## TWEED VALLEY HOSPITAL PROJECT RESPONSE TO SUBMISSIONS ADDENDA REPORT

# ENVIRONMENTAL IMPACT STATEMENT (EIS) FOR THE STATE SIGNIFICANT DEVELOPMENT (SSD) APPLICATION

24 January 2019 | Final









#### **DOCUMENT ADMINISTRATION**

#### **Revision History**

Version	Date	Issued To	Remarks
Draft	20 December 2018	Geolink	Draft for Review
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#### **Document Control**

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Approved for issue:	Sue Folliott	Date:	24/1/2019





#### 1.0 Introduction

This document has been prepared in response to the comments and issues raised by the Department of Planning and Environment (DPE), Department of Industry (DoI), Environmental Protection Agency (EPA), Government Architect of NSW (GA NSW) and Tweed Shire Council (TSC) in the Response to Submissions for SSD 9575.

It is intended that the responses are read in conjunction with the EIS and Appendices submitted as part of the Concept Proposal and Stage 1 Early and Enabling Works, submitted under SSD 9575.

#### 2.0 Response to Submissions

#### 2.1 Department of Planning and Environment (DPE)

#### Land Use and Offsets

- Section 5.2.14 of the EIS states that the proposal will result in the loss of 16 hectares (ha) of State Significant Farmland. Pursuant to the principles of ecologically sustainable development, specifically "inter-generational equity", reasonable measures / strategies should be proposed to offset the loss of the agricultural potential of this land due to construction of the hospital.
- Section 5.6.3 of the EIS notes that Dept of Premier and Cabinet is currently pursuing efforts outside of the project to support the agricultural industry in the region that, "If successful, this initiative could more than offset the reduction of eight hectares of crops at any one time on the Project Site." The Response to submissions should include an overview of the measures that are being proposed to offset the loss of the agricultural potential of the land. In this regard consideration should also be given to broader commitments such as using local produce in the future for the hospital etc.

The Department of Premier and Cabinet (DPC), with the support of the TVH 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.

Engagement with DPI Agriculture regarding incentives/ strategies as well as NSW TAFE and Universities will form part of the development of that opportunity. If successful, this initiative could provide opportunities to offset the reduction of arable land and eight hectares of crops at any one time on the Project Site.

Further, the Project Team will work with the Industry Capability Network in the lead-up to operational commissioning, to ensure that local businesses and suppliers of produce have the best possible chance of competing for supply contracts with NNSWLHD within the requirements of the State Purchasing Policy.

Initiatives such as The Buy Local Project Northern Rivers, an existing partnership between Lismore City Council, NNSW LHD and University Centre for Rural Health are being considered for development with Tweed Shire Council and other interested parties to encourage further local business participation.





#### Site Area

• It is noted that the lot numbers have been amended due to the recent acquisition of part of the property. Please confirm if the site boundary of the project has been amended or whether it is part of the parent allotment. If the project boundary has changed, then please provide the Department with an amended site plan indicating the new lot numbers and the site area of the acquired lot. Please clarify whether the area of the site is 19.4 hectares.

The site boundary of the acquired site has been amended as part of the acquisition process. The updated survey can be found at Appendix 1 and confirms the acquired lot (Lot 11) is 19.38 hectares.

#### **Construction Jobs**

• Please indicate the construction jobs likely to be generated for the Stage 1 works.

It is estimated the construction phase of Stage 1 will generate approximately 380 full time equivalent (FTE) jobs.

#### **REF** and Upgrade works

• Please provide a consolidated and updated outline of the details of the REF works and the timing and status of such works. Please provide of details of any additional works proposed as part of the Stage 1 works in lieu of preliminary works (not identified in the EIS).

The scope of work under the REF involves soil and water management works including:

- Earthworks and construction of four sediment detention basins with a total capacity of approximately 6,457m3 to capture stormwater runoff from the Site; and
- Revegetation of the Site by grass seeing to mitigate potential impacst of stormwater runoff

An updated package of drawings can be found at Appendix Q of the Submissions report.

Procurement of sub-contractors has commenced and construction of temporary haulage roads to allow trucks and machinery to access the sedimentation basin works zone is underway. Sediment fencing control is being implemented prior to commencement of construction.

No additional works are proposed as part of the Stage 1 works in lieu of preliminary works.

#### 2.2 Department of Industry (DoI)

Department of Industry (DoI) have made the following recommendations:

• Section 3.8 of the Environmental Impact Statement (EIS) states that 103.15ha of State Significant Farmland in the locality is potentially underutilised and that the loss of the area in question could be effectively offset by other areas being brought into production. If the proposal proceeds, any commitment to investment or strategies that will lead to increased agricultural production in this locality would be strongly supported. DPI Agriculture would welcome further involvement in developing incentives/strategies for increasing agricultural production in this area.





The Department of Premier and Cabinet (DPC), with the support of the TVH 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, this initiative could provide opportunities to offset the reduction of arable land and eight hectares of crops at any one time on the Project Site Engagement with DPI Agriculture regarding incentives/ strategies as well as NSW TAFE and Universities will form part of the development of that opportunity.

 DPI Agriculture considers that greater integration of local agriculture within the built form and environment of the hospital will assist with meeting the 'community asset' project aspiration outlined on page 28 of the EIS. DPI Agriculture considers that a Statement of Commitment to utilise local produce as part of the hospital's food procurement would assist in maintaining agricultural production in the region. Hospital grounds could also be designed to include edible gardening opportunities for rehabilitating patients.

Opportunities for incorporating edible plan varieties within the landscape design will be considered as part of the landscape design development process, which subject to feasibility, will be detailed and submitted as part of the Stage 2 SSD application.

The Project Team will work with the Industry Capability Network in the lead-up to operational commissioning, to ensure that local businesses and suppliers of produce have the best possible chance of competing for supply contracts with NNSWLHD within the requirements of the State Purchasing Policy.

Initiatives such as The Buy Local Project Northern Rivers, an existing partnership between Lismore City Council, NNSW LHD and University Centre for Rural Health are being considered for development with Tweed Shire Council and other interested parties to encourage further local business participation.

#### 2.3 Environmental Protection Agency (EPA)

EPA have made the following recommendations:

#### Waste Control and Management

The proponent be required to identify and implement feasible and reasonable opportunities for the reuse and recycling of waste, including food waste.

- The proponent be required to ensure that:
  - All waste generated during the project is assessed, classified and managed in accordance with the EPA "Waste Classification Guidelines Part 1: Classifying Waste", November 2014 and the 2016 Addendum thereto;
  - 2. The body of any vehicle or trailer, used to transport waste or excavation spoil from the premises, is covered before leaving the premises to prevent any spill or escape of any dust, waste, or spoil from the vehicle or trailer; and
  - 3. Mud, splatter, dust and other material likely to fall from or be cast off the wheels, underside or body of any vehicle, trailer or motorised plant leaving the site, is removed before the vehicle, trailer or motorised plant leaves the premises.





Waste management practices will adopt the principles in accordance with the waste management hierarchy, established under the Waste Avoidance and Resource Recovery Act 2001 (WARR Act).

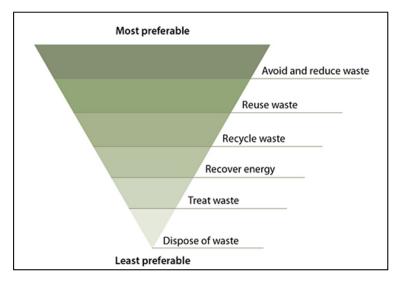


Figure 1: Waste Hierarchy (NSW EPA 2017)

Resource management options will be considered against the following priorities:

- 1. Avoidance actions to reduce the amount of waste generated and undertaking activities.
- 2. Resource Recovery including reuse, reprocessing, recycling and energy recovery, consistent with the most efficient use of the recovered resources.
- 3. Disposal an 'end of pipe' option that must be undertaken carefully to minimise any negative environmental outcomes.

The table below (Table 1) provides a summary of likely waste streams to be generated through construction and identifies practical methods for handling, storage and reuse/disposal of each type of waste. Where appropriate, the reuse and recycling of waste is proposed.

Activity	Waste Stream	Management
Construction of new building/s	Structural steel	<ul><li>Segregation on site.</li><li>Transport or collection to a recycling facility.</li></ul>
	Steel reinforcement	<ul><li>Segregation on site.</li><li>Transport or collection to a recycling facility.</li></ul>
	Concrete	<ul> <li>Segregation on-site.</li> <li>Transport to a recycler or use on-site/off-site in road making activities, building, landscaping and construction works in accordance with the requirements of the Recovered Aggregate Resource Recovery Exemption 2014.</li> <li>Where reuse is not practical, concrete has been pre-classified by the EPA as General Solid Waste (non-putrescible) and can be</li> </ul>





Activity	Waste Stream	Management
		disposed to an appropriately licensed facility by a licensed contractor.
	Plasterboard	• Landfill
	Metals	<ul><li>Segregation on site.</li><li>Transport or collection to a recycling facility.</li></ul>
	Asphalt (for roads and car parks)	• Landfill
	Mechanical – ductwork	<ul><li>Segregation on site.</li><li>Transport or collection to a recycling facility.</li></ul>
	Electrical – metal cable trays, electrical cables, fibre optic cables	<ul><li>Segregation on site.</li><li>Transport or collection to a recycling facility.</li></ul>
	Hydraulics – UPVC pipe, copper pipe, HDPE pipe	<ul><li>Segregation on site.</li><li>Transport or collection to a recycling facility.</li></ul>
Site office and worksites	General office waste – paper, printer cartridges	<ul> <li>Segregation of recyclable waste and storage on-site.</li> <li>Collection and transport to a recycling facility.</li> </ul>
	Domestic waste – food scraps, glass bottles, cans, packaging	<ul> <li>Segregation of recyclable waste and storage on-site</li> </ul>
	Septic and sanitary systems waste	Sewerage treatment plant.
Plant maintenance and chemicals management	Drums and containers	<ul> <li>Segregation of recyclable wastes and storage onsite.</li> <li>Collection and transport to a recycling facility.</li> </ul>
	Waste oil, great, lubricants, oily rags and filters	<ul> <li>Segregation of recyclable wastes and storage onsite.</li> <li>Collection and transport to a recycling facility.</li> </ul>

Table 1: Waste Streams and Management during Construction

The Works will be undertaken in accordance with the legislative requirements relevant to the management of waste in New South Wales outlined within the WMP, including the NSW EPA Waste Classification Guidelines (November 2014) and Addendum (October 2016).

Waste that cannot be recycled and/or reused will be disposed off-site by a licensed contractor to a licensed landfill or recycling facility. Prior to disposal, waste will be classified in accordance with the requirements of the NSW EPA Waste Classification Guidelines.

All vehicles transporting waste off-site will have covered loads. Mud, splatter, dust and other material likely to fall from or be cast off the wheels, underside or body of any vehicle, trailer or motorised plant will be removed before leaving the premises.

A waste tracking record will be maintained of all disposals that records the waste facility name and address, type and identity of disposal vehicle, date of disposal, type and quantity of waste and method of treatment (where applicable). Contractor(s) will keep evidence of the proper disposal of waste to licensed facilities.





All vegetation and topsoil will be assessed for site suitability. All nominated weeds must be cleared from site, or topsoil likely to contain weed material must be disposed of to an appropriately licensed off-site waste facility, and must not be reused on-site for any purpose (e.g. as compost, fill material, etc.)

#### Waste Control and Management (Concrete and concrete rinse water)

EPA made the following recommendation with regard to waste control and management of concrete and concrete rinse water:

- The proponent be required to ensure that concrete waste and rinse water are:
  - 1. not disposed of on the development site, and
  - 2. prevented from entering waters, including any natural or artificial watercourse.

All waste, including concrete, will be disposed of in strict compliance with the applicable Waste Management Guidelines for Health Facilities, including EPA guidelines.

Waste management of concrete will involve segregation on-site and transport to a recycling facility or use on-site/off-site in road making activities, building, landscaping and construction works in accordance with the requirements of the Recovered Aggregate Resource Recovery Exemption 2014.

Where reuse is not practical, concrete has been pre-classified by the EPA as General Solid Waste (non-putrescible) and can be disposed to an appropriately licensed facility by a licensed contractor.

Concrete rinse water will be collected and disposed to an appropriately licensed facility by a licensed contractor to avoid entering waters, including any natural or artificial watercourse.

The Contractor will develop a detailed construction waste management plan as part of the Construction Environmental Management Plan. The plan will provide further details of the management required for concrete waste and concrete rinse water for works associated with the Tweed Valley Hospital Development.

#### Waste Management (Clinical and related waste)

EPA made the following recommendation with regard to waste management of clinical and related waste:

- The proponent be required to properly classify and manage clinical and related waste in accordance with the EPA's Waste Classification Guidelines.
- The proponent be required to ensure that the occupier of the hospital prepares and implements a waste management plan, in respect of clinical and related waste generated at the development site in accordance with NSW Health policy directive 2017 026 titled "Clinical and Related Waste Management for Health Services", dated August 2017.

Operational matters, including clinical and related waste, will be detailed further as part of the Stage 2 SSD, which comprise the main works and operations. In general, relevant State and National Legislation and policy relevant to clinical and related waste will be followed in the development of the Waste Management Plan.

In line with the NSW Health PD2017\_026 Clinical and Related Waste Management for Health Services, the Waste Management Plan will address:

- Governance, including oversight by a Waste Management Committee and clear responsibilities
- Strategies for complying with PD2017\_026, waste minimisation, training, workplace health and safety, auditing, incident management, procedures for specific waste stream management and contract management.





As part of the operations policy, all staff and volunteers will be required to comply with the Waste Management Plan including waste reduction practices.

#### Radiation Management

EPA made the following recommendation with regard to radiation management:

- The proponent be required to ensure shielding of 'regulated material', including diagnostic imaging equipment is assessed and calculated in accordance with the EPA's guidance material provided in "Radiation Guideline 7 Radiation shielding design assessment and verification requirements".
- The proponent be required to apply for and obtain a 'radiation management licence' in respect of 'regulated material' at the new facilities and the management and handling of any waste containing radioactive material.

State and National Legislation and regulations relevant to radiation management will be followed in the development of the design.

The Tweed Byron Health Service Group (TBHSG) Waste Management Plan states that the amount of hazardous waste stored at the current facility does not require the TBHSG to be licensed as a treatment facility.

As the design develops, the licensing requirements will be reviewed and licenses to be obtained as required. A specialist consultant will be engaged as required to inform the design for the Stage 2 SSD application.

#### 2.4 Government Architect NSW (GA NSW)

#### Transport/ Circulation/ Access

• The extent of surface parking is also a concern due to the heat island impacts. Further consideration could be given to alternatives such as smaller footprint multi deck parking, integration of tree canopy and landscape into surface parking or basement parking in future development. Consideration should also be given to reconfiguring the street network to accommodate kerbside parking.

Basement parking is not supported by contemporary best practice for State Significant infrastructure due to issues of security. In some circumstances there are no options due to site constraints however in the case of Tweed Valley Hospital parking can be accommodated on site without the need for basement parking. Car parking demand studies are currently underway to further inform design as part of the Stage 2 SSD application. Integration of tree canopy and landscape into surface parking will be further developed as part of the landscape proposal for the Stage 2 SSD. A Landscape Zonal Plan has been provided as part of the Concept Proposal Drawings in Appendix B of the Stage 1 EIS.





#### 2.5 Tweed Shire Council (TSC)

TSC have made the following recommendations with regard to the following items:

#### Water and Sewer Infrastructure Arrangements

• (Item 1a) An agreement regarding water and sewer headworks financial contributions should be reached between HI and Tweed Shire Council before any water and sewer related approvals are issued;

HI and Tweed Shire Council have commenced discussions regarding water and sewer headworks financial contributions and will reach an agreement prior to receiving water and sewer related approvals.

#### Agricultural Value

Additional information is needed on soil classification

• (Item s) It is recommended that a soil assessment including soil samples and classification against a recognised soil classification system to assess the value of soils across the site be required. In addition, any such assessment should validate the distinction that might exist between the soils on the top of the plateau and those on the surrounding escarpment.

Soil sampling and geotechnical investigations have been undertaken on both the plateau and the escarpment and results can be found in Appendix Q and R of the Stage 1 EIS. Since submission of the EIS, additional geotechnical investigations including permeability testing have been undertaken.

Additional soil classification can be found in Appendix J of the Submissions Report which notes the distinction between the soils on the top of the plateau and those on the surrounding escarpment. Following the recommendation of this report a Landscape Management Plan has been undertaken and is attached at Appendix J.

The Landscape Management Plan acknowledges the surrounding rich, red volcanic soils of the Cudgen Plateau and considers the soils on the top of the plateau to be fertile red Krasnozems however notes geotechnical assessments on the site plateau identified rockiness.

Of further note was the long term cultivation of the site which may have lead to severe deficiencies within the soil despite the usual classification of the Cudgen soil landscape. The Landscape Management Plan confirms that not all soil on the site may be suitable for reuse due to the noted areas of contamination during previous extensive soil sampling and the potential spread of fertilisers and pesticides across the area and recommends that if excess topsoil requires removal from site that further sampling be undertaken to determine appropriate use of excess material. Additional studies may allow for segregation of materials which may be used for landscaping purposes.

#### Sustainable Agriculture

Council is requesting State funded offsets for the loss of any agricultural land and meaningful consultation with the local farmers in relation to the possible impacts with active farming pursuits and the setback requirements to avoid land use conflicts.





• (Item 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.

At this stage, HI is unable to provide confirmation from State Government to commit to supporting an agricultural support program. It is noted that preliminary landscape concept designs for the project contemplate edible gardening options.

The Project Team will work with the Industry Capability Network in the lead-up to operational commissioning, to ensure that local businesses and suppliers of produce have the best possible chance of competing for supply contracts with NNSWLHD within the requirements of the State Purchasing Policy.

Initiatives such as The Buy Local Project Northern Rivers, an existing partnership between Lismore City Council, NNSW LHD and University Centre for Rural Health are being considered for development with Tweed Shire Council and other interested parties to encourage further local business participation.

#### **Community Services**

The application is lacking in detail in regards to accessibility, transport, public safety, onsite linkages and linkages external to the site, accommodation and housing, the relationship with other ancillary social service providers in the area and whether existing State social providers will relocate form Council's assets.

#### Public Safety

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.

In response to hospital related violence and anti-social behaviour associated with hospitals, the principles of CPTED in the development of the Concept Plan have been adopted to establish a safe and secure environment. The CPTED principles will continue to be followed as the design progresses to infom the Stage 2 SSD application. More details how each strategy is implemented can be found in the Stage 1 EIS Appendix C Built Form and Urban Design Report.

#### Accommodation and Housing

 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.

Provision of short to medium-term key worker accommodation in close proximity to the hospital site is considered important in securing visiting workforce. A small amount of on-site accommodation will be





provided as part of the project for on-call clinical staff. It is also acknowledged that the project will need to consider provision for patient and carer accommodation, located on or in close vicinity to the campus.

A Workforce Strategy will be developed as part of the Stage 2 SSD application that will contemplate the future demand for key worker accommodation associated with the Tweed Valley Hospital.

#### **Ancillary Health and Social Services**

• 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.

The masterplan for the site includes capacity for a range of ancillary health and social services. It is acknowledged that the project will bring about potential opportunities, including a provision of a range of retail offerings and potential for child care. Potential service partnership opportunities are currently being explored and will be further defined as part of the Stage 2 SSD application as the project progresses.

#### **Item 14: Other Miscellaneous**

#### Air Quality and Dust

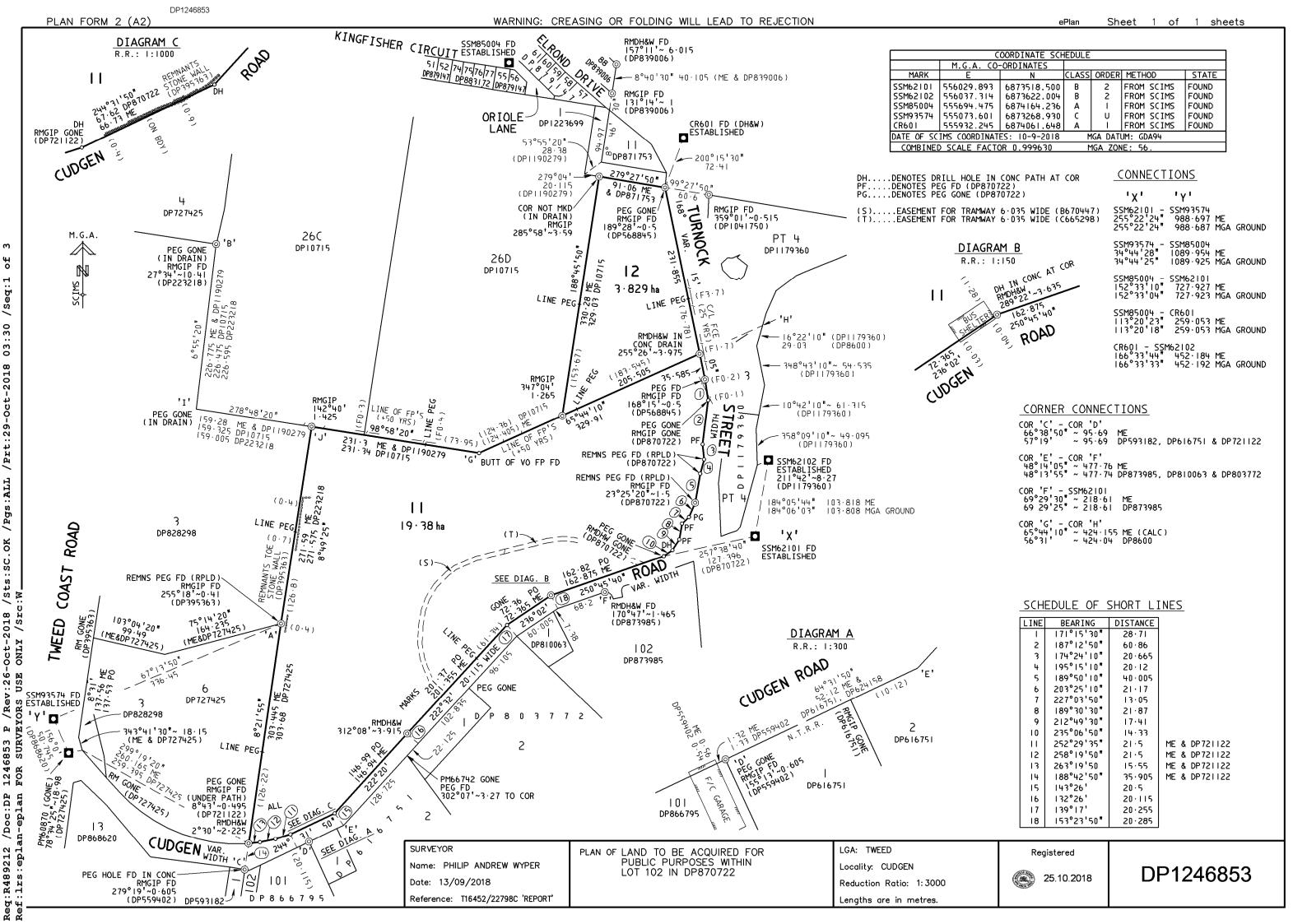
• It is recommended that the Department of Planning and Environment (DP&E) require that for the concept proposal and Stage 2 of the development, where hospital site is smoke free, designated onsite smoking areas shall be identified to prevent second-hand exposure to tobacco smoke and potential pollution of neighbouring properties and public areas.

The development will be in compliance with the Smoke-free Environment Act 2000 and the NSW Health Smoke-free Health Care Policy [PD2015\_003], with NSW Health buildings, grounds and vehicles to be smoke-free, with the exception of designated outdoor smoking areas as determined by the Northern NSW Local Health District (NNSWLHD). The locations of designated onsite smoking areas will be further detailed as part of the Stage 2 SSD application.





### 3.0 Appendix 1 Survey



Req:R489212 /Doc:DP 1246853 P /Rev:26-Oct-2018 /Sts:SC.OK /Pgs:ALL /Prt:29-Oct-2018 03:30 /Seq:2 of 3 Ref:lrs:eplan-eplan FOR SURVEYORS USE ONLY /Src:W ePlan **DEPOSITED PLAN ADMINISTRATION SHEET** PLAN FORM 6 (2017) Sheet 1 of **3** sheet(s) Office Use Only Office Use Only 25.10.2018 Registered: DP1246853 **TORRENS** Title System: LGA: **TWEED** PLAN OF LAND TO BE ACQUIRED FOR PUBLIC PURPOSES WITHIN Locality: CUDGEN **LOT 102 IN DP870722** Parish: CUDGEN County: ROUS Crown Lands NSW/Western Lands Office Approval Survey Certificate I, ...... (Authorised Officer) in I, PHILIP ANDREW WYPER ..... approving this plan certify that all necessary approvals in regard to the Of B & P SURVEYS, PO BOX 327, TWEED HEADS, 2485...... allocation of the land shown herein have been given. a surveyor registered under the Surveying and Spatial Information Act 2002, certify that: Signature: ..... \*(a) The land shown in the plan was surveyed in accordance with the Date: ..... Surveying and Spatial Information Regulation 2017, is accurate and the survey was completed on 13 / 9 / 2018 ....., or File Number: ..... \*(b) The part of the land shown in the plan (\*being/\*excluding \*\* ......... Office: was surveyed in accordance with the Surveying and Spatial Information Regulation 2017, the part surveyed is accurate and the survey was completed on,..... the part not surveyed Subdivision Certificate was compiled in accordance with that Regulation, or \*(c) The land shown in this plan was compiled in accordance with the \*Authorised Person/\*General Manager/\*Accredited Certifier, certify that Surveying and Spatial Information Regulation 2017. the provisions of s.109J of the Environmental Planning and Datum Line: 'X' - 'Y' ..... Assessment Act 1979 have been satisfied in relation to the proposed subdivision, new road or reserve set out herein. Type: \*Urban/\*Rural Signature: ..... The terrain is \*Level Undulating / \*Steep Mountainous. Dated: 13/9/18 Accreditation number: Signature: Consent Authority: ..... Surveyor Identification No: 2340 Date of endorsement: Surveyor registered under the Surveying and Spatial Information Act 2002 Subdivision Certificate number: ..... File number: ..... \*Strike out inappropriate words. \*\*Specify the land actually surveyed or specify any land shown in the plan that \*Strike through if inapplicable is not the subject of the survey. Statements of intention to dedicate public roads, create public reserves Plans used in the preparation of survey/compilation. and drainage reserves, acquire/resume land. DP8600 DP624158 DP870722 DP10715 DP721122 DP873985 IT IS INTENDED TO ACQUIRE LOT 11 FOR DP727425 DP1041750 DP395363 PUBLIC PURPOSES DP223218 DP803772 DP1179360 DP559402 DP810063 DP1190279 DP1223699

Signatures, Seals and Section 88B Statements should appear on

PLAN FORM 6A

DP828298

DP836315

DP839006

Surveyor's Reference: T16452 / 22798C "REPORT"

DP 871753

DP568845

DP593182

DP616751