

22 January 2019

Sue Folliot
Senior Project Manager
TSA Management
Email: sfolliott@tsamanagement.com.au

Dear Sue,

Re: EIS Response to Submissions

Thank you for forwarding on comments received from:

1. NSW Department of Planning and Environment (DPE).
2. Tweed Shire Council (TSC)

This letter provides a response to comments from those agencies.

The original agency comment text is in black, with our (SGS) response to each recommendation coloured green.

SGS notes that many of the recommendations made by the agencies are beyond the scope of a Socio and Economic Impact Assessment (SEIA) to make recommendations on, in isolation of the design team and Health Infrastructure. SGS has responded to these in that light, and responses from other consultants and Health Infrastructure are provided elsewhere in the EIS Response to Submission (RtS).

It should also be clarified that the 'SIA' (Social Impact Assessment) referred to by DPE and TSC in their queries and comments is in relation to SGS's 'SEIA' (Social and Economic Impact Assessment).

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1. SGS RESPONSE TO DPE COMMENTS

6. Social Impact Assessment

The SEARs required that the Social Impact Assessment be taken into consideration, the Social Impact Assessment Guideline (IAIA, 2015). It is unclear whether these guidelines have been considered in the preparation of the Social Impact Assessment Report. Confirmation regarding this and the details of that consideration should be provided.

The Social and Economic Impact Assessment (SEIA) is guided by the principles outlined in the Social Impact Assessment Guideline (IAIA, 2015), as relevant to the specifics of the Tweed Valley Hospital project. The SEIA outlines the issues pertaining to the function of the hospital in the Tweed Valley Catchment, considers and assesses the impacts that elements of the project or process will have and, where applicable, provides mitigation recommendations or links to other studies that provide mitigation procedures.

The IAIA guidelines also note the role of community engagement through ‘participatory processes’ (p8). As part of the wider Tweed Valley Hospital project, significant stakeholder and community consultation has been undertaken. This is detailed in the Tweed Valley Hospital Project Stakeholder and Community Consultation Report undertaken by Elton Consulting, which estimates that 300 external stakeholders were reached through 360 events. These included landowners.

The SIA should include the baseline information identifying the local community values of Kingscliff and should then assess the impacts based on this baseline data.

Chapter 2 (Context) of the SEIA report focuses on baseline information and data that is focused on this local catchment (which includes Kingscliff), and then benchmarks this information against regional and state-wide trends in order to put local trends into context. The assessment of impacts was then based on this baseline/contextual data.

The justification regarding the re-location of the Tweed Valley Hospital from its current location to the proposed site, largely focusses on access to health care. The report also acknowledges that the relocation would have some negative impact on the local employment and the local economy. However, the SIA does not propose any reasonable mitigation measure to be delivered by Health Infrastructure or others to offset this impact on the local economy.

The SEIA report does not justify the decision to relocate the Tweed Valley Hospital – that justification sits with the business case and site selection documents. The SEIA focuses on the identification of all impacts – positive and negative – arising from this relocation.

The assessed ‘Medium’ negative impact to the Tweed Town Centre relates to the loss of the hospital as a land use on this large site. However, further work has since been undertaken to review the future health services that will continue to be delivered in Tweed Heads.

Northern NSW Local Health District (NNSWLHD) is planning the establishment of the HealthOne facility in the Tweed Heads Central Business District (CBD), with services that will complement those at the Tweed Valley Hospital. The scope and scale of the HealthOne facility will be further developed in coming months, but the HealthOne will provide Community and Allied Health services to the population of Tweed Heads, Tweed Heads South, Tweed Heads West, Terranora and Cobaki, which account for around 49% of the current Tweed LGA current population. An estimated 44% of the Tweed LGA Aboriginal population also reside in these areas. The establishment of the HealthOne will be a significant offset not just in terms of local health care but also impact on the local economy.

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It is considered that a detailed assessment of the impacts on health-related services and other businesses such as local coffee shops, that are associated with the current hospital, should be conducted. Following this, reasonable mitigation measures should be proposed to minimise any negative impacts upon local businesses and users due to the relocation of the hospital.

Further work has also been undertaken to better understand the social and economic impacts on Tweed Heads and potential mitigation measures, identifying likely future uses for further investigation.

Health Infrastructure commissioned an analysis which focuses on this issue in detail through interviewing staff at Tweed Heads Hospital. 51 people were interviewed in total. The primary findings were that:

- A significant majority of participants drive to The Tweed Hospital and therefore the new hospital's location is not considered to be a major impact. Those staff residing in NSW identified that they will have similar or even improved journey to work times when the hospital moves location.
- All staff interviewed used the on-site hospital cafeteria whether buying there or bringing in food from home. Only 4 of the 51 respondents left the hospital to purchase lunch or coffee, and only occasionally.
- The majority (49 out of 56 respondents) of those interviewed did grocery shopping close to home or on their way home, at a location that was convenient to them. Of the 51 surveyed, only 2 identified using the local Tweed Mall to do their grocery shopping due to its proximity to the hospital.
- Interviewees noted that fuel was purchased as convenient or on price, not based on proximity to work or home.
- No staff interviewed had children currently in child care or used elder care. Those that have previously utilised child care noted that proximity relative to the hospital, rather than place of residence, would be the preference.

Concurrent analysis undertaken by SGS also found that:

- Both the resident workforce and the jobs located within Tweed Heads – Coolangatta display a prominence of population serving industries. This is partially owing to the influence of tourism within the area. Increases in population within the region will serve to grow demand within these industries – independently of where health infrastructure facilities are located.
- Employment within the Healthcare and Social Assistance industry represents a significant part of total employment within the areas examined and while hospitals constitute a large proportion of this employment, it is spread across a variety of subclassifications. Aged care services constitute a considerable proportion of employment within these industries.
- The resident population within the workforce catchment is ageing, with a higher than average proportion of residents aged 65 years and over, and a higher proportion of residents approaching retirement age. This indicates that further shifts towards population serving industries and aged care services into the near future.
- The employees of the hospital have a limited engagement with businesses in the surrounding area, with the survey results indicating that there was very little economic input in terms of worker spend originating from the hospital. This indicates that moving the hospital would not likely cause significant disruption to patterns of trade or threaten the viability of retail or food businesses within the area.

SGS has also undertaken further analysis into what other land uses could be developed on the site to assist with economic development in the Tweed Town Centre in the long run, with a focus on the relative economic impacts that these uses may have in the Tweed Heads Town Centre. It was found that potential and/or suitable land uses on the vacated site could include:

- Aged care residential/retirement living
- Residential development
- Tourism
- Accommodation
- Education

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The Community Consultation Report outlines concerns raised in the community about the negative impact of the proposed hospital on the local character of Kingscliff and potential conflicts with the surf tourism and agricultural character of the area. The SIA does not acknowledge or assess these concerns, or the potential impacts of the hospital on the future land release areas in the vicinity.

With regards to the consideration in the SIA, these concerns were reviewed but were not assessed as material impacts. Development of the Tweed Valley Hospital with the appropriate design and mitigation measures will not undermine the local character of Kingscliff or have material impact on the local surf tourism industry as the hospital site is away from the centre of the Kingscliff township and coastline. It is noted that the current hospital site is a similar distance from other beaches in the area, albeit in the larger centre of Tweed Heads, and its operation is not considered to have an adverse impact on tourism in the Tweed Heads-Coolangatta area.

In relation to potential conflicts with agricultural character, some preliminary landscape concept designs contemplate edible gardening options and the opportunity to develop community gardening initiative on undeveloped land. The Department of Premier and Cabinet (DPC), with the support of the Tweed Valley Hospital Cross Agency Planning Committee (including Health Infrastructure) is currently pursuing a collaborative opportunity with relevant agencies, outside of the Project, to support the agricultural industry in the region. This will include improving utilisation of agricultural land, including that which has not been farmed for some time. If successful, at any one time this initiative would provide opportunities to offset the reduction of eight hectares of crops (offsetting those crops removed from the Project Site). Engagement with Department of Primary Industries (DPI) Agriculture regarding incentives/ strategies as well as NSW TAFE and various universities will form part of the development of that opportunity.

The proposed hospital will have no negative impacts on the future land release area.

The SIA should include additional mitigation measures regarding management of the community's needs and expectations during the transitional phase of relocating the hospital as well as area specific mitigation measures for the community in this regard.

This is noted and further mitigation measures should be considered regarding management of community needs and expectations during the transition phase. The project will develop a targeted communications strategy. Community engagement will be ongoing through all phases of the project, through the project website and dedicated telephone line, as well as community pop-ups, online surveys, community information sessions and drop-in sessions as appropriate.

The Traffic Study indicates that there would be approximately 5,000 average daily vehicular trips due to the hospital which is considered to be a substantial increase in traffic movements when compared to the existing scenario in the locality. But the SIA states that the impact of the development on local traffic would be "Low" with no specific mitigation measures identified. The SIA should be amended to address the traffic impacts and propose specific mitigation measures considering the social aspects.

The Traffic Impact Assessment follows the appropriate methodology for undertaking a Traffic Impact Assessment (i.e. the RMS Guide to Traffic Generating Developments) and addresses the SEARs for Transport and Accessibility. As part of this process the operations of the surrounding road network were assessed with background and design traffic volumes. This assessment identified all intersections (with the exception of the Tweed Coast Road / Cudgen Road intersection) operate within acceptable performance thresholds (in terms of queuing, delays and degree of saturation).

Mitigation measures / capacity improvements have been proposed at the Tweed Coast Road / Cudgen Road intersection.

NSW Health Infrastructure is working closely with Council and RMS on the delivery and timing of external traffic infrastructure to support the Project and to ensure that this is commensurate with Council's future planning for the surrounding road network.

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This section of the SEIA report (specifically Section 4.2, page 50) makes a reference to the Traffic Impact Study for full details of the mitigation measures being proposed by HI with respect to traffic impacts.

The hospital would be operating for 24 hours, seven days a week. There would be several activities that would be at night time including helicopter movements, ambulance movements and traffic. The SIA does not identify and assess the social impacts due to these activities that would occur outside the day time hours.

The broader Tweed Valley Hospital helicopter approach and departure “catchment” area generally, encompasses the area out to the coast from the location of the Tweed Valley Hospital and then northwards towards the Queensland border. Advice from specialist consultant, AviPro (Appendix C of the Response to Submissions report), is that the number of helicopter movements to and from the new Tweed Valley Hospital should not be significantly greater than the current number of movements to and from The Tweed Hospital. Therefore, the hazard/risk is not appreciably different.

Further, as part of any commissioning documentation, any necessary “Fly Neighbourly” procedures can be developed in conjunction with helicopter operators with regard to every day hazards such as birds, bats and even drones which need to be considered during the planning and conduct of flight operations. This is considered a normal risk that is addressed thousands of times a year when helicopters conduct their life saving work for NSW Ambulance. Typical daily traffic profiles have distinct peaks (generally morning and afternoon peak hour peaks) which are used for design and assessment purposes. The Traffic Impact Assessment (Appendix L of the EIS) prepared by Bitzios, identified that off-peak and particularly night-time traffic volumes are significantly lower than peak volumes, with hourly traffic volumes representing less than 1% of the overall daily traffic volumes generated by the Hospital. On this basis, it is estimated that less than 50 vehicles per hour would be generated by the development before 10:00pm, which is expected to reduce further during late night periods (between 10:00pm to 5:00am). This evening traffic will be distributed across four access location and consists of both entering and exiting vehicles. Relative to the site’s day time and peak hour traffic generation, these volumes are considered minor.

Given this technical assessment of a 1% increase in traffic volumes, the social impacts will likely be minimal.

The SIA should include details of the social impacts due to provision of paid parking on the site and the mitigation measures to offset the identified impacts. This should be considered in the context of no regular public transport to the site.

Cudgen Road and Turnock Street are part of an existing public transport route which includes public bus stops fronting the subject site.

Consultation has been held with Transport for NSW and Surfside and will be ongoing to ensure appropriate public transport updates and provisions are in place to support the Tweed Valley Hospital.

Further to the EIS submission, a Transport, Access and Parking Working Group has been established to review car parking demand, supply and operations. The working group will review impacts that the Project may have on the on-street parking supply and on nearby off-street car parks (including the Kingscliff TAFE car park). The working group will investigate and develop strategies to determine the appropriate parking provision and address parking impacts to the surrounding area. The working group will also review proposed on-site parking operations. It is noted that this work will be undertaken and submitted as part of the Stage 2 SSD application and is therefore not addressed in detail as part of the work to date.

The submitted SIA states that there are certain services in the existing hospital that would not be included in the future hospital. The SIA also includes a list of the facilities. The Response to Submissions should identify the anticipated impacts on the community due to deletion of these facilities from the future hospital and the measures proposed to mitigate or offset the identified impacts.

The SIA notes that a number of services that are currently being provided/ are located at the Tweed Hospital do not currently form part of the scope of services at the Tweed Valley Hospital Site. Specifically, these services include:

- Community Health

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- Oral Health (non-surgical)
- Breast Screen services
- The Tweed Clinical Education and Research Institute (TCERI)
- Ambulance Station.

The SIA recommended that these services would be best delivered in, or collocated with, a community health facility located in or close to the Tweed Heads Town Centre. It is therefore assumed that these services will remain somewhere within the catchment. The SIA is not suggesting that any of these services will be deleted or become unavailable to the local community.

Northern NSW Local Health District (NNSWLHD) is planning the establishment of the HealthOne facility in the Tweed Heads Central Business District (CBD), with services that will complement those at the Tweed Valley Hospital. The scope and scale of the HealthOne facility will be further developed in coming months, but the HealthOne will provide Community and Allied Health services to the population of Tweed Heads, Tweed Heads South, Tweed Heads West, Terranora and Cobaki, which account for around 49% of the current Tweed LGA current population. An estimated 44% of the Tweed LGA Aboriginal population also reside in these areas. The establishment of the HealthOne will be a significant offset not just in terms of local health care but also impact on the local economy.

For the purposes of clarity, this new facility will accommodate the following services:

- Aboriginal Health and Integrated Aboriginal Chronic Care (IACC).
- BreastScreen
- Child and Family Health services;
- Chronic Disease Management
- Community Nursing & Breast Care;
- Day Therapy;
- Hospital in the Home;
- Harm Reduction, Needle and Syringe Program and HARP Health Promotion;
- Older Person services;
- Oral Health
- Podiatry;
- Women's Clinic;
- Midwifery Group Practice

Note that this list is currently in draft form pending further consultation.

The Tweed Heads area has a good supply of General Practitioners (GPs) and will provide an opportunity to further embed NNSW LHD approach to Integrated Care and improve integrated care between GPs, NNSW LHD Community and Allied Health services and other important service partners.

Moreover, the objectives of the NSW Integrated Care Strategy are to transform how to deliver care to improve health outcomes for patients and reduce costs deriving from inappropriate and fragmented care, across hospital and primary care services.

SIA Stage 1 works

The SIA does not identify specific receptors that would be adversely impacted by the Stage 1 works. This consideration should include, at a minimum, the North Coast TAFE, Kingscliff High School, Kingscliff Library, several residential areas and the commercial areas that incorporates several amenities including Kingscliff Community Health Centre. The SIA should identify these (and any other) receptors and list the predicted impacts for each receptor.

We are not aware of any evidence which suggests that construction would adversely affect any of the above groups in addition to what is already identified in the SIA. That said, if there is further information which arises that identifies specific issues which should be considered for those receptors that differ from those identified in Section 3.2 of the SEIA, the SEIA should be updated to reflect the new evidence.

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The Project Team has undertaken initial consultation with adjoining landowners and neighbouring residents, detailed further in Section 2.5 of the Land Use Conflict Risk Assessment (LUCRA) submitted with the EIS. Further targeted consultation may be undertaken to investigate in more detail exactly how this impact will affect these surrounding areas and to help determine what sort of targeted mitigation measures would be best suited to minimising these impacts on adjoining land owners. The SIA does not acknowledge that there is a broader area which would be affected by the noise, dust and traffic during the construction works during Stage 1 and the construction works for the future hospital. The SIA should specifically identify areas that would be impacted upon, specifically by dust, while being located at a certain distance from the site (due to topography and wind direction), if not mitigated.

Impacts from noise, dust and traffic as a result of the Stage 1 works has been addressed in the EIS and the Response to Submissions Report by specialist noise, dust and traffic consultants. Construction impacts will be managed under a Construction Environmental Management Plan (CEMP).

The EIS notes that Stage 1 construction will be undertaken over 10 months which includes several noise generating activities including pile driving and rock crushing. In addition, consent is sought for extended construction hours on a Saturday between 8am and 4pm. The SIA has not considered any social impacts due to these activities, although significant concerns are identified in the Community Consultation Report submitted with the EIS.

The SEIA identifies that surrounding areas will be negatively impacted by noise, heavy vehicle movements and temporary traffic impacts during construction. The Project Team has undertaken initial consultation with adjoining landowners and neighbouring residents, detailed further in Section 2.5 of the Land Use Conflict Risk Assessment (LUCRA) submitted with the EIS. Further targeted consultation may be undertaken to investigate in more detail exactly how this impact will affect these surrounding areas and to help determine what sort of targeted mitigation measures would be best suited to minimising these impacts on adjoining land owners.

Issues associated with noise, dust and traffic are addressed in the EIS and RTS. As part of the Response to Submissions, proposed construction hours on Saturdays from 8am to 4pm have been revised to 8am to 1pm. This is in line with standard construction hours and the Environmental Protection Agency (EPA) recommendation.

Since the submission of the EIS, additional geotechnical investigations have been carried out and confirm the quantity of rock being excavated is much less than assumed, following the initial investigation. Bonacci Group, as the project civil engineering consultant, have noted that if the Contractor utilised the services of a rock crushing plant, the plant will be located away from sensitive receivers (residential, commercial and educational facilities).

The SIA does not address the number of construction workers and whether they will be locally sourced, as this would have a knock-on effect in economic benefits and potential negative impacts.

Employment during the construction phase of the project is addressed in the Economic Impact Assessment. The modelling in the EIA identified a range of GRP and employment related flow on impacts to the NSW economy which are all positive.

While there is no obligation to specifically employ workers from the local region, this issue is acknowledged and supported. The selected contractor has developed a plan to identify and implement local industry capability strategies to encourage local industry participation, create local employment opportunities and identify potential opportunities to enhance training and skilling to support the local workforce.

At present, the main challenge to local industry participation in the Tweed Valley region is the amount of employment that the Gold Coast provides for Tweed-Byron residents. In 2014, according to the NSW Department of Employment, 22% (6,300) of employed people living in Tweed Region work in the Gold Coast.

Effectively, the Tweed-Byron Region is a net exporter of skilled workers to other regions. This means that other LGA's (incl. in QLD) are getting the benefit of the significant experience which lives in the Tweed-Byron region.

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Independent insight.



HI's vision for the Tweed Valley Hospital project is that it creates opportunities for local employment and local industries during the construction phase, as well as long term benefits to the Tweed-Byron region.

Further analysis has been undertaken assessing the industries of employment of residents in the region which indicates that 13% of those living around Tweed Heads-Coolangatta are employed in the Construction industry.

The SIA does not identify or assess impacts of the construction on specific sensitive times such as high tourism seasons or examination times in the TAFE.

The SEIA was undertaken without certainty around construction timing and its alignment with tourism seasons. The SEIA does acknowledge the impact of temporary traffic measures on the area during construction.

The construction project will occur on a single self contained site and will not adversely impact peak tourism seasons in the broader area.

As mentioned above, TAFE is one of the key stakeholders being consulted with. The Project Team will put communication protocols in place during construction for TAFE to report if noise is excessive during exams.

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2. SGS RESPONSE TO TWEED SHIRE COUNCIL COMMENTS

6. Sustainable Agriculture

V. The state government develop and fund an agricultural support program to offset the impacts of the development including the loss of 14ha of State Significant Farmland and the associated socioeconomic impacts.

The support program could identify current farming issues that impact on viability and help local farmers to overcome existing production and market access issues, create pathways for farmers to supply the new hospital with fresh food, and support the use of currently underutilised state significant farmland using mechanisms not limited to incentives, education and technical support.

It is acknowledged that every productive hectare is potentially significant to the state. This idea has merit, although it is noted that it is one option. Further analysis by an agribusiness consultant, including some consultation with those businesses to provide an assessment of what other measures would deliver the most benefits would provide further detail.

Furthermore, the Department of Premier and Cabinet is currently pursuing a collaborative opportunity with relevant agencies, outside of the Project, to support the agricultural industry in the region. Improved utilisation of agricultural land, including that which has not been farmed for some time. If successful, at any one time this initiative would provide opportunities to offset the reduction of eight hectares of crops (offsetting those crops removed from the Project Site).

This initiative will target a broad range of objectives. Examples include:

- a) Partnerships with TAFE and other education providers to research and improve productivity
- b) Opportunities to get under-utilised land back into production.

7. Community Services

Accessibility, transport and Public safety

W. It is recommended that the Department of Planning request additional information to clarify the considerations used in determining the impact as “low” and include demographic considerations, benefits to active and public transport linkages, accessible parking options for people with limited mobility.

There are plans to mitigate accessibility impacts through public transport service improvements as well as parking options. These would help bring down the impact to accessibility and transport to low. It is noted from staff surveys of hospital staff that a significant proportion of drive to work.

In terms of public safety – in the absence of crime and violence statistics and data, it is difficult to analyse and quantify the real nature of this potential impact to be able to classify it as a high impact. The construction of the hospital in line with CPTED principles will reduce the impact of public safety issues.

Public safety

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X. It is recommended that the Department of Planning request additional information to clarify how hospital related violence and anti-social behaviour associated with hospitals will be mitigated in relation to surrounding facilities.

A high level of importance will be placed on the security and surveillance in the design of the proposal as part of the Stage 2 SSD Application. It is considered that the proposed design measures will significantly reduce the risk of anti-social and criminal activity relative to the current hospital. The detailed design will focus on public surveillance, not providing opportunities for concealed criminal behaviour and addressing all other principles of crime prevention through environmental design.

Accommodation and Housing

Y. It is recommended that the Department of Planning request additional information regarding the consideration for accommodation provisions on site or linkages to affordable accommodation options for staff, patients, students and visitors in a high tourism zone.

The need for dedicated key worker housing is different in this area compared with a place such as Metropolitan Sydney. This is because in many metropolitan areas, the housing market creates higher barriers for gaining accommodation close to places of work. A survey undertaken of current hospital staff indicates that a clear majority drive to work from various localities and that the impact is considered minimal and, in some instances where staff live closer to the hospital, would benefit from a reduced commute time. This indicates that the need for affordable housing for staff would likely be lower compared with a metropolitan hospital.

Further discussions during development of the Stage 2 SSD application between Health Infrastructure and the NSW Department of Planning and Environment regarding expectations around provision of affordable accommodation options for key workers will provide clarity on how much key worker housing may be required near to the Tweed Valley Hospital. This will also provide further light on the need for short to medium stay accommodation for patient families and carers (E.g. Ronald McDonald House at the Royal Children's Hospital in Parkville Melbourne).

Ancillary Health and Social Services

Z. It is recommended that the Department of Planning request additional information regarding the consideration of ancillary health and social services on site or linkages to these services in the vicinity.

It is understood that some ancillary health uses will relocate with the hospital. These may include consulting rooms, some pathology services etc that require co-location. A focus on improvement of public transport access between Tweed Town Centre and the new facility at Kingscliff will mitigate this to some extent.

The SEIA acknowledges a marginal risk that the vacated location in Tweed Town Centre will result in reduced physical accessibility to community health services. However, the report finds that this can be potentially mitigated through the provision of a range of community health and other out-of-hospital services located in or close to the Tweed Heads Town Centre.

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Independent insight.



Please contact me if you have any questions regarding these responses.

Yours sincerely,

A handwritten signature in black ink, appearing to be "Yilong Shi".

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