

22 April 2020

Ms Aditi Coomar
Principal Planner
Department of Planning, Industry and Environment
4 Parramatta Square,
12 Darcy Street
Parramatta, NSW 2150

Dear Aditi,

Tweed Valley Hospital Stage 2 (SSD-10353) – Response to Submissions: Second Request for further information

I refer to your letter and subsequent emails dated 02, 07 and 20 April 2020 respectively, requesting additional information to support the above State Significant Development (SSD) application. Health Infrastructure (HI) provides the following information in respect to each of the matters raised.

Hydrology Assessment

HI's stormwater and hydrological consultants (RBG and SMEC) have reviewed the request from the Department of Planning, Industry and Environment (DPIE) and the review undertaken by DPIE's consultant (Alluvium). Following consultation with DPIE and Alluvium, an updated version of the Tweed Valley Hospital Hydrology Assessment (Rev 4) has been prepared along with relevant modelling (attached). SMEC has also provided a cover letter (attached) summarising the response to the request for additional information.

The SMEC response and the updated hydrology assessment have addressed your request and respond to the key matters raised in the review by Alluvium. The updated assessment includes updated MUSIC modelling, and monthly and seasonal (dry/wet) scenarios. Overall, it demonstrates that there would be no significant impact to the wetland. specifically that:

- Based on the available data, it is determined that the increase in runoff from the development is negligible to the entire catchment inflows. In addition, the available data indicates that the wetting and drying sequence is unlikely to impact the hydrologic cycle of the wetland; and
- Based on the associated ecological assessment (Section 5 of the hydrology assessment), there does not appear to be a likelihood of a negative impact on sensitive vegetation communities as a consequence of changed inflows associated with the development.

Traffic Assessment

Bitzios Consulting has reviewed the request for additional information from a traffic perspective. Their response (attached) provides relevant clarification and further information to each of the matters raised by DPIE. The response demonstrates and reaffirms that:

- appropriate modelling and adequate assessment was undertaken;

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- any minor changes between the different assessment stages are justified and reasonable;
- the proposed upgrades more than cater for the development's traffic impacts in relation to the Tweed Coast Road / Cudgen Road intersection; and
- further mitigation measures (in addition to those already proposed) are not required at the Tweed Coast Road / Cudgen Road intersection as a result of hospital traffic.

Infrastructure Management Plan

As requested, the proposed Infrastructure Management Plan prepared by JHA (originally part of Appendix R of the Stage 2 Environmental Impact Statement) has been updated (attached) to reflect/include the additional responses related to water and sewer services provided in the Stage 2 Response to Submissions (RtS) dated 4 March 2020.

Water and Sewer Headwork Charges/Agreement

DPIE also sought further clarification/evidence in relation to SSD 9575 condition of consent schedule 2, B30(c) and matters raised by Tweed Shire Council (TSC). This condition relates to establishing an agreed approach between HI and TSC to connect to the existing water trunk main for water supply services and sewer rising main for sewerage service, as well as headwork charges/financial contributions (if any). In response to TSC submissions on this matter, the RtS dated 4 March 2020 noted the matter and stated that it is still being discussed/negotiated. Further to this, we can advise that an interim agreement and approval are in place with TSC for water and sewer connections respectively. Agreement for permanent connections to TSC services and any associated headwork charges are subject to ongoing engagement and negotiation.

The attached Temporary Water Meter Connection Agreement satisfies the relevant condition requirements as a temporary agreement for the water connection for the construction phase of the hospital and it shall remain in place until a permanent agreement is formalised.

With regard to sewer, the attached Section 68 connect to sewer/drainage approval under the *Local Government Act 1993* demonstrates the authorisation of TSC for sewer, plumbing and drainage works, including connection to the 300mm network utility rising main in Cudgen Road.

It is therefore submitted that this constitutes adequate evidence of agreement with Council for water and sewer connections, notwithstanding that the applicable permanent agreement is yet to be formalised. It is suggested that any condition for permanent water and sewerage service agreements (including details of any headwork charges, if any), can be deferred to and incorporated as a Stage 2 condition of consent, to be satisfied prior to occupation/operation of the hospital.

Agricultural Offset Plan

In response to comments from the Department of Primary Industries (DPI) on the RtS and a subsequent information request from DPIE, the Agricultural Offset Plan has been updated further (attached). The updated Agricultural Offset Plan:

- provides information on programmes / initiatives that have been identified and will be developed and implemented to increase productive and sustainable agricultural land use across the region;
- provides a commitment to these programmes / initiatives and their ongoing development and implementation; and

- provides further evidence of the extensive consultation undertaken (past and ongoing).

As indicated in the RtS, it is relevant to note that in regard to the identified programmes / initiatives applicable to the broader support of agriculture in the region, that HI would not be able to undertake, nor should be responsible for, all of the initiatives by itself. The work forms part of an integrated government response as outlined in the Agricultural Offset Plan, and is guided by the work of the Tweed Valley Productive Land Use Sub-Committee of the Tweed Valley Hospital Regional Cross Government Committee. Hence, by its nature, addressing the agricultural productivity and sustainability of the region is and must be a collaborative effort by the relevant agencies.

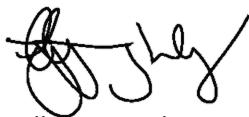
On this basis, we submit that the initiatives in the Agricultural Offset Plan are reasonable and meaningful, and overall the Agricultural Offset Plan adequately satisfies the relevant SSD 9575 conditions of consent.

Noise and Vibration Impact Assessment

JHA have confirmed in the attached letter that the noise assessment and results relating to the expected changes in traffic noise conditions shown in Section 5.4 of the Noise and Vibration Impact Assessment (NVIA) are inclusive of the existing residence located at 764 Cudgen Road. Further to this, a sleep disturbance assessment has been carried out in Section 5.6 of the NVIA, which also relates to this property. Based on the findings and results from the assessments, the expected traffic noise as a result of the proposed development is in accordance with the relevant standards and requirements. Condition B25(c) of SSD 9575 (Concept Approval) has therefore been satisfied.

Health Infrastructure trusts this response satisfies the request and allows for an efficient assessment of this State significant project. If you have any questions, please contact Leone McEntee at leone.mcentee@health.nsw.gov.au.

Yours sincerely,



Gillian Geraghty
Executive Director, Rural and Regional
NSW Health Infrastructure

Attach:

- LTR-Tweed-Hospital-Report-DPIE-Response (SMEC)
- Tweed Valley Hospital Hydrology Assessment (Rev 4)
- Stormwater catchment plan (RBG-CV-DWG-RIE-86-351 Rev 2)
- MUSIC models x2
- Bitzios transport and traffic response (P3378.002R)
- JHA updated Infrastructure Management Plan (Rev I)
- TSC Water meter connection agreement letter
- Approved council hydraulic drawings
- Updated Agricultural Offset Plan (V9)
- JHA noise response letter.