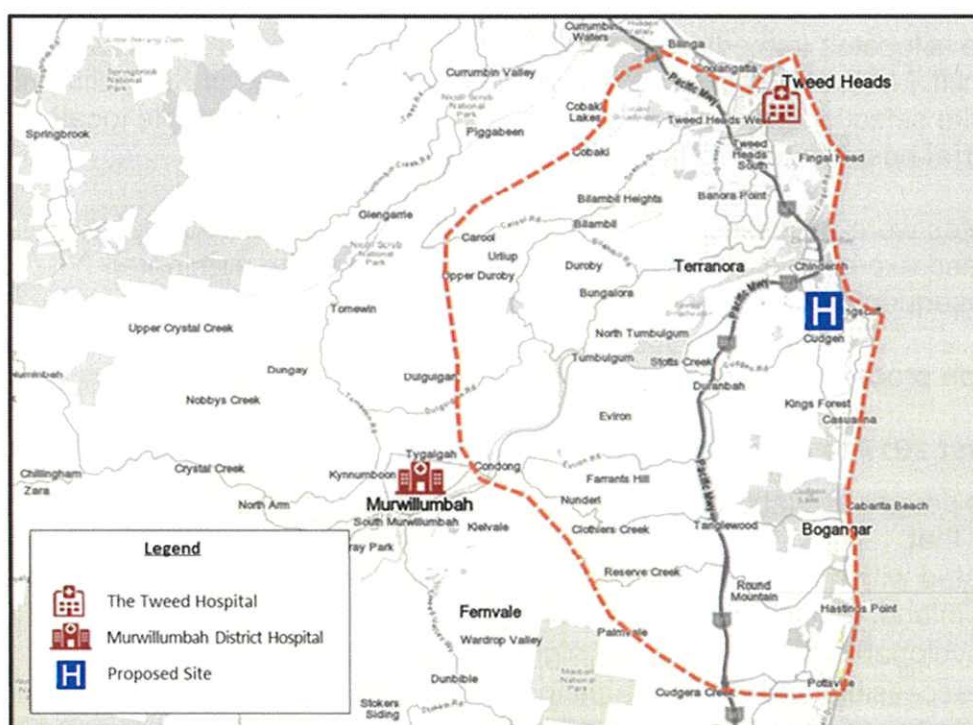


Figure 2 Site Locality and Site Selection Study Area

### Phase 2 (April 2018 to June 2018):

Following the announcement of the proposed site and in recognition of concerns raised by the local community, the NSW Government directed HI to undertake a focused six-week community consultation process. During this time, the community was invited to provide detailed feedback on the proposed site; as well as identify any potential alternative sites to be considered by the project team, for comparison against the proposed site.

Consultation events were arranged to hear feedback from all geographic areas within the region at varying times of day. Opportunities included pop-up booths at shopping centres and markets, hospital receptions and staff forums; project office



drop in sessions; and the provision of written submissions. An independent communications consultant was engaged to manage this process. The consultation process was announced at a community forum on 26 April 2018 and submissions closed on 14 June 2018.

Over 1,000 people within the region were directly involved in the consultation either through face to face engagement or through the formal submissions process. Of more than 600 people consulted at pop-up events, 49 per cent of people spoken to supported the proposed site; a further 25 per cent were neutral; and the remaining 26 per cent opposed.

Both phases of the site selection process have been overseen by an independent Probity Advisor who has stated that the process has been conducted in a fair and equitable manner with due regard to probity.

Further information on the site selection has been published on the project website ([http://www.tweedvalleyhospital.health.nsw.gov.au/www\\_tweed/media/tweedvaley/site-selection-summary-report\\_july-2018\\_1.pdf](http://www.tweedvalleyhospital.health.nsw.gov.au/www_tweed/media/tweedvaley/site-selection-summary-report_july-2018_1.pdf)).

### **3 Need for the Project**

Driving the case for change is the need to increase the health service delivery capacity to meet projected demand.

The Draft 2018 Service Statement outlines significant projected growth in the catchment population, with the profile being an aged population as well a significant group of children aged 0-14 years. The growing catchment population has a lower socio-economic status as well as a higher percentage of Aboriginal residents in comparison to the respective NSW averages. There are also high rates of lifestyle risk factors and there is a high burden of chronic illness.

There are significant gaps between the demand for healthcare services and the supply, accessibility and availability of services within the Tweed-Byron region. Investment in these services and models of care aims to increase self-sufficiency and reverse cross-border flows to Queensland.

NNSW LHD recognises that continual examination and renewal of models of care is required to maintain optimal service delivery and performance and to meet growing community expectations for access to high quality and safe health services locally. This requires facilities compliant with the Australasian Health Facility Guidelines (AusHFG) and service provision consistent with the National Safety and Quality HealthCare Standards.

The objectives of the Tweed Valley Hospital Project are to:

- Deliver the service capacity needed now and into the future for a growing and ageing population, well placed to provide equitable access to the broader Tweed-Byron catchment
- Improve self-sufficiency and minimise the complexity and costs associated with cross-border resident flows to services located in Queensland
- Support further development of speciality and sub-specialty clinical services
- Support contemporary models of care to improve health outcomes
- Deliver patient-centred healthcare supported by an environment that fosters integrated service delivery
- Improve utilisation of the workforce and develop an environment that will attract and retain a skilled and motivated workforce
- Support development of increased clinical capability through education, training and research opportunities
- Provide a tiered network clinical service model to support Byron Central Hospital and Murwillumbah District Hospital.

#### 4 The Site

The Project Site is located on a portion of 771 Cudgen Road, Cudgen, legally described as Lot 102 DP 870722. **Figure 1** is an aerial image as it exists at present and shows the Lot boundary, the Project Site and the area proposed to be rezoned to SP2 Infrastructure.

##### ***Site Context and Surrounding Land Uses***

The Project Site is the southern 19.4Ha of an existing single lot and fronts Cudgen Road immediately west of the Kingscliff urban area. It has proximal access to Tweed Coast Road, which connects to the Pacific Motorway (M1) in the north. The Project Site is approximately 13.5 km south of Tweed Heads.

The Project Site includes rural land, situated on the immediate urban periphery of Kingscliff with a sliver of residential zoned land adjacent to its eastern boundary and environmental protection zone along its northern boundary, which is mapped as Coastal Wetlands and will be preserved to protect the environmental biodiversity and to provide views and amenity for the hospital campus.

Other land uses in proximity to the Project Site include urban, rural and environmental uses/zones. To the east is the main Kingscliff urban and residential area. To the north is vegetated rural land, including environmental protection areas and mapped Coastal Wetlands. Beyond this, further to the north is existing residential development. To the south, on the opposite side of Cudgen Road, is an educational facility in the form of the Kingscliff TAFE. To the southwest and west is rural/ farmland. The village of Cudgen is located west of the Project Site, on the western side of Tweed Coast Road.



Immediately to the north of the nature reserve is a major proposed development area that is identified in the draft *Kingscliff Locality Plan*, including a Business & Knowledge Precinct adjacent to the M1 and residential development of around 1,500 dwellings.

**Figure 2** shows the approximate location of the Project Site in the context of Tweed Heads and Murwillumbah. **Figure 1** shows the Project Site (indicated by the yellow shading) which is the southern part of Lot 102 DP 870722.

### Site Analysis

The site topography is varied, including elevated relatively flat areas in the south, to sloping and low-lying in the north. The Project Site's boundary to Cudgen Road represents its high point with maximum elevations of approximately 27m Australian Height Datum (AHD). There is a large plateau in this area that is planned to support the main hospital building/ development zone. Elevations in the northern point are low-lying, down to approximately one metre AHD. The Project Site is substantially clear of vegetation, with some sparse scatters and strands of trees. More dense vegetation occurs along its northern extent in low-lying areas, largely within an environmental protection zone. The majority of the Project Site is currently used for agricultural purposes. The Department of Environment's eSPADE website indicates the site is largely made up of Residual (Cudgen) soil landscapes.

The Project Site contains a number of environmental and development constraints. Key ones, include:

- Part of the Project Site supports and is adjacent to mapped Coastal Wetlands, including the Coastal Wetlands proximity buffer under the Coastal Management State Environmental Planning Policy (SEPP) 2018;
- The majority of the Project Site is mapped as State Significant Farmland (SSF) (representing approximately 0.13 per cent of the total SSF mapped for the NSW Far North Coast) and Biophysical Strategic Agricultural Land;
- Bush fire prone land (category 1 vegetation and buffer);
- The northern portion is flood prone, however, the majority of the Project Site including the main development area and access is above the PMF;
- Majority of the Project Site is mapped as Class 5 Acid Sulfate Soils, with the northern portion being Classes 2 and 3; and
- Vegetation in the northern portion is mapped EEC and Koala Habitat.

These constraints, including mitigation measures, are further discussed below under the heading "Environment, Heritage and Culture". **Figure 3** and **4** below provides mapping relevant to the Project Site analysis, showing constraints and environmental features present.



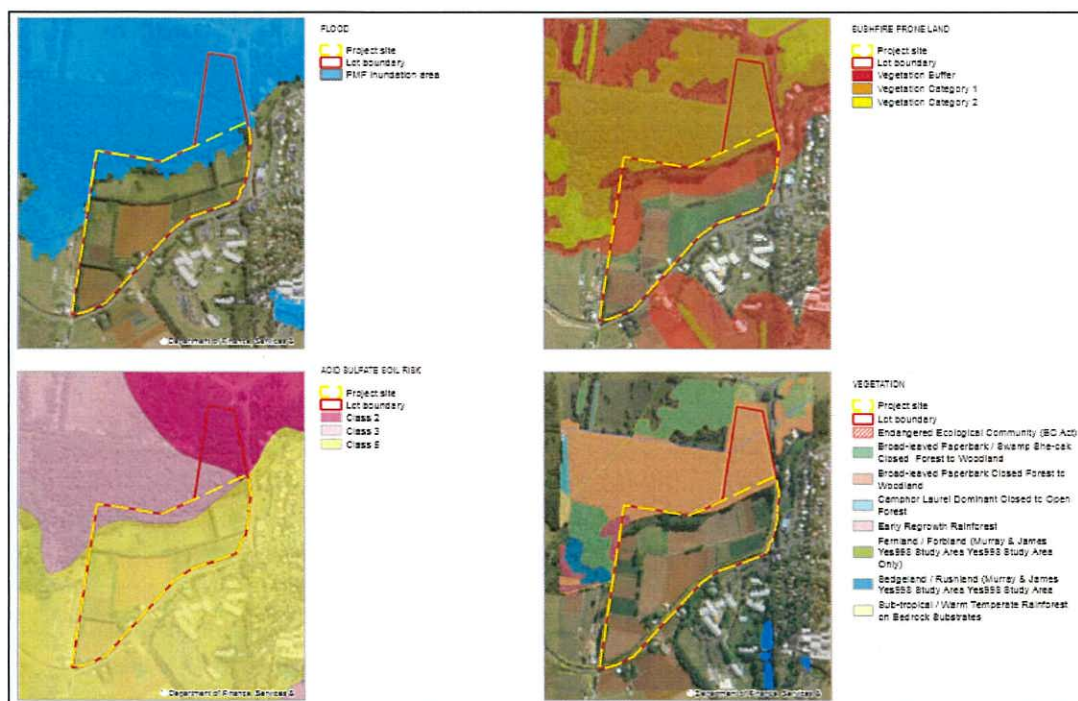


Figure 3 Project Site Analysis

Source: GeoLINK 2018 with base data from DFS&I, Tweed Shire Council and Ecosure

Importantly, key attributes and considerations of the Project Site that support its selection for the new Tweed Valley Hospital include:

### Location, Access and Traffic

- **Existing road network** – located close to the M1 and adjacent to a major road (Tweed Coast Road). Road network capacity is distributed to some extent as there is the ability to connect into Turnock St and the eastern roads surrounding Kingscliff.
- **Easily accessible by the Tweed-Byron region** – well located to service existing and future population centres across the Tweed-Byron region, providing timely access by car for the majority (70%) of the Tweed LGA part of the catchment in under 30 minutes and with an average peak travel time equivalent to the existing Tweed Hospital site.

The Project Site location south of Tweed Heads, with ready access to the M1 and Tweed Valley Way, is well placed to provide equitable access to the broader Tweed-Byron catchment and support hospital transfers from Byron Central Hospital and Murwillumbah District Hospital.

- **Public transport** – situated to take advantage of the existing public transport network with three public bus routes currently passing or terminating at the Project Site. Further upgrade/ extension of services would be expected over time to service the increased demand from the hospital and major residential developments planned to the west and south of Kingscliff.



- **Proposed road network** – Council is seeking Commonwealth funding support for the duplication of Tweed Coast Road. While duplication of Tweed Coast Road is not technically required for development of the hospital on this site, early delivery would be advantageous.

The Project will require a range of upgrades along Cudgen Road and at the Tweed Coast Road intersection.

An extension to Turnock Street connecting it back to Tweed Coast Road is also planned to the west of Kingscliff to support residential developments. This is not required for development of the hospital but will further improve alternative access to the Project Site and take future pressure off Cudgen Road.

- **Flood access** – the Project Site for the hospital and its immediate access roads are above the PMF, with good street frontage and various access points. There is alternative road access for the southern coastal population when the M1 and Tweed Coast Road are impacted by flooding. This will maintain access to acute hospital services for the population south of the Tweed River, with population centres to the north able to access Robina Hospital within approximately 30 minutes.

## Urban Context

**Surrounding urban environment** – the Project Site is located on the outskirts of Kingscliff in close proximity to existing community facilities, including the Kingscliff Community Health Centre, Kingscliff TAFE and retail and accommodation facilities in Kingscliff. The location opposite Kingscliff TAFE and the major population centre in Kingscliff provides a significant and immediate opportunity to build on existing urban infrastructure.

The Project Site has extensive street frontage (>900m) along Cudgen Road and its interface with Turnock Street, providing good street visibility of the hospital campus with multiple opportunities for additional site access points and lower level buildings addressing the street edge to achieve a sensitive town planning response to the area.

The location opposite Kingscliff TAFE, provides the opportunity to strengthen partnerships between Health and TAFE and develop an integrated precinct over time. This Health & Education Precinct would be complementary to the development planned to the west of Kingscliff, identified in the draft *Kingscliff Locality Plan*, including a Business & Knowledge Precinct adjacent to the M1 and residential development of around 1,500 dwellings.



- **Planning considerations** – the Project Site has mixed zoning including agricultural, nature reserve and residential. The Project Site is located on the north eastern tip of the Cudgen Plateau that has been mapped as SSF. The agricultural area of the Project Site represents approximately 0.13% of the total SSF mapped for the Far North Coast. A process will need to be undertaken to change the zoning of a portion of the Project Site to permit development of the hospital and broader health and education campus over time. This is further covered under the “Environment, Heritage and Culture” heading below.
- **Impact on/of neighbouring properties** – the Project Site is well situated to take advantage of the existing public transport network, and active transport will be promoted including the provision of end-of-trip facilities. The potential to use some hospital car parking outside of peak times (e.g. weekends) to help reduce parking and traffic congestion in Kingscliff could be explored for community benefit.

Social impact studies will be undertaken as part of the planning submission.

The potential impacts on agricultural activities are discussed further in the section titled “Environment, Heritage and Culture” below.

### Built Forms and Landscaping

- **Campus potential** – preliminary master planning (developed to inform the site selection due diligence) has confirmed that the Project Site will support the full range of hospital expansion scenarios as well as a range of complementary health-related uses to support the development of a broader health and education campus over time.

This includes development of the initial hospital plus a range of expansion scenarios (e.g. +20%, +50%, +100%), as well as a renewal strategy so that the hospital can be rebuilt on the campus in the long term.

The length of the Project Site, with its extensive street frontage, supports the development of a range of complementary health-related developments, with multiple access points and lower level buildings addressing the street edge.

The development areas will be supported and supplemented by greenspace providing ecological buffers and amenity for the campus.

- **Healing environment** - the Project Site sits on a north facing ridge, which maximises access to nature, light and panoramic views across the adjacent nature reserve and out to the mountains and coast.

The hospital can be effectively designed to utilise the slope of the land to maximise amenity and views while being sensitive to the surrounding area.

A nature reserve on the Project Site provides views from the hospital and will be preserved outside of the development area. It will be fringed by greenspace providing ecological buffers and amenity for the campus.



## Environment, Heritage and Culture

- **State Significant Farmland** – as noted earlier, the majority of the Project Site is mapped as SSF. It currently has approximately 8 hectares growing crops at any one time.

The location of the Project Site will not fragment the Cudgen Plateau and will limit flow-on impacts to other SSF as follows:

- The Project Site sits on the far north-eastern tip of the agricultural area - it is on the urban side of Cudgen Road, opposite Kingscliff TAFE and between existing residential areas of Kingscliff and Cudgen, with future residential developments planned to the north.
- The large size of the Project Site allows for future hospital expansion and health and education developments on the Project Site without encroaching on surrounding areas.
- Strengthening partnerships between Health and TAFE provides further opportunity to ensure that all health and education and supporting developments can be accommodated across these two large and collocated sites into the future.

Community consultation identified that there was some opposition to any site that includes SSF.

- **Impact on/of neighbouring properties** – surrounding farms are already in close proximity to residences and schools and, with the existing controls required to manage these interfaces and an appropriate master planning response, agricultural activities will not significantly impact on hospital operations or be significantly impacted by it. A full Land Use Conflict Risk Assessment will be undertaken as part of the planning submission.

The master plan will position the hospital on the broad plateau towards the centre of the Project Site, which is away from the short section of Project Site frontage that has farming activities on the opposite side of the road. The master plan will maintain landscaping screening along the southern road boundary to help provide an additional buffer.

- **Flooding considerations** – the Project Site has 16-hectares of land above the PMF level and its immediate access roads are also above the PMF. The Project Site is also opposite Kingscliff TAFE, a well-equipped evacuation centre identified in regional flood and disaster planning and used by nearly 400 people in the 2017 floods.

- **Ecological considerations** – the northern part of the Project Site supports and is adjacent to mapped Coastal Wetlands under the Coastal Management SEPP. Some parts of the hospital campus may also abut/overlap mapped Proximity Area for Coastal Wetlands. Civil engineering review of the 'test fit' master planning options indicate that the facility can be delivered with appropriate controls on the quality and quantity of surface and groundwater flows to the adjacent wetland. There is also the opportunity to improve stormwater runoff quality from current farming activities in terms of sediment impact.

Koala Habitat Class 2A and broad-leaved paperbark have been identified in the northern part of the Project Site and fall under the Biodiversity Conservation Act (State legislation). However, ecological constraints are not present in the proposed location of the hospital development. This area has been surveyed and the presence of Koala Habitat has not been identified. Advisors have confirmed that based on the proposed footprint and associated impacts, this would not trigger a referral under the Environmental Protection and Biodiversity Conservation (EPBC) Act (Commonwealth legislation). The mapped wildlife corridor is not directly impacted.

- **Bushfire** – buffers and Asset Protection Zones (APZ) have been considered during initial master planning to accommodate expansion and growth of the hospital. These buffers overlap with planned greenspace, amenity and future road access, as well as environmental buffers and can be used to enhance the healing environment and overall amenity of the campus.

### Time, Cost and Value

- **Land acquisition** – the Project Site is privately owned and was put forward by the landowner in response to the EOI process. The negotiation and acquisition process is being undertaken in accordance with the *Land Acquisition (Just Terms Compensation) Act 1991*.
- **Existing utilities** - major utilities (including electricity, telecommunications, sewer, reticulated water supply and drainage infrastructure) are available in close proximity to the Project Site.
- **Enabling works** – utilities connections and road upgrades to Cudgen Road from and including the intersection with Tweed Coast Road will be required.
- **Potential capital cost** – based on draft planning, assessment of the overall capital cost for developing the hospital on the Project Site indicates that it is affordable within the allocated capital budget for the Project.



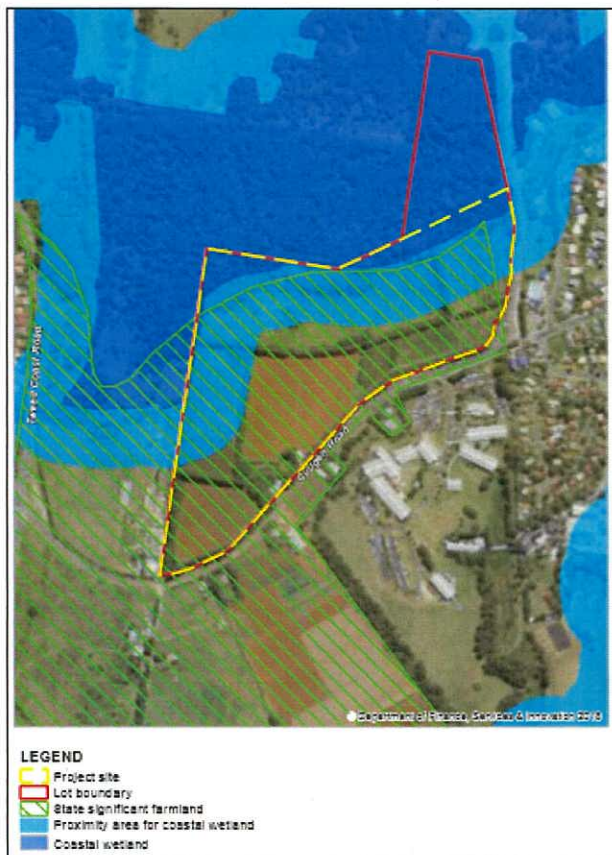


Figure 4 Site Analysis - Coastal Management SEPP and State Significant Farmland  
 Source: GeoLINK 2018 with base data from DFS&I

## 5 Master Planning Process

A master planning process is continuing to be undertaken by Silver Thomas Hanley (STH) and Bates Smart Architects, including testing for future growth strategies and complementary uses.

Although the project will deliver infrastructure to meet the projected health service once completed, the master plan and hospital design will be planned to allow for future reconfiguration, expansion, enhancement and potential consolidation of services over time. The master planning process looks at long term renewal/ replacement strategies for key infrastructure beyond the service projections, maximising environmental opportunities, minimising disruption to existing services during construction of future services and enabling various development scenarios with minimal dependencies. In these regards, key considerations include:

- Maximising the density of the initial build within the site context to provide fit-for-purpose hospital infrastructure, while minimising travel distances and improving operational efficiencies
- Design scenarios that provide future-proofing for different service configurations and incremental expansion over time

- Strategically located on-grade car parking that can be converted to multi-deck parking in the future and provide sites for additional buildings
- Maintaining space for a future major acute services building to enable long-term replacement and redevelopment of the Project Site.

The master planning process has and continues to look at a range of options based on the Draft 2018 Service Statement including projections to 2026/27 and 2031/32 as well as significant expansion scenarios (e.g. +20%, +50%, +100% of initial requirements).

The siting and arrangement is focused on achieving an optimal and functional arrangement for clinical service requirements, whilst being responsive to the Project Site's constraints and opportunities, and broader site context. Refer to **Figure 5** for an indicative Preliminary Master Plan.

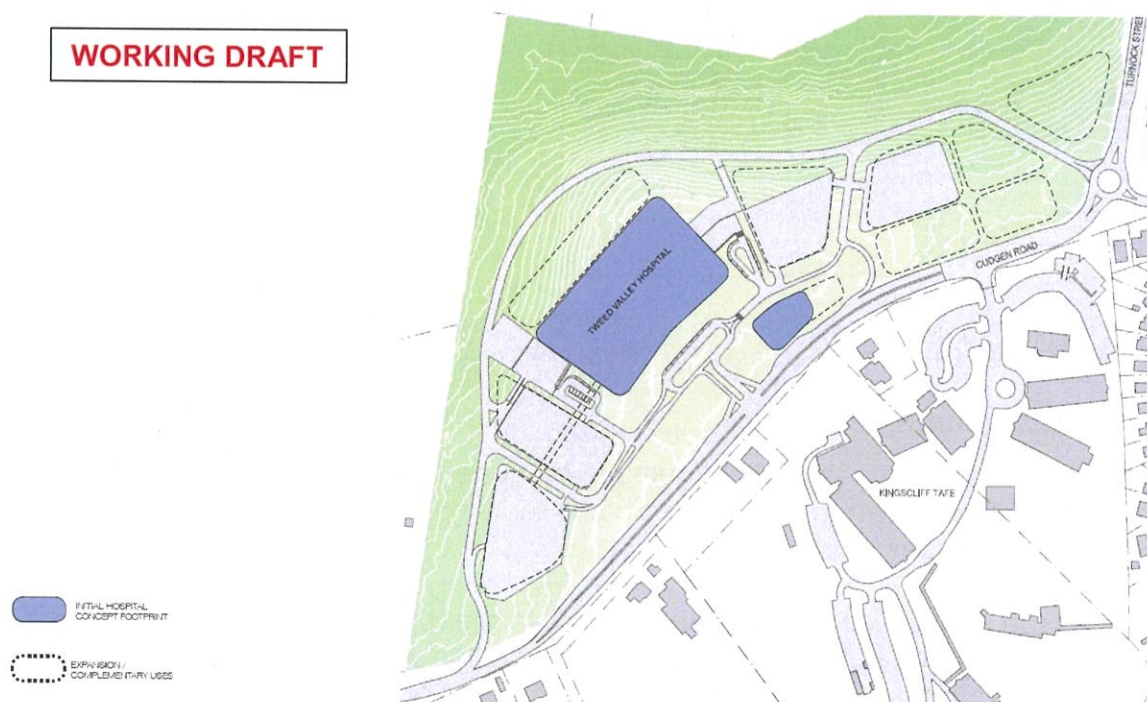


Figure 5 Indicative Preliminary Master Plan Option  
 Source: STH Bates Smart



## 6 The Project

As outlined above, the Project for which a staged approval is sought consists of:

- Delivery of a new Level 5 major referral hospital to provide the health services required to meet the needs of the growing population of the Tweed-Byron region, in conjunction with the other hospitals and community health centres across the region
- Master planning for additional health, education, training and research facilities to support these health services, which will be developed with service partners over time. These areas will be used initially for construction site/ compound and at-grade car parking
- Delivery of the supporting infrastructure required for the new hospital, including green space and other amenities, campus roads and car parking, external road upgrades and connections, utilities connections, and other supporting infrastructure.

At this stage the proposed new Tweed Valley Hospital would comprise the following components and services:

- A main entry and retail area
- Administration Services
- Ambulatory Services
- Acute and Sub-Acute Inpatient Units
- Paediatrics
- Intensive Care Unit
- Close Observation Unit
- Mental Health Services
- Maternity Unit
- Renal Dialysis
- Pathology
- Pharmacy
- Cancer Services including Day Oncology and Radiation Oncology
- Emergency Department
- Integrated Interventional Services
- Interventional Cardiology
- Medical Imaging
- Mortuary
- Back of house Services
- Car parking
- Future expansion areas.

The design team is continuing to work with HI and NNSW LHD to further define the scope of the project which will be documented in the SSD Application.

### ***Staging***

The Tweed Valley Hospital project would be staged as follows:

**Stage 1:** Approval of a Concept proposal design for the new Tweed Valley Hospital and early and enabling works. The early and enabling works would generally comprise:

- Establishing access to the Project Site
- Demolition of existing buildings/structures on the Project Site
- Construction compound
- Augmentation and connection of permanent services for the new facility (water, sewer, electricity, telecommunications)
- General clearance of vegetation within the footprint of the hospital construction works including tree stumps
- Chipping of cleared vegetation (excluding weed species) to use on-site for ground stabilisation/ erosion control, or off-site disposal (as required)
- Bulk earthworks to establish the required site levels and create a stable landform in preparation for hospital construction
- Piling and associated works
- Associated in-ground infrastructure and works, including stormwater and drainage works
- Site stabilisation, including establishment of necessary erosion and sediment controls
- Rehabilitation and revegetation of part of the wetland area
- Construction of internal road ways for use during construction and in preparation for final road formations in Stage 2
- Retaining walls.

**Stage 2:** The second stage would include detailed design, construction and operation of the Tweed Valley Hospital. Stage 2 will be subject to a separate application following Stage 1.

### **Works to be carried out under Exempt and Complying Development Provisions**

HI proposes to undertake some preliminary works under the exempt development provisions of *State Environmental Planning Policy (Infrastructure) 2007* (ISEPP) and the complying development provisions of *State Environmental Planning Policy (Exempt and Complying Development Codes) 2008*. These works would not form part of the SSD Application for the Project and would be undertaken strictly in accordance with the relevant provisions of each SEPP, including:

- Portable site offices
- Car parking
- Hoardings to restrict unauthorised entry to the Project Site
- Establishment of initial erosion and sediment controls
- Retaining walls (under 2.0m) other than those included in Stage 1
- Site sheds
- Demolition of buildings or structures other than those included in Stage 1.



## 7 Planning Framework

### *Strategic Planning Framework*

**NSW: Making it Happen** was released in September 2015 and replaces the State's previous 10-year plan, NSW 2021. NSW: Making it Happen outlines 30 key reforms for the State, including 12 personal priorities of the Premier.

The Premier's Priorities are key priorities for the NSW Government which identifies 12 key areas of focus to rebuild the economy, return quality services, renovate infrastructure, strengthen our local environment and improve education, health and community services. Of particular relevance to the development of the Tweed Valley Hospital are the priorities to:

- Improve access to quality healthcare
- Improve survival rates and quality of life for people with potentially fatal or chronic illness through improvements in health care
- Maintain and invest in infrastructure.

Development of these services in regional areas, in particular, is a significant capital investment and results in employment opportunities. Projects will also contribute to achievement of the following priorities:

- Jobs closer to home
- Increased business investment in rural and regional NSW
- Increased business investment.

**State Infrastructure Strategy 2018-2038** – the State Infrastructure Strategy is a 20-year infrastructure investment plan for the NSW Government that places strategic fit and economic merit at the centre of investment decisions.

The Strategy assesses infrastructure problems and solutions, and provides recommendations to best grow the State's economy, enhance productivity and improve living standards for our NSW community. It is updated every five years.

The strategic objective related to health in the Strategy is to plan and deliver world-class health infrastructure that supports a 21st century health system and improved health outcomes for the people of NSW. The proposed Tweed Valley Hospital development is consistent with this strategic objective and investment in health infrastructure.

**NSW State Health Plan towards 2021** – the proposal would be consistent with and contribute to the delivery of the following key directions and strategies:

- Keeping people healthy
- Providing world class clinical care
- Delivering truly integrated care
- Supporting and developing our workforce
- Support and harnessing research and innovation

- Enabling e-Health
- Design and building future-focused infrastructure.

**North Coast Regional Plan 2036 (NCRP 2036)** – is the NSW Government's blueprint for land use planning priorities and decisions to 2036. It provides an overarching framework to guide subsequent and more detailed land use plans, development proposals and infrastructure funding decisions. While a series of priority actions are included, medium and longer-term actions will be identified to coincide with population growth and economic change. The proposal is consistent with the following goals and Direction of NCRP 2036:

**Goal 2: A thriving, interconnected economy**

*Direction 5: Strengthen communities of interest and cross-regional relationships*

*Direction 6: Develop successful centres of employment*

**Goal 3: Vibrant and engaged communities**

*Direction 14: Provide great places to live and work*

*Direction 15: Develop healthy, safe, socially engaged and well-connected communities*

*Direction 16: Collaborate and partner with Aboriginal communities*

*Direction 17: Increase the economic self-determination of Aboriginal communities*

*Direction 21: Coordinate local infrastructure delivery.*

The coastal settlements of the Tweed Shire have experienced some of the strongest growth on the North Coast. The popularity of the Tweed Coast is expected to continue into the future. Kingscliff will be an important centre in this regard and will service the growth of the Tweed Coast's network of villages.

Justification for the rezoning of, and development of public infrastructure on, SSF will also be provided in the context of the NCRP 2036 and *Northern Rivers Farmland Protection Project – Final Recommendations 2005* as relevant.

**Kingscliff Locality Plan (draft)** – This plan is intended to establish a long term strategic planning and design framework for managing and guiding future growth, development and conservation for the locality. The plan will provide a 30-year strategic planning vision and framework for the Kingscliff and surrounding locality by identifying a clear direction and guiding set of strategies and development controls to implement the strategic framework.

The plan identifies a number of growth areas and precincts around Kingscliff. The proposed Tweed Valley Hospital Project Site is situated immediately adjacent to existing urban and future growth areas and can be effectively integrated into the strategic direction and future development of the locality.



## **Statutory Planning Framework**

### **Environmental Planning and Assessment Act 1979**

The EP&A Act establishes the assessment framework for SSD. Section 4.22 of the EP&A Act provides for staged development applications. Section 4.12 (8) requires that a development application for SSD is to be accompanied by an EIS in the form prescribed by the Regulations.

### **State Environmental Planning Policy (State and Regional Development) 2011**

Clause 8 of State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP) states that development is declared to be SSD for the purposes of the EP&A Act if:

- the development is not permissible without development consent under Part 4 of the EP&A Act; and
- the development is specified in Schedule 1 or 2.

The Project would not meet the requirements of Clause 58 of SEPP, which allow certain health services related development to be undertaken without consent, as the development is not within an existing health services facility. Therefore, the Project requires development consent under Part 4 of the EP&A Act.

Clause 14 of Schedule 1 of the SRD SEPP designates the following development as State significant development:

*Development that has a capital investment value of more than \$30 million for any of the following purposes:*

- (a) hospitals,
- (b) medical centres,
- (c) health, medical or related research facilities (which may also be associated with the facilities or research activities of a NSW local health district board, a University or an independent medical research institute).

The Project is for a hospital that has an estimated total capital investment value of \$534 million. Therefore, the Project is classified as SSD.

The Project will be staged and an EIS is intended to support the Concept Proposal and Stage 1 (early and enabling works). A separate EIS will be prepared to assess impacts associated with Stage 2, which will be the subject of a separate application.

Section 4.39 of the EP&A Act, along with the Regulations, make provision for the Secretary of the DPE to issue environmental assessment requirements to be addressed as part of the SSD applications for both the Concept Proposal / Stage 1 and Stage 2 of the Project.

### **Other State Environmental Planning Policies**

In addition to the SRD SEPP the following SEPPs would apply to the Project Site and will be investigated as required for the SSD Application:

- Coastal Management SEPP 2018
- SEPP 33 – Hazardous and offensive development (would be applicable to Stage 2 construction and operation as part of a separate application)
- SEPP 44 – Koala Habitat Protection
- SEPP 55 – Remediation of Land
- SEPP (Infrastructure) 2007.

### Permissibility

The Project Site is located within the Tweed Shire Council LGA. Tweed Shire has three Local Environmental Plans (LEPs):

- Tweed City Centre LEP 2012, applying to the Tweed Heads Central Business District area;
- Tweed LEP 2014; and
- Tweed LEP 2000, which will continue to apply to the remainder of the LGA that is not governed by the Tweed LEP 2014.

The following section provides an overview of the zoning controls that apply to the Project Site and the general permissibility of a health services facility/ hospital under current planning provisions.

In this instance the Project Site is subject to the Tweed LEP 2014 and Tweed LEP 2000. The following table and Figure 6 provide an overview of the zones applicable to the Project Site.

**Table 1 Summary of Project Site Zoning**

Planning Control	Tweed LEP 2014	Tweed LEP 2000
<b>Zone</b>	RU1 Primary Production (majority of the Project Site) R1 General Residential DM Deferred Matter (Tweed LEP 2000 applies)	1(b1) Agricultural Protection 2(c) Urban Expansion 7(l) Environmental Protection (Habitat)



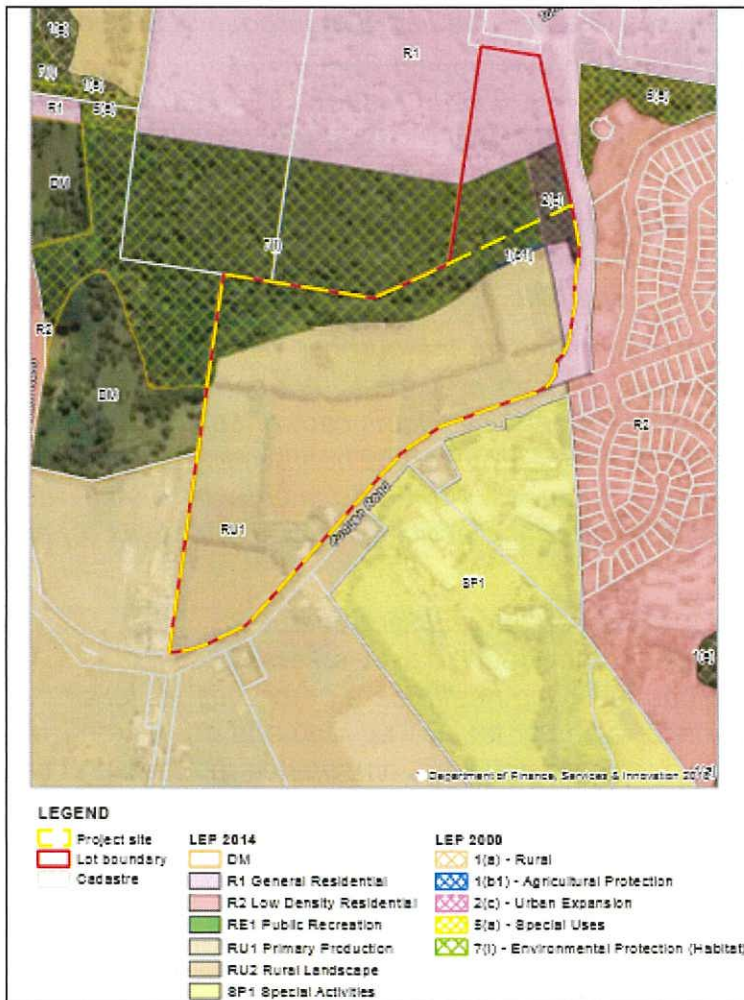


Figure 6 Site Zoning Pursuant to Tweed LEP 2014 and 2000  
 Source of base data: Tweed Shire Council

The proposal potentially involves a number of uses that would have separate definitions under the standard instrument LEP (Tweed LEP 2014). All of the uses fall under the overarching (parent) definition of a health services facility which is defined under the Tweed LEP 2014 as:

*Health services facility means a building or place used to provide medical or other services relating to the maintenance or improvement of the health, or the restoration to health, of persons or the prevention of disease in or treatment of injury to persons, and includes any of the following:*

- a medical centre,*
- community health service facilities,*
- health consulting rooms,*
- patient transport facilities, including helipads and ambulance facilities,*
- hospital.*

The uses can then be further defined as follows:

**Medical centre** means premises that are used for the purpose of providing health services (including preventative care, diagnosis, medical or surgical treatment, counselling or alternative therapies) to out-patients only, where such services are principally provided by health care professionals. It may include the ancillary provision of other health services.

**Health consulting rooms** means premises comprising one or more rooms within (or within the curtilage of) a dwelling house used by not more than three health care professionals at any one time.

**Hospital** means a building or place used for the purpose of providing professional health care services (such as preventative or convalescent care, diagnosis, medical or surgical treatment, psychiatric care or care for people with disabilities, or counselling services provided by health care professionals) to people admitted as in-patients (whether or not out-patients are also cared for or treated there), and includes ancillary facilities for (or that consist of) any of the following:

- a) day surgery, day procedures or health consulting rooms,
- b) accommodation for nurses or other health care workers,
- c) accommodation for persons receiving health care or for their visitors,
- d) shops, kiosks, restaurants or cafes or take away food and drink premises,
- e) patient transport facilities, including helipads, ambulance facilities and car parking,
- f) educational purposes or any other health-related use,
- g) research purposes (whether or not carried out by hospital staff or health care workers or for commercial purposes),
- h) chapels,
- i) hospices,
- j) mortuaries.

**Mortuary** means premises that are used, or intended to be used, for the receiving, preparation, embalming and storage of bodies of deceased persons pending their internment or cremation.

The Tweed LEP 2000 defines a hospital as follows:

*A building or place (other than an institution) used for the purpose of providing professional health care services (such as preventative or convalescent care, diagnosis, medical or surgical treatment, care for people with developmental disabilities, psychiatric care or counselling and services provided by health care professionals) to people admitted as in-patients (whether or not out-patients are also cared for or treated there), and includes:*

- a) ancillary facilities for the accommodation of nurses or other health care workers, and
- b) ancillary shops or refreshment rooms, and
- c) ancillary accommodation for persons receiving health care or for their visitors, and
- d) facilities situated in the building or at the place and used for educational or research purposes, whether or not they are used only by hospital staff or



*health care workers, and whether or not any such use is a commercial use.*

Health services facilities, including hospitals, are not permissible in all zones. However, in instances where health services facilities are prohibited in a zone under the LEP, they can be permissible with consent under Clause 57(1) of ISEPP if they meet the applicable criterion. Clause 57(1) of ISEPP states that development for the purpose of health service facilities may be carried out by any person with consent on land in a prescribed zone. A **prescribed zone** means any of the following land use zones or a land use zone that is equivalent to any of those zones:

RU4 Primary Production Small Lots,	B3 Commercial Core,
RU5 Village,	B4 Mixed Use,
RU6 Transition,	B5 Business Development,
R1 General Residential,	B6 Enterprise Corridor,
R3 Medium Density Residential,	B7 Business Park,
R4 High Density Residential,	B8 Metropolitan Centre,
R5 Large Lot Residential,	SP1 Special Activities,
B2 Local Centre,	SP2 Infrastructure.

Based on the zones applicable to the Project Site the following tables outline if a health services facility (or hospital) is permissible.

**Table 2 Tweed LEP 2014 Site Zoning and Permissibility**

Tweed LED 2014 Zone	Health Services Facility (or Hospital) Permissible?
RU1 Primary Production	No - Prohibited under LEP and not an ISEPP prescribed zone or equivalent
R1 General Residential	Yes – Permitted with consent under LEP and an ISEPP prescribed zone
Part DM Deferred Matter	N/A – refer to LEP 2000

**Table 3 Tweed LEP 2000 Site Zoning and Permissibility**

Tweed LED 2000 Zone	Health Services Facility (or Hospital) Permissible?
1(b1) Agricultural Protection	No - Prohibited under LEP and not an ISEPP prescribed zone or equivalent
2(c) Urban Expansion	Yes – Permitted with consent under LEP
7(l) Environmental Protection (Habitat)	No - Prohibited under LEP and not an ISEPP prescribed zone or equivalent

As per the tables above, two zones (R1 General Residential and 2(c) Urban Expansion) permit health services facilities/ hospitals. However, these zones only cover a small portion of the Project Site and are insufficient to support the main development area of the hospital. The remaining zones applicable to the Project Site prohibit health services facilities/ hospitals.



Pursuant to Section 4.38 (2) of the EP&A Act, development consent cannot be given to an SSD application that is wholly prohibited by an Environmental Planning Instrument (EPI). However, pursuant to Section 4.38 (3) of the Act, it can be given to a partially prohibited development.

Notwithstanding this, Section 4.38 (5) of the Act provides that a development application in respect of a SSD, that is wholly or partly prohibited, may be considered in conjunction with a proposed EPI to permit the carrying out of the development.

To permit/ facilitate the development of the Tweed Valley Hospital on the Project Site, HI requests that DPE prepare a new SEPP, pursuant to Divisions 3.2 and 3.3 of the EP&A Act that amends TLEP 2000 and TLEP 2014 by rezoning part of the Project Site to SP2 Infrastructure (which is area currently zoned RU1 Primary Production, R1 General Residential) and removing height and Floor Space Ratio (FSR) controls to be consistent with other hospital sites. It is proposed that the SEPP would be repealed after TLEP 2000 and TLEP 2014 have been amended.

It is proposed that the draft SEPP and SSD Application be considered and determined in accordance with Division 3.5 and Clause 4.38 (5) of the EP&A Act. These provisions allow an SSD Application, involving development that is wholly or partly prohibited, to be considered in conjunction with a proposed environmental planning instrument (in this case a site-specific SEPP) which proposes to permit the carrying out of the wholly or partly prohibited development on the subject land. Pursuant to Clause 3.40 of the EP&A Act, it is understood that the SSD Application and proposed SEPP would be publicly exhibited at the same time.

#### Other controls under Tweed LEPs 2014 and 2000

As noted above, the proposed Tweed Valley Hospital is located on land which is subject to the Tweed LEP 2014 and 2000. Relevant provisions of these LEPs would be considered during the preparation of the EIS as required. An overview of clauses contained within the Tweed LEP 2014 and 2000 and the objectives that would likely require general consideration are summarised in **Table 4**. However, it is noted that the application of some are subject to change pursuant to the Project Site being rezoned by way of a site-specific SEPP.

**Table 4 Consideration of Tweed LEP 2014 and 2000**

Key LEP Clauses		
<b>TLEP 2014</b>	Clause 4.3 Height of Buildings	The design response would establish an appropriate building height that balances the clinical and functional needs of the hospital whilst suitably responding to contextual, amenity and urban design considerations as is generally the intent of this clause in the LEP.
	Clause 4.4 Floor Space Ratio (FSR)	Currently most of the Project Site is not subject to FSR. As above, a suitable design response would be developed and presented in the SSD Application.



Key LEP Clauses		
	Clause 5.10 Heritage Conservation	The Project Site does not contain nor impact on listed heritage items.
	Clause 7.1 Acid Sulfate Soils (ASS)	The Project Site is mapped as having potential ASS Classes 2, 3 and 5. ASS will need to be considered and addressed. An ASS management plan is likely to be required for the proposal. This would need to be prepared in accordance with the Acid Sulfate Soils Manual and form part of the EIS.
	Clause 7.2 Earthworks	The objective of this clause is to ensure that earthworks for which development consent is required will not have a detrimental impact on environmental functions and processes, neighbouring uses, cultural or heritage items or features of the surrounding land. Relevant provisions of the clause would be addressed and measures proposed to ensure no detrimental impact from earthworks.
	Clause 7.3 Flood Planning	The provisions of the clause have been addressed. The proposed location of the new hospital and associated buildings are above the PMF level. The SSD Application would include relevant flood considerations and demonstrate that the hospital is suitably sited and designed in response to flood planning requirements (as applicable to the proposed development siting).
	Clause 7.10 Essential Services	This clause requires that development consent must not be granted for development on land unless the Council is satisfied that any public utility infrastructure that is essential for the proposed development is available or that adequate arrangements have been made to make that infrastructure available when it is required. Services are available in the vicinity of the Project Site and the SSD Application will need to demonstrate that adequate services can be provisioned for the proposed hospital.
<b>TLEP 2000</b>	Height of Buildings	Similar to above TLEP 2014 considerations.
	Floor Space Ratio	Similar to above TLEP 2014 considerations.
	Clause 28 Development in Zone 7 (I) Environmental Protection (Habitat) and on adjacent land	The Project Site is partly subject to Zone 7(I); however, the development footprint will not be within or directly affect this zone. Biodiversity and stormwater assessments, amongst others, will be prepared and form part of the EIS.
	Clause 34 Flooding	Similar to above TLEP 2014 considerations.
	Clause 35 Acid Sulfate Soils	Similar to above TLEP 2014 considerations.
	39A Bush Fire Protection	The Project Site is partly bush fire prone. The proposal will need to demonstrate acceptable bush fire

Key LEP Clauses		
		protection, having regard to the provisions of Planning for Bush Fire Protection 2006 and draft Planning for Bush Fire Protection 2017.

### Consultation

As outlined previously, HI has undertaken an extensive level of consultation, facilitating community and stakeholder feedback and alternative site comparative analysis to ensure a comprehensive review and site selection process. Agency consultation has also been a key part of the process, with HI and relevant specialist consultants liaising with relevant agencies and Tweed Shire Council to ensure their views and requirements are considered in the site selection and assessment process. Community and agency consultation will be documented in the EIS.

## 8 Preliminary Impact Identification and Risk Assessment

Based upon our preliminary environmental assessment, the potential impacts associated with the proposal are summarised in the table below and will be addressed in detail in the EIS relevant to the Concept Proposal and Stage 1 (early and enabling works).

**Table 5 – Potential impact identification**

Constraint/Issue	Comment
Biodiversity	<p>The Project Site has been extensively cleared and disturbed as it is currently a working farm under cultivation and most of the Project Site does not have native vegetation.</p> <p>Due diligence and preliminary assessment by the project ecological consultants has found that ecological constraints on the Project Site are not substantial but do include the presence of vegetation in the northern portion which is classified as an EEC and Koala Habitat Class 2A. This area has been surveyed and the presence of Koala Habitat has not been identified. This area is also mapped as 'Coastal Wetlands' (Coastal Management SEPP).</p> <p>Based on the current understanding of the proposed development zone and associated impacts, the proposal is expected to occur within the cleared and disturbed area of the Project Site, and no substantial ecological constraints are present on this area.</p> <p>A biodiversity development assessment report would be prepared for the SSD Application.</p>
Agricultural impact	<p>The Project Site is mapped SSF. A comprehensive due diligence assessment and evaluation of over 50 sites determined that the Project Site is the most suitable for the proposed new Tweed Valley Hospital. Public infrastructure can be permitted on SSF under certain circumstances. Any justification for the proposed new site-specific</p>



	<p>SEPP and the EIS (as relevant) would outline the site selection process and justification for development of the Project Site, including assessment of:</p> <ul style="list-style-type: none"> <li>• Impact on (including loss of) SSF</li> <li>• Impact on adjoining SSF</li> <li>• Land Use Conflict Risk Assessment and conflict risk minimisation/ avoidance strategies.</li> </ul>
Bushfire	<p>Part of the Project Site is mapped as bushfire prone land (category 1 vegetation and associated buffer). Siting and design of the proposal will take into account bushfire prone land and a bushfire hazard assessment will be prepared as part of the EIS.</p>
Flooding	<p>Preliminary assessment of the Project Site has found that:</p> <ul style="list-style-type: none"> <li>• The majority of the Project Site is above the PMF. This includes the entire area where the hospital and its access roads will be developed.</li> <li>• The northern sections of the Project Site are within the “Flood Fringe” hydraulic category and the northeast portion is within the “Flood Storage” hydraulic category</li> <li>• Inundation for the 5% Annual Exceedance Probability (AEP) and 1% AEP flood events are similar, with impacts along the northern and northeast extent of the Project Site</li> <li>• A similar but slightly increased inundation extent exists for the PMF flood event.</li> </ul> <p>Importantly, as depicted in the constraints analysis mapping, the majority of the Project Site is outside/ above the PMF extent and therefore can support the proposed hospital development outside of flood prone land, which is a key planning and site selection consideration for a new hospital.</p> <p>There is also good street access and where the Project Site borders Cudgen Road these roads remain flood free for all mapped flood events. There is alternative road access for the southern population if the M1 and Tweed Coast Road are closed due to flooding.</p> <p>The Application would address relevant flood assessment considerations to demonstrate that it satisfies flood planning requirements for a hospital and its associated facilities.</p>
Geotechnical investigations	<p>The topography of the Project Site suggests that it may have geotechnical constraints. A geotechnical assessment is being undertaken and the EIS would assess suitability of the Project Site for the proposal from soil and geotechnical perspective.</p>
Acid Sulfate Soils (ASS)	<p>The Project Site is mapped as potentially being subject to three different classes of ASS. The expected main development zone is elevated and lower risk. An assessment of ASS and a management plan would be prepared as part of the SSD Application, where required.</p>
Land Contamination	<p>The Project Site is disturbed and has been/is used for agricultural purposes, including broadacre intensive cropping. There is some</p>



	<p>potential that contamination exists given past/ current activities on the Project Site.</p> <p>As part of the EIS an Environmental Site Assessment will be undertaken to assess the Project Site's suitability for the proposed use in accordance with SEPP 55.</p>
Drainage and Stormwater	The Project Site slopes to low-lying land in the north, where there are also mapped Coastal Wetlands. Management of drainage and stormwater will therefore need to be carefully considered and assessed as part of the SSD Application.
Water Sources	The EIS will assess impacts to water sources and propose sound management measures as required.
Traffic and Transport	<p>Preliminary assessment of the Project Site has found that:</p> <ul style="list-style-type: none"> <li>• There is good site access potential and connection to Tweed Coast Road and Kingscliff</li> <li>• Access to the Project Site can be provided from Tweed Coast Road and Cudgen Road</li> <li>• Travel time to the Project Site by car for the majority (70%) of the Tweed LGA part of the catchment in under 30 minutes and with an average peak travel time equivalent to the existing Tweed Hospital site</li> <li>• There are existing public transport services and facilities on Cudgen Road</li> <li>• The Project Site is in close proximity to existing educational establishments</li> <li>• Access to the Project Site will be from newly constructed access and some local road upgrade works would be required.</li> </ul> <p>Traffic generation and impacts in and around the Project Site will need to be considered. A comprehensive traffic and access analysis will be undertaken to determine the functionality and appropriate traffic, access and parking arrangements for the Project Site.</p>
Noise and Vibration	<p>An analysis of noise and vibration associated with the proposal will require careful consideration of the impacts in relation to the amenity of surrounding residential uses. A noise and vibration assessment for Stage 1 works will be undertaken and outline measures to minimise and mitigate the potential noise impacts.</p> <p>An assessment of Stage 2, including main construction and operational noise, would be undertaken as part of the subsequent SSD Application.</p>
Aboriginal Heritage	The majority of the Project Site has been heavily disturbed by past and ongoing agricultural activities, and the main development zone of the new hospital is expected to occur in this area. However low-lying northern vegetated areas of the Site appear to be less disturbed. An Aboriginal Cultural Heritage Assessment has been commenced and information will be provided in the EIS.
Utilities/Services	Services are available in the vicinity. The capacity and need for augmentation of any essential services will need to be determined and documented as part of the SSD Application, ensuring that the development can be adequately serviced.



Environmental Amenity	The Project Site is on the urban periphery of Kingscliff, near surrounding residential land uses. The EIS will assess potential amenity related impacts.
Landscape and Visual Amenity	Impacts to visual amenity and the broader landscape would be addressed as part of the ongoing design process and clinical services planning for the hospital.
Socio-economic	The proposed new Tweed Valley Hospital has and will generate interest in terms of social and economic impacts. Both social and economic costs and benefits of the proposal will be addressed through a specialist social and economic assessment that will accompany the EIS. The social impact assessment would comply with the guidelines issued by DPE.
Waste	A preliminary waste management plan will be prepared to accompany the EIS. It will address likely waste streams to be generated during Stage 1 construction and describe the measures to be implemented to manage, reuse, recycle and safely dispose of waste.
Potential Land Use Conflicts	An assessment of any potential land use conflicts will accompany the EIS and mitigation measures to minimise or remove these impacts where required will be included.

### Request for SEARs and the making of a new SEPP

HI requests that the DPE prepare a new SEPP, pursuant to Divisions 3.2 and 3.3 of the EP&A Act, that amends TLEP 2000 and TLEP 2014 by rezoning part of the Project Site to SP2 Infrastructure to allow the SSD Application for the Project to be determined by way of the grant of development consent.

In addition, and on the basis that the Project meets the criteria identified in Schedule 1 Clause 14 of the SRD SEPP, being a health services facility with a capital investment value greater than \$30 million, HI formally requests that SEARs be issued in respect of the Concept Proposal and Stage 1 (early and enabling works) for the Project.

Yours sincerely



Sam Sangster  
**Chief Executive**

