

25 March 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: First Supplementary Response to Submissions**

I refer to your email dated 23 March 2020 requesting additional responses to issues raised in public submissions made on the above State Significant Development (SSD) application. While Health Infrastructure's (HI) Response to Submissions (RtS) report dated 4 March 2020 provides a comprehensive, yet consolidated response to public submissions categorised into key themes/issues, further details on the particular matters raised in the Gales-Kingscliff Pty Ltd (Gales) submission are provided below.

**Drainage from the proposed hospital onto adjoining Gales land**

Stormwater drainage has been addressed in the Stage 2 RtS dated 4 March 2020, along with updated modelling. A civil and stormwater management response by Robert Bird Group (RBG) is attached as Appendix G of the RtS, with an updated hydraulic report and associated responses to submissions included as Appendix H of the RtS.

The topography of the land is such that it drains to the adjacent areas which are at a lower level. Runoff that does not or cannot (due to geotechnical constraints as detailed in the Stage 2 RtS) be managed through infiltration will be directed to the basins which discharge to the north. The discharge rates from the basins will be controlled to ensure that flows are not increased (in accordance with the Development Control Plan). In terms of drainage onto adjoining land, this matter was addressed in the Concept Proposal and Stage 1 (SSD 9575) SSD application and RtS. The following statement remains valid and demonstrates the lawful point of discharge for the site/development:

*Currently, the site drains stormwater runoff into the existing environmental area containing a waterbody identified as an intermittent watercourse or a wetland. It is important to note that a natural waterbody such as an intermittent watercourse or a wetland forming part of the northern portion of the site and includes the neighbouring site is considered a "Lawful Point of Discharge". This principle is also established in David v Hornsby Shire Council [2017] NSWLEC 1025. The stormwater will be discharged via headwalls and will be controlled to mimic natural flow characteristics. Energy dissipation and scour protection will be provided. The headwalls are located well away from the property boundaries and the receiving waters, and discharge within*

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*the development lot. The clean water being discharged, will make its way north and onto the environmental area and ultimately to the wetland which constitutes an intermittent watercourse and is identified as such with a dashed blue line on topographic maps and is therefore a 'lawful point of discharge'.*

It is normal stormwater engineering practice for any development to have a lawful point of discharge. Given the discharge would be controlled and is to a natural waterbody such as an intermittent watercourse or a wetland, constituting a lawful point of discharge, the proposed stormwater management arrangement is acceptable. There is no requirement for an easement or permission to achieve discharge of stormwater to the lawful point of discharge in this instance.

#### **Integration and connection between the hospital site and Gales adjoining proposed future parklands**

The submission by Gales includes a suggestion of shared parking. As outlined in the Environmental Impact Statement (EIS) for Stage 2, the Tweed Valley Hospital will provide on-site parking for staff, patients and visitors of the hospital. This is an acceptable arrangement. Shared parking arrangements with adjoining sites/uses is not proposed.

The Gales submissions refers to a conceptual/proposed future recreational park on the adjoining lot to the northwest of the hospital site. The Gales submission suggests the provision of a connecting pathway between the sites. Health Infrastructure have not pursued this nor consider it practical for the following reasons:

- At this stage the proposed recreational park by Gales is conceptual only and not confirmed. There are also currently no proposed footpaths within our site which this could link to - only a service ring road.
- The proposed future park and any associated infrastructure (by Gales) would occupy an area of mapped Coastal Wetland. These are sensitive environmental areas and detailed assessment would be required to develop such areas or build infrastructure within them.
- The current arrangement of a steep batter along the hospital's western boundary, presence of the ring road and associated site infrastructure (including the hospital's proposed sewer pump station), make it impractical to construct a safe and accessible pathway linkage between the sites at the suggested location.
- If the park is developed in the future, the opportunity for a pedestrian linkage between the sites could be revisited. However, at this stage it is neither practical nor considered necessary.

#### **Gales request that Tweed Coast Road/Cudgen Road intersection upgrade allow for U-turns from the north**

Bitzios Consulting, the Project's traffic engineers, have provided the following advice regarding inclusion of a U-turn facility as part of the Tweed Coast Road/Cudgen Road intersection upgrade:

*The intersection upgrades at Tweed Coast/Cudgen Road have been developed in consultation with Tweed Shire Council and RMS [now known as Transport for NSW]. These upgrades specifically mitigate against the impacts of hospital related traffic. The upgrades do not include provision of a northbound U-turn facility. The inclusion of a northbound U-turn facility will require further traffic engineering assessment and preparation of design plans. The provision of a U-turn facility at this location is not the responsibility of Health Infrastructure, particularly*

*given U-turn movements at this location will not be required for hospital traffic. If this facility is required for the Gales Kingscliff development, this should be reviewed as part of relevant Gales Kingscliff development applications and the necessity and design requirements should be negotiated between the applicant for Gales Kingscliff, Tweed Shire Council and RMS. Any works required to implement this would be agreed by Tweed Shire Council and RMS and works undertaken by or on behalf of Gales Kingscliff.*

On this basis, a U-turn facility is not proposed as part of the hospital development and associated road/intersection upgrades.

**Gales seeks details of hospital accommodation**

This is addressed in Section 3.4.11.1 of the Stage 2 RtS dated 4 March 2020 as follows:

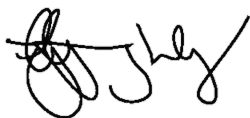
*The hospital design incorporates overnight and lounge facilities for on-call staff in accordance with relevant industrial instruments.*

*The provision of accommodation does not form part of the current application. The large size of the Tweed Valley Hospital site provides a range of future opportunities for co-locating complementary services, in addition to expansion and redevelopment of the hospital, without the need for additional land.*

*Future planning approvals for any developments on the site will include community consultation and public exhibition of documentation explaining and providing details of each particular proposal, as required by the relevant planning approval pathway.*

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](mailto:leone.mcentee@health.nsw.gov.au).

Yours sincerely,



Gillian Geraghty  
**Executive Director, Rural & Regional Region**