

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

Agreed to false or misleading information statements: yes

Name: [REDACTED]

Email: [REDACTED]

Address:

[REDACTED]

[REDACTED]

[REDACTED]

Content:

I have lived in Kingscliff and Cudgen for the past 15 years. I have seen how vital and important the farm land is to this area. I do not object to the building of a new hospital I object to the proposed site. I object to the EIS for the following reasons:

- There are other sites that exist. The only option does not have to be state significant farmland. The farmland should be protected by the government not destroyed
- The community was not consulted on this matter. This is very significant as the hospital built in the proposed location would ruin Kingscliff's local beach and fresh food tourism industry. Changing the core business focus and culture of the town from tourism and small crop agriculture to health services without any discussion with the community.
- The community has worked hard to keep Kingscliff's building level at three storey's. The hospital would completely undermine this.
- Falsely asserting that the chosen site was the "best" and "chosen by experts" when in fact it was a commercial decision from the limited land for sale at one particular point in time in 2017.
- Residents in Tweed would be cut off from accessing the hospital in times of flooding.
- Diminishing Kingscliff residents' quality of life with intense urbanization, increased traffic congestion and parking demand, 24hr ambulance emergency sirens, 24hr helipad emergency aircraft arrivals, all-night floodlighting of entire site, loss of amenity, loss of rural ambience and lifestyle.

IP Address: [REDACTED]

Submission: Online Submission from [REDACTED] (object)

https://majorprojects.accelo.com/?action=view_activity&id=300697

Submission for Job: #9575 New Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_job&id=9575

Site: #4045 Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_site&id=4045

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Agreed to false or misleading information statements: yes

Name: Christine Boyd

Organisation: [REDACTED]

Email: [REDACTED]

Address:

[REDACTED]

Kingscliff, NSW
2487

Content:

Please see attached file for detailed response to EIS and my reasons for objecting.

IP Address: [REDACTED]

Submission: Online Submission from Christine Boyd of Mrs (object)

https://majorprojects.accelo.com/?action=view_activity&id=300699

Submission for Job: #9575 New Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_job&id=9575

Site: #4045 Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_site&id=4045

I am writing to advise you that I am strongly objecting to the proposal to relocate Tweed Hospital to 771 Cudgen Road, a farm currently zoned RU1 State Significant Farmland for the following reasons.

1. Lack of any meaningful Community Consultation

1.1 Breach of Department of Planning & Environment's own policies

<http://www.planning.nsw.gov.au/Policy-and-Legislation/Under-review-and-new-Policy-and-Legislation/Legislative-amendment-for-concept-proposals>

From Appendix H of the SEARs application from Health Infrastructure (HI), "Over 1000 people within the region were directly involved in the consultation either through face to face engagement or through the formal submission process. (Page7) the SEAR mentioned "extensive level of consultation, facilitating community and stakeholder feedback" (Page 28). 1,000 people out of a population of 90,000 could hardly be termed as "extensive". Also at no time was the community informed that supposed pop ups, website etc, that statistics from this would be included in the SEAR. If I, as a concerned community member had known this I would have made more of an effort to attend a pop up. However I attended a HI pop up at Kingscliff markets only to be informed the site of the hospital was already chosen & they were only there to talk about the clinical services the community would want. There did not appear to be any formal manner of collecting people's views, nor were there any questions asked. So based on this I feel the entire consultation process is flawed and should be ignored. I have included the written submissions graph in my objection to the SEPP so will not repeat it here

1.2 Deliberately misleading

Conveniently, the HI SEAR application on Page 7 has omitted the written submissions that they received where over 600 letters/emails were received, thus making up the 60% of the people consulted. In the written responses, 44% opposed the proposed site whilst 32% supported. Also begs the question about the data collection & what the meaning of "neutral is." If people make the effort to write a response, this figure is always more reliable than face to face consultation. Not only were these consultations a farce, **members the local farming community had to organise the first meeting with the local Member of Parliament and Health Infrastructure. Thus breaching the EPA Act 2.23 and your own department's community consultation policies.**

1.3 Real Community Consultation

As part of the Relocate Group, we are also in possession of over 9,000 signed petitions opposing the proposed site of the Tweed Valley Hospital and also over 6,000 signatures on an online petition. Far more consultation than Elton undertook. It is interesting that none of this is included in the HI application. This petition has been tabled in the NSW State parliament.

Also I personally spent many months petitioning and talking to the elderly who live near the current hospital. In the hundreds of community members I have spoken to only 4 people thought the location of the proposed hospital was a good option. Also during my months of petitioning, there would have been a great many more signatures as Queenslanders, Victorians and even overseas tourists wanted to sign the petition, but it was limited to NSW residents on the electoral roll.

Note in the Elton Consulting report page 5 "consultation was undertaken from 4th April to June 14 2018." This statement is FALSE, as there was absolutely no consultation with the community until the community organised the first meeting on 14th April at Cudgen Leagues Club. Yet another breach of the EPA Act Section 10.6 "False or Misleading information."

1.4 lack of Transparency (Requirement of the EP&A Act)

Also despite numerous requests for the full site selection report by various members of the community GIPA request, to date HI has never released this publicly, nor have they even defined the site selection criteria, for example one of the criteria was urban context, what does this mean & why is it relevant for a hospital. There is no urban context around Coffs Harbour hospital (built in an industrial area) or Byron Bay Hospital, several kilometres from town centre.

Also of note they consistently refer to the community consultation group of over 50 community members but I need to point out, no-one knows who these people are, what they represent in the community and if you did not vote LNP or were in favour of the proposed site , then you did not get picked to be on the consultation group.

1.5 Lack of Consultation with key Stakeholders

Not only has HI not consulted with the local community, it has also neglected key stakeholders such as the Northern NSW Local Health District, who amended their minutes to have the word consult removed as they were just told by Department of Health/HI where the proposed hospital would be located.

Also Tweed Shire Councillors were also kept in the dark and were unaware where the hospital would be located until the announcement by Minister Hazzard on 4th April 2018.

Such lack of consultation and engagement is completely unacceptable.

1.6 Personal Impact

Finally the construction of the proposed Tweed Valley Hospital will directly affect our family due to our proximity to the construction site. We have not received any communications from HI or The Health Department even though our streets will be the most affected. But people I know in other parts of the town who will not be so significantly impacted, have received letters about the proposed hospital. Highlighting again the lack of any communication and consultation with the community.

I also request an answer on how NSW Health can erect a fence with prominent signage that the Tweed Valley Hospital is on its way, even when no approval has been obtained and the community consultation process is not yet completed? It seems this is deliberately designed to ensure the local community give up on objecting to this proposal.

How can the community have faith in the site selection process when there has been no consultation and no ongoing transparency, rigged community consultation group and works already commenced without approval?

Already we have demolition and construction works already commenced on the site, out of normal construction hours, when approval has not even been granted. I have had to lodge a complaint already.

2. Breaches Long term strategic plans/ State Policies

2.1 North Coast Regional Plan 2036

This long term regional strategic plan calls for the expansion of the existing hospital after years of planning and was endorsed by the Health Minister (Minister Hazzard) only last year - 2017. The plan also is trying to protect existing agricultural businesses from encroachment of inappropriate land activities. **This proposal to build a hospital on State Significant Farmland is a direct breach of the North Coast Regional Plan 2036**, as it places the new hospital directly across the road from important farming activities and will consequently fragment/destroy the existing SSF farmlands on the Cudgen plateau.

When asked at a community meeting in June why Minister Hazzard had changed the location of the new hospital when the North Coast Regional Plan had it remaining at Tweed Heads, Minister Hazzard responded to the community and I quote "because I changed my mind" when asked why he replied "Because I can." Not nearly a good enough reason for this ill thought out proposal and an insult to the local community. How can the community have any confidence in the transparency of this planning proposal when approved regional strategic plans are ignored.?

There is also multiple other breaches of the NCRP which have conveniently been left out of the SEARs, such as Goal 2 – Direction 11 "protect and enhance productive agricultural lands." (Rezoning SSF is a direct breach of this Direction). Also Goal 2 Direction 8 – "Promote tourism" (Who will want to drive past a nine storey hospital, into a town that will be busy, no parking and excessive traffic).

The NCR Plan 2036 also outlines the following:

"Kingscliff is renowned for its low-key coastal settlement atmosphere, proximity to the beaches, environmental qualities of Cudgen Creek and the expansive coastal foreshore. Agricultural and farming define the edge of the Kingscliff and Cudgen settlements and when combined with the green hinterland back drop forms the unique landscape and visual character of Tweed's Green Caldera. Natural attributes and the coastal character make Kingscliff one of the Tweed's most popular tourism destinations, attracting hundreds of thousands of visitors every year.

The future vision for the Kingscliff locality is for a vibrant coastal town servicing the needs of the local residents as well as the broader network of Tweed coastal

villages and tourist alike. A coastal town which offers a prosperous and healthy community life, local economy and employment opportunities, appropriately scaled goods and service provision, diversity of housing choice nestled within a highly valued environmental context fringed with a working agricultural hinterland."

Placing a 450 bed hospital right next to Kingscliff and on one of the main roads into Kingscliff will have a significant impact on coastal character of Kingscliff and will impact on tourism.

2.2 Tweed Shire Local Environment Plan

This Hospital proposal breaches the above strategic plan as the plan prohibits the use of RU1 land for hospital/health precinct use. It also has hard fought (by the community), restrictions on height limits (which this proposal breaches).

2.3 Kingscliff DCP

Tweed Shire Council has spent many years developing and consulting with the local community as to how we wish to see Kingscliff in the future. The community has chosen to have a three storey height limit to maintain the coastal village charm, as this is why many tourists come to Kingscliff. The TVH proposal blatantly breaches the Kingscliff DCP as it is proposed to be nine storeys. This will completely change Kingscliff and set the precedent for further high rise, destroying our town and our farms, therefore should be refused.

2.4 Tweed Coast Rural Land Strategy 2018-2036



Obviously this hospital relocation proposal also breaches the above Tweed Shire Council strategic plan.

2.5 The NSW Right to Farm Policy

This proposal to build a large hospital on SSF breaches the Department of Primary Industries Right to Farm policy which on page 4 states the aim of the policy is to allow farmers "to undertake lawful agricultural practices without conflict or interference." And environmental planning instruments should be used to minimise land conflict. There are several farms in very close proximity to the proposed hospital and land conflict will escalate as a result of this proposal.

NSW Right to Farm Policy

In December 2015 the NSW Government published the New South Wales Right to Farm Policy. The concept of 'right to farm' relates to a desire by farmers to undertake lawful agricultural practices without conflict or interference arising from complaints from neighbours and other landusers.

In addition to comments received from the Department of Primary Industries raising concerns about loss of access to potentially productive agricultural land, the State Government is implementing a planning approach for landuse adjoining and near agriculture or land capable of being used for agriculture that minimises conflict, and will support farmers'

2.6 Environmental Planning & Assessment Act

Section 2.23 Community participation plans – “The community has a right to be informed about planning matters that affect it”. This and additional sections have all been breached as there was no community consultation about this significant development until the community organised the first consultation meeting.

2.23 (g) “ Planning decisions should be made in an open and transparent way and the community should be provided with reasons for those decisions.” This section of the Act has also been breached, see 2.1 Paragraph 2 for Minister Hazzard’s response to the community. Not nearly a good enough reason for this ill thought out proposal. How can the community have any confidence in the transparency and thorough assessment of this planning proposal?

With such drastic changes proposed to the above strategic plans, the community should be consulted again before these changes are adopted.

3. Visual impact

The Geolink consultant’s report subjectively assess the visual environment of the area as being at the rural/urban interface as being of Medium value. This is despite their reference to the “Visual Management System for NSW Coast, Tweed Pilot 2004” where it actually described as “high visual quality Rural landscape with low capacity for change.” Again more misleading comments.

It is also interesting to note that only one of the VSR view frame photos included a view of Mount Warning and this was presented in such a manner to make it look insignificant, deliberately misleading the significance of the visual impact on houses elevated on Kingscliff Hill. The red line which is supposed to outline the height/impact of the proposed hospital is very amateur and not what would normally be expected of a consultant’s report. So I have done a photo montage of my own, indicating the massive impact this proposal will have on the surrounding community.



Plate 4.5 VSR view frame taken from McPhail Avenue

We are most affected and to date there has been no communication received by the residents of Kingscliff Hill. Again a breach of the EP&A Act 2.23.

Impact of adjoining towns

The local residents of Kingscliff and Cudgen will also be faced with the loss of quality of life we currently enjoy. Increased traffic congestion, parking issues (as the proposal has inadequate parking spots allocated & have indicated they will be paid parking). Increased noise, 24 hour sirens, helicopter landings, flood-lighting and loss of rural ambience.



From our loungeroom window – I would call this High visual impact and no “healing views” for us



Hospital at night

Again, a breach of the EPS Act, 10.6. The proposal should not be approved.

4. Site Constraints

The EIS on page 25 sites a number of environmental & development constraints as it is located Coastal Wetlands that are protected and in this area it is mapped as Endangered Ecological Community with Koala Habitat.

4.1 Actual Block

Below is a picture of the western part of the site (which has not been included in the EIS thus making the area look quite flat and suitable to build on). The block is actually quite steep and sloping. There is very little flat area to build a large hospital and the block will require significant cut & fill. Therefore increasing the cost of the project leaving less money for the clinical services we so urgently (apparently) we need in a new hospital.



4.2 Proposed Earthworks constitute and Extractive Industry and should be the subject of a second EIS

The Geotechnical report identifies further site constraints and indicate that the site is underlain by hard basalt and the soil layers will contain large basalt boulders. Further it suggests that rock breakers and blasting may be required to remove the rock to get to the required basement levels of the proposed development. Also it makes mention that additional funds may be required to allow extraction again increasing the cost of this proposal. The civil report states this excavated rock should be used for road pavements despite the fact that the geotechnical report says it is unlikely the hard rock could be broken into pieces small enough to be used as pavement. Thus a crushing plant is required to break the rock into small enough fragments so it can be used as pavement material. The combined reports therefore suggest that more than 2 hectares will be cleared, blasting will occur within 1000 metres of an urban population, rock will be crushed on site to make pavement materials. **This fits the definition of an extractive industry under Part 3 of the EP and A Act and therefore a further EIS is required.**

5. Tweed Shire Council

More recently Tweed Shire Council has indicated through Council Resolutions that they have objected to the proposed hospital site & re-zoning in the strongest terms possible. They have also written several letter objecting in the strongest terms to the SEPP and EIS and have raised some very significant concerns about the project, how its been implemented and the long term impact on the community. **So if the Tweed Shire Council and the majority of the local community do not support this EIS, then the Planning Department should not approve either the SEPP or the EIS.**

6. The Applicant has pre-empted the approval.

How can the community have any faith in the planning process when the Applicant has blatantly pre-empted the approvals process by:

- Moving specific works out of the Hospital EIS and undertaking them using Part 5 so they can side step the approvals process.
- The proposed site is now ringed with signage proclaiming the new hospital will be constructed on “this site” prior to rezoning of the site and prior to determination of the EIS.
- The Health Minister and Local Member have continuously stated that “works will begin before the end of the year”.
- In the recent Supreme Court case where the owners of 771 Cudgen Road attempted to halt the Compulsory Acquisition of the land by HI, it is noted that negotiations between HI & the owners first commenced in November 2017 and continued right through to November (again highlights misinformation and lack of community consultation)
- Health Infrastructure staff at their pop up shops have stated that the Cudgen Site is a “done deal”.

7. Other issues with this proposal

7.1 Access

As previously mentioned the vulnerable people of the Tweed community, who have bought housing to be close to the current hospital have not been considered in this EIS. I have personally spoken to several hundred residents in the Tweed area and they are very angry at this proposal and are very concerned as to how they are going to get to Kingscliff as many of them do not drive. There is only some vague mentioned that bus routes can be extended, but again this will increase costs to the elderly (catching taxis etc as there is very little in the way of community transport in this area), increased traffic in kingscliff and so on.

7.2 Economic Impact

Impact economic impact on the Tweed region by re-locating the Tweed Hospital is very vague. It includes very little about the economic impact on Tweed heads itself. But according to the NCRP – the Hospital sector is a one of the main economic drivers for the city. All the EIS mentions is the loss of four farm related jobs. Again deliberately misleading.

7.3 Security of community & Hospital staff

After many years in the planning a regional police station has been built at Tweed Heads, within 2 minutes of the existing Tweed Hospital site. It is well documented that public hospital Emergency departments have frequent security events for a variety of reasons including alcohol related violence mental health patients, homeless people etc. In fact there have recently been media articles about the increasing violent attacked on Tweed Hospital staff. My point being that there is no manned police station at Kingscliff and by moving the hospital away from police support, will endanger the hospital staff who will be on the frontline.

7.4 Increased ambulance transport times

The current Tweed Hospital site has an ambulance station onsite. Kingscliff currently has two only ambulances located at Kingscliff and no ambulances located at Cudgen. The vast majority of Aged Care Facilities are located at Tweed Heads & the surrounds. There only two located at Kingscliff. As it is the elderly who are most likely to require public hospital services and the ambulance service north of the Tweed River will have to transport sometimes critically ill people another 15-290 minutes to Kingscliff. The EIS makes not mention of how they will manage this. We have all seen the Northern Beaches hospital debacle and this does not inspire community confidence.

7.5 Lack of affordable homes

A 450 bed hospital will require a significant number of additional staff who will require somewhere to live. There is a significant lack of affordable housing especially in the Kingscliff and Cudgen areas. But again no mention of this in the EIS.

7.6 Flood Impact 2017

HI has made much of the selection criteria that any site must be above the PMF flood level. HI 's Peter Lawless, at a community meeting displayed a distinct lack of knowledge when he advised the community that people living north of the Tweed River, in a flood such as we experienced in 2017, could access the Robina Hospital if required. The M1 was cut off during this flood and the Robina carpark had to be closed due to flooding. He further compounded his lack of knowledge by advising that the proposed Tweed Valley Hospital at Kingscliff could be accessed via the tweed coast roads. Kingscliff and Salt/Casuarina were completely cut off by floodwaters for three days, so no-one from north or south could access the townships. There appears to be no plan for prolonged inaccessibility in this EIS.

Tweed Hospital at it's current site was accessible to people on the north.

7.7 Noise & Dust

I am particularly concerned about the noise and dust that will be created during the lengthy construction of the proposed hospital only 200 metres from my residence. I have two children who are currently studying at Kingscliff High School, with one of these being in Year 12. How does HI propose to limit the disruption to Cudgen and Kingscliff when they have requested additional construction hours? **I strongly disagree with extended construction hours and as mentioned previously construction has already commenced on the site and contractors are already not adhering to the proposed hours.**

7.8 Impacts on public venues located near the proposed hospital site

The EIS does not make any comment on the impact on nearby public amenities such as the local pool the TAFE and Kingscliff High School. All of these amenities currently have free parking onsite and are located in close proximity to the proposed hospital site. With paid onsite parking already proposed for the Tweed Valley Hospital, these other public amenities will be greatly impacted by carparking, increased noise and traffic. Yet there is no plan to manage this.

7.9 Conflicting Information in Consultant's reports

Obviously the Consultant reports have been expedited with some reports even looking at the dates of these reports it is easy to see why there is so much conflicting information. Even some reports make comment that there was not enough to fully assess certain items.

Traffic Data undertaken – 31 May for 1 week
Agricultural Impact inspection – 16 June
Contaminated Land Investigations – 14 June
Biodiversity Field Surveys - 15 June
Noise Monitoring - 14 June to 22 June
Contamination Report - 14 June
Electrical Connection – 13 June
Telstra – 29 May
Gas 12 June

There are inconsistencies with the look of the Masterplan building. There is a secondary "support building" located along Cudgen Road but its impact is not assessed.

The Geotech reports states that “weathered basalt rock may therefore need to be removed from site,” yet this requirement is not mentioned in the Waste Plan. Another example of many inconsistencies is the proposed construction hours in the CEMP page 4, proposed hours of construction listed as Mon-Fri 7-6pm & Saturday 8-4pm. But in the Noise & Vibration report Saturday’s hours are 8-1.

7.10 EIS staging

The local community deserve to understand the full impact that this proposed hospital will have on all our community. HI/Department of Health has sought to bypass the usual planning processes by commencing “early enabling works on the site without any approval. Surely earthworks and piling cannot be considered early enabling works.

There is a legal case on the DOPE where the courts ruled that such was the significance of the impact of a proposed project that the EIS should not be staged and the community deserved to know the full impact. **So I propose that the EIS not be staged.**

8. Summary

With so little community consultation, lack of transparency, speed at which the proposal has been handled (perhaps due the upcoming State election, the numerous inconsistencies in the consultant reports and the lack of widespread community or local council support, both the SEPP and the EIS should not be approved.

APPENDICES

What locals who are consulted by their own council say:

The natural environment is a key aspect of the character and attractiveness of the Tweed which differentiates it from South East Queensland and should be protected.

But not like the Gold Coast

The Tweed community has expressed a strong desire for the Tweed to not develop and look like the Gold Coast. The ability to protect those attributes which make the Tweed a distinctive and desirable place to live and work, or just visit are the very aspects at most risk from development resulting from inappropriate planning and management.

Given the already significant loss of agricultural land to rural residential purposes, the potential for ongoing productive use of rural land for agricultural purposes, and the clear focus of the State government to enhance productive agricultural land, further subdivision of rural properties is not considered to be an appropriate way to support agricultural production and secure a future for innovation and diversification of rural based enterprises.

Tweed Shire Council Rural Land Strategy 2018-2036

NSW Government legislation

Strengthening land use planning

In NSW the *Environmental Planning and Assessment Act 1979* (the Act) is the major legislation governing land use and environmental assessment in NSW. The Department of Planning and Environment is the lead agency in implementing this Act. The Act establishes a framework for strategic and local plans, local zoning, development control plans, assessment requirements and development consent provisions.

DPI does not have a role under the Act in relation to the agriculture but works with councils at the strategic level to plan for agricultural industry development and to maintain access to agricultural resources including land. This includes recommending actions to reduce land use conflict.

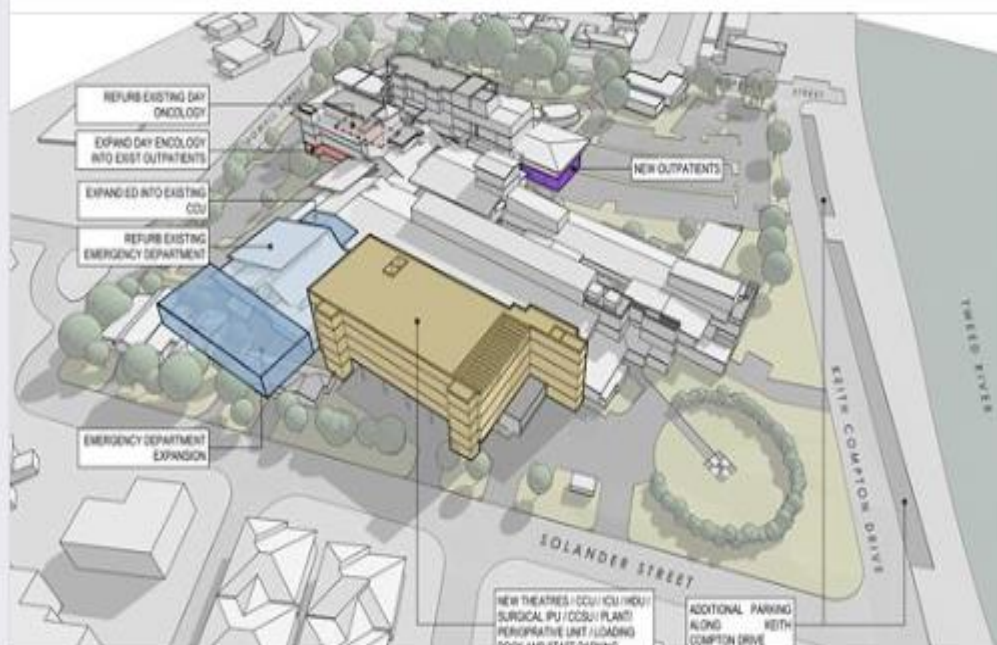
The intended outcome is appropriate zoning and permissible uses that are compatible with agricultural activities, and local strategies that guide land uses and minimise conflict.

The NSW Government is currently strengthening its approach to strategic planning and the coordination of economic infrastructure, including in regional NSW, through the roll-out of state-wide Regional Plans.

Regional Plans identify the regions priorities that support economic growth and change within the context of ecological sustainable development. Regional Plans deliver these priorities by: directing housing and jobs growth preferred locations; identifying and protecting valuable environmental, agriculture and resources across the region; and setting the framework to balance competing uses.

The NSW Government is reviewing planning instruments that relate to rural lands, with the aim of strengthening the planning policy framework to better support current and future agricultural practices, which are important to underpin the concept of right to farm.

Existing Tweed Hospital Master Plans 2017



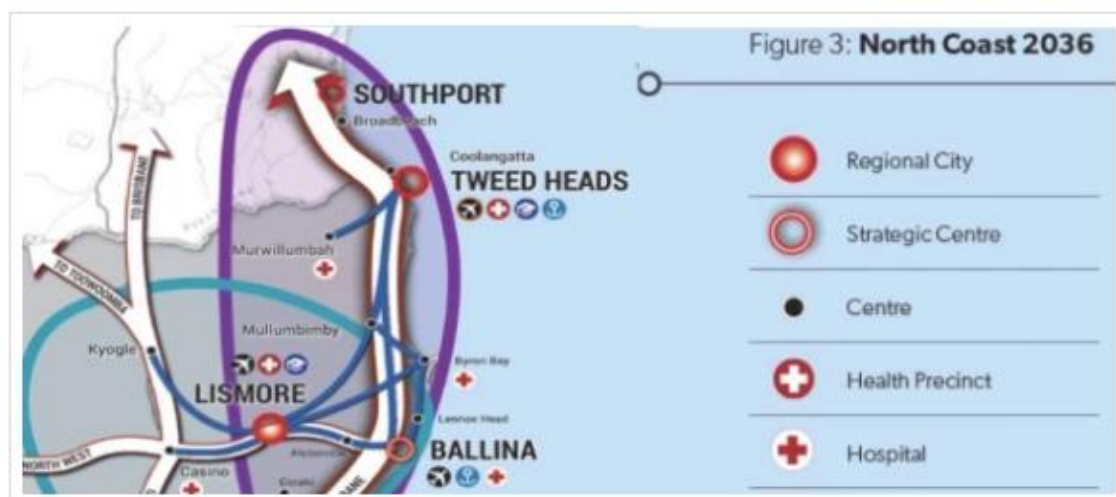
MARTIN-OLLMANN.COM

Tweed Hospital Masterplan - M & O

The Tweed Hospital, a major Non-Metropolitan hospital, is the main public...

Long Term Planning

Here is the government's recently adopted North Coast Regional Plan for 2036. (NCRP) March 2017. It shows the planned major growth centres for the next 20 years.



After much public consultation the Government decided that the growth focus would be the regional city of Tweed Heads, with a Regional Health Precinct of out-of-hospital services clustered around a new much enlarged hospital, acting as the main economic driver for the city. High rise high density residential development would take advantage of the hospital and public transport proximity and sustain the street level retail and private health services. The Tweed Council prepared government endorsed Local Environmental Plans and Development Control Plans to reflect the NCRP.

The debate on hospital site continues

Council (Councillors, the elected body) is continuing to advocate for the Tweed's new hospital to not be built on agricultural land.

On Saturday 30 June, the NSW Government confirmed that the new \$534 million Tweed Valley Hospital would be built at Cudgen, opposite Kingscliff TAFE.

This was the site originally selected however the issue of location was revisited during a period of subsequent six-week period of community consultation.

Council had previously taken a stand against the hospital being located on State Significant Farmland and advocated for alternative sites.

This position was reiterated by a decision at last Thursday's Council meeting, where it was resolved:

"That Council condemns the reaffirmed decision to allow the Tweed Valley hospital to be built on the State Significant Farmland at Cudgen, and requests the State Government provide the following:

1. A comprehensive review into the Governance of this process including but not limited to what led to the initial decision for a greenfield site, effectively excluding expansion of the current hospital into the civic precinct west of the existing site,
2. A social and economic impact analysis for the residents north of the river from the loss of hospital services and potential loss in value of their homes or ability to relocate, as well as a social and economic impact analysis for residents south of the river,
3. A report into the locations of the current high users of the hospital,
4. A comprehensive review into the lack of adherence with

Tweed Shires planning strategies, particularly in regard to the communities long held aim of containing the urban intensity north of the river, and the inevitable impacts of traffic and urban sprawl on the amenity, visual impacts, height limits, economy and tourism values for the village of Kingscliff,

5. An agricultural impact analysis into the effect on the State Significant Farmland area from loss of the site and potential impact on this SSF area as a whole,
6. A report explaining the sudden apparent imperative for a hospital for residents south of the river to service them in a flood, despite no plans or strategies ever identifying this need in over 20 years of planning documents, greenfield developments approvals, or Local Health District Board minutes,
7. A report into how the flooding situation is managed currently with the hospital for residents south of the river,
8. Council also calls on the State Government to release to the public:
 - i. The original and final site decision making reports,
 - ii. The full environmental and infrastructure studies on the various lands considered,
 - iii. The full criteria and any weightings used,
 - iv. Full details of community consultations including prior to the original announcement,
 - v. All documentation on the future of the Tweed Heads Hospital, and
 - vi. All documentation on future Clinical Services Plans for the Tweed Heads and Murwillumbah hospitals post the new hospital opening and for the new hospital."

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Agreed to false or misleading information statements: yes

Name: Christine Boyd

Organisation: [REDACTED]

Email: [REDACTED]

Address:

[REDACTED]

Kingscliff, NSW

2487

Content:

I have attached a file that details my personal objections to the proposed SEPP.

And again I wish to express my strong objection to having a massive public hospital placed on State Significant Farmland

IP Address: - [REDACTED]

Submission: Online Submission from Christine Boyd of Mrs (object)

https://majorprojects.accelo.com/?action=view_activity&id=300699

Submission for Job: #9575 New Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_job&id=9575

Site: #4045 Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_site&id=4045

I am a long term resident of Kingscliff having moved to this special coastal village from inner city Sydney 18 years ago. I will be directly affected by the proposed Tweed Valley Hospital as I reside within three hundred metres from the site. I will have my rural views severely compromised by the proposed nine storey Hospital and the associated increase in traffic will also have a negative impact on the entire town of Kingscliff.

I am therefore writing to object to the proposed rezoning of State Significant Farmland Lot 771 Cudgen Road as outlined in the following points:

1. Local Environmental Plans – Tweed LEP 2014

Local Environmental Plans, (as quoted from your website) “guide planning decisions for local government areas....LEPs are the main planning tool to shape the future of communities and ensure local development is done appropriately”, with community consultation involved in all aspects of the LEP development.

The proposal to place a nine storey public hospital on State Significant Farmland, zoned RU1, next to the small coastal town of Kingscliff with a current height limit of three storeys cannot in any way be considered appropriate development.

Further, the Tweed LEP Plan 2014 (NSW) has identified the purpose for RU1 zoning as follows:

“Zone RU1 Primary Production

Objectives:

- To encourage sustainable primary industry production by maintaining and enhancing the natural resource base.
- To encourage diversity in primary industry enterprises and systems appropriate for the area.
- To minimise the fragmentation and alienation of resource lands.
- To minimise conflict between land uses within this zone and land uses within adjoining zones.
- To protect prime agricultural land from the economic pressure of competing land uses.”

The proposed re-zoning of this RU1 farmland is in direct breach of the objectives of the RU1 zoning and the Tweed LEP 2014 for numerous reasons as follows

- a) The proposed height of the hospital at nine stories plus helipad, is a direct breach of the Tweed Local Environmental Plan 2014 especially part 4 Clause 4.3 Height of Buildings and will set a precedent for heights of other buildings in the Kingscliff surrounds, against the wishes of the local community.
- b) It will fragment the RU1 &RU2 zoned farmland on the Cudgen plateau.
- c) It will create land conflict with other RU1 farms adjoining and adjacent to the proposed site.
- d) In no way is this re-zoning protecting any prime agricultural land from economic pressures, in fact the compulsory acquisition of the site by Health Infrastructure will, without a doubt, allow further re-zonings and further loss of SSF lands on the Cudgen plateau.

This last point can be confirmed in the 20th Sept Council meeting, as the “Tweed Council has been advised by the Health Minister on 13th August that a “Tweed City Action Plan” has already been implemented to encourage growth of private health infrastructure development in immediate proximity to the new hospital at Kingscliff... This in effect rewrites the NCRP by Ministerial decree.”

The proposal is also a direct breach of the State Environment Planning Policy (Rural Lands) 2008, numerous sections of this NSW Legislation. Therefore the SEPP should not be approved.

2. North Coast Regional Plan 2036 (Appendix One)

The hospital proposal is also not in accordance with the North Coast Regional Plan 2036, currently located on the Department of Planning's own website and endorsed by the Health Minister himself, in State parliament in 2017. Years of planning have identified the Tweed Hospital to be expanded on its existing location. See plans already commissioned by Health Infrastructure for the redevelopment of Tweed Hospital on the existing site (Appendix 2). I also note that when asked at a community meeting why the site of the hospital was being moved from Tweed Heads, Minister Hazzard responded to this question by stating "because he changed his mind." This comment does not fill the local community with confidence in the State Government's planning processes when long term strategic planning can be thrown out the window at a minister's discretion.

Also on Page 40 of the aforementioned planning document, I quote "Identify and protect intensive agricultural clusters in local plans to avoid land use conflicts, particularly with residential and rural residential expansion." Direction 12 - "Existing agribusinesses should be protected from encroachment of inappropriate land operation". This proposal to build a mega hospital on State Significant Farmland is a direct breach of the North Coast Regional Plan 2036. Therefore the SEPP application should not be approved.

The NCR Plan 2036 also outlines the following:

"Kingscliff is renowned for its low-key coastal settlement atmosphere, proximity to the beaches, environmental qualities of Cudgen Creek and the expansive coastal foreshore. Agricultural and farming define the edge of the Kingscliff and Cudgen settlements and when combined with the green hinterland back drop forms the unique landscape and visual character of Tweed's Green Caldera. Natural attributes and the coastal character make Kingscliff one of the Tweed's most popular tourism destinations, attracting hundreds of thousands of visitors every year.

The future vision for the Kingscliff locality is for a vibrant coastal town servicing the needs of the local residents as well as the broader network of Tweed coastal villages and tourist alike. A coastal town which offers a prosperous and healthy community life, local economy and employment opportunities, appropriately scaled goods and service provision, diversity of housing choice nestled within a highly valued environmental context fringed with a working agricultural hinterland."

Placing a 450 bed hospital right next to Kingscliff and on one of the main roads into Kingscliff will have a significant impact on coastal character of Kingscliff and will impact on tourism.

Further the North Coast Regional Plan 2036 requires that local plans must avoid land use conflicts

Actions

11.1 Enable the growth of the agricultural sector by directing urban and rural residential development away from important farmland and identifying locations to support existing and small-lot primary production, such as horticulture in Coffs Harbour.

11.2 Deliver a consistent management approach to important farmland across the region by updating the *Northern Rivers Farmland Protection Project* (2005) and *Mid North Coast Farmland Mapping Project* (2008).

11.3 Identify and protect intensive agriculture clusters in local plans to avoid land use conflicts, particularly with residential and rural residential expansion.

This proposal to build a 450 bed hospital on State Significant Farmland is a direct breach of the North Coast Regional Plan 2036 in numerous ways and I quote from the Tweed Shire Council meeting minutes (20th September) this "project which by even the most superficial analysis will have bulk, scale, social, traffic and economic impacts that utterly overwhelm the community on which it is imposed.". Therefore the site specific SEPP application should be denied.

3. Northern Rivers Farmland Protection Project (2005)

“Agriculture is an important industry on the North Coast as the region’s third largest employer” (Northern Rivers Farmland Protection Project (2005).

This project was a long term government initiative to identify agricultural land that should be conserved for future agricultural use. It was designed to keep agricultural land available for farming and to provide farmers with certainty, so they could invest in agriculture & sustainable farm management practices. One of the recommendations of the report was that “state agencies proposing public infrastructure on (state significant farmland), should select alternative sites where possible.” (Page 29). So the initial Expressions of Interest by Health Infrastructure should have excluded any State Significant Farmland. Thus indicating that the site selection process for the Tweed Valley Hospital is flawed and the SEPP should not be approved and the SSF zoning for 771 Cudgen Road, must be retained for future farming generations.

Further the above project recommended that a contiguous area of 500 hectares is necessary to stay within the State Significant Farmland (SSF) threshold. The current SSF cluster stands at 534 hectares, so loss of the 16 hectare block to a 450 bed hospital will greatly jeopardise the viability of this important rural cluster.

Finally on the matter of farmland, the Cudgen plateau is drought proof and in this current time most of NSW is in drought, why would the current State Government even contemplate concreting over State Significant Farmland, it does not make economic sense. Therefore the site specific SEPP application should be denied.

4. Community Consultation

The announcement of the Hospital funding in June 2017 in the media release, did not specifically state that this new hospital would be on a greenfield site and given the North Coast Regional Plan 2036 (see Appendix 1), where the Hospital Precinct remained in its current location, the local community welcomed the announcement without understanding that the new hospital would not be located at its existing site.

Expressions of interest were called for the proposed location of the new hospital in August 2017. During this whole process, the local community was never kept informed of the areas that were being considered by Health Infrastructure, nor were they informed that the current site would not be considered part of this review. When the Tweed Valley hospital site was announced, the community were offered a token comment that the existing brownfield site “was not a viable site.” Despite requests both at community meetings and in writing to Health Infrastructure, no further reason has been given as to why the brownfield site was not an option, indicating a lack of transparency in the site selection process.

Please note there were already plans drawn up indicating that expansion on the current Tweed Hospital site was indeed not only viable, but already planned in 2017 (see Appendix Two).

Then on 4th April 2018, the announcement was made by Minister Hazzard that 771 Cudgen Road, a parcel of land zoned State Significant Farmland, would be the chosen site for a 450 bed Hospital (up to 900 bed capacity in the future).

There was absolutely no community consultation leading up to the announcement of the Cudgen Rd site. In fact, no community consultation occurred until a community meeting was organised at Cudgen Leagues Club on 10th April, by the local community itself. Thus ignoring the DoPE’s draft Community Participation Plan, which requires communities to be “engaged in the planning process at the earliest opportunity.” No wonder there is so much opposition to the decision. As well, a review of the recent court case into the valuation and subsequent compulsory acquisition of the site, indicated that Health Infrastructure began negotiations with the owners back in December 2017 and continued these negotiations through until the recent acquisition. Thus making a farce of the

statement in the Intended Effects report that “further comprehensive site analysis was undertaken from April to June 2018.” It indicates that the site was selected and committed to, well before it was announced and well before any consultation took place.

As a concerned resident and member of the Relocate Group, I have visited markets and spoken to hundreds of residents. The Group overall spoke to thousands of locals and gathered over 9,000 signatures opposing the proposed site of the Tweed Valley Hospital and also over 6,000 signatures on an online petition. This is real community consultation. The overwhelming response was that residents do not want the Tweed Valley Hospital on State Significant Farmland. Yet again another reason for the request to re-zone State Significant Farmland, be refused as proper community consultation has not occurred.

Conclusion

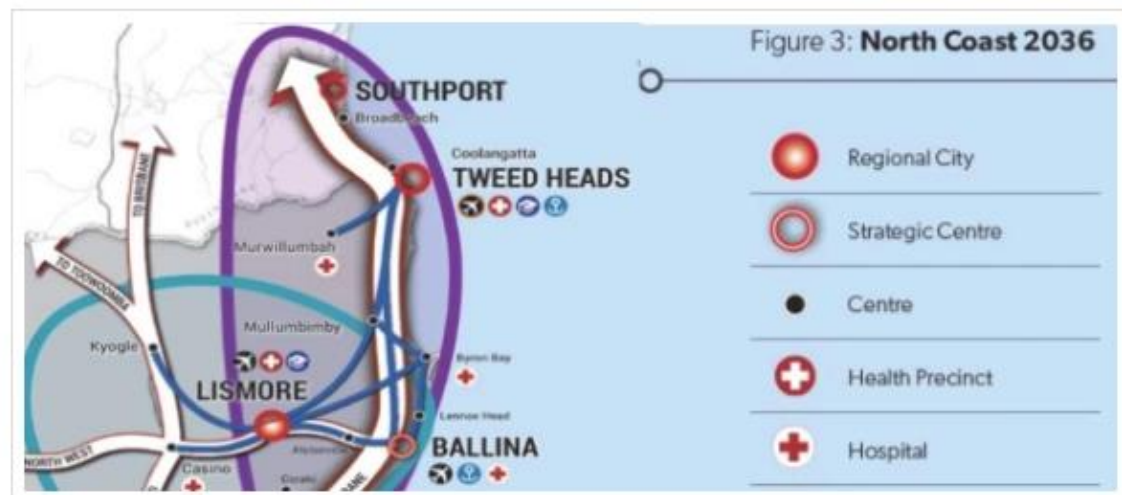
Given the numerous digressions by this SEPP rezoning as outlined in this letter, from existing long term strategic government and local council plans, that are designed with community consultation and relied on by local councils, businesses, farmers and the existing communities, the local community needs to have confidence in the State Government’s planning processes. So I urge you to carefully consider, but refuse the SEPP and EIS as the proposed site, State Significant Farmland, is not the best option to place a 450 bed hospital. See Appendix Three as to what will be destroyed if the project is approved)

APPENDICES

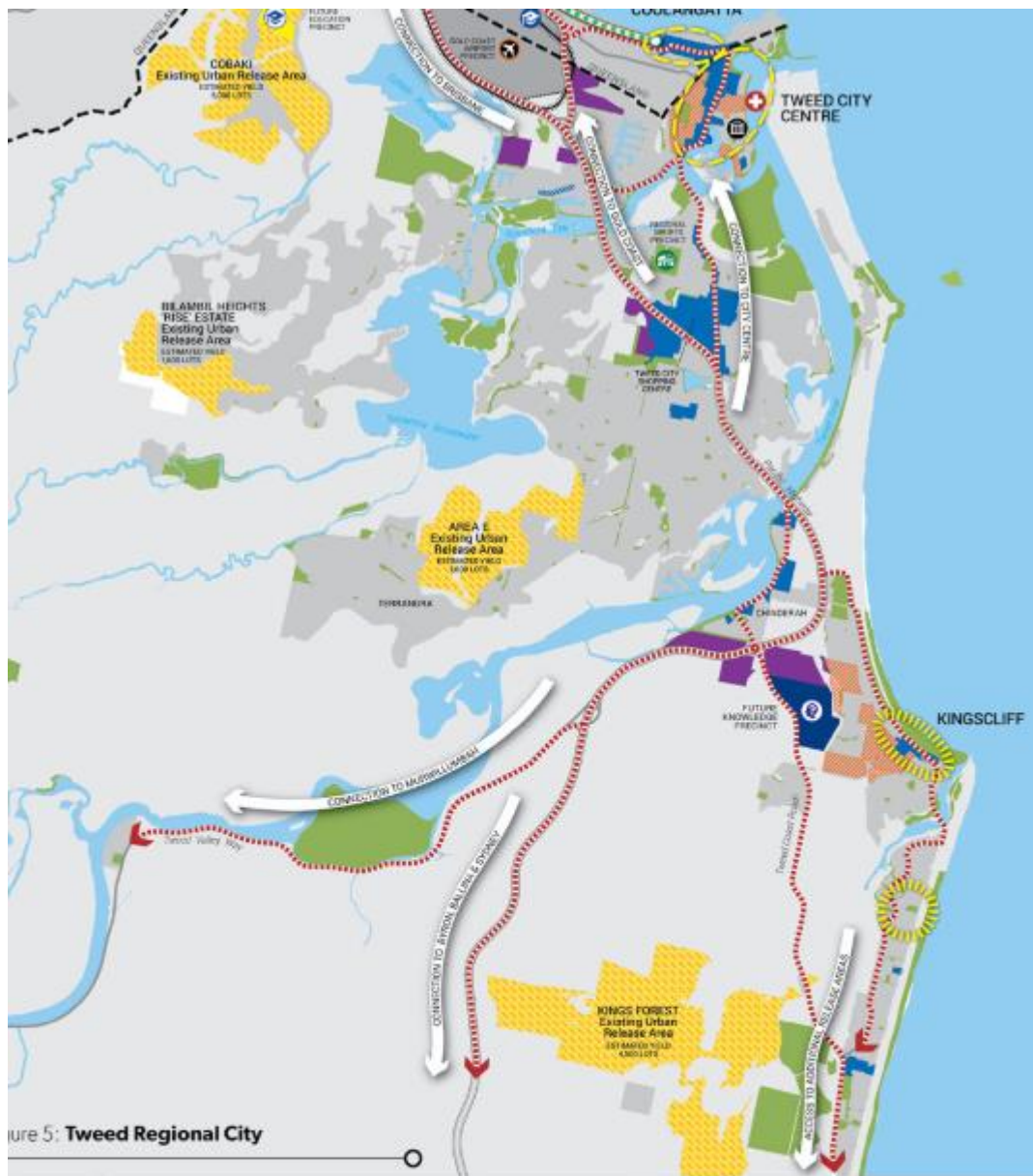
Appendix One

Long Term Planning

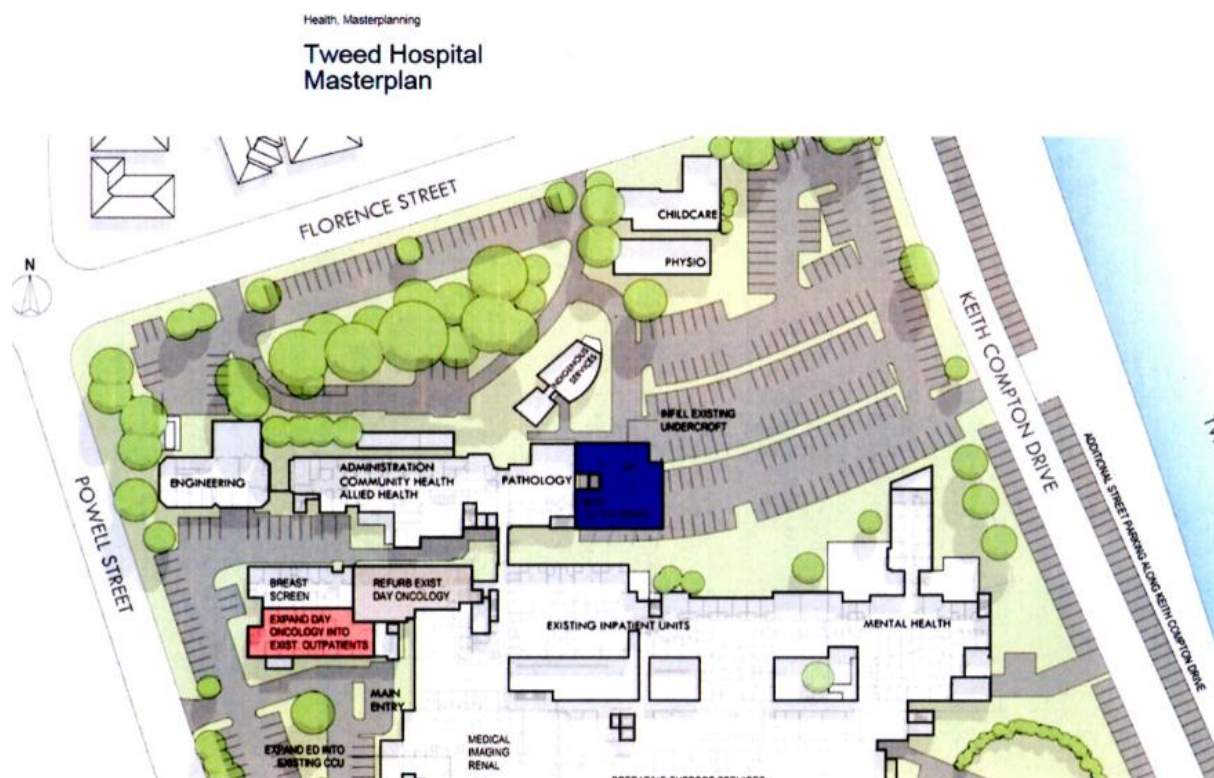
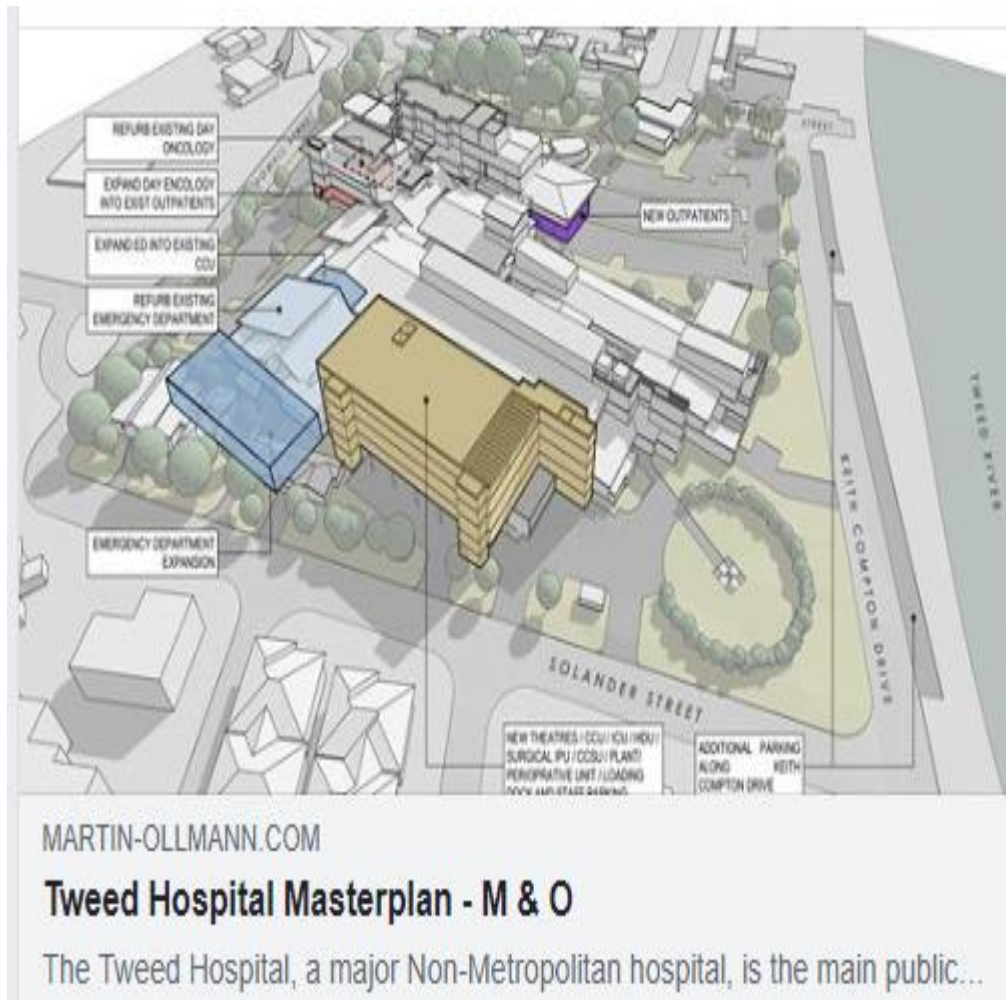
Here is the government's recently adopted North Coast Regional Plan for 2036. (NCRP) March 2017. It shows the planned major growth centres for the next 20 years.



After much public consultation the Government decided that the growth focus would be the regional city of Tweed Heads, with a Regional Health Precinct of out-of-hospital services clustered around a new much enlarged hospital, acting as the main economic driver for the city. High rise high density residential development would take advantage of the hospital and public transport proximity and sustain the street level retail and private health services. The Tweed Council prepared government endorsed Local Environmental Plans and Development Control Plans to reflect the NCRP.



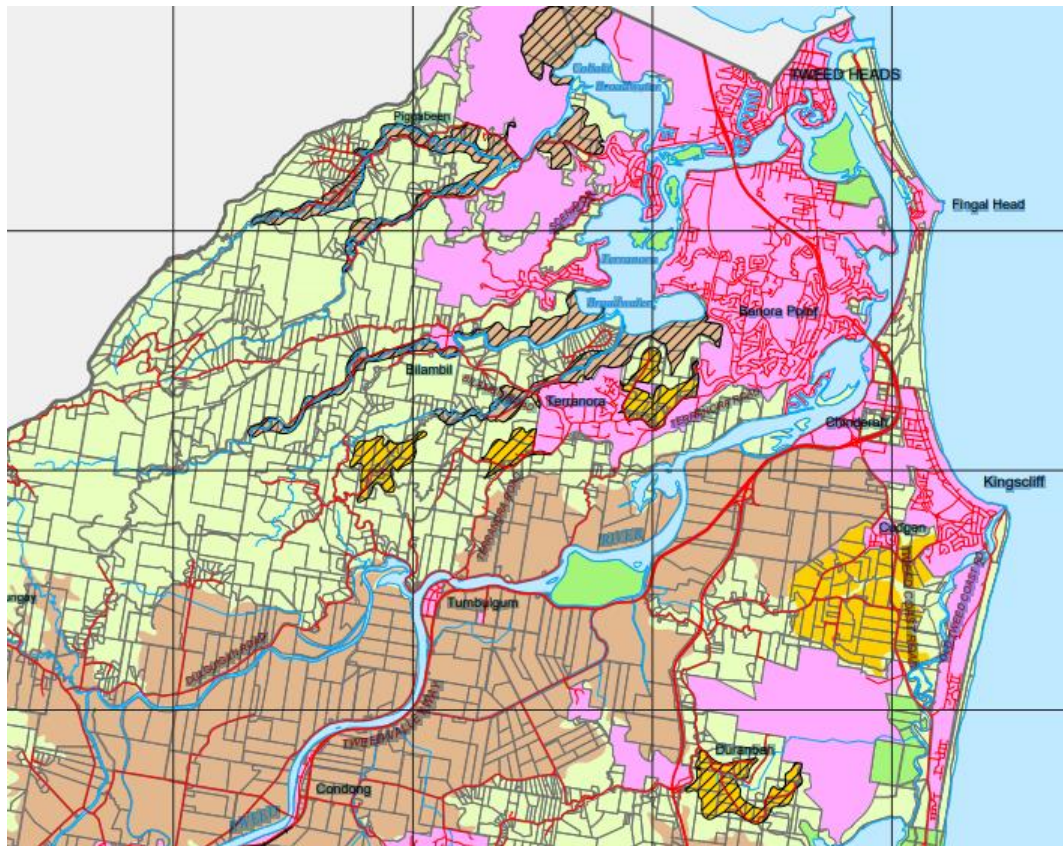
Appendix Two



Appendix Three

Appendix Three

State Significant Farmland in Northern New South Wales (coloured dark yellow)



Cudgen plateau



Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Agreed to false or misleading information statements: yes

Name: [REDACTED]

Email: [REDACTED]

Address:

[REDACTED]

[REDACTED]

[REDACTED]

Content:

As a local of the Tweed Valley with a family history amongst the first dairy farmers I object to the proposed location of the Tweed Valley Hospital for many reasons, the major reasons are listed below:

- * State Significant Farmland was designated to be protected, by the government, not destroyed. The proposed location of the Tweed Valley Hospital is on the most agriculturally productive soil type in Australia. There is very limited areas of this soil type in the shire, the state or in Australia and it should be afforded its protection in perpetuity from development.

- * Other options for the location of the proposed hospital have not been properly explored or the community engaged and consulted. Demonstrate the due diligence for this process, was all land considered equally?

- * Failing to consider the importance to the economy locally and nationally of this agricultural precinct and its local, regional and national identity for quality commodities.

- * Disregarding policy and instruments of government, council and other planning processes already in place established through years of research and community consultation;

- o Ignoring the Tweed LEP, established through extensive community consultation, pertaining to the current building height limit restrictions for Kingscliff. Undermining the community, changing its character by depositing a multi-storey building that will over-whelmingly dominate the village

- o Ignoring the 2017 North Coast Regional Plan which has gazetted protection for agriculture

- o Revising the 2017 North Coast Regional Plan by Ministerial decree to shift the Tweed Hospital away from the City of Tweed Heads to the Town of Kingscliff with no community consultation.

- * The total disregard the government has shown to the destruction of the lifestyle and identity of Kingscliff, Cudgen and the local agricultural precinct by the impact of the placement of the proposed hospital. Changing the core business focus and culture of the town from village, tourism and small crop agriculture to health services without any discussion with the community. The impact of increased traffic congestion, parking demand, 24hr ambulance emergency sirens, 24hr helipad emergency aircraft arrivals, all-night floodlighting of entire site, loss of amenity, loss of rural ambience, lifestyle, etc are big things in a little community.

- * The total disregard for the Tweed Heads residents, gutting the current economy of that area by removing the key economic driver (hospital) and consequent removal of services.

- * Why has there been no acknowledgment in the Community Consultation appendices of the two petitions with well over 8000 signatures that went to the Upper & Lower Houses of NSW Parliament, nor of the 4600 followers of the "Relocate" FaceBook page. These were the strongest community responses recorded for ANY government development.

- * The location for the proposed hospital does not service effectively the Shires centres of population. Australian Bureau of Statistics figures as at the 2016 census state: Total population of Tweed Heads, South Tweed Heads and Banora Point is ~32,000 and the population of Kingscliff is 7,464. There is a whole range of logistics around how to service the population effectively from this proposed location.

o The majority of Tweed's residents (Tweed Heads & Banora) will be isolated from access to the Tweed Regional Hospital during major flood events

* The government should provide full disclosure of all costs associated with relocating the Hospital development by including the future costs of extending transport and infrastructure not hiding them in other public Authorities.

As an individual I object to the blatant lack of due process and consultation with the community by the government regarding this development proposal.

IP Address: [REDACTED]

Submission: Online Submission from [REDACTED] (object)

https://majorprojects.accelo.com/?action=view_activity&id=300734

Submission for Job: #9575 New Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_job&id=9575

Site: #4045 Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_site&id=4045

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation:

Agreed to false or misleading information statements: yes

Name:

Email:

Address:

Content:

As a local of the Tweed Valley with a family history amongst the first dairy farmers I object to the proposed location of the Tweed Valley Hospital for many reasons, the major reasons are listed below:

- Protection of State Significant Farmland. The proposed location of the Tweed Valley Hospital is on the most agriculturally productive soil type in Australia. There is very limited areas of this soil type in the shire, the state or in Australia and it should be afforded its protection in perpetuity from development.
- Facilitating a situation that would lead to the eventual demise of the Cudgen plateau agricultural sector, with ancillary health services and associated commerce and residential needs taking up additional land in much the same way as the Hospital thus undermining the remaining prime agricultural land's already at-risk viability threshold of 500ha.
- Failing to consider the importance to the economy locally and nationally of this agricultural precinct and its local, regional and national identity for quality commodities.
- Disregarding policy and instruments of government, council and other planning processes already in place established through years of research and community consultation;
 - o Ignoring the Tweed LEP, established through extensive community consultation, pertaining to the current building height limit restrictions for Kingscliff
 - o Ignoring the 2017 North Coast Regional Plan which has gazetted protection for agriculture
- The total disregard the government has shown to the destruction of the lifestyle and identity of Kingscliff, Cudgen and the local agricultural precinct by the impact of the placement of the proposed hospital.
- The location for the proposed hospital does not service effectively the Shires centres of population. Australian Bureau of Statistics figures as at the 2016 census state: Total population of Tweed Heads, South Tweed Heads and Banora Point is ~32,000 and the population of Kingscliff is 7,464. There is a whole range of logistics around how to service the population effectively from this proposed location.

As an individual I object to the blatant lack of due process and consultation by the government regarding this development proposal.

IP Address: -

Submission: Online Submission from (comments)

https://majorprojects.accelo.com/?action=view_activity&id=300689

Submission for Job: #9659

https://majorprojects.accelo.com/?action=view_job&id=9659

Site: #0

https://majorprojects.accelo.com/?action=view_site&id=0

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Agreed to false or misleading information statements: yes

Name: [REDACTED]

Email: [e](#) [REDACTED]

Address:

[REDACTED]

[REDACTED]

[REDACTED]

Content:

See attachment

IP Address: [REDACTED]

Submission: Online Submission from [REDACTED] (object)

https://majorprojects.accelo.com/?action=view_activity&id=300740

Submission for Job: #9575 New Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_job&id=9575

Site: #4045 Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_site&id=4045

I have lived in Kingscliff since I was [REDACTED]
[REDACTED] My family moved here from [REDACTED] in search of a better life style and more family time. Kingscliff definitely offered that. It had that small-town beach feel and sense of community that was missing in [REDACTED]. The proposed hospital site will destroy what is left of the village vibe in Kingscliff.

[REDACTED]
[REDACTED] During my study every chance I had I would get out of Brisbane to come back home to Kingscliff to enjoy the life style. Even to the point now of commuting up and back every day just to avoid the 'city life style'. The proposed hospital site threatens to destroy everything that is great about this area for current and future generations.

I object to this proposal for these reasons:

- ✓ Why target State Significant Farmland when other options exist. The Cudgen Plateau has been designated for protection.
- ✓ No mention of the resolution by Tweed Shire Council to oppose siting of the Tweed Hospital on prime agricultural land when considering social impacts and community responses.
- ✓ No mention in the Community Consultation appendices of the two petitions with well over 8000 signatures that went to the Upper & Lower Houses of NSW Parliament, nor of the 4600 followers of the "Relocate" Facebook page. These were the strongest community responses recorded in ANY forum.
- ✓ This project disregards and undermines the hard fought 3 story height limit in Kingscliff. The multi-storey building will overlook the town and together with the parking and other ancillary structures this massive site will dwarf our coastal village.
- ✓ The experts who chose the site never considered any land that was not for sale. Using the same compulsory acquisition powers currently being exercised over the reluctant owner of the Cudgen site, they could have selected ANY site in the Tweed Valley.
- ✓ The Ministerial decree which revised the 2017 North Coast Regional Plan to move the Tweed Hospital from The City of Tweed Heads to the Town of Kingscliff was done with no prior community consultation.
- ✓ Funding for the project has not covered the transport and utility infrastructure. This will get pushed onto local councils and other authorities.
- ✓ Business & residential migration to the hospital precinct will increase property demand and therefore real estate prices in Kingscliff, rendering it unaffordable for family offspring to live there in the future.
- ✓ The move from Tweed Heads will remove the major economic driver from the area and betray residents who have used life savings to move close to the hospital for medical reasons. Much previous work has been done on expanding the original Tweed Hospital suggesting the hospital would remain in Tweed Heads.
- ✓ The quality of life will be diminished. There will be 24 hours helicopter ambulance arrivals including emergency sirens. Intense urbanisation with increases in traffic and demand on parking. This with floodlighting leads to loss of the rural ambience and amenity for me and the residents of Kingscliff.

- ✓ The issue of flooding is not real. In March 2017 Kingscliff was cut off by flood water for several days. The residences of Tweed and Banora (most of the shire population) would be isolated.
- ✓ There was no community consultation prior to the site choice. This is contrary to claims made in the EIS.
- ✓ The commercial activity of the hospital and the ancillary services accompanying it will change the character of a coastal holiday village forever. This would be inconsistent with and ruin Kingscliff's beach and fresh food tourism industry.
- ✓ Whilst there is to be parking provided on site, people (workers or visitors) will avoid the cost and look for free roadside parking wherever they can find it. Residents will be confronted with congested roads with either "No Parking" available or lined with parked cars.
- ✓ The population of the Tweed Shire is expected to grow significantly. Food security is an issue recognised by many levels of government in Australia. Areas in the Adelaide Hills and on the Fringe of Melbourne have been protected for farming. Given the agricultural value of the Cudgen Plateau it's a "no brainer" to similarly maintain it for future food supply.
- ✓ Not only will we lose the important food production but the livelihoods of many farming businesses and farm workers would go with it.

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation:

Agreed to false or misleading information statements: yes

Name:

Email:

Address:

Content:

See attached file

IP Address:

Submission: Online Submission from (comments)

https://majorprojects.accelo.com/?action=view_activity&id=300746

Submission for Job: #9659

https://majorprojects.accelo.com/?action=view_job&id=9659

Site: #0

https://majorprojects.accelo.com/?action=view_site&id=0

I have lived in Kingscliff since I was [REDACTED]
[REDACTED] My family moved here from [REDACTED] in search of a better life style and more family time. Kingscliff definitely offered that. It had that small-town beach feel and sense of community that was missing in [REDACTED] The proposed hospital site will destroy what is left of the village vibe in Kingscliff.

[REDACTED]
[REDACTED] During my study, every chance I had I would get out of Brisbane to come back home to Kingscliff to enjoy the life style. Even to the point now of commuting up and back every day just to avoid the 'city life style'. The proposed hospital site threatens to destroy everything that is great about this area for current and future generations.

I object to this proposal for these reasons:

- ✓ The area has been made State Significant Farmland because of its beautiful fertile red soil which is drought free.
- ✓ The 2017 North Coast Regional Plan protects the land for the proposed Tweed Valley Hospital.
- ✓ Kingscliff residents have worked with council to established restricted height limits. This massive Hospital contradicts these height limit restrictions in the Tweed LEP.
- ✓ Ancillary health services and associated commerce and residential needs will take up additional land and together with the Hospital, threatens the demise of the agricultural sector on the Cudgen Plateau.
- ✓ The Minister for Planning and Environment announced plans for an extended "Regional Health Services Precinct" adjoining the Hospital site, thus undermining the remaining prime agricultural land's already at-risk viability threshold of 500ha.
- ✓ Leading to automatic rezoning of adjoining land to support facilities associated with Tweed Regional Hospital.

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

Agreed to false or misleading information statements: yes

Name: [REDACTED]

Email: [REDACTED]

Address:

[REDACTED]

[REDACTED]

[REDACTED]

Content:

I am a local Kingscliff teenager and I wish to lodge my object to the EIS for the Tweed Valley Hospital. I live in close proximity to the site and the farm is currently zoned as State Significant Farmland due to its rich volcanic soil & its drought proof. With NSW being mostly in a drought now it makes no sense to take this farmland and destroy it for future generations. I am also very concerned this major project will have on the local communities, with increased traffic, parking problems and extra noise.

We choose to live here for the rural & coast ambience and the Tweed Valley Hospital will be an eyesore, completely overwhelm our small town. It will also lead to more loss of SSF. There has been little community consultation around this proposal but lots of misinformation. No-one I know in the community wants this proposal to go ahead on SSF at Kingscliff. I plead with your department to refuse this EIS as it does not fully inform the community of the full impact of the proposal.

IP Address: [REDACTED]

Submission: Online Submission from [REDACTED] (object)

https://majorprojects.accelo.com/?action=view_activity&id=300750

Submission for Job: #9575 New Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_job&id=9575

Site: #4045 Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_site&id=4045

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

Agreed to false or misleading information statements: yes

Name: [REDACTED]

Email: [REDACTED]

Address:

[REDACTED]

[REDACTED]

[REDACTED]

Content:

I am a Kingscliff resident and business owner and wish to object to the proposed Tweed Valley Hospital on state significant farmland situated on the edge of Kingscliff.

I feel that the overdevelopment of kingscliff and surrounds will forever ruin the coastal village charm, and will pave the way (literally) for high rises to enter our community.

I provide healthcare services to people in the community, a lot of whom are elderly residents who live in Tweed Heads, Banora Point and surrounding suburbs. Many of these people are at the age when access to Hospital services are necessary however some of my clients have raised their concerns that they have never been to Cudgen/Kingscliff, let alone have the confidence to navigate the M1 freeway to attend the new Tweed Valley Hospital on the proposed site.

IP Address: [REDACTED]

Submission: Online Submission from [REDACTED] (object)

https://majorprojects.accelo.com/?action=view_activity&id=300762

Submission for Job: #9575 New Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_job&id=9575

Site: #4045 Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_site&id=4045

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation:

Agreed to false or misleading information statements: yes

Name: [REDACTED]

Email: [REDACTED]

Address:

[REDACTED]

[REDACTED]

[REDACTED]

Content:

I am a Kingscliff resident and business owner and wish to object to the proposed Tweed Valley Hospital on state significant farmland situated on the edge of Kingscliff.

I feel that our community's voice is being ignored! The current site will ruin Kingscliff's local beach and fresh food tourism industry. It will change the core business focus and culture of the town from tourism and small crop agriculture to health services without any discussion with the community. It definitely undermines the community's hard fought 3 story limit in Kingscliff (and the coastal villages) by changing its character through an iconic multi-storey building that will over-whelmingly dominate the skyline

I feel outraged at the choice of the hospital site and lack of community consultation on something that will negatively impact our everyday life in Kingscliff. Part of the reason we chose to purchase property in Kingscliff was to distance ourselves from the traffic, congestion and urbanisation of the Gold Coast. Yet, the proposed hospital threatens the very way of life we have come to cherish in Kingscliff.

IP Address: - [REDACTED]

Submission: Online Submission from [REDACTED] (comments)

https://majorprojects.accelo.com/?action=view_activity&id=300768

Submission for Job: #9659

https://majorprojects.accelo.com/?action=view_job&id=9659

Site: #0

https://majorprojects.accelo.com/?action=view_site&id=0

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Agreed to false or misleading information statements: yes

Name: Sandra O'Brien

Email: [REDACTED]

Address:

[REDACTED]

Kingscliff, NSW
2487

Content:

This is an objection to the proposed SEPP for Cudgen Rd Cudgen

My name is Sandra O'Brien. I have lived in the Tweed region for 28 years since 1991. I have lived in the town of Kingscliff for the past 24 years and have a strong respect for the environment and community that I have been privileged to be part of since leaving Sydney's Western Suburbs, choosing quality of life for myself and my family.

I am a registered nurse by profession and have been employed by NSW Health for 35 years. As a Registered Nurse I have worked at The Tweed Hospital for the majority of this time and my role currently is as a change manager working with services across the whole LHD. I have been fortunate to have attended consultation and information sessions provided by the TTH, NSW Health Infrastructure, Relocate team and local media groups to inform my viewpoint and objection to the site chosen.

I object to the proposed SEPP that will allow the rezoning of State Significant land at Cudgen. State Significant land should not be destroyed.

I object that the Tweed LEP will not be upheld, ignoring the expertise that has led to the current zoning. The current zoning protects a national asset, the local agricultural region that has a significant role in the state tourism industry and assists food security, the uniqueness of this highlighted by the significant loss of farmland through natural disasters such as drought, flood and cyclone.

I object the SEPP because it contradicts the Tweed LEP planning to address the known impact of building heights on coastal and farming regions as experienced on the Gold Coast. Maintaining the 3 storey height limit has helped to protect the region from excessive development and allow farming and residential development to co-exist. To ignore this is to ignore the long term efforts of local resident and expertise that "know" the land and history.

I object to the unspoken plan of further rezoning of other farmlands within proximity that will be required to support a 450 bed hospital that will require a supporting health precinct and further expansion with the future population growth of the Tweed/ Gold Coast region.

The concept proposal refers to site layout and landscape masterplan that has not been confirmed or consulted on. Approval leaves open the opportunity for cost cutting and poor planning that does not address the ideal that is being implied at this early stage.

I object to the commencement of stage 1 works before due process has occurred. Fencing and earthworks commencing. Early environmental destruction and disruption to local traffic movements that will be highlighted with the Christmas influx and the rush if Health Infrastructure to claim the land prematurely.

Another more suitable location would be to continue with the redevelopment plan for the existing site and utilise the financial commitment in the current holding works for permanent upgrade. The council site can be utilised and buy up of the bowls club would provide a suitable site for expansion and stage 1. Existing infrastructure and planning (including the new police station and retirement and nursing

homes) are already established

Other sites exist and as such the government should be forefront in protecting this area not the driver in destroying this land.

IP Address: [REDACTED]

Submission: Online Submission from Sandra O'Brien (object)

https://majorprojects.accelo.com/?action=view_activity&id=300776

Submission for Job: #9575 New Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_job&id=9575

Site: #4045 Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_site&id=4045

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Agreed to false or misleading information statements: yes

Name: Sandra O'Brien

Email: [REDACTED]

Address:

[REDACTED]

Kingscliff, NSW
2487

Content:

This is an objection to the proposed EIS for Cudgen Rd Cudgen

My name is Sandra O'Brien. I have lived in the Tweed region for 28 years since 1991. I have lived in the town of Kingscliff for the past 24 years and have a strong respect for the environment and community that I have been privileged to be part of since leaving Sydney's Western Suburbs, choosing quality of life for myself and my family.

I am a registered nurse by profession and have been employed by NSW Health for 35 years. As a Registered Nurse I have worked at The Tweed Hospital for the majority of this time and my role currently is as a change manager working with services across the whole LHD. I have been fortunate to have attended consultation and information sessions provided by the TTH, NSW Health Infrastructure, Relocate team and local media groups to inform my viewpoint and objection to the site chosen.

The residents of Kingscliff and the Tweed Valley recognise the responsibility that they have in being caretakers of this land and lifestyle so that it continues to be available for future generations. This is not an objection to the hospital this is an objection to the proposed site. It is important to note that those that counter argue with the urgency to build to "Save lives" have no preference on site. I have not heard any arguments that it must be Kingscliff

I object to claims made in the environmental impact statement and would like the following issues addressed

- * Failure to provide the community adequate time to interpret and respond to many complex documentation, despite the 2-week extension.
- * No full site selection report has been made available
- * Blasting and building process will have a huge impact on local residents due to the proximity of this development. This was experienced by local residents with the redevelopment of the caravan park on the foreshore, who now have cracks in the walls from vibration and shifting. HI has not addressed the plan to eliminate or compensate for this.
- * Increased flooding to local areas caused by road development. Areas of Kingscliff experienced flooding in 2017 that had never been affected previously, impacting on access to areas. HI have continuously sited old information on flooding potential and not based their information on up to date evidence.
- * Majority of population- age group north of the river, close to existing site. They will be cut from services in the stated floods and will be required to attend Qld hospitals.
- * Loss of jobs in local retail community and local farming, restaurant and tourism caused by the presence of a health precinct.
- * Ignoring the 2017 North Coast Regional Plan moving the Tweed Hospital way from the city of Tweed Heads where current infrastructure exists.

* Severely compromising Kingscliff Beach unique culture and business model. Once lost it can never be replaced. Not only has it provided quality of a healthy lifestyle for many people of a range of ages.

* It is essential for the wellbeing and culture of our country that we preserve the affordable beach holiday destinations that our population enjoys. This is a health intervention to be shared with our metropolitan living citizens. We do not need monoliths in rural areas.

* With the size of the Tweed Valley- why congest the coastal corridor with major infrastructure.

* NSW Govt is undermining the Community's hard fought 3 story limit in Kingscliff.

* The visual impact on the landscape cannot be understood unless observed in person.

I have had the relocate conversation with many colleagues in the LHD who do not live locally. Over the ensuing months they have all commented that their previous ambivalence was due to not having been to the site and having a true understanding of its location, beauty and the potential impact due. After visiting site, they are horrified and cannot believe the irrationality of the site decision.

I implore all decision makers in this process to make the trip to the Tweed and tour the area Cudgen farming, Kingscliff foreshore and residential area, as well as the existing Tweed location. Speak to local experts and give them the same airtime that the contracted HI experts have been given. Please be informed, this is more than a documents, maps and reports.

* Ignoring any mention in the community consultation appendices of the 2 petitions with well over 8000 signatures that went to the Upper and Lower Houses of NSW Parliament nor the 4700 followers through social media of the Relocate Facebook page. These were the strongest community Responses recorded in ANY forum.

* Ignoring any mention of the resolution by the elected Tweed Shire Council to oppose siting of the Tweed valley Hospital on prime agricultural land when considering social impacts and community Responses.

*

Negative impact on the Community accessing health care

* The service is moving away from the areas where the most vulnerable in Tweed reside

* Residents of Tweed with a chronic illness purposely access housing to be near the health precinct. Placing a hospital in a town with one of the highest real estate price medians means that this community group will not have the ease of living near these services.

* There are virtually no available properties for rent in a median range.

* There has also been a lack of transparency over the future of Murwillumbah hospital and its services.

Negative impact on the town of Kingscliff

* major construction on the perimeter of the town without a buffer- primarily residential area.

* Poor road access requiring significant upgrade including the roads through the town of Kingscliff. Increased traffic into a congested holiday town- local traffic will likely favour the coastal road - Casuarina Way through to Pearl St to avoid hospital traffic.

* This is already bottle necked at peak periods through the day since the one way was introduced in Marine Pde. This is a road with medium density residential, 2 school precinct and retail area that cannot cope as it is.

* Loss of Kingscliff TAFE and more local jobs- the hospital has no educational affiliate needs for a TAFE and this is likely to be assumed by the university or rural research

* Lack of adequate public transport- the public bus system will need to be increased. This will place greater burden on the town and local infrastructure

* Lack of free parking- while parking will be addressed through paid parking, many employees and visitors will choose to park outside of these areas as seen at Lismore Base and John Flynn. This will have a negative impact on local residential streets within a 2 km radius approximately.

* Noise and impact of traffic- it has been stated that Tweed will increase its trauma referrals and helicopter access. This will also include police, ambulance and daily delivery trucks.

* Kingscliff and Cudgen are valuable tourism resources for the Tweed Shire and NSW Tourism- why would that be forfeited for a hospital that could be successfully relocated, increasing assets rather than trade one for the other?

* the healing environment that is described will no longer exist with the forced development of this landscape. The current Tweed Hospital is situated on the beautiful Tweed River and if carefully redesigned also accesses a healing environment as it did in its early years.

* The forced creation of a health precinct on the town of Kingscliff with the likely buy up of residential

properties to become the consultation rooms of specialists. The site is not unique with respect to the healing environment that it offers clients. As per the definition offered by Huisman et. al. (2012), a healing environment is that which offers clients a view of nature and is typically described as a forest, garden, or some other kind of community activity. This is achievable in any setting and is hardly unique to the proposed site, nor will the proposed site offer any significant benefit to clients in this regard.

- * with a large hospital so closely located local Kingscliff residents will expect an increase in rates and home insurance costs. Insurance costs increase being located close to major public facilities.

- * Potential destruction of rainforest corridor at base of site and creek side of TAFE- will there be guarantees that this won't be disturbed?

- * There is a concern that the hospital developers may eliminate the natural beauty of the Cudgen creek by extending the campus down to the creek. Can you confirm this will be protected?

- * Likely negative impact on local business as is evident around current campus- Tweed mall.

Minjungbal Dve

- * Impact on wellbeing of residents. Local residents choose to live in a smaller quieter town for the own physical and mental wellbeing. Change is inevitable but the impact of 4 years of construction, noise from construction, drilling and impact of a huge workforce hitting our back door will mean that the local residents will bear the cost.

- * Loss of the identity of the Kingscliff Community and loss of community events that generate income for sporting groups and local businesses due to limited parking and access- major surf club events, surfing titles, bowls competitions.

- * The site is on State Significant Farmland, declared in 2005. In this respect, food security and climate change are factors that have not been accounted for in the site assessment, and are issues that are under current investigation by the Federal Minister for Agriculture and Water Resources, the Hon David Littleproud MP. There is documented evidence that Australia's climate is shifting to a summer dominant rainfall pattern (Jose, 2018) with intensified drought due more frequent El Niño events. At present, approximately 60% of NSW is currently on drought watch with much of the state tending towards drought (ABC News, 2018). In this regard, the north eastern NSW region still receives consistent rainfall, and it would be extremely short sighted to reduce the acreage of land currently dedicated to horticulture.

- * The site comprises a nature reserve populated by endangered and threatened species, and lies within a wildlife corridor and preferred koala habitat (Tweed Shire Council, 2018). The Tweed Coast Koala Study (2015) determined that koalas actively use the proposed site and have been observed onsite. The site is also home to the nationally critically endangered Mitchell's Rainforest Snail, the Wallum Froglet, the Bush Stone Curlew, Red Tailed Black Cockatoos. A natural watercourse runs through the site, and any major development is likely to have a severe impact on the hydrology of the area and any associated flora and fauna. Environmental impact assessment of the site will be extensive and time consuming, having triggered EPBC approval from state government.

- * The site is 70% below PMF when land area is adjusted in line with criteria used by NSW Health to assess the Kings Forest "estate" which covers an area of 856.5 ha. According to NSW Health's own criteria - this rules the Cudgen site out completely as a suitable hospital site. The proposed site does not fit within the boundary of the G4 area commented on in the NSW Health site summary report. The site lies directly under the Gold Coast Airport flightpath (see Appendix 2) creating a hazard for emergency helicopter access. As stated by NSW Health Guidelines for Hospital Helicopter Landing Sites in NSW (2018) possible air-traffic conflicts between helicopters using a HLS and other air traffic should be avoided where possible.

IP Address: [REDACTED]

Submission: Online Submission from Sandra O'Brien (object)

https://majorprojects.accelo.com/?action=view_activity&id=300794

Submission for Job: #9575 New Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_job&id=9575

Site: #4045 Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_site&id=4045

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Agreed to false or misleading information statements: yes

Name: Lynette Wilson

Email: [REDACTED]

Address:

[REDACTED]

Kingscliff, NSW
2487

Content:

I am extremely fortunate my parents moved from Sydney in the early 70s to build a home in Kingscliff. Both my sibling & myself also own homes in Kingscliff & have both raised another generation of children here. Cudgen has always produced the finest crops in its rich red fertile volcanic soil & adds to the charm of this area. This State Significant Farm land was given its protection for the purpose of growing food.

I strongly object to the Government for even contemplating building upon such a sustainable piece of land that is consistently valuable for growing food, farming employment & tourism.

Once this parcel of land is eliminated from farming-it will be just like a cancer to the surrounding area. When our country has increasing fluctuations in climate & frequent droughts, to destroy this land forever has absolutely zero logic. Cudgen grows amazing healthy food in fertile soil- our Tweed Valley of Contrasts gave us the gift from Mt Warning not to be enclosed in concrete.

IP Address: [REDACTED]

Submission: Online Submission from Lynette Wilson (object)

https://majorprojects.accelo.com/?action=view_activity&id=300778

Submission for Job: #9575 New Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_job&id=9575

Site: #4045 Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_site&id=4045

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

Agreed to false or misleading information statements: yes

Name: [REDACTED]

Email: [REDACTED]

Address:

[REDACTED]

[REDACTED]

[REDACTED]

Content:

I strongly object to the staged development application for a concept proposal for 'A new Level 5 Hospital for the Tweed Valley, comprising: a main entry and retail area; Administration Services; Ambulatory Services Acute and Sub-Acute Inpatient Units; Paediatrics; ICU; Mental Health Services; Maternity; Renal Dialysis; Pathology; Pharmacy; Cancer Services; Emergency Department; Integrated Interventional Services; Interventional Cardiology Medical Imaging; Car parking and Future expansion areas'.

I have attached a more detailed response (PJN EIS) but in brief I object to:

- * The proposed development of a Level 5 hospital conflicts with the surrounding towns, coastal villages and farmlands.
- * The proposed site is categorised as State Significant Farmland.
- * Lack of transparency in the Tweed Valley Hospital site selection process.
- * The economic and social impact on Tweed Heads.
- * The flawed and rushed process to date which has resulted in the 3000 pages of documents which accompany this DA.

My objection can only be addressed by leaving the area that is proposed for rezoning as State Significant Farmland as State Significant Farmland and either continuing with the already planned redevelopment and extension of the current Tweed Heads Hospital or (as a lesser alternative) choosing a site that will not impact SSF and the Tweed Coast villages.

IP Address: [REDACTED]

Submission: Online Submission from [REDACTED] (object)

https://majorprojects.accelo.com/?action=view_activity&id=300782

Submission for Job: #9575 New Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_job&id=9575

Site: #4045 Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_site&id=4045

PJN EIS Submission

I have been a ratepayer/resident of Kingscliff for over 10 years and prior to that holidayed here annually for many years. I am a strong advocate for the thoughtful and considered approach of the Tweed Shire Council to the sustained development and growth of the Shire (including a Hospital redevelopment), while preserving the very fabric of the unique coastal and rural farmland areas. The development of the Kingscliff Locality Plan and other regional planning documents has been marked by very high level and meaningful community consultation and input, unlike this rushed and flawed proposal.

I also fully endorse the Tweed Shire Council's response to this rezoning and proposed hospital development. This response was contained in a letter to the Director of Urban Assessments, Department of Planning, NSW Government dated 7 December 2018. The Council has methodically outlined a range of major shortcomings in the EIS document and this rushed proposal.

I strongly object to the staged development application for a concept proposal for 'A new Level 5 Hospital for the Tweed Valley, comprising: a main entry and retail area; Administration Services; Ambulatory Services Acute and Sub-Acute Inpatient Units; Paediatrics; ICU; Mental Health Services; Maternity; Renal Dialysis; Pathology; Pharmacy; Cancer Services; Emergency Department; Integrated Interventional Services; Interventional Cardiology Medical Imaging; Car parking and Future expansion areas' for the following reasons:

- **The proposed development of a Level 5 hospital conflicts with the surrounding towns, coastal villages and farmlands.**

The proposed rezoning and development is in an area dominated by coastal villages, farmland and coastal wetlands. The proposed hospital is a major piece of regional infrastructure which, (initially) is the equivalent of a small town in population, being plonked on State Significant Farmland between the unique rural and coastal precincts of Cudgen and Kingscliff.

Should this proposed rezoning go ahead, it will have an irreversible impact on the fabric of the Cudgen/Kingscliff area. Some of the impacts are:

- Significantly increased traffic in the proposed hospital precinct on what are single lane, rural roads. This will also extend into the 40k and 50k streets of Kingscliff and Chinderah. None of this has been acknowledged within the Tweed Valley Hospital EIS.
- Parking is already at its limits in Kingscliff Village and surrounds. The proposed rezoning will create additional parking issues in streets which will be unable to absorb the increase. This will clearly compromise access and parking options for residents, visitors and tourists.
- The proposed rezoning from State Significant Farmland will be the thin edge of the wedge for other development applications in this unique area.
- Kingscliff and surrounds has a 3-storey height limit. The proposed rezoning to accommodate a multi-storey, major infrastructure development will end the element which is a trademark of Kingscliff and surrounds.
- The resulting impact on tourism as Kingscliff becomes no more than an extension of Tweed Heads and the Gold Coast and does not provide the outstanding, relaxed, rural/coastal natural environment that separates this destination from the Gold Coast.

- **The proposed site is categorised as State Significant Farmland.**

The Site Analysis component of the Tweed Valley Hospital EIS states *'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.'*

The Cudgen Plateau is the only State Significant Farmland in the Tweed Shire and the rezoning of this valuable cropping land should not be considered for any purpose. It is incumbent on governments and the community to take responsibility for protecting land such as this. Major regional infrastructure is not appropriate for this land or conducive to the surrounding environment.

It is interesting to note that at a time when cities and communities are exploring and implementing ways of maximising our diminishing cropping lands and protecting them from development, this proposal seeks to do the exact opposite. I refer you to a recent ABC News article which describes how Adelaide is taking steps to protect cropping lands from development.

<https://www.abc.net.au/news/2018-12-09/adelaide-puts-food-not-development-on-menu/10567538>

This proposed rezoning and development of a Level 5 hospital not only runs opposite to conventional town and regional planning wisdom and community expectations, but makes a mockery of a key component underpinning any development on State Significant Farmlands (my emphasis):

*Public infrastructure is permitted on land mapped as state or regionally significant **where no feasible alternative is available**. Councils or state agencies proposing public infrastructure on such land **should select alternative sites where possible**.*

Feasible alternatives do in fact exist, with one in particular having been previously accepted by this Government (the redevelopment and extension of the current Tweed Hospital) up until 2017 when the NSW Health Minister embarked on this rushed course. Every aspect of this process to date appears to have been designed with the proposed site as the outcome from the outset, with little or no regard to the tenets underpinning the designation of the selected site as State Significant Farmland.

- **Lack of transparency in the Tweed Valley Hospital site selection process.**

As per my earlier point, it clearly appears that the site selection process has been designed with a predetermined outcome (the proposed site) in mind.

There has been a decided lack of meaningful community consultation, very limited provision of information on site evaluation criteria and, importantly, the advice of the Tweed Shire Council (the local planning authority) was completely ignored.

Most damning of all is the complete lack of weight provided to the protection of State Significant Farmland (and other environmental factors) in making the site selection. As stated in my first point, a *feasible alternative* exists in the plans to redevelop the Tweed Hospital and precinct. The Government appears to have listened to a small

number of medical staff (looking for a Greenfield option) and disregarded the wider community and the tenets underpinning the zoning as State Significant Farmland.

Surely, in any open and transparent process, a community consultation around the options would have been appropriate. Instead, the community has been subjected to a process hallmarked by a decided lack of transparency, in complete contrast to how the Tweed Shire Council engages with the community on major, generational planning matters. One can only draw the conclusion again that this process has been designed with the outcome in mind.

- **The economic and social impact on Tweed Heads**

The proposed rezoning and the proposed development of a major hospital on the site will have a major economic impact on the businesses within Tweed Heads.

The significant impact of this on the business and local community is ignored in the planning documents, apart from a tepid acknowledgment in the EIS that *initially businesses may suffer*. Again, yet another sign of the rushed and poorly thought out nature of this proposal.

Redevelopment of the current Tweed Hospital would provide an opportunity to revitalise this area. In this regard, the proposal again appears out of step with contemporary practice and community expectations. I refer you to a recent ABC News article which describes how the city of Ipswich is seeking to revitalise its centre through the establishment of a 'Health Precinct':

<https://www.abc.net.au/news/2018-12-09/ipswich-cbd-to-be-made-into-health-precinct/10557454>.

- **The flawed and rushed process to date which has resulted in the 3000 pages of documents which accompany this DA**

The documents presented as part of this DA lack transparency, contain inconsistencies and do not address all of the details required for a community to be able to comment on what is being proposed. Even simple cross referencing of documents provides many examples of flaws and omissions. There are clear examples where critical detail is mentioned as being an issue in one document, to be addressed in another, but is then clearly missing.

The Tweed Shire Council's responses contained in a letter to the Director of Urban Assessments, Department of Planning, NSW Government dated 7 December 2018 methodically outline a range of major shortcomings in the EIS document and this rushed proposal. I fully endorse their statements and recommendations and believe that this proposal can not proceed until the Council's recommendations have been met.

In Conclusion

Nearly 40 years ago the NSW State Government made a decision which has had significant, defining impact on the coastal strip framing the beautiful and unique coastal and rural area of Kingscliff and ultimately the Tweed Coast. They stepped in to protect the unique

characteristics of Kingscliff from a developer-friendly Council and the type of unbridled foreshore development seen on the Gold Coast.

The result of this intervention (the first enforcement of the recently legislated *Coastal Protection Act*) is that Kingscliff and the Tweed Coast has a coastal strip that is completely protected from foreshore development - an area that has been enjoyed and loved by many thousands, quite simply because *it's not the Gold Coast*.

Fast forward to 2008 and the Government again steps in to protect valuable cropping lands from developers and ultimately extinction. The result of this intervention and the gazetting of the Cudgen plateau as *State Significant Farmland* preserved the unique characteristics and the strong links between the coastal community of Kingscliff and rural community of Cudgen.

It is simply unthinkable, indeed unconscionable, that the current State government would seek to move against the history of their predecessors in protecting this unique part of the world and be the first to take steps to tear down the very fabric of this area and community.

Major regional infrastructure belongs in major regional centres, not in unique rural and coastal towns and villages. This rezoning proposal pays little heed to the importance of State Significant Farmland, the very fabric of the unique rural and coastal connection that is Cudgen and Kingscliff and their communities, including the Tweed Heads business area.

This is a major generational change. The lack of regard and concern in this proposal for the key issues as described in this submission – and more eloquently in the Tweed Shire Council response referenced above - is at best incompetence and at worst highlights a contemptuous disregard of the community and the Tweed Shire by the Health Minister and the current local member, all for the sake of rushing through a poorly thought out vanity project.

The proposal itself reeks of 'confirmation bias', clearly focused on delivering what the Minister requires and with a predetermined outcome in mind. This, in itself, should be enough to halt any further consideration of the rezoning and development processes until a fully open and transparent, consultative process and proposal are developed...or simply adhere to the current, approved plan and commence the redevelopment of the current hospital and precinct, without loss of State Significant Farmland and resultant impact on the communities of Cudgen, Kingscliff and Tweed Heads.

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation:

Agreed to false or misleading information statements: yes

Name: [REDACTED]

Email: [REDACTED]

Address:
[REDACTED]
[REDACTED]

Content:

I strongly object to the land located at 771 Cudgen Road, Cudgen being rezoned from RU1 Primary Production and R1 General Residential (under Tweed LEP 2014) to SP2 Infrastructure (Health Services Facility).

I have attached a more detailed response but in brief I object to:

- the destruction of any part of State Significant Farmland including the proposed site at Cudgen
- the generational impact that the development of major infrastructure (including, but not limited to, the proposed hospital) will have on the surrounding towns and villages in particular Kingscliff and Cudgen.
- the economic and social impact on Tweed Heads should the proposed hospital be built on this site and away from the established businesses and urban infrastructure that is in place in Tweed Heads to support a hospital.

My objection can only be addressed by leaving the area that is proposed for rezoning as State Significant Farmland as State Significant Farmland and either continuing with the already planned redevelopment and extension of the current Tweed Heads Hospital or (as a lesser alternative) choosing a site that will not impact SSF and the Tweed Coast villages.

As an added bonus, it would be wonderful if the Department of Planning could implement steps to further strengthen the categorisation of SSF so that no future attempts are made to destroy this magnificent cropping land.

IP Address: - [REDACTED]

Submission: Online Submission from [REDACTED] (comments)

https://majorprojects.accelo.com/?action=view_activity&id=300748

Submission for Job: #9659

https://majorprojects.accelo.com/?action=view_job&id=9659

Site: #0

https://majorprojects.accelo.com/?action=view_site&id=0

SEPP Submission

I have been a ratepayer/resident of Kingscliff for over 10 years and prior to that holidayed here annually for many years. I am a strong advocate for the thoughtful and considered approach of the Tweed Shire Council to the sustained development and growth of the Shire (including a Hospital redevelopment), while preserving the very fabric of the unique coastal and rural farmland areas. The development of the Kingscliff Locality Plan and other regional planning documents has been marked by very high level and meaningful community consultation and input, unlike this rushed and flawed proposal.

I also fully endorse the Tweed Shire Council's response to this rezoning and proposed hospital development. This response was contained in a letter to the Director of Urban Assessments, Department of Planning, NSW Government dated 7 December 2018. The Council has methodically outlined a range of major shortcomings in the EIS document and this rushed proposal.

I strongly object to the land located at 771 Cudgen Road, Cudgen being rezoned from RU1 Primary Production and R1 General Residential (under Tweed LEP 2014) to SP2 Infrastructure (Health Services Facility) for the following reasons:

- **The proposed site is categorised as State Significant Farmland.**

The Site Analysis component of the Tweed Valley Hospital EIS states *'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.'*

The Cudgen Plateau is the only State Significant Farmland in the Tweed Shire and the rezoning of this valuable cropping land should not be considered for any purpose. It is incumbent on governments and the community to take responsibility for protecting land such as this. Major regional infrastructure is not appropriate for this land or conducive to the surrounding environment.

It is interesting to note that at a time when cities and communities are exploring and implementing ways of maximising our diminishing cropping lands and protecting them from development, this proposal seeks to do the exact opposite. I refer you to a recent ABC News article which describes how Adelaide is taking steps to protect cropping lands from development.

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This proposed rezoning not only runs opposite to conventional town and regional planning wisdom and community expectations, but makes a mockery of a key component underpinning any development on State Significant Farmlands (my emphasis):

*Public infrastructure is permitted on land mapped as state or regionally significant **where no feasible alternative is available**. Councils or state agencies proposing public infrastructure on such land **should select alternative sites where possible**.*

Feasible alternatives do in fact exist, with one in particular having been previously accepted by this Government (the redevelopment and extension of the current Tweed Hospital) up until 2017 when the NSW Health Minister embarked on this

rushed course. Every aspect of this process to date appears to have been designed with the proposed site as the outcome from the outset, with little or no regard to the tenets underpinning the designation of the selected site as State Significant Farmland.

- **Lack of transparency in the Tweed Valley Hospital site selection process.**

As per my earlier point, it clearly appears that the site selection process has been designed with a predetermined outcome (the proposed site) in mind.

There has been a decided lack of meaningful community consultation, very limited provision of information on site evaluation criteria and, importantly, the advice of the Tweed Shire Council (the local planning authority) was completely ignored.

Most damning of all is the complete lack of weight provided to the protection of State Significant Farmland (and other environmental factors) in making the site selection. As stated in my first point, a *feasible alternative* exists in the plans to redevelop the Tweed Hospital and precinct. The Government appears to have listened to a small number of medical staff (looking for a Greenfield option) and disregarded the wider community and the tenets underpinning the zoning as State Significant Farmland.

Surely, in any open and transparent process, a community consultation around the options would have been appropriate. Instead, the community has been subjected to a process hallmarked by a decided lack of transparency, in complete contrast to how the Tweed Shire Council engages with the community on major, generational planning matters. One can only draw the conclusion again that this process has been designed with the outcome in mind.

- **The proposed zoning change conflicts with the surrounding towns, coastal villages and farmlands.**

The proposed rezoning is in an area dominated by coastal villages, farmland and coastal wetlands. The proposed hospital is a major piece of regional infrastructure which, (initially) is the equivalent of a small town in population, being plonked on State Significant Farmland between the unique rural and coastal precincts of Cudgen and Kingscliff.

Should this proposed rezoning go ahead, it will have an irreversible impact on the fabric of the Cudgen/Kingscliff area. Some of the impacts are:

- Significantly increased traffic in the proposed hospital precinct on what are single lane, rural roads. This will also extend into the 40k and 50k streets of Kingscliff and Chinderah. None of this has been acknowledged within the Tweed Valley Hospital EIS.
- Parking is already at its limits in Kingscliff Village and surrounds. The proposed rezoning will create additional parking issues in streets which will be unable to absorb the increase. This will clearly compromise access and parking options for residents, visitors and tourists.
- The proposed rezoning from State Significant Farmland will be the thin edge of the wedge for other development applications in this unique area.
- Kingscliff and surrounds has a 3-storey height limit. The proposed rezoning to accommodate a multi-storey, major infrastructure development will end the element which is a trademark of Kingscliff and surrounds.

- The resulting impact on tourism as Kingscliff becomes no more than an extension of Tweed Heads and the Gold Coast and does not provide the outstanding, relaxed, rural/coastal natural environment that separates this destination from the Gold Coast.
- **The economic and social impact on Tweed Heads**
The proposed rezoning and the proposed development of a major hospital on the site will have a major economic impact on the businesses within Tweed Heads.

The significant impact of this on the business and local community is ignored in the planning documents, apart from a tepid acknowledgment in the EIS that *initially businesses may suffer*. Again, yet another sign of the rushed and poorly thought out nature of this proposal.

Redevelopment of the current Tweed Hospital would provide an opportunity to revitalise this area. In this regard, the proposal again appears out of step with contemporary practice and community expectations. I refer you to a recent ABC News article which describes how the city of Ipswich is seeking to revitalise its centre through the establishment of a 'Health Precinct':

<https://www.abc.net.au/news/2018-12-09/ipswich-cbd-to-be-made-into-health-precinct/10557454>.

In Conclusion

Nearly 40 years ago the NSW State Government made a decision which has had significant, defining impact on the coastal strip framing the beautiful and unique coastal and rural area of Kingscliff and ultimately the Tweed Coast. They stepped in to protect the unique characteristics of Kingscliff from a developer-friendly Council and the type of unbridled foreshore development seen on the Gold Coast.

The result of this intervention (the first enforcement of the recently legislated *Coastal Protection Act*) is that Kingscliff and the Tweed Coast has a coastal strip that is completely protected from foreshore development - an area that has been enjoyed and loved by many thousands, quite simply because *it's not the Gold Coast*.

Fast forward to 2008 and the Government again steps in to protect valuable cropping lands from developers and ultimately extinction. The result of this intervention and the gazetting of the Cudgen plateau as *State Significant Farmland* preserved the unique characteristics and the strong links between the coastal community of Kingscliff and rural community of Cudgen.

It is simply unthinkable, indeed unconscionable, that the current State government would seek to move against the history of their predecessors in protecting this unique part of the world and be the first to take steps to tear down the very fabric of this area and community.

Major regional infrastructure belongs in major regional centres, not in unique rural and coastal towns and villages. This rezoning proposal pays little heed to the importance of State Significant Farmland, the very fabric of the unique rural and coastal connection that is Cudgen and Kingscliff and their communities, including the Tweed Heads business area.

This is a major generational change. The lack of regard and concern in this proposal for the key issues as described in this submission – and more eloquently in the Tweed Shire

Council response referenced above - is at best incompetence and at worst highlights a contemptuous disregard of the community and the Tweed Shire by the Health Minister and the current local member, all for the sake of rushing through a poorly thought out vanity project.

The proposal itself reeks of 'confirmation bias', clearly focused on delivering what the Minister requires and with a predetermined outcome in mind. This, in itself, should be enough to halt any further consideration of the rezoning and development processes until a fully open and transparent, consultative process and proposal are developed...or simply adhere to the current, approved plan and commence the redevelopment of the current hospital and precinct, without loss of State Significant Farmland and resultant impact on the communities of Cudgen, Kingscliff and Tweed Heads.

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

Agreed to false or misleading information statements: yes

Name: [REDACTED]

Email: [REDACTED]

Address:

[REDACTED]

[REDACTED]

[REDACTED]

Content:

My family and I are proud Kingscliff residents. We have invested our life to living in Kingscliff. I have 2 small children and I wish for them to grow up in the beautiful coastal village that it currently is. I am all for a new Tweed Hospital but not on the current chosen site at Cudgen. I submit that it is the wrong site choose for the following reasons:-

1. There was little to no community consultation prior to site choice and insufficient time for objections.
2. There are far better site options - Cudgen is NOT the last resort.
- 3.No community consultation to revising The 2017 North Coast Regional Plan and moving the city of Tweed Heads to Kingscliff.
- 4.The community has fought very hard to maintain a 3 storey height limit and this is to be changed without consultation with the residents who actually live here.
- 5.Total disregard for the 8000 plus signature obtained on a petition against the Cudgen site.
- 6.No full disclosure of cost to the community in relocating the hospital.
7. Failure to mention that the Councillors of Tweed Shire Council object to the Cudgen site.
8. The social impacts to the community by building a hospital on prime agricultural land.

I attended a meeting where Brad Hazzard stated that he simply changed his mind because he could when he was questioned about the upgrade to the current Tweed Hospital.

As a resident I feel that it is totally unacceptable to make such a big decision without proper disclosure or consideration to the residents of Kingscliff, Cudgen and the Tweed a decision which will greatly impact our lives and that of our children

It is my submission that the above objections can only be resolved by abandoning the proposal to relocate the Hospital onto prime Cudgen Farmland and pursuing a more suitable site.

IP Address: [REDACTED]

Submission: Online Submission from [REDACTED] (object)

https://majorprojects.accelo.com/?action=view_activity&id=300788

Submission for Job: #9575 New Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_job&id=9575

Site: #4045 Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_site&id=4045

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation:

Agreed to false or misleading information statements: yes

Name: [REDACTED]

Email: [REDACTED]

Address:

[REDACTED]

[REDACTED]

Content:

My family and I are proud Kingscliff residents. We have invested our life to living in Kingscliff. I have 2 small children and I wish for them to grow up in the beautiful coastal village that it currently is. I am all for a new Tweed Hospital but not on the current chosen site at Cudgen. I submit that it is the wrong site choice for the following reasons:-

1. The current site at Cudgen was zoned as State Significant Land and it should be protected as such and not rezoned when there are other choices eg. upgrade the current hospital.
2. I strongly believe that if this hospital goes ahead on farmland then the whole agricultural plateau will also be acquired to build hospital facilities eg parking, aged care.
3. The current hospital plan contradicts the current height restrictions in the Tweed which were established with community consultation.
4. Acquisition of further land in the Cudgen farmland vicinity will diminish the prime agricultural land and it will lose its special protection.
5. The small community village atmosphere will be lost and the hospital will have an overwhelming social, economic and visual impact. The community has built this beautiful town as a beach and food hub - it is not a city.

It is my submission that the above objections can only be resolved by abandoning the proposal to relocate the Hospital onto prime Cudgen Farmland and pursuing a more suitable site.

IP Address: - [REDACTED]

Submission: Online Submission from [REDACTED] (comments)

https://majorprojects.accelo.com/?action=view_activity&id=300816

Submission for Job: #9659

https://majorprojects.accelo.com/?action=view_job&id=9659

Site: #0

https://majorprojects.accelo.com/?action=view_site&id=0

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

Agreed to false or misleading information statements: yes

Name: [REDACTED]

Email: [REDACTED]

Address:

[REDACTED]

[REDACTED]

[REDACTED]

Content:

As a property owner/resident of Kingscliff and a local business owner, I am writing to submit my complete objection to the proposal to build a new Tweed Valley Hospital at Cudgen. I am outraged that a government-led site selection process would even consider wiping out a parcel of State Significant Farmland, let alone for a hospital. This proposal has outraged many in our community, who value this beautiful asset - healthy arable land that is currently NOT drought affected, as is much of the rest of the State. It is a significant concern that more and more farmland is being swallowed up by development, let alone at the hands of our own government who are meant to be custodians of our natural assets and our future. We must save the farmland that we have in order to maintain some form of fresh food supply in this country and the farming economy. I for one do not wish to be forced into eating food that has spent weeks travelling from other countries - how crazy when we have the means right here. But not for long if we continue to concrete over our farmland.

I fully support the provision of new hospital services for our growing region. But not at the nominate location. There has not been thorough planning to support a successful development at this location. However, I understand that a full masterplan has been done for the redevelopment of the currently Tweed Hospital site. The community has not been given a clear reason why this has been abandoned and why all of a sudden there is a requirement for a change of location.

Redevelopment option

The redevelopment of the Tweed Hospital is totally viable, even if it does require additional land - this is not a limiting factor as the government has just demonstrated that they can simply deploy their powers of compulsory acquisition if need be. The upgrade could incorporate problem solving design/engineering solutions to deal with the issues of flooding that may exist at the existing site. The argument that the Cudgen site is better in flood situations is rubbish. In a PMF, the Cudgen site becomes an island with no way to maintain safe ongoing operations and no easy way to evacuate! Even in much smaller flood events, many of the approach roads to the Cudgen site become inundated, therefore causing significant access issues to this site.

Maintain our farmland for a sustainable future

Our government has at some point valued this parcel of land enough to grant it the title of State Significant Farmland. A direct acknowledgement of the importance of this parcel of land, its nutrient rich soil and its value to our population.

The State also has a policy to maintain land for agricultural industries. This rezoning goes against a number of the State's own environmental planning guidelines, these are outlined on the Department of Primary Industries Policy Maintaining land for agricultural industries, 2011 and include:

- * promote the continued use of agricultural land for commercial agricultural purposes, where that form of land use is sustainable in the long term; (the site and its current use is very sustainable - drought free land for growing food for current and future generations)

- * avoid land use conflicts; (rezoning to SP2 would be a significant conflict to surrounding land uses -

farms and coastal wetlands, residential)

- * protect natural resources used by agriculture; (this land should be protected not concreted)

- * protect other values associated with agricultural land that are of importance to local communities, such as heritage and visual amenity (a change in land use will negatively affect the cultural aspects of the area of farming and fresh food tourism, relaxed beachside lifestyle/tourism/recreation, the farming heritage, the scenic amenity will change from farms and mountain ranges to concrete structures, with invasive lighting)

The policy also states 'The conversion of land used by agricultural enterprises to other uses should only take place where fully justified in the strategic planning context. Considerations include

- * all alternative sites and options for non agricultural developments;

- * any decisions to convert agricultural land of high value to regional and state agricultural industries should be a last option

There is no 'justified' strategic planning to support the rezoning of this land, in fact it goes against many facets of the current planning documents in place for the area, which the community has fought hard to maintain such as the Tweed Local Environment Plan (particularly building heights and other development limits).

And, the policy states that 'Spot rezonings and other ad hoc approaches to planning are undesirable.'

After many years of planning for a redevelopment on the current Tweed Hospital site, the government has suddenly spun around, bought a piece of State Significant Farmland and now hopes to make a 'spot rezoning' without appropriate planning to support their proposal.

Flawed site selection process

The site selection process used in identifying 771 Cudgen Road was fundamentally flawed. WHY was a parcel of State Significant Farmland even considered? Just because a landowner put his hand up? Not good enough. The government should have immediately discounted this land due to its current zoning (prohibiting the type of proposed development nonetheless) and agricultural value (SSF). As the DPI policy mentions above it should have been a last option, not a first option or not an option at all.

The site selection process identified numerous other locations that could have been considered which were not State Significant Farmland, and some not even plain old farmland, just viable land. Let's not forget the perfect location, on the current site of the Tweed Hospital. The arguments used to rule out other options and locations were flimsy to say the least. There are other viable options for the hospital to be located especially with the assistance of engineering or other improvements. We should be considering one of the numerous other options and maintaining this important parcel of State Significant Farmland for its ideal purpose - farming fresh food and maintaining it this way for future generations.

This is a blatant disregard for the importance of farming land such as this, in a period of devastating drought for the State. The notion that the government can simply decide to rezone such a significant piece of land at their own discretion and to meet their own desires is completely arrogant. Imagine if the previous landowner sought to rezone for development of some kind? I bet the request would have been shot down in flames.

One clear location which seems to be easily adaptable to a hospital precinct and which does not disrupt an already established community is the location at King's Forest. Actual greenfield site which could be easily accessed direct from the Pacific Highway. A huge site which could easily accommodate auxiliary services and is right in the heart of the growing population base for which this new hospital is meant to cater for. I cannot understand why the SSF at Cudgen can be considered more appropriate than this.

Social and economic implications

I encourage the government not to look at this parcel of land in isolation, but instead understand how this development will set a precedent and will have knock on affects both into the Kingscliff beachfront locality and up into the Cudgen plateau. Opening the flood gates for further development of farmland and a change of life's 'fabric' for residents and businesses in Kingscliff. In particular, the obvious need for associated auxiliary services, specialists etc that will need to be situated near the hospital therefore a further threat to adjacent farmland.

This proposal is also in direct opposition to the nature of the surrounding area, being predominately other farmland, coastal wetland and residential housing. More so it is a fundamental threat to the

culture of Cudgen and Kingscliff being that of relaxed beachside lifestyle, tourism and recreation. This is something that the community has been working hard to achieve over a number of years. Locating a hospital at 771 Cudgen Road will inevitably have widespread effects on the community, not just to the one block of land. The social implications are massive, significantly affecting the demographics of the area.

The EIS does not adequately address the direct impacts to Kingscliff from a demographic point of view. It does not explain the full impact of the requirement for affordable housing. It does not explain how the auxiliary services will be managed, nor where they will be located. It does not clearly address the obvious need for road upgrades surrounding the hospital (roads are already at capacity). There does not seem to be a clear picture of parking, and staff, patient, visitor vehicle movements/numbers and how this will be managed.

Downturn of Tweed Heads

Moving the hospital from its current location in Tweed Heads shows a complete disregard for the thousands of people (many elderly) who have moved to the area to be in close proximity to the hospital and its established nearby services/specialists.

What about all the businesses who have worked hard to establish themselves in an area with a hospital for its heart-beat. How will these businesses survive when their life-blood is removed?

Environmental impacts

The EIS contains very little detail on how the development will protect the adjoining coastal wetland, home to many significant flora and fauna, including koalas. The development would seemingly interrupt the natural habitat and natural travel paths of fauna in this area. I see this type of development being in complete conflict to this important ecosystem.

Please do this properly

I understand that there is an urgency to provide updated services to our region. There is only a rush now because the government has not acted on the growing need sooner. However, this does not justify a knee-jerk reaction with no robust planning to underpin it, which is the case with suddenly abandoning the redevelopment plans and throwing a dart at the Cudgen site. This EIS states that the concept design of the hospital is based on a draft NNSW LHD plan and that there is no design development for the project yet (obviously because the site has only just been found). What happened to making an informed assessment of the need, and designing the hospital accordingly. What happened to finding a site that the appropriate needs can be adequately catered for, rather than squeezing what you can onto a site that is volunteered by someone and then hoping that you make it work? I thought our government were better than that.

Please do not wipe out the State Significant Farmland on 771 Cudgen Road. Please maintain it for food and future generations. Please maintain it to keep the localities of Cudgen and Kingscliff in line with their fundamental way of life. Please do not rezone 771 Cudgen Road to SP2 - choose another location for the hospital, there are plenty of viable options. I urge the government to undertake the site selection process again and properly this time.

This EIS was grossly lacking any real investigation into the full effects of the hospital at this location. It is not legitimate to do an EIS on early works without really addressing the full impact. It seems as though the government is trying to sneak through with an initial approval only for it to be too late once the community understands the real impact and implications a development of this size and nature will bring. I believe that the full EIS needs to be investigated and assessed before any work can proceed to ensure a clear and transparent process for the community. It is too late once construction has started.

IP Address: [REDACTED]

Submission: Online Submission from [REDACTED] (object)
https://majorprojects.accelo.com/?action=view_activity&id=300796

Submission for Job: #9575 New Tweed Valley Hospital
https://majorprojects.accelo.com/?action=view_job&id=9575

Site: #4045 Tweed Valley Hospital
https://majorprojects.accelo.com/?action=view_site&id=4045

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

Agreed to false or misleading information statements: yes

Name: [REDACTED]

Email: [REDACTED]

Address:

[REDACTED]

[REDACTED]

[REDACTED]

Content:

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2. There are far better site options - Cudgen is NOT the last resort.
- 3.No community consultation to revising The 2017 North Coast Regional Plan and moving the city of Tweed Heads to Kingscliff.
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I attended a meeting where Brad Hazzard stated that he simply changed his mind because he could when he was questioned about the upgrade to the current Tweed Hospital.

As a resident I feel that it is totally unacceptable to make such a big decision without proper disclosure or consideration to the residents of Kingscliff, Cudgen and the Tweed a decision which will greatly impact our lives and that of our children

It is my submission that the above objections can only be resolved by abandoning the proposal to relocate the Hospital onto prime Cudgen Farmland and pursuing a more suitable site.

IP Address: [REDACTED]

Submission: Online Submission from [REDACTED] (object)

https://majorprojects.accelo.com/?action=view_activity&id=300800

Submission for Job: #9575 New Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_job&id=9575

Site: #4045 Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_site&id=4045

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation:

Agreed to false or misleading information statements: yes

Name: [REDACTED]

Email: [REDACTED]

Address:

[REDACTED]

[REDACTED]

Content:

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IP Address: - [REDACTED]

Submission: Online Submission from [REDACTED] (comments)

https://majorprojects.accelo.com/?action=view_activity&id=300818

Submission for Job: #9659

https://majorprojects.accelo.com/?action=view_job&id=9659

Site: #0

https://majorprojects.accelo.com/?action=view_site&id=0

OBJECTION TO EIS**Application Number****SSD 18_9575****New Tweed Valley Hospital**

To make a submission, please fill in the following fields. Those marked with an asterisk "*" are mandatory.



I am making a personal submission

Name: *

MR

TITLE

PAUL EDWARD

GIVEN NAME(S)

REDMAN

FAMILY NAME

Please tick this box if you do not want your name published in the list of submitters on the department's website

☐

"Name withheld on request" will appear on the list, instead of your name.

YOUR DETAILS**Email**

PAUL-EDWARD@BIG POND.COM

Address: *

Address 1 17 CRESCENT STREET

Address 2 CUDGEN

Suburb*CUDGEN
DoPE will publish your suburb in the list of submitters with your submission**State / Postcode**

NSW.

2487

Detach pages 13 → 15 and insert in envelope provided

MY SUBMISSION: *

I object to this exhibited EIS because:

- * THE ISSUE of THE PROPOSED BUILDING of THE TUGGER HOSPITAL ON CUDGEN PRIME AGRICULTURAL LAND SHOULD NOT BE AN ISSUE IF POLITICIANS LISTENED TO THE WISHES of THE PEOPLE THAT WILL BE MOST AFFECTED. BY THE LOSS of THE BEST SMARLY CROP LAND IN THE COUNTRY CAPABLE of PRODUCING CROPS 12 MONTHS PER YEAR.
- WHEN THE PUSH WAS ON TO BUILD A SCHOOL ON CUDGEN LAND AS PRESIDENT of THE CUDGEN PROGRESS ASSOCIATION I GAVE STATE MEMBER A GUIDED TOUR of RICHARDS FARM THEN EMPLOYING 40 WORKERS PICKING ZUCCHINES - TOMATOES - SWEET POTATOES.
- MR PROVOST SHOULD BE WELL AWARE of WHAT CUDGEN CAN PRODUCE IN THE WAY of JOBS.
- * MY NEXT POINT THAT SHOULD BE TAKEN INTO CONSIDERATION THIS PROPOSED HOSPITAL BUILDING WITH A HELICOPTER PAD WILL BE DIRECTLY UNDER THE FLIGHT PATH of INCOMING AIRCRAFT TO ONE of THE BUSIEST AIRPORTS OUTSIDE of THE CAPITAL CITIES THAT IN ITSELF SHOULD BE REASON ENOUGH TO BUILD THE HOSPITAL ELSEWHERE.
- * PERHAPS THE N.S.W. DECISION MAKERS SHOULD INSPECT JOHN FLYNN HOSPITAL AT TUGGER QLD IN MY VIEW SECOND TO NONE IN THE COUNTRY BUILT ON NON PRODUCTIVE LAND.
- NOT AS N.S.W. DESIRES PRIME AGRICULTURAL.

Detach pages 13 → 15 and insert in envelope provided

Disclose reportable political donations *

The requirement to disclose depends on:

- whether your submission is about a relevant planning application, and
- the value and timing of any political donation/s you or your associate have made.

To determine whether the reporting requirements apply to you, read Parts 3 and 4 of [Disclosure of Political Donations and Gifts](#).

I have made a reportable political donation.

5. AGREE TO THE FOLLOWING STATEMENTS

I have read the Department's [Privacy Statement](#) and agree to the Department using my submission in the ways it describes. I understand this includes full publication on the Department's website of my submission, any attachments, and any of my personal information in those documents, and possible supply to third parties such as state agencies, local government and the proponent.

I agree to the above statement ☒

6. LODGE YOUR SUBMISSION

Unless you agree with the statements at step five and tick the box you will not be able to lodge your submission. If you do not yet agree with the statements at step five, you may wish to read the [Privacy Statement](#) and/or remove personal information from your submission and any attachments.

7. OFFENCE TO PROVIDE FALSE OR MISLEADING INFORMATION

It is a serious criminal offence under the Crimes Act 1900 to provide information to the Department of Planning and Environment knowing that, the information is false or misleading or the information omits any matter or thing without which the information is misleading.

I have read and understood the above ☒

I understand that by making this Submission, I am providing the information contained in this form to the Department of Planning and Environment and confirm that that information is not false or misleading ☒

Signature



Date 05/12/18

Detach & place your 6 submission pages i.e. pp. 7-9 and 13-15 (only) along with any attachments into the addressed envelope provided, calculate postage and post via Australia Post before 5pm Friday 7th DEC 2018.

OBJECTION TO EIS		
Application Number	SSD 18_9575	New Tweed Valley Hospital

To make a submission, please fill in the following fields. Those marked with an asterisk "*" are mandatory.

☒ I am making a personal submission

Name: *

<div></div>		
TITLE	GIVEN NAME(S)	FAMILY NAME

Please tick this box if you do not want your name published in the list of submitters on the department's website

☐

"Name withheld on request" will appear on the list, instead of your name.

YOUR DETAILS

Email	<div></div>
Address: *	<div></div>

Address 2

Suburb *	<div></div>
State / Postcode	<div></div>

Detach pages 13 → 15 and insert in envelope provided

MY SUBMISSION:

I object to this exhibited EIS because:

I have included my submission to object to the proposed SEPP in this submission where I am objecting to the exhibited EIS. It should be read as part of this submission as many of the issues raised are relevant to both.

This also highlights the inadequacy of time given to the average individual to absorb, understand, analyse and respond to this complex document. I would have liked more time in order to give a more detailed response.

My SEPP submission also outlines my connections to the proposed hospital site and the Cudgen/Kingscliff area.

Detach pages 13 → 15 and insert in envelope provided

MY SUBMISSION:

I object to this proposed SEPP because:

My family has had an extremely close relationship with the Kingscliff/Cudgen area for over 100 years and in particular the rich farming land of the Cudgen plateau.

Sugar cane was grown on the farm until his death in the mid 1960's. My father then purchased the land and it remained in the family until 2010 when it was sold to long term Cudgen farmers.

It was actively farmed throughout this period by various family members, including myself and at times parts were leased to long term Cudgen farming families.

Until the compulsory acquisition my sister-in-law lived in the farmhouse and my nephew worked on the farm making him a 4th generation farmer.

My mother's parents also came to the area about [redacted] and owned significant amounts of Cudgen farmland.

I have been visiting Kingscliff/Cudgen regularly since 1960 and at times attended schools and worked in the area.

I still come to Kingscliff on a frequent and regular basis to ^{help} care for my elderly uncle who still owns a home on Kingscliff hill. I would consider myself to be a part time resident.

I believe I am well credentialed to submit an objection to the proposed SEPP^{EIS} which would allow the Tweed Valley Hospital to be built on 771 Cudgen Road, Cudgen.

I do support a new hospital or expansion of the existing one but not on state significant farmland.

Detach pages 7 → 9 and insert in envelope provided

Objection to SEPP

*also part of EIS

I object to this proposed SEPP because:

The land for the proposed hospital site is primarily zoned RU1 Primary Production and is classified as state significant farmland. A small section is zoned R1 general residential but this has always been used for agriculture as evidenced by yearly applications to the Tweed Shire Council for payment of farmland rates. The remaining wetlands section is zoned environmental protection.

Records indicate that this land has been used for agriculture since 1875. Sugar cane was ~~grown~~ definitely grown from 1916 to the mid 1960's. Since then there has been a large variety of small crops grown. Over the years these have included tomatoes, zucchini, sweet potatoes, Squash, cucumbers, beans, Peas and corn. Avocados, Mustard apples and citrus have successfully grown on the slopes. This reflects the diversity and adaptability of this farming land. Production rates are excellent.

This land is zoned state significant farmland which enables intensive horticultural production and provides the highest level of protection which can be given to preserve land for primary production. A number of factors have contributed to this classification.

Soil - rich red volcanic soil which has been rated in the top 2% of fertile land in Australia. This is such a precious diminishing resource and needs to be maintained for the benefit of future generations.

Climate - This is one of the most easterly farms in Australia and experiences a favourable subtropical climate. Due to its very close proximity to the ocean it has relatively mild summers, frost free winters and a high rainfall.

Water Supply - this land is basically drought free due to the rainfall and natural underground springs which feed into the dam. With 98% of the state in drought and water security becoming a massive issue throughout Australia production is down in many areas and with climate change this is likely to worsen. This is not the case here so the water supply needs to be valued and utilised in the best possible way - on our crops.

This farming land forms part of the Cudgen plateau which is one of the last unfragmented blocks of state significant farmland in the entire Tweed Valley. There has been an argument that as this farm is on the end of the SSF block it won't cause fragmentation to the remainder area if it is lost to agricultural production. This is not the issue as it will cause developmental encroachment which is just as critical. If this land is lost as SSF it will have an enormous impact on the other farms in this collective. Specifically, the cluster will be closer to the minimum 500 hectares required for SSF classification, there will be only a minor buffer which will increase the risk of SSF being lost for the Cudgen Plateau.

Experience elsewhere shows that where farming land close to towns, particularly smaller ones, has been lost to development the surrounding farmland is then placed in jeopardy of also being lost. There is a domino effect with more services required to support and complement hospital activities eg housing, aged care, ancillary and specialist services. Although lacking detail Health Infrastructure has already indicated this will happen with the announcement of an extended health precinct. This can only go to the west and south of the property which would facilitate a

automatic rezoning to support these services.

Irrespective of this, agricultural activities on adjoining farmland is always effected negatively by development.

If this land is rezoned there is also the environmental issue of the impact on the environmentally protected undeveloped wetland area. Lots of species of wildlife and plants have been identified in this area. My family also planted additional trees which provides preferred Koala food. Even with the current development in the area, the numbers of Koalas has greatly reduced so these plus the other wildlife would be further endangered.

Since the early 2000's there have been concerns about the impact of population growth and the expense of farming land. Consequently there has been extensive research and long term planning conducted by the NSW government and Tweed Shire Council for the Tweed area. This foresight needs to be commended.

Some of the Key Studies, Plans and ~~projects~~ ^{strategies} are:

- Northern Rivers Farmland Protection Project (2005) - Dept. of Infrastructure Planning + Natural Resources
- Northern Rivers Catchment Action Plan (2005)
- Far North Coast Regional Strategy (2006-31) - Dept of Planning which was built on the Northern Rivers Regional Strategy
- North Coast Regional Plan (2036) - Dept of Planning - released in March 2017
- Tweed LEP 2014 (Tweed Shire Council)

There have also been many other government initiatives. These have all been comprehensive, transparent and involved extensive consultation with all stakeholders.

What stands out most is the consistency in all these plans, strategies and initiatives is the absolute necessity to protect agricultural land on the NSW North Coast and in particular state significant farmland.

The site ~~in question~~ ^{where rezoning} is proposed received state significant farmland status in 2002. In every planning exercise conducted by the NSW government and Tweed Shire Council since then, it has clearly been stated that this land should remain zoned for primary production and certainly should not be considered for any type of development, at least until 2036, if not ever.

The Tweed Shire Council does not support the hospital on this site. They were not consulted and the proposed rezoning contravenes the most recent Tweed LEP 2014.

I believe there needs to be a new or expanded hospital in the Tweed but I strongly object for state significant farmland to be rezoned to enable this to happen. I have outlined my reasons. This even goes against the government's own policy which states that state significant farmland should only be rezoned ~~for a project~~ to enable a project like this when there is no alternative.

There are other alternatives.

The government's own plan until last year was to expand the current Tweed Heads Hospital and if the money had been allocated earlier this would be well underway. This is the Tweed Shire Council's preferred option and they have offered land adjoining the hospital to enable the necessary expansion.

Through the EOI process, two other sites were shortlisted as being suitable, so should be given further consideration as they do not have

SEPP + EIS 8c
state significant farm status, a big plus for them. I
note this wasn't listed as a negative for the proposed site.

Health Infrastructure has shown they are prepared
to obtain land via compulsory acquisition so therefore
they actively could and should investigate other sites
in the region which are likely to be more appropriate and
haven't been considered to date.

It seems that expediency, ^{failure to} ~~lack of~~ implementation of
current plans and perhaps self interest have dominated
this process ~~at the~~ ^{at the} ~~ex~~ ^{loss} This has led to the potential
expens^{loss} of some of the best agricultural land in the
state. This cost ~~has~~ does not appear to have been
seriously considered. Once gone it is gone forever.

There is a way to preserve high quality irreplaceable
agricultural land and have a much needed hospital.
You don't need to sacrifice one for the other.

Thank you for reading my hand written
submission

EIS The other reasons I object to this exhibited EIS are:

14a

- For many years Tweed Heads has been designated as the main regional centre for the Tweed and consequently all planning, except for the proposed new hospital, has been done with this in mind. The major hospital for the region is currently based there as well as all the support and complementary services. There are also offices of government departments, larger shopping centres and more specialist shops and services.
- On the other hand Kingscliff has been described as a coastal village / smaller town. The beach and creek along with their associated activities, cafes and boutique style shops and more relaxed lifestyle have been promoted as its major assets and drawcard for residents and tourists alike.
- People have chosen to live at Tweed Heads or Kingscliff with the above features in mind. The building of a hospital at Kingscliff and the eventual closure of the one at Tweed Heads will drastically change all this. Due to the projected size of the new hospital and the planned extended health precinct and the closure of services at Tweed Heads, Kingscliff will become the economic hub of the region. It would completely change the atmosphere and lifestyle of both. ~~Residents would not get what~~ places.
- The Kingscliff community has fought hard to maintain the 3 storey building height limit. Residents have given clear messages they do not want high rise and to become an extension of the Gold Coast. The current appeal will disappear with the abolition of these restrictions.
- The EIS does not ~~appear~~ give an accurate information about community consultation. It was over a very short time and the questions asked and answers recorded ~~appeal to be~~ ~~was designed~~ designed.

EIS to support Health Infrastructure's proposal. This process needs to be investigated. There has been no mention of the two petitions against the building of the hospital on state significant farmland. These, with over 8000 signatures went to the upper and lower Houses of NSW parliament. This is a very strong community response.

- The Tweed Shire Council has passed a resolution opposing the siting of the hospital on this state significant farmland. Their planning has been ignored. They were not even consulted prior to the decision being made. This is particularly poor as they ~~have~~ will have to provide alot of the ~~infrastructure~~ ^{infrastructure}. Much of this has not even been identified and subsequently not costed. This potentially ^{can} lead to an increase in rates or a decrease in other services.

- The council has ~~as~~ offered to sell adjoining land next to the existing hospital so further expansion could occur there. All their planning has been based on the hospital remaining where it is. Most of the infrastructure is already there.

- In conclusion I would like to say that a new or expanded existing hospital is essential for a growing population.

The preservation of existing state significant farmland to meet the needs of a growing population is just as essential. Rather than a quick fix, rushed decision there needs to be a more thorough and extensive process to find a suitable hospital site. We don't need to choose between hospital or state significant farmland with a better process we can have both.

Thank you for... :-

Disclose reportable political donations *

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- whether your submission is about a relevant planning application, and
- the value and timing of any political donation/s you or your associate have made.

To determine whether the reporting requirements apply to you, read Parts 3 and 4 of [Disclosure of Political Donations and Gifts](#).

I have made a reportable political donation.

5. AGREE TO THE FOLLOWING STATEMENTS

I have read the Department's [Privacy Statement](#) and agree to the Department using my submission in the ways it describes. I understand this includes full publication on the Department's website of my submission, any attachments, and any of my personal information in those documents, and possible supply to third parties such as state agencies, local government and the proponent.

I agree to the above statement ☒

6. LODGE YOUR SUBMISSION

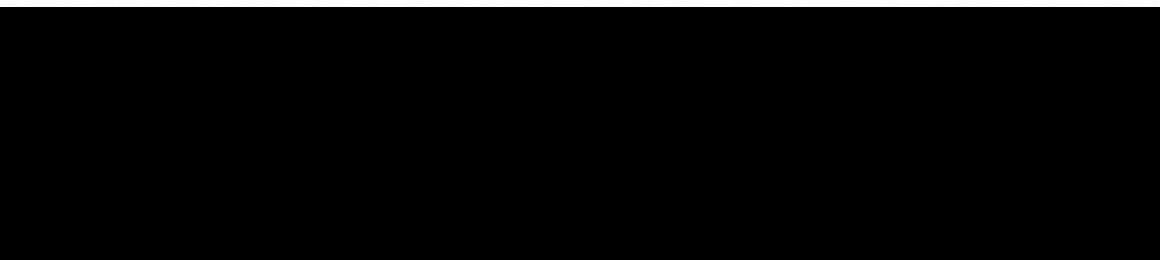
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7. OFFENCE TO PROVIDE FALSE OR MISLEADING INFORMATION

It is a serious criminal offence under the Crimes Act 1900 to provide information to the Department of Planning and Environment knowing that, the information is false or misleading or the information omits any matter or thing without which the information is misleading.

I have read and understood the above ☒

I understand that by making this Submission, I am providing the information contained in this form to the Department of Planning and Environment and confirm that that information is not false or misleading ☒



Detach & place your 6 submission pages i.e. pp. 7-9 and 13-15 (only) along with any attachments into the addressed envelope provided, calculate postage and post via Australia Post before 5pm Friday 7th DEC 2018.

OBJECTION TO EIS**Application Number****SSD 18_9575****New Tweed Valley Hospital**

To make a submission, please fill in the following fields. Those marked with an asterisk "*" are mandatory.



I am making a personal submission

Name: *

--	--	--

TITLE

GIVEN NAME(S)

FAMILY NAME

Please tick this box if you do not want your name published in the list of submitters on the department's website



"Name withheld on request" will appear on the list, instead of your name.

YOUR DETAILS

Email

--

Address: *

Address 1

--

Address 2

--

Suburb *

--

State / Postcode

--

Detach pages 13 → 15 and insert in envelope provided

MY SUBMISSION: *

I object to this exhibited EIS because:

- * TO FEED LOCAL COMMUNITIES
- * PETROL RESERVE'S - FREIGHT FROM
WHERE TO FEED THE PEOPLE. (RESIDENTS)
- * PARKING (PUBLIC TRANSPORT)
- * PROXIMITY TO PACIFIC HWY.
- * SHOULD BE. KIRKWOOD RD AND PACIFIC HWY
WEST TWEEN-

Detach pages 13 → 15 and insert in envelope provided

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OBJECTION TO EIS**Application Number****SSD 18_9575****New Tweed Valley Hospital**

To make a submission, please fill in the following fields. Those marked with an asterisk "*" are mandatory.



I am making a personal submission

Name: *

TITLE

GIVEN NAME(S)

FAMILY NAME

Please tick this box if you do not want your name published in the list of submitters on the department's website

☐

"Name withheld on request" will appear on the list, instead of your name.

YOUR DETAILS

Email

Address: *

Address 1

Address 2

Suburb *

DoPE will publish your suburb in the list of submitters with your submission

State / Postcode

Detach pages 13 → 15 and insert in envelope provided

MY SUBMISSION: *

I object to this exhibited EIS because:

Kingscliff is a village its farm land
hospital should be built off Kirkwood RD
All that needs doing is the interchange

Detach pages 13 → 15 and insert in envelope provided

Disclose reportable political donations *

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I have made a reportable political donation.

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I agree to the above statement ☒

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Signature 	Date 20/11
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Detach & place your 6 submission pages i.e. pp. 7-9 and 13-15 (only) along with any attachments into the addressed envelope provided, calculate postage and post via Australia Post before 5pm Friday 23rd November 2018.

OBJECTION TO EIS**Application Number****SSD 18_9575****New Tweed Valley Hospital**

To make a submission, please fill in the following fields. Those marked with an asterisk "*" are mandatory.



I am making a personal submission

Name: *

MR

TITLE

Aaron

GIVEN NAME(S)

Williams

FAMILY NAME

Please tick this box if you do not want your name published in the list of submitters on the department's website

☐

"Name withheld on request" will appear on the list, instead of your name.

YOUR DETAILS

Email

Address: *

Address 1

6112 Coyne St

Address 2

Suburb *

Coolangatta

DoPE will publish your suburb in the list of submitters with your submission

State / Postcode

QID

Detach pages 13 → 15 and insert in envelope provided

MY SUBMISSION: *

I object to this exhibited EIS because:

Kingscliff is a small town, putting a hospital in would add way to much population.

Detach pages 13 → 15 and insert in envelope provided

Disclose reportable political donations *

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I have made a reportable political donation.

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I agree to the above statement ☒

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I have read and understood the above ☒

I understand that by making this Submission, I am providing the information contained in this form to the Department of Planning and Environment and confirm that that information is not false or misleading ☒

Signature



Date 21.11.18

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OBJECTION TO EIS

Application Number

SSD 18_9575

New Tweed Valley Hospital

To make a submission, please fill in the following fields. Those marked with an asterisk "*" are mandatory.



I am making a personal submission

Name: *

MR

TITLE

Thomas

GIVEN NAME(S)

NORRIS

FAMILY NAME

Please tick this box if you do not want your name published in the list of submitters on the department's website

☐

"Name withheld on request" will appear on the list, instead of your name.

YOUR DETAILS

Email

Address: *

Address 1 Lot 2 190 B

Address 2 MCCONNELL RD

Suburb *

DUNBIE
DoPE will publish your suburb in the list of submitters with your submission

State / Postcode

NSW

2484-

Detach pages 13 → 15 and insert in envelope provided

MY SUBMISSION: *

I object to this exhibited EIS because:

KINGSKIFF is a small
 village the REHAB Centres
 out CENTRES ECT
 will have impact on
 the local SCHOOLS And
 community NO CHILDREN
 should FACE this
 or A PAIRLY BASIS-

Detach pages 13 → 15 and insert in envelope provided

Disclose reportable political donations *

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I have made a reportable political donation.

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I agree to the above statement ☒

6. LODGE YOUR SUBMISSION

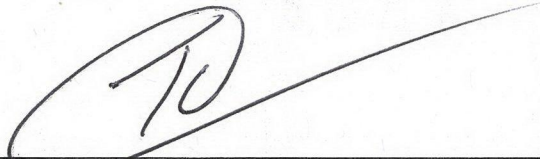
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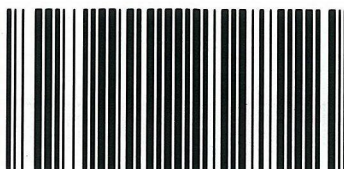
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I have read and understood the above ☒

I understand that by making this Submission, I am providing the information contained in this form to the Department of Planning and Environment and confirm that that information is not false or misleading ☒

Signature 	Date 20-11-18
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PCU077454

OBJECTION TO EIS**Application Number****SSD 18_9575****New Tweed Valley Hospital**

To make a submission, please fill in the following fields. Those marked with an asterisk "*" are mandatory.



I am making a personal submission

Name: *

Mr

TITLE

Cameron

GIVEN NAME(S)

McCallie

FAMILY NAME

Please tick this box if you do not want your name published in the list of submitters on the department's website

☐

"Name withheld on request" will appear on the list, instead of your name.

YOUR DETAILS

Email

Address: *

Address 1

21 Kildare drive

Address 2

Suburb *

Banora Point

DoPE will publish your suburb in the list of submitters with your submission

State / Postcode

N.S.W

2486

Detach pages 13 → 15 and insert in envelope provided

Department of Planning
Received

12 DEC 2018

Scanning Room

MY SUBMISSION: *

I object to this exhibited EIS because:

Kingscliff is a small town that has a very relaxed coastal feel about it and bringing a big thing like this will destroy the slow relaxing feel this town brings

Detach pages 13 → 15 and insert in envelope provided

Disclose reportable political donations *

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I have made a reportable political donation.

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Signature 	Date 20.11.18
---	---------------

Detach & place your 6 submission pages i.e. pp. 7-9 and 13-15 (only) along with any attachments into the addressed envelope provided, calculate postage and post via Australia Post before 5pm Friday 23rd November 2018.

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Agreed to false or misleading information statements: yes

Name: Trudy Edgar

Email: [REDACTED]

Address:

[REDACTED]

Kingscliff, NSW
2487

Content:

I wish to outline my main objections regarding the Environmental Impact Statement provided for the staged development of the new Tweed Valley Hospital proposed to be built at 771 Cudgen Road, Cudgen (Par Lot 102 DP 870722). There are many more objections other than those listed here however time and brevity require that I highlight the main and most vigorous objections in this personal submission.

Providing 28 days to a community and thousands of pages of development documentation to read and interpret is unacceptable. The extension of two weeks occurred because the Department's own advertising was incorrect. The confusing and complex nature of the information in itself is reason to object to the development which in its current form does not enable any real quality of response and community participation from the average person. There has been no assistance and education for the public in regards to what is the largest infrastructure ever designated for the region.

State Significant Farmland (SSF) is classified in this manner deliberately to protect it from development. There are a multitude of uses that could be envisaged for the site and that would benefit any number of groups or self-interests. However, the site proposed has been designated as SSF specifically because of the recognition that multiple interests would like to stake a claim in the uses of it, and the economic benefits that could arise through its sale or subdivision. As an ancient volcanic area, the soil quality is high, with rich soils that enhance growth on a rare drought-free part of the state. This is the character that makes it stand out and significant, and these characteristics are irreplaceable. A building can be built elsewhere. Farmland cannot be reclaimed once it is destroyed. As the site is a part of state significant farmlands it is ludicrous that it is the Government who wish to ignore the protections it has lawfully been given, to acquire it, and to override the protections to build state significant infrastructure. Both are important. One is completely irreplaceable and it is not the proposed development which can be built on other land.

The existing industries within both Kingscliff and Tweed Heads will be severely impacted by the removal of the main driver in Tweed and the positioning of an out of character and massive construction in the most dominant position in a tourist town. In Tweed Heads many of the businesses either are associated with the medical industry or reliant upon them to deliver business. Removal of the main driver has been acknowledged to have a serious impact on the economic stability of Tweed Heads with no plan or suggestions as to how it will "get better in time" (Appendix z - Social and Economic Impact Assessment). Kingscliff will have the dominant industries of tourism and hospitality destroyed, along with decades of work to promote the Tweed Coast area as a low-key natural environment destination. These are million-dollar industries that employ a large section of the population and through direct and value add are responsible for visitation of over 1,800,000 people

worth an anticipated \$1.46 billion by 2030. The option of a possible 240 addition jobs after the completion of the project does not come close to the impacts on tourism, hospitality and agriculture for employment and commerce in the future. (See attached Appendix 1 providing more information in regards to the impact on tourism and the visitor economy of Kingscliff). The jobs created during construction will exist no matter where it is built and do not serve as an argument for the location.

The amenity of Kingscliff will be impacted by a multitude of factors - light pollution, traffic, parking, noise (sirens), aircraft are just some of the negative expectations that will be in complete contrast to the existing serenity and quiet of the coastal/agricultural site. Proponents of the concept have either misunderstood the value of these to the local and visiting population, or provided suggestions to "mitigate" the problem that are band aid solutions. The reality is that plans for the site outline a nine-storey building with a range of equally large support buildings supposedly on the same site. These buildings will operate 24 hours a day and there will be no respite from the constant demand. The size of the building and its utilisation for two local government areas (figures and numbers for which were not included for Byron LGA) means that the traffic and parking demands will overwhelm the current road access and parking availability. The state government will only provide funding for the local road that runs in front of the site (Cudgen Road), with the burden for the improvements to the arterial road (Tweed Coast Road) to be provided by Tweed Coast Council. This road will be required by the majority of the population of both Tweed and Byron Shires to access the hospital.

The project building (s) will exceed the three-storey limit imposed for Kingscliff for a number of buildings. This height limit has wide support in Kingscliff and led to the election of one councillor on Tweed Shire Council whose main platform was to ensure the height limits were retained. It is valued as residents have specifically chosen to live on the Tweed Coast to avoid the high rise of the Gold Coast. What will the state government do to ensure that this amenity is preserved in Kingscliff?

The focal point and main centre of the Tweed is Tweed Heads. Tweed Heads will be severely impacted by the removal of the hospital. The vision of the community as documented in local and northern NSW plans has been for Tweed Heads to be the regional centre where the location of facilities was centralised. The majority of the existing and future population will reside near Tweed heads and north of the Tweed River. The infrastructure currently exists, as does a plan that has not been enacted to upgrade the hospital. Public transport routes originate and end in Tweed Heads. Many residents have bought in the area to be near to the Hospital and Health facilities.

In particular the aged, disabled and ATSI community are concentrated in Tweed Heads. NSW Health has a commitment to raise the level of health for underprivileged and disadvantaged communities. Removing the hospital from its current location creates more barriers to health for people with less private transport means, lower socio-economic status and a higher incidence of health problems. The issue of more difficult access for these people will be created, not addressed, for these communities. The proponent suggests that catching a bus will mitigate these circumstances for the aged and other communities. This simplistic solution is unworkable and shows that the requirements of the aged as just one group, have not been understood or considered in the plans.

There has been little show of support for the location of the hospital on the site chosen. People in Tweed are appreciative and relieved that the state government has finally recognised the need for vastly improved health services in the area. That need has existed and been predictable for some time. A large number have indicated their disagreement with the location chosen. Reports failed to acknowledge the presentation in NSW parliament of an 8000+ petition calling for the site to be rejected. There is also over 4500 supporters on the Relocate Facebook page.

The community consultation conducted for the project did not occur until after the site was announced, and then only following such public outcry that it could not be ignored. A range of strategies were employed however the rationale behind these, the documentation and validation of what was asked during activities such as "pop up consultations" has not been made public. As a Kingscliff resident I did not see one of these pop ups, nor any effort to make direct contact with residents, to ensure an opportunity to have input was made available.

This type of consultation is tokenistic and does not follow any similarity to best practice in public participation. The international standards and guidelines established by the International Association for Public Participation (IAP2) ensure best practice and quality is followed for stakeholder and community engagement. These standards were not applied even though NSW Health is familiar with these standards. The community consultation was incorrectly interpreted by the proponents as discussions with stakeholders. These stakeholders included management/staff and board of the hospital, the ambulance service and other vested interest stakeholders. This is not community consultation. The community are the people who spend their lives in an area and are impacted by the way it functions.

The activities that the proponent has attempted to pass as community consultation have been performed after decisions have been made, and with a lack of transparency. The failure to provide the validated instruments used for the community consultation indicate a resistance to acknowledgement of the communities right to participate, and their right to have opinions about the way the community they live in functions. Nobody is a greater expert on their community than the people who live in it.

Tweed Council was also surprised by the announcement of the site at Cudgen with no communication occurring between Health Infrastructure and local government on the decision. The decision does not acknowledge the extensive planning processes undertaken for the Tweed and Kingscliff localities where the maintenance of the low rise and natural amenity of Kingscliff as a seaside town is wished to be preserved. The role of Tweed heads has also been clearly communicated by residents in plans.

Council is also acutely wary of the location in Kingscliff as the economic burden for road access has been cost shifted to local government. The required upgrade to Tweed Coast Road to cope with the traffic demands to access the hospital is in the order of millions of dollars. Tweed Council has had no opportunity to develop plans as to how roads might be afforded. With no opportunity to forward plan, they are left on the back foot in a reactive position, left to ensure residents can access both Kingscliff normally and also the hospital. It will be the residents of Tweed who bear the brunt of this inability to forward plan when other services of council have to be either cut or made more expensive in order to allocate the required funds for road upgrades. This would not have to occur if the existing Tweed Hospital were upgraded.

Flooding has been used as the main justification for the selection of the site at Kingscliff. The site is above the Probable Maximum Flood Level and this has been the argument for not moving ahead with the Tweed upgrade. The issue of flood has also been confused with access to the hospital in floods. A number of factors have been ignored in the reasoning:

1. That the majority of the population will be unable to access the hospital in a time of flood as experienced in 2017 where the motorway was cut in numerous places. The only people able to access the hospital in this case would be the residents of Kingscliff and Casuarina as access was also cut to the west and south. This eliminates the most frequent users of the hospital - the aged - and the majority of the population - Tweed Heads, Banora, Terranora - cut off and advised to travel to Robina which also suffers flooding issues. On one hand the proponent says that the reason for the move of the hospital is to avoid the cross-border issues and yet in time of flood it is offered as the solution.
2. The hospital will be cut off from all access in the case of a PMF and will ultimately also have to be evacuated based on modelling from the United States and Hurricane Katrina. Without power and water services which will be affected by a flood of this magnitude, the hospital will not be able to continue to care for patients. In this case patients would need to be evacuated but at a time when the area will be completely cut off by flood waters surrounding the entire site.

It has not been shown conclusively that the preserved natural wetlands to the north of the site will be undamaged by the planned mitigation works. Similarly, the location of the site will join the Kingscliff and Cudgen townships leaving the natural wetlands isolated with flora and fauna restricted only to the site. It is known that there is some migratory behaviour of the fauna and there has not been shown that such impacts will not be detrimental to the land preserved by an environment act.

There are many more issues that could be listed by going through each consultant report. As a community member I have not the time or resources to be able to do so. The proposed development has a multitude of problems inflicted on the local community and failing to adequately address serious problems. Full completion of all assessments and reports, a thorough community consultation, buffers checked to show that the site is actually insufficient for the planned buildings and treatments, assessment of the impact of the hospital being the main resource for Byron LGA as well as Tweed in terms of numbers also needs to occur - these are just some of the activities that would need to occur before approval is given. The rush of the development is obvious but the people of the Tweed deserve better than that. They have waited long enough but not too long to be left with a facility that is completely lacking in alignment with the town in which it will be located. The reality is that the location as SSF should not be considered appropriate at all. The land needs to be protected.

IP Address: [REDACTED]

Submission: Online Submission from Trudy Edgar (object)

https://majorprojects.accelo.com/?action=view_activity&id=300826

Submission for Job: #9575 New Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_job&id=9575

Site: #4045 Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_site&id=4045

Appendix 1: The Impact on Tourism and the Visitor Economy - Objection to Location of Tweed-Byron Hospital at Cudgen

A response to Appendix Z – Social and Economic Impact Assessment

In justifying a move of the Tweed Regional Hospital from Tweed Heads to a proposed site at Cudgen/Kingscliff there has been a major oversight and complete failure to recognise or discuss the current dominant industry of Tourism and Hospitality in the Tweed Coast and particularly in the town of Kingscliff.

These industries form the backbone of business activities within the Tweed Coast Region and have seen steady growth over the past decade. As will be shown, these industries provide the substantial economic driver for the region; are making inroads with developing mutually beneficial relationships with local agricultural business unique to the Tweed; have established strategies which will result in further growth into the millions of dollars; and have a distinct reliance on the amenity of the township of Kingscliff to achieve objectives of a fully integrated and buoyant industry.

The data used within this response is sourced from the National and International Visitor Surveys and from the Tweed Destination Management Plan 2018, which drew as well as from consultations with community, industry and government.

The TWEED DIFFERENCE

The Tweed distinguishes itself from other mass tourism markets nearby, namely the Byron and Gold Coast Regions, by promoting a destination with unique appeal that emphasises the areas natural beauty. Without this branding the area would become indistinguishable from its neighbours and lost “in a long stretch of development”.

The strategic vision for tourism in the Tweed is to increase, by up to quadruple, the visitor economy by 2030 aiming to “position the Tweed as a world’s best practice sustainably managed destination with nature at the core of the experience.” (DMP page 7)

The development of a large health precinct in total conflict to character of the area and the town of Kingscliff, is a serious threat to the important stage-setting agricultural entrance to the main tourism town in the area, and a serious impediment to the achievement of developing the already established tourism and visitor economy of the area.

In developing the Tweed Destination Management Plan, community, business and government were consulted and this engagement of stakeholders helped to create a vision of what the Tweed would look like up to 2030. The vision is as much about the local community as it is about the visitor. It aims to create a destination that attracts visitors who “value and seek out the same sorts of experiences that locals love and treasure”. (DMP Page 11)

This is in contrast to the lack of community and stakeholder consultation that resulted in the planned hospital location at Kingscliff. The proponent’s community consultation was a significant failure, essentially because initially it did not occur at all. This is despite the NSW Dept of Health being well versed and familiar with the importance of and techniques to ensure effective participation. It was only following public outcry that community input of any description was sought. Unfortunately, consultation was conducted without observation of known best practice as per the international standard as described by the International Association for Public Participation (IAP2). This point is mentioned here to highlight the comparative lack of quality data from the community used to support the hospital relocation, as compared to the DMP document referred to in this objection which has a strong sense of accountability to the community.

TOURISM Vs MEDICAL

The plans for tourism development have been sensitive to the delicate balance between a vibrant destination and one that could lose its appeal to both locals and visitors through mass tourism. The same cannot be said for the

overwhelming nature of the planned hospital development which by its nature lacks any subtlety, discretion and respect for the surrounding environment and amenity of the area. Multiple high-rise buildings are envisioned in the concept for the site accompanying the nine-storey hospital building. These are not buildings with a focus on their ambience, connection and sensitivity to the surrounds.

Despite the best of treatments, the structures will have (as they should) the purpose of being functional and practical in character. That functional reflection is appropriate, but NOT appropriate for the chosen SITE, and therefore why the site is completely inappropriate. Rezoning changes to the planning policies for this purpose should not occur. A wonderful new building and services may be planned, but its location on state significant farmland and at the entrance to a tourist town is destructive to the overarching amenity and business of the area. Even if it will create residual jobs after completion, the threats to employment and economic vigour of the multitude of small and medium enterprises which trade on the tourism viability and atmosphere of Kingscliff, will be in excess of that number.

The hospital as an economic development activity will not add to the area because of its transference from Tweed to another area. It is simply being relocated. Even with additional staff this does not compare to the size of the impacts and employment in the tourism sector. The other main point of significance is that employment involved with the relocation of the hospital will apply anywhere. No matter where the hospital is moved to, the same economic benefits will apply. In the case of Kingscliff's tourism, the amenity and resulting economic benefits are intrinsically linked to the location.

There must be no adverse effect on tourism of this development for it to proceed in Kingscliff on state significant farmland. In this objection the reasons why this is not achievable will be highlighted.

WHO VISITS TWEED

The total number of visitors to the Tweed in the year to 30 September 2017 equalled 1,880,000.

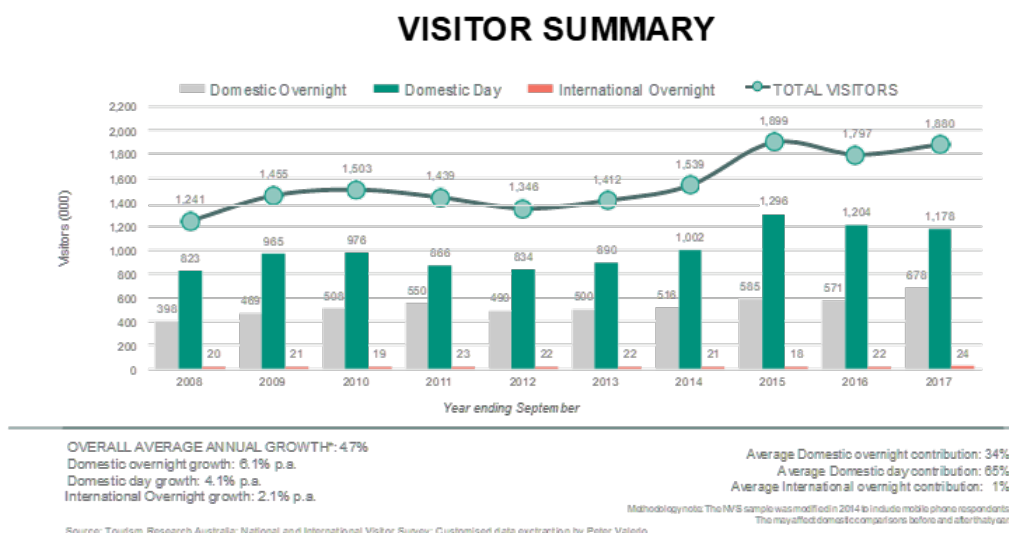
- Domestic Day-trip Visitors represent 65% of the total visitors to the Tweed. In the year to date 1,178,000 day-trip visitors during that period. Day trippers spend on average \$85 per visit.

- Domestic Overnight Visitors numbers are at record highs with 107,000 more overnight visitors that the same period the previous year totalling 678,000 or 34%. They stayed an average of 3.6 nights, with an average spend of \$126 per night, with more than half originating from South East Queensland (SEQ).

- International Overnight Visitors - 24,000 came to the Tweed.

The Tweed is performing very well in relation to the numbers of visitors and the consistent growth it has experienced in the domestic market. Domestic growth in overnight visitors has averaged 6.1%pa and day trip at 4.1%pa.

Figure 1& 2: Reprinted from The Tweed Destination Management Plan 2018, pg 14



The data in Figures 1 and 2 illustrate the importance of visitation to the Tweed and the growth that has been consistently occurring in the past decade. They indicate the scale of the industry and the economic reliance on the tourism, hospitality and related industries for the Tweed. Kingscliff and Salt are the core high value visitor offering of the area and therefore account for a large percentage of these figures.

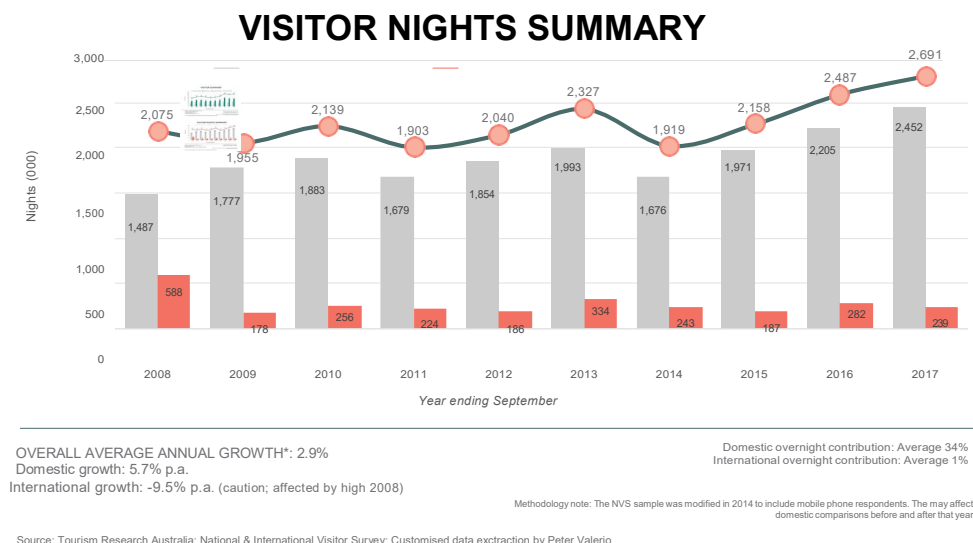


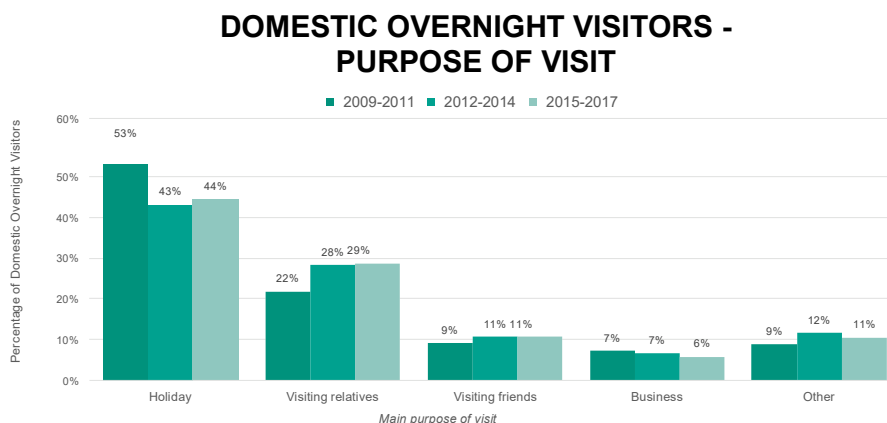
Figure 1& 2: Reprinted from *The Tweed Destination Management Plan 2018*, pg 14

From these figures it is clear that there is a large and consistently growing number of visitors to the Tweed. In support of the growth and substantial nature of tourism for the area, domestic and overnight indexes are a useful indicator of the performance of the region when compared to other regions. These help put into perspective the value and importance of the sector in the Tweed and in Kingscliff, and the need to preserve those aspects that enhance this important sector.

In comparison to other coastal NSW LGA's whose growth was 22% on average, the growth in domestic overnight stays in the Tweed has experienced visitor increase of over 70% over the past decade. Growth is also higher than the two closest tourism neighbours with the growth rate slightly better than Byron Bay and more than triple that of the Gold Coast. Growth for Tweed is almost 3 times that of other LGA's during the same decade.

HOW DO VISITORS TRANSLATE INTO ECONOMIC VALUE & THE NEED TO SAY NO TO A HOSPITAL ON THE SITE ?

The value of visitation and tourism, and the need to preserve the site at Cudgen, can be understood further when examining how the million-dollar tourism industry in Kingscliff and the Tweed can be sustained and growth enhanced. Holidays are the most dominant purpose of visits, followed by visitation. Visitation is likely to impact across the full Tweed area, while visiting for holidays applies particularly to the areas in the Tweed that focus on the provision of vacation accommodation services. Kingscliff and the Tweed Coast is the major attractor in terms of the availability of accommodation and resort room stocks.



Holiday and Visiting Relatives have always dominated and continue to do so. A number of visit purposes are included in the "Other" category because they lack significance (despite grouping three years of data).

Figure 5 Domestic Overnight by Purpose - Averages Over Time

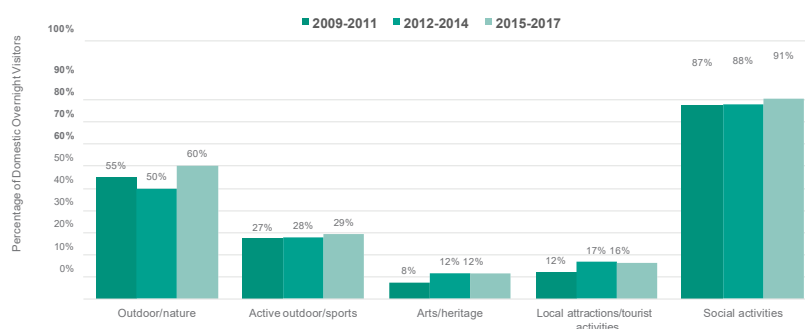
The large majority of overnight visitors to the Tweed are domestic from SEQ with a spend in the region of approximately \$147M annually. These visitors identify their desire for visitation to the Tweed as being related to its proximity and its natural unspoilt beauty.

SOURCE	ON VISITORS	NIGHTS	\$ PER NIGHT	APPROX \$M
SEQ	50%	38%	166	147
Sydney	11%	12%	200	54
Regional QLD	7%	7%	186	28
North Coast NSW	9%	6%	160	24
Melbourne	4%	5%	163	19
Regional VIC	2%	4%	166	14
New Zealand	1%	3%	125	8
ACT	1%	3%	163	10
Hunter	3%	3%	183	11
United Kingdom	0%	2%	86	4
Tasmania	1%	2%	180	8
Central Coast	2%	2%	179	7
Other Europe	0%	1%	100	3
New England North West	1%	1%	190	6
Western Australia	0%	1%	185	5
South Coast	1%	1%	176	4
Other	5%	10%	NA	15

Figure 6: Comparison of overnight source markets

When visitors come to the area what do they do? The DMP reveals that “more than 90% of visitors engage in social activities whilst in the region, which includes dining out as the most significant activity.” This has particular relevance for the Tweed coastal town of Kingscliff whose main street is a variety of small business with a focus on dining. If visitor numbers drop there will be a significant flow on effect to the core commerce of the town that up until this point has been a robust collection of cafes and restaurants. These businesses add to the charm and amenity of the town and help to give Kingscliff its character as a tourist seaside town. The relationship to social culinary experiences is important and this is where business links between the agricultural border and tourism become more apparent. As well as the geographic links created by meeting of coast with country, strong links are forming between agriculture and tourism in the town. Plans for growth specifically target connecting farm to plate and engaging visitors in the provenance story of the Tweed in restaurants markets and events. This is an effective way to entice visitors to spend more in the region and to increase the value add.

DOMESTIC OVERNIGHT VISITORS - ACTIVITY CATEGORIES



Social activities are fundamental. Almost all visitors to Tweed participate in activities in this category and could almost be considered 'basic trip needs'. Outdoor/nature activities are the most significant of the more 'active' activity types.

Note: adds to more than 100% as visitors can do more than one type of activity

89% of visitors to the Tweed engage in outdoor, nature and sporting activities. The location of a large regional hospital will bely the reputation as a naturally beautiful place to visit. This will contradict the publicised attractions of nature and the outdoors to both the general population living in the area, and visitors who are seeking an experience that enables them to enjoy the beauty and natural features. The presence of a large hospital facility replacing the soils of farmland destroys the brand and amenity in a number of ways –

1. It creates an unwelcoming (who wants to go to hospital?) and dominant unnatural facility as the main and most predominantly visual feature of the town.

2. The hospital will be highly visible and change the important link between country and coast that occurs as visitors enter the town.
3. It sends the message that rather than being a beautiful and healthy environment, this town requires a disproportionately large facility to manage health issues. The location of the hospital in this unmissable position screams that the town is 'sick' and is therefore in complete antagonism to the motivations of visitors who come to enjoy the natural, healthy pursuits of the outdoors while visiting.
4. Cudgen road is the entrance to the town of Kingscliff off the main arterial road of Tweed Coast Road. The positioning of the large structures of a hospital on this farmland create the antithesis of the image of farmland and natural surroundings that has been literally cultivated for hundreds of years. No advertising campaign to attempt to maintain the brand of the town will be able to overcome the reality of the large structures, increased traffic, parking issues, lighting pollution and other amenity issues that will accompany the development.
5. Adverse traffic conditions impact on tourism. With an estimated 10,000 additional cars accessing this area from both Tweed AND Byron shires and no plan to improve the infrastructure to ensure flow, this will become a deterrent to the visitation of Kingscliff and the Tweed Coast. It has been observed that traffic congestion on Ewingsdale Road into Byron Bay has deterred visitors from SEQ and with the same scenario in Kingscliff of a hospital on the main entrance to a town, this is a predictable outcome for Kingscliff.
6. Gold Coast University Hospital has a minimum of 3 helicopter arrivals per day and it is reasonable to expect a similar usage for the size of the planned hospital. Light pollution, sound (sirens) will be common experience. What will be done to negate the impact on the resident and visitor experience given that the core attraction of the area is low key environmental tourism?
7. In regards to the argument that a hospital will generate accommodation demand from visiting friends and relatives this is a. Unlikely, and b. Low value tourism. Kingscliff currently attracts high value visitation. How will the Government ensure the high value visitation status remains?

THE FUTURE BASED ON CURRENT COMMUNITY DESIRES AND ESTABLISHED INDUSTRIES

The Tweed is ripe for the development of tourism products that sustainably manage the very sensitive environmental and cultural resources and grow visitation. The site would be better dedicated to the development of an agricultural tourism hub that preserves its state significant status and blends the existing country and coast offerings to support the already notable growth in the tourism industry. In this way the forced purchase of the farmland will not be a waste of resources but becomes an investment in the already established and profitable industries of the region.

Agri and Culinary Tourism

The Tweed, and specifically the Tweed Coast of Kingscliff, Salt, Casuarina has the potential and foundations to be Australia's next great food destination. It currently has established "a stunning agrarian landscape, clean oceans and riverine environments and a growing number of innovative food producers and food artisans and chefs provid(ing) a perfect base to develop." (DMP page 29)

Farmers need to be supported to develop their concepts however this is impossible when the secured state significant land they need to use to create these concepts, is under threat of development. They do not need to be fighting hospital developments and the inevitable expansion of these, but instead receiving assistance to navigate the costly and complex regulatory system that will help mutually support both farming and tourism in the area. As dining out continues to be the highest expenditure item in the visitor economy and likely in the local economy, better links between local food and restaurants will create the farm to plate connection many consumers are seeking.

From concept plans it is clear that the proposed hospital site at Kingscliff will not flourish without the loss of further viable farmland and there is no comment of what the Government intends to do to ensure the spread of the health and medical industry doesn't impact further on the agricultural community and agri-assets which are of such foundational importance to food security and the tourism industry.

The vision for tourism in the area involves implementing a food and agritourism action plan. Developing and marketing the Tweed as a high quality food production and food tourism destination will occur only if the already

established industries of Kingscliff are not obstructed. Enabling a cluster of agri-food businesses, rather than a hospital on state significant farmland, can create a farm to plate value chain approach. If visitor numbers are impacted, which they will be by attempting to change the character of Kingscliff as outlined above, a situation will be created of destroying one existing established industry to enable another. There is no economic, employment or cultural rationalisation of such an action. The potential impact both direct and valued added is profound if the factors currently resulting in the success of the tourism, hospitality and agricultural focus of the area are changed.

It must be ensured that the impact of development does not harm the environment or sense of place and amenity, but positively contributes to the economy and the community's way of life and culture, without destroying what already exists and has been embraced.

The big aim of the Tourism industry in the Tweed is to have doubled the visitor economy by 2025 and establish the Tweed as Australia's most sustainable destination. A large medical precinct in the middle of, and dominating the areas jewel in the crown – the coastal accommodation and tourism markets of Kingscliff, Salt and Casuarina – will make this goal unachievable. Immeasurable damage economically both directly and value added will be caused. As the main access to Salt and Kingscliff the flow past the hospital will undermine the natural environment and visual amenity and disenfranchise the agricultural environment.

Through the realisation of the Tweeds vision for its tourism and visitor economy it is anticipated that by 2030 the visitor economy will double again to **1.46 billion dollars**. We simply can't afford to impeded the tourism and agricultural industries of the region with a facility that can go elsewhere.

There must be no adverse effect on tourism, agri and culinary tourism, by this development for it to proceed in Kingscliff on state significant farmland.

Statement of Strategic Intent from Destination Management Plan 2018:

"We believe that the Tweed's beautiful natural environment, our eclectic and creative community, our culture and way of life, our agrarian landscape and local food, are the essence of why we and others are drawn to live in and visit the Tweed. We are custodians of this special place and it is our collective responsibility to ensure it is sustainably managed for future generations."

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Agreed to false or misleading information statements: yes

Name: Karina Hall

Email: [REDACTED]

Address:

[REDACTED]

KINGSCLIFF, NSW
2487

Content:

Please see attached PDF File for my submission.

IP Address: [REDACTED]

Submission: Online Submission from Karina Hall (object)

https://majorprojects.accelo.com/?action=view_activity&id=299991

Submission for Job: #9575 New Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_job&id=9575

Site: #4045 Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_site&id=4045

Objection to the Proposed EIS – TWEED VALLEY HOSPITAL

My name is Karina Hall, a member of the Kingscliff community. I would like to object to the State Significant Development (SSD) of the Tweed Valley Hospital on the location at 771 Cudgen Road, Cudgen, NSW 2487. I would like to question some of the information in the Environmental Impact Statement (EIS) for the development, that make this development not appropriate for this location.

By selecting the Hospital Site on the Cudgen Plateau, the NSW Government is going against its own policy the “Maintaining Land for Agriculture Industries” **Department of Primary Industries**¹ as shown on the NSW Government website. It is your government policy to protect Agricultural and State Significant Farmland. The NSW Government is also going against its plan for our region as stated in your **North Coast Regional Plan Report 2036**.² This report states that you want to preserve our farmlands, and our unique natural heritage sites. You state that after conducting extensive community consultation that the NSW Government would plan to keep development to areas zoned for development to get the balance right and preserve our areas of Natural Heritage and our Farmlands.

The Tweed Valley Hospital site was announced by Minister Brad Hazzard and Geoff Provest without consulting with the Tweed/Byron community in April, and without doing proper impact studies. As an afterthought, a small community consultation was later done, which involved a very small sample of our community.

The following pages will detail why I object to the proposed EIS for the Tweed Valley Hospital. I will cover a number of points to justify my objection. Please read my concerns, and I would like the NSW Government to seriously consider these concerns before making any decision on approving the SSD Stage 1, of the Tweed Valley Hospital.

Unacceptable Community Consultation of Site Selection on State Significant Farmland.

I object to the RU1 State Significant Farmland being re-zoned at 771 Cudgen Road, due to a flawed Community Consultation process that was granted to the community of the Tweed/Byron region after the community was shocked by the announcement by Brad Hazzard and Geoff Provest on the site, in April 2018. A large portion of our community do not support the hospital being put on this State Significant Farmland. Yes, we are all very grateful to be getting funding for a hospital, but it is important that the NSW Government listen to the many concerns that we have about the position of the proposed site on State Significant Farmland. We value our farming lands, and the NSW Government should respect this, and also value them. Our community have collected over 8000 petition signatures, have written a large number of letters to various ministers in the government, requesting that the NSW

¹ “Maintaining Land For Agriculture Industries” Policy, NSW Department of Primary Industries, 2011.
https://www.dpi.nsw.gov.au/__data/assets/pdf_file/0008/396458/Policy-O-104-maintaining-land-agricultural-industries.pdf

² NSW Department of Planning and Environment, ‘North Coast Regional Plan 2036’, March 2017,
<https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/primary-production-and-rural-development-eie-2017-10.ashx>

Government relocate the site to a more suitable location, or go through with the NSW Governments previous plan to re-develop the current Tweed hospital.

I would like to bring to your attention the Community Consultation that took place for six weeks to ask the community to nominate alternative sites for the hospital. This consultation was not conducted extensively or appropriately. I am requesting that the NSW Government/Health Infrastructure have the consultation process done again before the NSW Department of Planning Minister makes a decision on re-zoning the RU1 State Significant Farmland. My justifications for this request are documented below:

I am an Information Scientist with a degree in Bachelor of Applied Science (Information) from the University of Technology, Sydney. I have also been employed in the past in market research roles. I would like to refer to **Appendix H, Volume 2 of the Tweed Valley Hospital Project and Stakeholder and Community Consultation Report** by Elton Consulting.³

I am extremely concerned as an Information Professional about how the Community Consultation was conducted. I am questioning how Elton Consulting could possibly obtain the quantitative data that they presented in the two pie charts in **The Tweed Valley Hospital Site Selection Report** when their consultation program was conducted using qualitative research methods?

Qualitative research is a method of information gathering based on observation to collect non-numerical data. Quantitative research is a data collection method used that results in numerical values i.e. Surveys, interviews and questionnaires that collect information or count data by using **closed-ended questions**.

I would like to question the pie charts utilised to demonstrate community opinion from the **POP-UP** consultation sessions and the **Written consultation** results about the proposed Tweed Valley Hospital Site at Cudgen.

It appears from feedback we have had from some people in our community, who attended the POP-UPS that the consultations were casual and non-structured. People in our community who attended the POP-UPS said that none of the consultants wrote down their feedback in front of them.

There is no evidence in the report (Appendix H, Volume 2) of what questions people at POP-UPS were asked, and it appears there was no structured questionnaire utilised to ask the community closed ended questions such as:

“Are you either:

- a) Opposed to the selection of the proposed site?
- b) Support the proposed site?
- c) Neutral over the selection of the proposed site?”

If Elton Consulting had asked and physically recorded answers to such a closed-ended question, then they would be able to tally up how many people responded to each option, hence then they could have recorded a numerical value, and then reported it on a pie chart. There is no evidence to show that Elton

³ Elton Consulting, ‘Appendix H, Volume 2 of the Tweed Valley Hospital Project and Stakeholder and Community Consultation Report’, Tweed Valley Hospital EIS, 18th October 2018.
<https://majorprojects.accelo.com/public/8500a879574f6a2d4b1b9a027d7924da/Appendix%20H%20Consultation%20Report%20Part%202.pdf>

Consulting used quantitative research methods such as this, to collect data to support the figures they have presented in the POP-UP and Written Response Pie Charts that were published in the **Tweed Valley Hospital Site Selection Report**.

I would now like to refer to the Written Pro-Forma forms that were presented to our community to fill-in online or in person. We were asked to submit either Part A/Part B or both. It is my professional opinion that the layout of these forms were not user friendly. Many people in the community found this form extremely daunting, hard to understand the instructions, and difficult to fill in. My concern is that this written feedback form was not designed to encourage people in the general community to fill it out.

As an Information Professional, it is usually our aim to design questionnaires, surveys and forms in an easy to use format, so that the general public can easily complete. A simpler and better structured feedback form would have been a far more appropriate method to get the community to give numerically measurable feedback on the proposed site and alternative sites to build a hospital. The form should have been designed to gather both quantitative and qualitative data to get the best overall insight into what the community concerns or favourable reactions to the proposed site at Cudgen or alternative sites were.

These forms did not have any questions that would lead to quantitative data collection. The information collection method used was qualitative, asking people to express their own views on the chosen hospital site, and also to present alternative site options.

So once again, where did Elton Consulting get their figures that they displayed on the two Pie Charts? It is not professional practice in the Information Industry to interpret qualitative information and convert it into quantitative data. Qualitative information is about collating people's views and opinions, and can be interpreted in varied ways by the information worker. The only way you can report numerically and accurately how people feel about an issue is if you ask them directly, through closed-ended questions, and give them options that would best describe their opinion.

Below are the two questionable pie charts for your reference:

Figure 2 Support for the Proposed Site – Pop-Ups

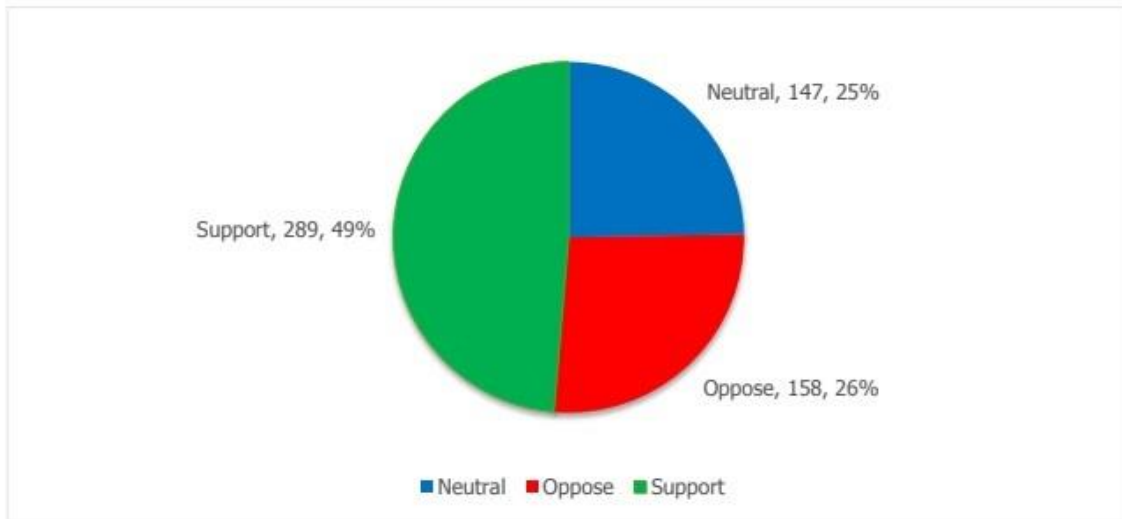
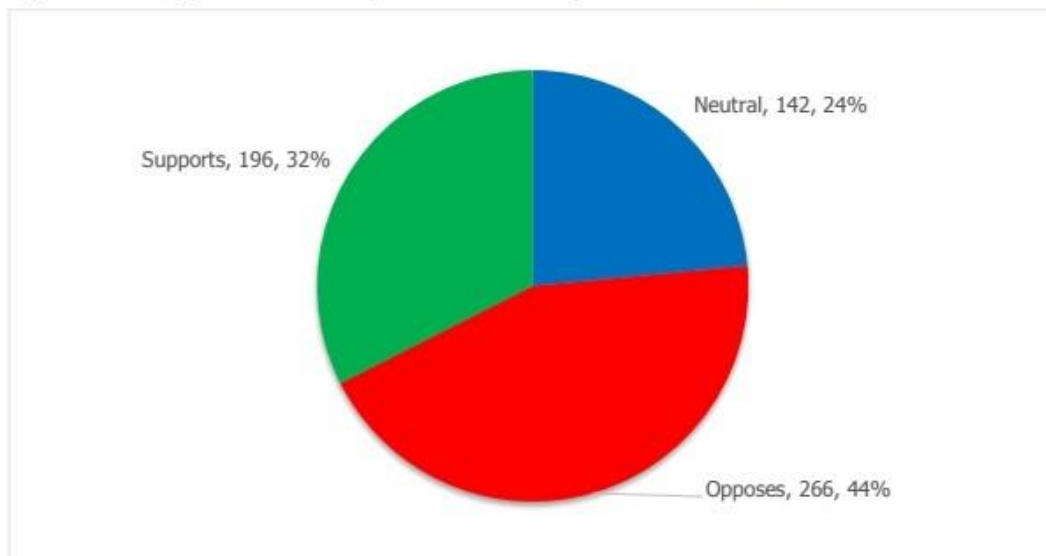


Figure 5 Support for the Proposed Site – Unique Written Submissions



My next concern regarding the Community Consultation is in relation to Health Infrastructure, Geoff Provest, Minister Brad Hazzard and Elton Consulting. They claim that the Community Consultation process was “**extensive**” and reached a large diverse sample of people over a wide demographic area. I would like to dispute this claim for the following reasons.

From the data provided in **Table 1. Pop-Ups and Proposed Site Support** Elton Consulting list 19 locations that they randomly picked to Pop-Up at. See table below:

Table 1 Pop-Ups and Proposed Site Support

Pop-Up Date	Location	Time	Number of People Actively Engaged	Support for the Proposed Site		
				Neutral	Opposes	Supports
Saturday 19 May 2018	Murwillumbah Finders and Makers Market	8am – 2:30pm	54	13	13	28
Wednesday 23 May 2018	Murwillumbah Farmers Market	7am – 11am	27	6	10	11
Friday 25 May 2018	Tweed Mall	10am – 2:30pm	48	11	16	21
Saturday 26 May 2018	Kingscliff Markets	7:30am – 1pm	29	4	11	14
Sunday 27 May 2018	Murwillumbah Showground Markets	7am – 11:30am	34	8	6	20
Wednesday 30 May 2018	Kingscliff Shopping Village	10:30am – 2:30pm	42	9	10	23
Thursday 31 May 2018	Tweed City Shopping Centre	10:30am – 2:30pm	52	9	12	31
Friday 1 June 2018	Tweed Hospital Reception	11am – 1pm	14	5	1	8
Friday 1 June 2018	Kingscliff Lantern Markets	4pm – 7pm	27	9	10	8
Saturday 2 June 2018	Uki Farmers Market	7:30am – 11:30am	16	8	2	6
Sunday 3 June 2018	Pottsville Beach Neighbourhood Centre Markets	7:30am – 11am	56	17	11	28
Monday 4 June 2018	The Tweed Hospital Staff Forum ¹	1:30pm – 2pm	18	0	0	0
Tuesday 5 June 2018	Kingscliff Shopping Village	10am-2pm	39	6	9	24
Thursday 7 June 2018	Tweed Mall	9am – 12:00pm	42	7	19	16
Monday 11 June 2018	The Tweed Hospital reception	1pm – 3pm	8	1	6	1
Friday 8 June 2018	Tweed City Shopping Centre	10am – 2pm	52	9	12	31
Friday 8 June 2018	Byron Bay Hospital Reception	11am – 1pm	5	4	0	1
Saturday 9 June 2018	Banora Point Shopping Village	9am – 11:30am	14	7	3	4
Sunday 10 June 2018	Chillingham Markets	7am – 11:30am	32	13	7	12
Tuesday 12 June 2018	Murwillumbah District Hospital Reception	12pm – 2pm	3	1	0	2
Tuesday 12 June 2018	Murwillumbah District Hospital Staff Forum	2:30pm – 3:30pm	13	0	0	0
TOTAL			625	147	158	289

As you will see in Table 1. there are 19 Community POP-UP locations, and 2 Staff Forum POP-UPs.

Elton Consulting indicate in their report that the POP-UP locations were placed to reach members of the whole Tweed/Byron Community.

I would like to dispute the claim that the POP-UP forums reached a wide sample of the Tweed/Byron community. If you look at the locations chosen to POP-UP, they are not extensively spread out throughout our community. In fact, there was a lack of consultation in some of the major main population areas of our region.

Areas that were NOT Consulted, which should have been in order to give an extensive representation are:

- **Cabarita Shopping Centre** (Woolworths) – there were no POP-UP stations placed here, where a wide and diverse cross section of the town of Cabarita visit.
- **Casuarina Shopping Centre** (Coles) – there were no POP-UP stations placed here, where a wide and diverse cross section of the town of Casuarina visit.
- **Salt Village** (Café area/IGA) – there were no POP-UP stations placed here, where a wide and diverse cross section of the suburb of Salt Village visit.
- **Brunswick Heads** (Shopping area) – there were no POP-UP Stations placed here.
- **Byron Bay Shopping Centre** (Woolworths) - there were no POP-UP Stations placed here.
- **Mullumbimby** (Shopping area) - there were no POP-UP Stations placed here
- **Ocean Shores** (Shopping area) - there were no POP-UP Stations placed here.
- **Terranora Shopping Village** – there were no POP-UP Stations placed here.
- **Bilambil Heights** – there were no POP-UP Stations place here.

These are major centres in our region, where the population was not consulted about the Tweed Valley Hospital chosen site and site selection process. These are areas that should have been reached, according to the parameters stated in the Appendix H, Volume 2 report, of covering the Tweed/Byron region. **I therefore, feel our community has every right to dispute the claim that the study reached a wide and diverse section of our population.**

The other point I would like to make is that many of the chosen sites were Markets. It is fine to have some POP-UP stations at the markets, but 8 of the POP-UP locations were at markets. A narrow sample group of people attend markets; they are a demographic that does not represent the wider community as a whole. For instance, people who do not like market stall shopping would not be attending, people who are tourists to the area and not residents would be quite a large section of the market community. Yes, having POP-UPs at perhaps a few market locations would be fine, but 8 is excessive. Some of those POP-UPs would have seen a more varied sample range of people if been located at some of the sites/areas that I have listed above, where Elton Consulting did not set up POP-UP stations.

I am also concerned that the POP-UP stations did not make contact with many people at most of the locations. Some of the POP-UP stations had very low numbers of people actively engaged with the consultants.

If you refer to table 1, the sessions at many of the POP-UP stations were very short. On average 4 hours long. Most of the consultations were held during the week, and during work hours.

I would have liked to see a few more of these POP-UP sessions to have been held at peak times when people are visiting shopping centres in the evening on their way home from work. The people in this demographic were poorly represented in the sample.

I would have also liked to have seen data on how many of the people consulted were, male, female, young, elderly, middle age, working, students, retired etc. then we would have had a better idea if a good cross section of the community was consulted.

I would also like to question why there were such low numbers of people consulted at the POP-UP stations in the receptions of the hospitals? For instance, the pop up in the Tweed Hospital Reception was for a total of 2 hours, and recorded 14 people being consulted (7 per hour). Byron Bay Hospital Reception, POP-UP session was 2 hours and 5 people were recorded as being consulted (2.5 people per hour). Murwillumbah Hospital Reception also for 2 hours, and only 3 people were engaged to be consulted (1.5 people per hour). These numbers are very low, and not a good representation of our community as a whole.

I am concerned about the **content** and the **coverage** of the information given at the POP-UP consultations. The aim of the Community Consultations as stated by Elton Consulting was to:

- Engage with a broad spectrum of community ranging from those where they were vocal in opposition to those not aware of the project.
- Elton Consulting aimed on conducting consultation to hear feedback from all geographic areas in region, and all age ranges at varying times of the day. That they aimed to consult people in the main population centres within the Tweed-Byron Region.
- The aim of consultation was to provide the opportunity for community members to discuss the site selection process and provide comment on the proposed site and alternative site nominations.

My concern is that Elton Consulting did not achieve these goals. Feedback from members of our community about the POP-UP consultations say that the consultants were promoting the proposed site on the Cudgen Plateau. Feedback from people who attended the POP-UPs said that the consultants did not give them information about the alternative sites, and did not record the concerns or opinions that they expressed. Some comments from various members of our community that went to the POP-UPS are as follows (below comments taken from people from our community who attended the POP-UPs, and wrote about their experience on the "Relocate Tweed Valley Hospital Facebook Page").

- "Information was biased so only one side had their point of view addressed"
- "no one asked me to sign anything! No one took any notes!"
- "Not once at the Tweed City Pop Up stall did they ask questions regarding 'for' or 'against' NOR did they document ANY information that would contribute to this argument they believe existed during their 'consultations'. They also told us no definitive information about Tweed or Murwillumbah Hospitals closing. The man was VERY vague and avoided all factual questioning."

- "I attended a booth at the Murwillumbah Makers and Finders Market. The young man listened to what I said but did not take notes or fill out any documents in front of me. He said he would record my opinion afterwards."
- "at the Kingy markets pop up. No recording of any feedback, advised me site was a done deal & they were only consulting about the clinical services the community wanted at the hospital. Yes, took no documentation re my feedback at all."

From the comments in our community about the POP-UP sessions, I am extremely concerned, as already mentioned, how Elton Consulting came up with their "Opposed", "Support" and "Neutral" results, when it appears they did not have any structure to their consultations, that would allow them to record genuine quantitative data from the community members they saw.

Qualitative research methods, such as face to face consultations, are well known in the Information Industry to be at times not always accurate. This is due to the fact that the interviewer who questions at a face to face consultation can influence a person's answer by prompting an answer, giving additional information or show emotions via facial expressions and head nodding. So, the information gathered at these types of face to face consultations can be contaminated if not structured and controlled.

From the evidence that Elton Consulting presents in their report, there does not seem to be any formal structured format to their POP-UP consultations. This is fine if the aim was just to present information to the community, but not fine if they are then going to use these consultations as data collecting portals, especially if they are claiming to have acquired quantitative data, to place on their pie chart.

From feedback from people who attended some of these POP-UP sessions, they stated that they were mainly given information only about the Cudgen site, and that the people running the consultations did not have much knowledge about the other shortlisted sites, and were not presenting information to the community about the other sites. People who attended these POP-UPs commented that when they expressed their concerns about the Cudgen site, the consultants were not writing down their answers. One person asked them if they were going to record their feedback, and the consultant said they "would write it down later".

My concern is that the POP-UP consultations were designed to give the community a lot of information about the proposed site, and not much information about the alternative sites. This is illustrated in the information boards that were put up at the POP-UP session which highlight the benefits of the Cudgen site, but did not do the same for the shortlisted alternative sites. The instructions on how to nominate an alternative site were complex, confusing, and not easy for the wider community to understand.

A more structured survey, would have been a preferred method of data collection, mixing both qualitative and quantitative information collection to get a better overall sense on where the community would want the hospital built. Proper interviews should have been conducted, where answers were written down and recorded in front of the community member. Information on all of the shortlisted site options should have been presented to the community members, as well as the proposed site.

I would like to request that Health Infrastructure, and the NSW Government re-do the Community Consultations for both POP-UP and Written Consultations. I would like the Community Consultation conducted properly, so that the NSW Government can really find out what the community wants, where the community would prefer the hospital. I would like the consultation process to be planned properly, so that both quantitative and qualitative data is collected professionally, with proper structured questionnaires that are not open to bias, but conducted to receive an uncontaminated outcome.

I would like POP-UPs to be placed in locations where you will get a broad and varied sample of our community and their opinions. To cover a wide range of demographics from young to elderly people, of different ethnic groups etc. and an even spread of male and female sample groups.

I also insist that the consultants who conduct consultations, inform people they consult equal weighted information on all the shortlisted sites for the hospital and the pros and cons for each site, including redevelopment of the current Tweed Valley Hospital.

In addition to the POP-UPs, and Written Consultation, there were the Community Drop-in Sessions. 32 people were engaged in 9 booked sessions. The qualitative data collected from these sessions was indicative of a group of people who gave many valid concerns about the selected site at Cudgen. I am concerned that the NSW Government/Health Infrastructure did not take into account this community feedback, as they seemed to be preoccupied with looking at the pie charts that Elton Consulting produced that only took into account responses from POP-UPs and Written Responses. The same so called "quantitative" reporting (Pie Chart) was not applied to the results of these Community Drop-In Sessions most probably due to the fact that most of the responses seem to be of a "concerned" or rather an "Opposed" nature.

I am sure if Elton Consulting had put together the same type of questionable pie chart on the Community Drop-In Sessions the pie would have been very red in colour with a lot of "opposed" statistics. Of course I would never suggest that any Information Professional convert qualitative data into quantitative data as it is not a conventional way of reporting accurately.

This consultation process has evidently been done in a rush. Little thought and planning has been put into the structure of the consultation program. Our community was only granted this consultation as an afterthought, once a negative reaction was demonstrated by the community of Kingscliff/Cudgen when the shock announcement was made by Geoff Provest and Brad Hazzard on the 4th April 2018. Proper community consultation should have been done at the same time as the initial site selection process was taking place, for the community to voice concerns and opinions about any site that was being shortlisted before it was announced.

Our community has collected over 8000 petition signatures and presented them to the NSW Parliament. The volume of people who have signed this petition is a good indication that there are a large portion of the community who object to the hospital being placed on our State Significant Farmlands. The volume of people who have signed the petition indicates that the community would like the government to re-consider the other feasible short-listed sites, or the re-development option of the current Tweed Hospital.

I as an Information Scientist I have many concerns about the validity of the results from the community consultation that was conducted regarding the site selection. I challenge the accuracy of the reporting,

due to the research methods that were used to collect the data that was represented in the pie charts. I also challenge the claim that Health Infrastructure, Geoff Provest and Brad Hazzard made that the community consultation was “extensive”. I request that the NSW Government/Health Infrastructure, before proceeding with the bid to approve both the EIS and SEPP, re-do the community consultation, and that the consultation be conducted in a fair manner where they educate the community at the consultations equally about each of the shortlisted site options, that they ask them directly if they are opposed, support or are neutral about the proposed site, record what their opinions are, consult people in all areas of the community and at different times of the day and week. Use quantitative and qualitative methods of research and professionally record in front of the community members their answers and opinions to survey questions. Then accurately present and report the results of the consultation.

Flooding – Appendix W – Tweed Valley Hospital – Flooding and Coastal Hazards Assessment.

I would like to object to the selection of the proposed Tweed Valley Hospital site at 771 Cudgen Road, Cudgen, 2487 due to the risks to the community that this location would have in a severe flood.

My concern is that the **Appendix W**, as per the SEARS outline has asked the consultant to focus on addressing the flood risk on the site, but does not place enough focus and attention to the fact that there is a severe access issue to the town of Kingscliff when the Tweed River floods in an 1% and 5% AEP flood event.

The main access roads into the Town of Kingscliff, and the proposed hospital site are cut off in a severe flood. These roads are the M1 near Tweed Coast Road exit, Tweed Coast Road, Chinderah Bay Drive and Wommin Bay Road. In 2017 we had a very severe flood, and full access into the town of Kingscliff from these roads was cut off for over a 24-hour period. No traffic north of Kingscliff could enter the town. Please refer to the following photos to see the extent of the flooding of these roads.



Wommin Bay Road 1/4/17



Chinderah Bay Drive 31/3/17



M1 Motorway

Northbound towards Tweed Heads, just before road

Closed 31/3/17



Flooding on Tweed Coast Road 1/4/17.

Road did close due to flooding.

In section 2.4 – **Project Site Access** of the **Appendix W** of the EIS it states that Cudgen road, the access road that the hospital site is, flood free in a flood event. However, Cudgen Road connects to other roads which are very impacted by flood in an event. For instance, in a 5% AEP event and a 1% AEP event.

Sections of the M1 and Tweed Coast Road are inundated, Tweed Coast Road, Chinderah Bay Drive and Wommin Bay Road are all inundated. This means none of the community North of Kingscliff can access the hospital in a flood. With the majority of the population of the Tweed/Byron community living North of Kingscliff, this is a major risk to the health needs of our community, and is negligent of the NSW Government/Health Infrastructure not to consider this in choosing the proposed site at 771 Cudgen Road.

There is no mention in the flood report **Appendix W**, on how staff such as specialist doctors are to get to critically ill patients in the hospital during a flood event. Even if the solution was to transfer medical professional staff to the patients in the hospital via helicopter or boat, it would prove a time consuming

process, that could put patients' lives at risk, if the staff cannot get to patients quickly in an emergency situation.

According to the **Appendix W** flood consultants, the alternative plan for residents North of Kingscliff who will be unable to access the hospital in a flood event, will be that they have to access Robina Hospital. The consultant who wrote Appendix W, reports that it is only a 30-minute drive to Robina. In a flood event, this is not the case. There has been no consideration on how the Queensland route to Robina will also be affected by flood conditions, the traffic has proven to be chaotic in a flood event along the M1. Also it is local knowledge that access roads from the M1 to the Robina Hospital floods in storm events, due to the creeks and lakes of the Glades Golf Course flooding, and inundating the Robina Town Centre Drive access road, and the carpark at the Robina Hospital. Detours to the Robina Hospital need to be made, in the event of a flood, this can be long with traffic gridlock. It is not a suitable alternative for residents of the Tweed to access, as it is a risk to community members lives if they are delayed getting to the hospital due to traffic and flood issues.

In relation to the above issue, I object to the NSW Government's site selection at 771 Cudgen Road, as it shows a lack of research into the flood situation of the proposed alternative route for residents north of Kingscliff during a flood. In **Appendix H, Volume 1 – Consultation Report of the EIS**⁴, I have found a reference in the Table 1, of "Section 2.2 Government Agency Consultation". It refers to a meeting with the stakeholder "Natural Hazards Gold Coast City Council" where they discussed the road flood immunity of the roads from Tweed Heads to Robina and Gold Coast University Hospital, as these hospitals would be the alternatives in a flood situation for patients North of Kingscliff to attend. It is normal practice when assessing risk to a community to have modelling performed on the flood immunity of roads that are required to be accessed in a situation such as in the case of the Tweed Valley Hospital and a flooding scenario, where it has been suggested the community who can't reach the hospital North of Kingscliff, access the Robina hospital. This modelling is very expensive, but seen as crucial when assessing risks to the public. The outcome of the email meeting between Health Infrastructure and the "Natural Hazards Gold Coast City Council" department was noted on Table 1 as follows:

"There was a large data cost to extract data from the various flood models of the Gold Coast and relate this to flood immunity for various road/bridges, etc. This option was not pursued, and local knowledge has been documented in the flood assessment report. This local knowledge was largely provided by Bitzios"

I request that the NSW Government/Health Infrastructure do not just take "local knowledge" as accurate enough when assessing the access risks of the route to the Robina or Gold Coast University Hospitals in a flood event. The majority of the Tweed population is being put at risk of not being able to access the alternative hospitals, this could be life threatening, and is negligent of Health Infrastructure to not pay for the expert modelling that will highlight any access risks patients would have in a Tweed/Gold Coast flood and storm event. The claim by both the Traffic Consultants and the consultants who wrote the Flood Appendix W, that the commute to Robina is only 30 minutes when

⁴ Elton Consulting, 'Appendix H, Volume 1, Tweed Valley Hospital, Community and Stakeholder Consultation Report', 18th October 2018.
<https://majorprojects.accelo.com/public/c1999f7531c4b6e2c0eb269e6e7e177e/Appendix%20H%20Consultation%20Report%20Part%201.pdf>

there is a flood event is not accurate, as no traffic or flood condition delays have been taken into account. Delays on the access roads in a flood/storm event could be hours.

Also, stated in the **Appendix W – Flood report**, that **Queensland Department of Transport & Main Roads** (QLD TMR) has advised that it understands that during the 1% AEP event, access on the M1 travelling north to either Robina Hospital or Gold Coast University Hospital may be impacted at Oyster Creek (near Exit 87) and near Mudgeeraba Creek (Exit 82). QLD TMR has advised that these two flood sites are subject to current upgrade projects which may improve their existing flood immunity. Again, this is speculation and presumption. Without proper professional flood modelling, we do not know how the route from Tweed Heads to Robina will be affected. We don't know how much delay will be enforced on the sick and dying trying to get to Robina in flood associated traffic jams.

I insist that the NSW Government pay for proper modelling to be done and a risk assessment be performed before approval of any SSD is allowed for the Tweed Valley Hospital development.

One other point is that the NSW Government has no funding for flood proofing and upgrading the access roads to the proposed hospital. The Tweed Council is expected to fund any upgrades of these roads. Currently there is no funding allocated in the Tweed Council budget to upgrade Tweed Coast Road for the increased traffic and for flood proofing the route to the hospital site. Our community has been informed that the Tweed Council is relying on contributions from developers of the future residential zoned areas of Kings Forest, and the Gales Holding land parcels to upgrade Tweed Coast Road. As both of these developments are yet to be built, it is estimated it could be as long as ten years after the hospital is completed before these roads are upgraded. This is also an issue that has not been address in the EIS, that the NSW Government has not considered.

Traffic Impact Assessment – Appendix L – Tweed Valley Hospital Development

I would like to object to the SSD on 771 Cudgen Road, Cudgen, NSW, 2487 of the Tweed Valley Hospital due to issues with the Traffic Impacts of the development.

Firstly, the Traffic Impact Assessment is based on assessing traffic relating to the hospital having 430 beds, and 1050 staff by 2032. The SEARS and EIS for the Tweed Valley Hospital Development states that there is an allowance for expansion of the building up to 100% of the initial size of the project into the future – which would equate to ultimately up to 860 beds with over 2000 staff. The Traffic Impact Assessment should cover all potential traffic estimated for the project in the immediate and into the future of the development, so that an assessment can be made of future stress and road upgrades that may need to be accounted for. This is what council and government town planners need to consider when looking at a development of the scale of the Tweed Valley Hospital, and this should be taken account. With a 430 bed hospital, the Traffic Assessment Report details that an estimated 11.81 trips/bed/day, to the hospital, that is a total of 5078 trips per day of vehicles to the hospital. The Traffic Assessment Report, does not mention proposed future numbers, which could add up to another 2000 people a day attending the hospital. Hence also needing extra parking facilities, is the development going to be able to cope with this many extra cars to the site? If not, does that mean they will in the future require more State Significant Farmland to increase the parking facilities? I request that Health Infrastructure commission a Traffic Impact Assessment to be done on what the impacts will be into the future on the traffic and car parking requirements for the future ultimate 860 bed scenario of the Tweed Valley Hospital. This should be done before proceeding with approval process of the Stage 1 SSD.

Tweed Shire Council's application to upgrade Tweed Coast Road to four lanes has been denied due to lack of funding. I have presented to you here a link to a Tweed Daily News Article (30th October called "Funding for Tweed Coast Road Hits a Speed Bump") link FYI -

<https://www.tweeddailynews.com.au/news/funding-for-tweed-coast-road-upgrade-hits-speed-bu/3561982/>

To upgrade the Tweed Coast Road to four lanes and potentially to flood proof the road, the council will need to seek developer contributions (Kings Forest Developer, and West Kingscliff Developer). As these developments are in the future, it is estimated that the upgraded road would be completed by 2033, ten years after the hospital is completed. The delay in upgrading these roads due to no funding from the government will cause major traffic chaos in the region of the hospital, with the increased traffic to and from the hospital.

It is not mentioned in the Traffic Assessment Report that Kingscliff streets have a 4.5 tonne load limit. This should be considered when heavy vehicle trucks are required for construction to the site, and future hospital operations. The constant wear and tear on these roads from heavy trucks could cause stress on these roads which may become pot holed, and dangerous to the general community. Cudgen road is the main road into the town of Kingscliff, there needs to be an assessment made on how this road will cope with the extra construction traffic stress. The NSW Government should do such an assessment before proceeding with approval for the Stage 1 SSD.

The Appendix L Traffic Impact Assessment states there is no on-street parking available on Cudgen Road or Turnock Road. Poor parking available around the site for parking during construction. Nearby residential streets including McPhail Ave, Cudgen Road (Nth of McPhail) and Oxford street have On-Street parking. We would like to point out that having parking of construction traffic on these residential roads could be problematic to the residents of these streets, and the Kingscliff High School, who have senior students parking on these streets, as well as the lack of parking that will be available at school pick-up and drop off times. In the Traffic Assessment there is very little information provided for Construction Parking no data provided or site plan. Estimated 1200 workers onsite. It seems inevitable that there will be Construction parking surrounding streets. No Construction Parking Management plan included in the Appendix L. The NSW Government need to have a Construction Parking Management plan in place to show the community of Kingscliff that the workers from the site will not need to park their vehicles on the residential streets. This plan should be provided before considering approval of the Stage 1 SSD.

Social & Economic Impacts

I would like to object to the SSD of the Tweed Valley Hospital on the site at 771 Cudgen Road, Cudgen, NSW 2487, for the following reasons relating to the Social and Economic impacts it will have on the City of Tweed Heads, and town of Kingscliff/Cudgen.

The Current Tweed Heads Hospital is situated in a community that is set up to support the services of the hospital. The population of Tweed Heads, Banora Point and Tweed Head South totals 31,782 (2016 Census), which is 33% of our regional population. The Average age in this demographic is 52, with the percentage of this community over 65 being 34%. With the greatest concentration of the ageing population in the Tweed Shire Community living in this Tweed City region, they are the most at risk of having health issues. This group are most vulnerable and most inclined to need regular access to

hospital and other health associated services. The aged are more likely to have mobility and transport limitations. The over 65 group, the Aboriginal and Torres Straight Communities (who have higher than average health issues), and the Disabled in the 2016 census show a concentration living in the vicinity of the current Tweed Hospital. Illustrating how people with needs for health facilities move close for ease of access to the health facilities. I would like the NSW Government/Health Infrastructure to look into the ramifications of relocating the current Tweed hospital facility, what consequences it will have on the community of aged, ill and disabled people who are currently located there for convenience. What impacts will it have on these people if they have to relocate their homes? Will they be able to afford to relocate to Kingscliff? If not, will their health needs be put at risk if they cannot access the hospital quickly due to distance. Some of these people cannot drive, they use mobility scooters or wheel chairs to get around. I would like the NSW Government/Health Infrastructure to consider the importance that the large portion of these community groups place on living close to the current hospital and medical precinct facilities. The NSW Government/Health Infrastructure should consider whether they have made the wrong decision by not just continuing with their original plan, which was to upgrade the current hospital, using the land available around the site where the old council chambers are. Perhaps keeping the hospital in Tweed City is the best solution, when you start to examine the social impacts on the current community who are located near the hospital.

In the immediate suburbs surrounding the hospital are two of the biggest employment industries in the area. They are in aged care and accommodation. This is due to the fact that the majority of the region's aged care facilities have been built in the suburbs surrounding the hospital. Relocating the hospital from its current site at Tweed Heads will have a big impact on the symbiotic relationship aged care facilities have with a hospital. Doctors who currently enjoy the convenience of travelling short distances between aged care facilities and the hospital to see patients will be inconvenienced by travelling longer distances to see patients. People who live in aged care facilities will now have to travel longer distances to get treatment in hospital. Currently the accommodation around the hospital has affordable motels that currently service the family and friends of sick loved ones. These inexpensive accommodation businesses rely on this demographic to fill their motels, as tourism accommodation is the only costly alternative and serves a different market. Kingscliff in comparison specialises in accommodation for the tourist market and does not offer the range of inexpensive accommodation options offered by Tweed Heads. The NSW Government/Health Infrastructure should consider the ramifications that relocating the hospital from the city of Tweed Heads to Kingscliff will have on these two employment industries.

The medical services that form the medical precinct in the near vicinity of the current Tweed Hospital will be severely impacted by the relocation of the Tweed Hospital to the Cudgen State Significant Farmlands. Currently the medical precinct consists of businesses such as Specialist/Doctors Consultation rooms, radiography services, aged care facilities, physiotherapy and other rehabilitation businesses, cancer clinics, pharmacies, disability services, private hospital and day surgery facilities, and so forth. I would like to see more study done by the NSW Government/Health Infrastructure on the impact of relocating these medical businesses, what impact will it have on the business owners and the costs associated with moving these businesses? I would like the government to look into the impact that moving these medical services will have on the community who have chosen to move to Tweed Heads and immediate suburbs and their accessibility to medical services. I would like the NSW Government/Health Infrastructure to do a study on where these medical services will relocate to, as it is a major concern to the community that more State Significant Farmland will be required to be re-zoned

to accommodate these medical services around the hospital. There currently is insufficient office space and commercial buildings in the town of Kingscliff for such medical services to relocate to. Also would like the NSW Government/Health Infrastructure to reveal if a private hospital facility will also need to be built in the future near the hospital, and hence on more State Significant Farmland. All these studies need to be completed before the NSW Government considers the approval of the Stage 1 SSD.

Doctors, Nurses and other hospital staff also are disadvantaged by the Tweed Hospital being relocated. Many of them have bought property in the near vicinity of the Tweed Hospital for convenience for shift work hours and to be on call in emergency situations. By relocating the hospital, these hospital staff will either have to move at great expense, or be inconvenienced by travelling a longer distance to and from work. I would like the NSW Government/Health Infrastructure to do more study into what impact this relocation will have on the longer commute to work, and with problems these staff might have affording to relocate their residences to be close to hospital. These impacts should be considered by the NSW Government before considering approval of the Stage 1 SSD.

I have concerns that there will be economic and social impacts on the town of Kingscliff as a result of the hospital being built on the entrance to the town. I would like to point out that a hospital of the size and magnitude of the Tweed Valley Hospital will change the focus of our town. Currently our town enjoys the economic benefits of a thriving weekend and tourism industry. With our beautiful coastal scenery, and red soil farmlands, our magnificent beaches, great café strip our area has a lot to offer the tourist. I am concerned that the tourism industry will go, as our town changes into a Hospital town. I would like the NSW Government to do an impact study on what effect a hospital will have on our tourism industry, if the town will become a city rather than a relaxing laid back holiday town.

How the threat of the loss of more State Significant Farmland will occur once the surrounding farms are needed for the Medical Precinct. How the whole Cudgen Plateau's State Significant Farmland RU1 zoning is in jeopardy due to there only being a 500-hectare threshold for the zoning to exist. If the farmlands around the hospital are re-zoned for a medical precinct, then there will not be enough hectares left of the Cudgen Plateau to keep the State Significant Zoning. So, I think it is extremely important that the NSW Government do a proper impact study on the impacts on the State Significant Agriculture lands and Agriculture industry as a result of the hospital being placed on the proposed position.

We need to Protect RU1 Primary Farmland – State Significant Farmland

The majority of the Kingscliff/Cudgen community sees the Cudgen Plateau's fertile volcanic farmland soil as being a National Treasure. That should be conserved for future generations of farmers to grow Australia's food and for the people of Australia to continue to enjoy as a beautiful rural and coastal destination to farm, live and holiday.

The Cudgen Plateau farming region has been zoned RU1 Primary Farmland, and zoned State Significant Farmland because it is considered some of the best and rarest farming soil in the country. Being on the coast with high rainfall, we need to preserve this farmland when much of NSW is very prone to extreme drought. We need to protect productive coastal farmland from the pressures of population growth and development. The Cudgen Plateau has a renewed generation of farmers, who have invested heavily in new farming technologies, and are applying state of the art farming practices to make their farms highly productive.

If the hospital is built on the Cudgen Plateau at 771 Cudgen Road, Cudgen, 16 hectares (ha.) of this RU1 Primary Farmland will go. The NSW Government argues that this is a mere 1.9% of the Cudgen Plateau State Significant Farmland.⁵

I would like to argue that the re-zoning of this 16 ha. from RU1, would have a “domino effect” and threaten the whole RU1 Zoning on the Cudgen Plateau. If the NSW Planning and Environment Department allow the re-zoning, placing the hospital here would put massive pressure on the surrounding State Significant Farmland to also be re-zoned. More of this land will be required in the future to facilitate hospital associated development such as medical precinct businesses, a future private hospital, and aged care facilities.

The Zoning threshold for keeping the Cudgen Plateau Zoned State Significant is 500 ha. According to the **Appendix F – Agriculture Impact report** by Agronomist Tony Hartley, there is only 580.3 ha. of State Significant Farmland remaining on the Cudgen Plateau. Therefore, if 16 ha. is re-zoned to SP2 then there will be 564.3 ha. remaining.

I will illustrate how the total zoning of the Cudgen Plateau is then going to be under threat of dropping under the 500 ha. requirement for State Significant Zoning when the hospital needs more farmland for associated development. Please refer to the below satellite photograph on the next page. I have labelled the farms around the proposed hospital site that are zoned RU1 and the size in hectares of each farm, that are most at risk of being targeted for medical precinct land, and at threat of future re-zoning.

If you look at the satellite picture you will see that the threatened surrounding farmland that I have labelled adds up to a total of 74.97 hectares. So if this land is needed in the future for a medical precinct, and is re-zoned from RU1, this would threaten 500-hectare threshold to keep the State Significant Protection on these farmlands. If the zoning goes on these farms, the zoning goes on the whole Cudgen Plateau.

⁵ Tony Hartley, ‘Report – Agricultural Impact – Tweed Valley Hospital’, from EIS for Tweed Valley Hospital – Appendix F, 16th October 2018, p.5.
<https://majorprojects.accelo.com/public/fc5fe0c2a1f9427c62ccf6a5cb93a729/Appendix%20F%20Agricultural%20Impact%20Assessment.pdf>



The Environmental Impact Statement (EIS) for the Tweed Valley Hospital State Significant Development (SSD), states that the Tweed Valley Hospital will be originally 430 beds with over 1050 staff with an expansion in the future up to 860 beds (as stated in the EIS, an expansion allowance of up to 100% for future). I would like the NSW Department of Planning and Health Infrastructure (HI) to answer the following questions for me, and consider these points carefully:

- I would like the NSW Department of Planning and Environment and HI to consider realistically what will be the long term pressure or threat to the surrounding RU1 State Significant farms if a hospital of this size was to be placed in this location?
- I would like the Health Infrastructure/NSW Department of Planning and Environment to do a study on what medical precinct facilities and businesses will need to relocate to the surrounding region of the hospital. Medical precinct facilities such as specialist doctor's offices, radiography, physiotherapy, aged care health services and other such businesses that would need to move close to the hospital?
- I would like to know if in the future, as with most public hospitals, if a Private Hospital would be planned for the surrounding vicinity of the hospital?

- I would like to know if aged care and retirement housing will be needed to be built for the elderly who need to live near the hospital due to health reasons?
- I would like to know if Health Infrastructure has done a study into how much extra parking will be required for the hospital if there are eventually 860 beds, or rather the hospital is double the size in the future?
- I would like the Department of Planning and Environment and Health Infrastructure to calculate and consider how much extra land will be required to fulfil the needs of future hospital associated development?

In the EIS I have yet to find any studies that have been done on how much more farmland in the future will be required for such hospital related development. I would like to see some proper studies done on what the actual threat to the RU1 Zoning of this precious farmland would be. No professional studies have been conducted. No decision on the re-zoning should be made until all these questions are answered and considered.

I recently read the **In Touch Newsletter** that Health Infrastructure published in December, about “Rumours” about the chosen Tweed Valley Hospital site. One of the “Rumours” they state as follows:

“The hospital is a backdoor for the NSW Government to do away with the State Significant Farming Status of Cudgen to make way for further development in the area”.

Response to this “Rumour” by Health Infrastructure:

“The Tweed Valley Hospital campus will have special purpose zoning and as a result, the development is not connected to the town planning controls imposed on other areas. Any other developments in the local area would be required to go through the standard development application processes that are assessed and determined by local government on an individual basis.

The Master plan has considered a number of long-term growth scenarios, including up to the doubling the size of the initial build and the ability to renew/rebuild the initial buildings. The size of the site allows for future planning initiatives for both the hospital and supplementary health related services to be contained on the hospital campus without the need for additional land.”⁶

Firstly, it is not a “Rumour” that the State Significant Farmland surrounding the hospital site will be under pressure for future hospital medical precinct development. It is a “Genuine Concern” that our community has. Secondly, as I have already mentioned no independent detailed study has been commissioned by Health Infrastructure on how many medical precinct businesses will need to relocate to the vicinity of the hospital. No study has been done on aged care, private hospital facilities and so forth that will need to be built in the vicinity of the hospital. There is not enough room for these medical precinct businesses on the hospital site, and there is no evidence of areas being allocated on the Masterplan drawings to illustrate where these businesses would go on the property. I therefore argue that the surrounding State Significant Farmlands are under threat of being needed for future medical precinct development. I would also argue that if Health Infrastructure believe that the Local Government will be the decision makers on approval of any other State Significant Farmland being re-zoned for these medical precinct developments, then isn’t it a big risk that the NSW Government are

⁶ In Touch Newsletter, Tweed Valley Hospital Development. Special Edition, December 2018, Health Infrastructure, NSW Government.

taking, placing the hospital here when the Local Government may not approve re-zoning of State Significant Farmland for medical businesses who want to relocate to be close to the hospital site? The EIS, does not address this concern.

The **Appendix F – Agriculture Impact Study of the EIS for Tweed Valley Hospital**, has addressed various issues as laid out in the SEARS for the Tweed Valley Hospital Development.

- I would like to query why Appendix F of the EIS report did not consider how the Cudgen Plateau will become fragmented once more land is required for hospital associated development such as a Medical Precinct?
- I would like to query why of Appendix F of the EIS, did not consider the disruption to the farms and farming businesses across the road from the proposed hospital site which will be affected by the construction and extra traffic problems that will occur whilst this hospital is being built? This could impact these farmers in several ways, and this will affect their productivity levels. Tractors who have to go into the traffic from time to time will be held up by the extra stress the construction of the hospital will cause on Cudgen Road, making their daily farming activities more difficult. The pollution and extra red dirt that will be in the air during construction, could cover their crops, causing potential damage to the crops, and the quality of the crops. The farmer's crops could become contaminated by construction dust and other toxic substances that float through the air.
- I would like to know why Appendix F of the EIS, did not consider the productivity impacts that the farm and the farm produce store across the road from the hospital site will experience by constant disruption by heavy construction vehicles, red dirt being scattered over their customer's cars, and their store? Their customers will find it harder to go in and out of their carpark, as the road will become extremely busy with the proposed extra traffic that will be entering and leaving the hospital during construction and once it is built.

The above points are some of the impacts to the agriculture businesses surrounding the hospital site, that have not been investigated, and are an economic cost to the farming businesses.

I would now like to refer to the RU1 Zoning in the **Tweed LEP 2014** policy document which states the following:

Zone RU1 Primary Production

1 Objectives of zone

- To encourage sustainable primary industry production by maintaining and enhancing the natural resource base.
- To encourage diversity in primary industry enterprises and systems appropriate for the area.
- To minimise the fragmentation and alienation of resource lands.
- To minimise conflict between land uses within this zone and land uses within adjoining zones.
- To protect prime agricultural land from the economic pressure of competing land uses.

2 Permitted without consent

Environmental protection works; Extensive agriculture; Home occupations; Intensive plant agriculture

3 Permitted with consent

Agricultural produce industries; Animal boarding or training establishments; Aquaculture; Bed and breakfast accommodation; Boat launching ramps; Boat sheds; Cellar door premises; Dual occupancies (attached); Dwelling houses; Environmental facilities; Extractive industries; Farm buildings; Farm stay accommodation; Flood mitigation works; Forestry; Group homes; Helipads; Home-based child care; Home businesses; Home industries; Industrial retail outlets; Intensive livestock agriculture; Jetties; Open cut mining; Plant nurseries; Roads; Roadside stalls; Rural workers' dwellings; Turf farming; Water recreation structures; Water storage facilities

4 Prohibited

Any development not specified in item 2 or 3

To bring to your attention the objectives of the RU1 Primary Production zone.

- In the case of the Cudgen Plateau it has been allocated this RU1 State Significant zoning because it has been identified as a sustainable agricultural industry, that relies on the rare natural resource of the volcanic rich soils of the Cudgen Plateau. This natural resource is rare and unique to the North Coast Region. These farmlands being coastal have a higher yearly rainfall than other drought prone farming areas. These farmlands have been given protection because they have been identified as precious and important to the sustainability and the future of Australia's food bowl.
- One of the objectives of this RU1 zoning is to prevent fragmentation and alienation of resource lands. If the hospital is put on the Cudgen site, it will threaten and fragment the whole RU1 zone in this region. If more land is acquired for future hospital associated development, as the Tweed population grows, then the State Significant zoning will fall to a low hectare level, making it too small an area to sustain its agriculture industry, and allowing developers to purchase the farmlands in the future. I cannot stress how important it is that we protect these majestic farmlands for future food security and jobs for agriculture workers in the future.
- The final objective of the RU1 Zoning in the **Tweed LEP** is to protect the farmland from economic competing pressures of other land uses. As I have already detailed earlier in my submission there is a real threat to the whole State Significant Zoning, as more of the land will be under pressure to be acquired for a medical precinct, private hospital and other hospital

associated development in the future. Every time we lose a farm in the RU1 zone, it chips away at the economic viability for the agriculture industry in the region. The smaller the State Significant Zone gets, the less economically viable it may be for other industries associated. For example, the transport/distribution companies will reduce the number of loads of produce that they consider economically viable to pick up from farms in the area. Other associated economic problems occur, if there are less farms, there is less employment opportunities. It is all about economies of scale

The hospital site is very close to other farmlands. As noted in the **Appendix J of the EIS – Land Use Conflict Risk Assessment**.⁷ There are some issues here. **The Living and Working in Rural Areas Handbook** has been used to assess the conflict risks associated with the building of a hospital on the Cudgen site. There are recommended buffer distances to residential areas from farming activities. There is a buffer of 300 metres from State Significant Farmland to residential areas.:

- In the vicinity of the hospital, the distance between the closest proposed hospital building and vegetable cropping to south is only 100 metres.
- The distance between the closest proposed hospital building and the disused plant nursery next door is 60 metres.
- The distance between the closest proposed hospital building and the sweet potato farm to the south west is approximately 280 metres
(See page v of the Appendix J of EIS)

A comment written by Tim Fitzroy who has written **Appendix J of the EIS - Land Use Conflict Risk Assessment Mixed Agricultural Use and Proposed Tweed Valley Hospital, Cudgen** is as follows:

“It is important to note that the **Living and Working in Rural Areas Handbook** does not include reference to separation distances between agriculture and commercial activity such as those proposed on the Project Site. While a default buffer area of 300m width is recommended between State and Regionally Significant Farmland and residential development the DPI does not stipulate a setback from commercial/industrial developments to State and Regionally Significant Farmland.”

⁷ Tim Fitzroy, ‘Land Use Conflict Risk Assessment – Mixed Agricultural Use on Proposed Tweed Valley Hospital’, from EIS for Tweed Valley Hospital Development, Appendix J, 2018.
<https://majorprojects.accelo.com/public/23b09627725bfb89da3e6b302cf5fdb6/Appendix%20J%20Land%20Use%20Conflict%20Risk%20Assessment.pdf>

I would like to argue that just because the handbook does not “include reference” to the separation distances between agriculture and commercial activity such as those on the proposed Hospital site, that does not mean that these buffers should not apply.

It means that they have not considered what to do in the case of a commercial development, at the time of writing the handbook. I would like to point out that it is equally important that these buffer zones are applied to a public commercial building such as a hospital. It is very important that people with vulnerable health should not be subjected to chemical residue from agriculture sprays, chemical odour, and fine red dirt dust from tractor ploughing. I therefore argue that these same buffer zones should apply to the hospital development. This buffer zone issue does therefore threaten the RU1 objective of minimising the impact of conflict of land uses within the zones.

A land use conflict risk that was not considered in the **Appendix J** of the EIS for Tweed Valley Hospital is the **red soil dust** that is frequently spread into the air while tractors on the surrounding farms are ploughing. The red dust from the Cudgen Soil is quite dense and spreads far and wide when ploughing in windy conditions. This could be an issue for people who have vulnerable health such as respiratory problems or low immune systems. As the hospital is a facility where some ill people are quite vulnerable to bad air quality. The red dust at times could be an irritant to some groups of people like asthmatics or cancer patients etc. Also this red dirt will have some chemical and bacterial residue from farming activities. It would be negligent of the NSW Government not to investigate what risks there may be on Hospital patient's health, being too close to agriculture activities, and not within the safe buffer zones. The NSW Government should do an impact study to make sure that the daily agriculture activities will not have to be changed or stopped due to complaints from hospital patients and staff.

A 30 metre Vegetative buffer that Tim Fitzroy recommends is placed on borders of the hospital site where agriculture sprays etc. could blow over to the hospital site, as the hospital is not outside 300 metres of agriculture farmlands. This vegetative buffer is able to fail as a method of protection if not maintained to a high standard, and takes quite some time to establish. The vegetative buffer also is a fire hazard, as it would not be in the buffer zone required for bush fire prevention being too close to the hospital building. Health Infrastructure needs to do further study into the problems that could arise from a Vegetative Buffer being used as a protection method against agriculture practices. A hospital being so close to farmlands needs to consider the Land Use Conflicts that arise from the building being inside the 300 metre buffer zone, and the ramifications that could arise from both the perspective of patient's health, and also considerations to the agriculture practices of the surrounding farmers not being restricted due to the hospital being located too close to the State Significant Farmlands.

This leads me to bring to your attention the NSW Department of Primary Industries (DPI), **NSW Right to Farm Policy**.⁸ The Department of Planning and Environment should refer to this policy when considering the ramifications that may flow from the re-zoning of the site at 771 Cudgen Road, and the Land Use Conflicts that it may cause between a Hospital SSD, and the surrounding agriculture businesses. As mentioned above, the hospital will not be in the recommended buffer zone distance of 300 metres from the surrounding farms. This will inevitably cause land conflict issues with the farmers 'Right to Farm'. As stated in the NSW Government's **NSW Right to Farm Policy Summary document**, I quote the following:

"The NSW Government recognises the value of agriculture for growing food and fibre for domestic and international markets and is concerned about the potential loss or impaired use of agricultural land."....."The NSW Government will plan for land use near agriculture that minimises conflicts"

I would also like to refer to the **North Coast Regional Plan 2036**, published in 2017 by the NSW Planning and Environment Department.⁹ I refer to **Direction 11: Protect and Enhance Productive Agricultural Lands**. I will quote from the document on page 38:

"The North Coast's rich soils, reliable rainfall and range of landscapes support a diverse and important agricultural sector. The most important farmland has been mapped to support long-term agricultural production."

I would like to highlight that the above are the words of the NSW Government. I would like to point out that you should do as you preach and protect the Cudgen Plateau State Significant Farmlands. I would also like to refer to "Appendix B" of the **North Coast Regional Plan 2036** the following points from the "Important Farmland Interim Variation Criteria". It states that Important Farmland may be suitable for uses other than farmland if:

- *"The land is isolated from other important farmland and is not capable of supporting sustainable agricultural production."* My comment here is that the proposed hospital site on Cudgen Plateau is not isolated farmland. It is part of a thriving and active Agriculture industry.
- *"The land use does not increase the likelihood of conflict and does not impact on current or future agricultural activities in the locality."* My comment is that the use of this land for a hospital will threaten surrounding State Significant Farmlands by more land being needed in the future for a medical precinct. It will also cause a land use conflict, as the buffer zone is 300 metres, there is active farming surrounding the Hospital site, the development would threaten the farmers 'Right to Farm'. Hence conflicting and impacting the future of the agriculture industry on the Cudgen Plateau.

⁸ NSW Department of Primary Industries, 'NSW Right to Farm Policy Summary Document', https://www.dpi.nsw.gov.au/__data/assets/pdf_file/0007/587185/NSW-Right-to-farm-policy-summary_final.pdf

⁹ NSW Department of Planning and Environment, 'North Coast Regional Plan, 2036', March 2017. <https://www.planning.nsw.gov.au/~media/Files/DPE/Plans-and-policies/north-coast-2036-regional-plan-2017.ashx>

I would also like to suggest that the NSW Department of Planning and Environment when considering re-zoning, read and consider the document published in 2005 – **Northern Rivers Farmland Protection Project: Final Recommendations**.¹⁰ This report documents the study that was done from 2002 to 2005 to put State Significant Zoning on the Cudgen Plateau and other Farmlands in the Northern Rivers. This document is a very comprehensive study, that was undertaken when the zoning for agriculture land in the Tweed region was being decided. The report on page 26 in relation to State Significant Farmland and urban and rural residential development states:

“State significant farmland cannot be considered for urban (including housing, retailing and other uses normally located within towns) or rural residential rezoning. “

The report also says on page 29, point 9 the following:

*“Public infrastructure is permitted on land mapped as state or regionally significant where **no feasible** alternative is available. Councils or state agencies proposing public infrastructure on such land should select alternative sites where possible”*

In section 5.2.4 of the EIS¹¹ for the Tweed Valley Hospital, and in the **Tweed Valley Hospital Site Selection Report - Summary**,¹² the NSW Government give their reasons for the other shortlisted sites at Kings Forest, Chinderah and the Upgrade of current Tweed Valley Hospital as not being preferred sites, but they are feasible. I would like to challenge the reasons that the NSW Government have given for the other alternatives as not being appropriate, as our community still sees these alternative sites as feasible, and therefore should be considered instead of threatening our State Significant Farmland - for the following reasons:

CHINDERAH SITE

As you will see from the TWEED VALLEY HOSPITAL DEVELOPMENT SITE SELECTION REPORT there are many advantages of the site being placed at the Chinderah Site location, and it is a very feasible alternative to the proposed site.

- It is right next to the M1 Motorway, so everyone in the Tweed-Byron region can easily access the site from the motorway.
- Public transport - the site is well situated to take advantage of existing bus routes and services.
- Minimal flood proofing of the M1 and exit to this site would be required, compared to problems faced by the Tweed Coast Road in a flood to the proposed Cudgen Site. This is an advantage compared to proposed site in Cudgen which would require massive funding to upgrade the road

¹⁰ NSW Department of Primary Industry, ‘Northern Rivers Farmland Protection Project: Final Recommendation’, February 2005. <https://www.planning.nsw.gov.au/~media/Files/DPE/Other/northern-rivers-farmland-protection-project-final-recommendations-2005-02.ashx?la=en>

¹¹ Geolink, ‘Environmental Impact Statement – New Tweed Valley Hospital (Concept Proposal & Stage 1 Works)’, p.72. <https://majorprojects.accelo.com/public/a8dc0620a640c2713d3f0a914ced7708/2682-1118%20Tweed%20Valley%20Hospital%20EIS%20V6%20Final.pdf>

¹² NSW Government, ‘Tweed Valley Hospital Site Selection Summary’, July 2019. http://www.tweedvalleyhospital.health.nsw.gov.au/www_tweed/media/tweedvalley/180716-site-selection-summary-report_july-2018_issued.pdf

for the increased traffic going to/from the hospital and to flood proof the road from the various flood events that occur on Tweed Coast Road, cutting access to the Kingscliff region. There is no funding provided from the NSW Government to upgrade the Tweed Coast Road to the hospital site. The government is relying on the council to provide the funding for the upgrade. These funds are currently not available in the Tweed Council's budget, they have indicated that the funding to upgrade Tweed Coast Road will only be available by contributions to funding the upgrade by the developers LEDA and GALES HOLDINGS when their housing developments are approved, this could be up to ten years after the hospital is scheduled to be completed.

- Flooding, is an issue for all the sites, including the proposed hospital site on the Cudgen Plateau. The Chinderah site would need to be engineered so it is above the maximum flood levels. This is not an uncommon practice in construction. I feel that by building the site on the Chinderah location, and building it up above the maximum flood level it is a feasible solution to the massive flooding problems the Kingscliff region experiences. As, the Chinderah site is close to the M1, if the small section of the M1 that floods is improved, then access to the hospital during a flood would be highly accessible to the Northern and Southern communities of our region. As they would not need to go down Tweed Coast Road or Wommin Bay road, which are the two main access roads into the town of Kingscliff that get completely cut off in a flood. The proposed Cudgen site is not accessible to the Northern Community during a flood, the Chinderah alternative site if selected could be a more feasible option, as it can be built above the flood levels, and the small part of the M1 that floods in major flood events could be built up for less cost than flood proofing the Tweed Coast Road, the main access road to the proposed Cudgen Site. The **Tweed Valley Hospital Site Selection Report** and the **Appendix W – Flood Assessment, from the Tweed Valley Hospital EIS**, suggests that the Northern Tweed Community in a flood events goes north to the Robina hospital in 30 minutes. This is incorrect, it has proven in a flood, that the M1 gets gridlocked with traffic. There has been no modelling done by the NSW Government, on the route from Tweed to Robina Hospital in a flood event, so there is no certainty that it is a feasible option for the community of Tweed to go North to the Robina Hospital. In fact, it is well known that in a Gold Coast Flood event, that often the access road from the M1 to Robina Hospital is cut off because there is a golf course next to the hospital that has creeks and lakes that overflow during a major storm, flood the road and prevent traffic from passing. In a flood event in the Tweed and Gold Coast regions, there are delays on the M1 freeway due to the flood situation, so there is no guarantee that the Tweed community in a flood will be able to access the Robina hospital in 30 minutes. The NSW Government need to pay for proper flood modelling to be done on the route from Tweed to Robina if they are going to require the community north of Kingscliff to go to Robina in a flood if the proposed Cudgen site is where the hospital goes. It is negligent of the NSW Government not to do proper flood modelling of the Tweed – Robina Hospital route, before making a decision on selection of the proposed Cudgen site, major delays of people getting to a hospital could result in death or negative patient outcomes.
- The Chinderah site is zoned for housing and other development for 1500 residential properties, and a business and knowledge precinct. It is not zoned State Significant Farmland therefore is a very feasible location for the hospital.
- The Chinderah site is unlikely to have much objection from the community. It is away from the main township of Kingscliff, so will cause minimal disruption to the seaside atmosphere of the town that tourists and residents love., it will also not threaten further State Significant Farmland, in regard to the requirement for more land for a medical precinct and other hospital services.

- There is no immediate development in the Chinderah location, so would be favourable to make good planning decisions for the whole hospital and health precinct, it is a clean pallet.
- Building construction will have minimal disruption to the flow of the traffic and township of Kingscliff if put in this location.
- EVERYONE WOULD BE HAPPY - Farmers, the wider Tweed-Byron Community, tourists and Kingscliff Community.

The main reason I can see that the NSW Health Infrastructure have not chosen the Chinderah site, is because of the potential extra capital cost. The land will have to be built up to be above a 1 in 20-year flood level, which is engineering wise not a problem. This is a small price to pay to keep a profitable \$10 million farming industry and thriving tourist industry alive that provides jobs and food for the Australian Community. Also to keep the disruption and impacts of such a massive development to a minimal level on the township of Kingscliff. I believe the Chinderah site is a very feasible option, and the government needs to consider this site in order to protect the State Significant Farmland zoning on the Cudgen Plateau.

THE KINGS FOREST SITE

As you will see from the **Tweed Valley Hospital Site Selection Report**, there are many feasible reasons why the Tweed Valley Hospital could be built at Kings Forest:

- It is within a few minutes drive from M1 Motorway, so everyone in the Tweed-Byron region can easily access the site from the motorway. The problems associated with flooding can be addressed as if the Kings Forest development is to go ahead, this would trigger funding to be contributed to the upgrade and flood proofing of the Tweed Coast Road. Tweed Shire Council are relying on the developers LEDA to provide funding for this road in order for development to go ahead.
- The Kingscliff Forest is largely zoned for housing and other development with 4500 proposed residences, town centre and other amenities. This site would allow room for not only the hospital but also there would be room to accommodate other hospital services, plenty of room for a medical precinct. This is therefore a very feasible option.
- It is away from the main township of Kingscliff, so will cause minimal disruption to the seaside atmosphere of the town that tourists and residents love.
- Building construction will not disturb the flow of the traffic and township of Kingscliff if put in this location.

The main reasons that I can see that the NSW Health Department have not chosen this site, is because it considers that the opportunity for use of current education facilities are more limited, however, it is within minutes drive of the TAFE, so not really an issue. The report has said that the “healing view” is not as good as the Cudgen site, but the natural views are still very beautiful in this location. The Koala plan needs to be approved, which I understand is being worked on and refined with associated Koala committees. The Kings Forest site is a feasible alternative and should be considered by the NSW Government to preserve the State Significant Farmland.

Current Tweed Hospital Re-Development

As you will see from the **Tweed Valley Hospital Site Selection Report** there are many feasible reasons why the Current Tweed Hospital could be upgraded.

A feasibility study has already been done by the NSW Government for the upgrade of the current Tweed Hospital. The NSW Government is currently spending \$48 million upgrading a section of the Tweed Hospital to keep up with the demands of the hospital. It would therefore be feasible for the hospital upgrade to continue as per the government's plans that were already done:

- The cost to the Tweed economy would be less if the government continues to upgrade the current hospital, as there is already a network of associated health services and private hospitals in the vicinity of the current hospital.
- The medical professionals who have bought property in the vicinity of the hospital for convenience of shift work, would not be disadvantaged by the move of the hospital.
- The elderly and other residents who have bought property in the vicinity of the hospital for convenience due to their health needs would not be disadvantaged by the move of the hospital.
- The majority of the Tweed /Byron population lives in the city of Tweed, and in close proximity to the hospital.
- The new Tweed Police Station is very close to the current hospital, which is important due to risk of violent patients that are now common place at hospital locations.
- In the event of a flood, the majority of the Tweed population and staff will still be able to reach the hospital in an emergency, this is not the case with the proposed Cudgen Site.

The upgrade or rather re-development of the current Tweed Hospital is also therefore a feasible alternative to the proposed Cudgen Site.

I therefore would like to emphasise how State Significant Farmland zoning should **only be allowed if there is no other feasible option**. All three options – Chinderah, Kings Forest, and Upgrade of current Tweed Hospital are all feasible alternatives. Like the Cudgen site, not all sites are perfect, but nor is the proposed Cudgen site.

I would like the NSW Government/Health Infrastructure and NSW Department of Planning and Environment to reassess the feasibility of the alternative sites in order to provide protection to the State Significant Farmlands of the Cudgen Plateau for generations to come.

Conclusion

I would like the NSW Government to re-consider the site they have selected, and look at the other alternative feasible hospital sites that were detailed in **The Tweed Valley Site Selection report – Summary**. By including the other shortlisted sites in this report, Health Infrastructure are admitting that these sites are feasible hospital sites. These sites need to be considered more carefully, as already mentioned State Significant Farmland should only be considered an option for development if there are no feasible alternatives. We need to protect the farmlands of the Cudgen Plateau for our future food needs. There is no reason why the NSW Government cannot protect these farmlands AND build a great hospital for the Tweed/Byron community, we can have both!

Thank you for considering my concerns.

Kind regards,

Karina Hall

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation:

Agreed to false or misleading information statements: yes

Name: Karina Hall

Email: [REDACTED]

Address:

[REDACTED]

KINGSCLIFF, NSW
2487

Content:

Tweed SEPP Submission - Please refer to the PDF File uploaded Thank you.

IP Address: - [REDACTED]

Submission: Online Submission from Karina Hall (comments)

https://majorprojects.accelo.com/?action=view_activity&id=299987

Submission for Job: #9659

https://majorprojects.accelo.com/?action=view_job&id=9659

Site: #0

https://majorprojects.accelo.com/?action=view_site&id=0

Objection to the Proposed TWEED SEPP.

My name is Karina Hall, a member of the Kingscliff Community. I wish to object to the proposed **Tweed SEPP** to amend the **Tweed Local Environmental Plan (LEP) 2014** to enable the RU1 zoning to be changed to SP2 Infrastructure for the proposed Tweed Valley Hospital development on 771 Cudgen Road, Cudgen, NSW 2487. I object to the rezoning of the property from RU1 Primary Production and R1 General Residential to SP2 Infrastructure (Health Services Facility). My explanations for my objection are as follows:

We Need to Protect RU1 Primary Farmland – State Significant Farmland

The majority of the Kingscliff/Cudgen community sees the Cudgen Plateau's fertile volcanic farmland soil as being a National Treasure. That should be conserved for future generations of farmers to grow Australia's food and for the people of Australia to continue to enjoy as a beautiful rural and coastal destination to farm, live and holiday.

The Cudgen Plateau farming region has been zoned RU1 Primary Farmland, and zoned State Significant Farmland because it is considered some of the best and rarest farming soil in the country. Being on the coast with high rainfall, we need to preserve this farmland when much of NSW is very prone to extreme drought. We need to protect productive coastal farmland from the pressures of population growth and development. The Cudgen Plateau has a renewed generation of farmers, who have invested heavily in new farming technologies, and are applying state of the art farming practices to make their farms highly productive.

I would like the NSW Government to refer to their own policy on **"Maintaining Land for Agriculture Industries" on the Department of Primary Industries website.**¹ Health Infrastructure has failed to meet many of these policy recommendations when they have selected the proposed site on the State Significant Farmlands of the Cudgen Plateau.

The policy says –

"Where a change in land use appears to be desirable, any changes to environmental planning instruments should only be made after open and informed consultation with the community. Spot rezonings and other ad hoc approaches to planning are undesirable. Changes should be implemented in a way that minimises the impact on existing agricultural enterprises, such as by phasing in the change and providing buffers between agricultural and non-agricultural properties."

I will explain throughout my submission why I believe that Health Infrastructure have not selected an appropriate site to build the new Tweed Valley Hospital. I will explain how the NSW Department of Planning and Environment and the Minister should carefully think through the ramifications and possible future impacts re-zoning this parcel of land will have on the entire Cudgen Plateau's agriculture industry and State Significant Farmlands.

¹ "Maintaining Land For Agriculture Industries" Policy, NSW Department of Primary Industries, 2011.
https://www.dpi.nsw.gov.au/__data/assets/pdf_file/0008/396458/Policy-O-104-maintaining-land-agricultural-industries.pdf

The “**Maintaining Land For Agriculture**” policy states that:

Policy

1. Environmental planning instruments should be structured to;

- a. promote the continued use of agricultural land for commercial agricultural purposes, where that form of land use is sustainable in the long term;
- b. avoid land use conflicts;
- c. protect natural resources used by agriculture;
- d. protect other values associated with agricultural land that are of importance to local communities, such as heritage and visual amenity;
- e. provide for a diversity of agriculture enterprises, including specialised agricultural developments, through strategically planned locations to enhance the scope for agricultural investment in rural areas; and
- f. allow for value adding and integration of agricultural industries into regional economies.

2. Conversion of land

The conversion of land used by agricultural enterprises to other uses should only take place where fully justified in the strategic planning context. Considerations include;

- all alternative sites and options for non agricultural developments;
- any decisions to convert agricultural land of high value to regional and state agricultural industries should be a last option; and
- the impact of non agricultural developments on agricultural business and infrastructure reliant on the surrounding agriculture production.

If the hospital is built on the Cudgen Plateau at 771 Cudgen Road, Cudgen, 16 hectares (ha.) of this RU1 Primary Farmland will go. The NSW Government/Health Infrastructure argues that this is a mere 1.9% of the Cudgen Plateau State Significant Farmland.²

I would like to argue that the re-zoning of this 16 ha. from RU1, would have a “domino effect” and threaten the whole RU1 Zoning on the Cudgen Plateau. If the NSW Planning and Environment Department allow the re-zoning, placing the hospital here would put massive pressure on the surrounding State Significant Farmland to also be re-zoned. More of this land will be required in the future to facilitate hospital associated development such as medical precinct businesses, a future private hospital, and aged care facilities.

The Zoning threshold for keeping the Cudgen Plateau Zoned State Significant is 500 ha. According to the **Appendix F – Agriculture Impact report** by Agronomist Tony Hartley, there is only 580.3 ha. of State Significant Farmland remaining on the Cudgen Plateau. Therefore, if 16 ha. is re-zoned to SP2 then there will be 564.3 ha. remaining.

² Tony Hartley, ‘Report – Agricultural Impact – Tweed Valley Hospital’, from EIS for Tweed Valley Hospital – Appendix F, 16th October 2018, p.5.
<https://majorprojects.accelo.com/public/fc5fe0c2a1f9427c62ccf6a5cb93a729/Appendix%20F%20Agricultural%20Impact%20Assessment.pdf>

I will illustrate how the total zoning of the Cudgen Plateau is then going to be under threat of dropping under the 500 ha. requirement for State Significant Zoning when the hospital needs more farmland for associated development. Please refer to the below satellite photograph on the next page. I have labelled the farms around the proposed hospital site that are zoned RU1 and the size in hectares of each farm, that are most at risk of being targeted for medical precinct land, and at threat of future re-zoning.

If you look at the satellite picture you will see that the threatened surrounding farmland that I have labelled adds up to a total of 74.97 hectares. So if this land is needed in the future for a medical precinct, and is re-zoned from RU1, this would threaten 500-hectare threshold to keep the State Significant Protection on these farmlands. If the zoning goes on these farms, the zoning goes on the whole Cudgen Plateau.



The Environmental Impact Statement (EIS) for the Tweed Valley Hospital State Significant Development (SSD), states that the Tweed Valley Hospital will be originally 430 beds with over 1050 staff with an expansion in the future up to 860 beds (as stated in the EIS, an expansion allowance of up to 100% for

future). I would like the NSW Department of Planning and Health Infrastructure (HI) to answer the following questions for me, and consider these points carefully:

- I would like the NSW Department of Planning and Environment and HI to consider realistically what will be the long term pressure or threat to the surrounding RU1 State Significant farms if a hospital of this size was to be placed in this location?
- I would like the NSW Department of Planning and Environment to do a study on what medical precinct facilities and businesses will need to relocate to the surrounding region of the hospital. Medical precinct facilities such as specialist doctor's offices, radiography, physiotherapy, aged care health services and other such businesses that would need to move close to the hospital?
- I would like to know if in the future, as with most public hospitals, if a Private Hospital would be planned for the surrounding vicinity of the hospital?
- I would like to know if aged care and retirement housing will be needed to be built for the elderly who need to live near the hospital due to health reasons?
- I would like to know if Health Infrastructure has done a study into how much extra parking will be required for the hospital if there are eventually 860 beds, or rather the hospital is double the size in the future?
- I would like the Department of Planning and Environment and Health Infrastructure to calculate and consider how much extra land will be required to fulfil the needs of future hospital associated development?

In the EIS I have yet to find any studies that have been done on how much more farmland in the future will be required for such hospital related development. I would like to see some proper studies done on what the actual threat to the RU1 Zoning of this precious farmland would be. No professional studies have been conducted. No decision on the re-zoning should be made until all these questions are answered and considered.

I recently read the **In Touch Newsletter** that Health Infrastructure published in December, about "Rumours" about the chosen Tweed Valley Hospital site. One of the "Rumours" they state as follows:

"The hospital is a backdoor for the NSW Government to do away with the State Significant Farming Status of Cudgen to make way for further development in the area".

Response to this "Rumour" by Health Infrastructure:

"The Tweed Valley Hospital campus will have special purpose zoning and as a result, the development is not connected to the town planning controls imposed on other areas. Any other developments in the local area would be required to go through the standard development application processes that are assessed and determined by local government on an individual basis.

*The Master plan has considered a number of long-term growth scenarios, including up to the doubling the size of the initial build and the ability to renew/rebuild the initial buildings. The size of the site allows for future planning initiatives for both the hospital and supplementary health related services to be contained on the hospital campus without the need for additional land."*³

³ In Touch Newsletter, Tweed Valley Hospital Development. Special Edition, December 2018, Health Infrastructure, NSW Government.

Firstly, it is not a “Rumour” that the State Significant Farmland surrounding the hospital site will be under pressure for future hospital medical precinct development. It is a “Genuine Concern” that our community has. Secondly, as I have already mentioned no independent detailed study has been commissioned by Health Infrastructure on how many medical precinct businesses will need to relocate to the vicinity of the hospital. No study has been done on aged care, private hospital facilities and so forth that will need to be built in the vicinity of the hospital. There is not enough room for these medical precinct businesses on the hospital site, and there is no evidence of areas being allocated on the Masterplan drawings to illustrate where these businesses would go on the property. I therefore argue that the surrounding State Significant Farmlands are under threat of being needed for future medical precinct development. I would also argue that if Health Infrastructure believe that the Local Government will be the decision makers on approval of any other State Significant Farmland being re-zoned for these medical precinct developments, then isn’t it a big risk that the NSW Government are taking, placing the hospital here when the Local Government may not approve re-zoning of State Significant Farmland for medical businesses who want to relocate to be close to the hospital site? The EIS, does not address this concern.

The **Appendix F – Agriculture Impact Study of the EIS for Tweed Valley Hospital**, has addressed various issues as laid out in the SEARS for the Tweed Valley Hospital Development.

- I would like to query why Appendix F of the EIS report did not consider how the Cudgen Plateau will become fragmented once more land is required for hospital associated development such as a Medical Precinct?
- I would like to query why of Appendix F of the EIS, did not consider the disruption to the farms and farming businesses across the road from the proposed hospital site which will be affected by the construction and extra traffic problems that will occur whilst this hospital is being built? This could impact these farmers in several ways, and this will affect their productivity levels. Tractors who have to go into the traffic from time to time will be held up by the extra stress the construction of the hospital will cause on Cudgen Road, making their daily farming activities more difficult. The pollution and extra red dirt that will be in the air during construction, could cover their crops, causing potential damage to the crops, and the quality of the crops. The farmer’s crops could become contaminated by construction dust and other toxic substances that float through the air.
- I would like to know why Appendix F of the EIS, did not consider the productivity impacts that the farm and the farm produce store across the road from the hospital site will experience by constant disruption by heavy construction vehicles, red dirt being scattered over their customer’s cars, and their store? Their customers will find it harder to go in and out of their carpark, as the road will become extremely busy with the proposed extra traffic that will be entering and leaving the hospital during construction and once it is built.

The above points are some of the impacts to the agriculture businesses surrounding the hospital site, that have not been investigated, and are an economic cost to the farming businesses.

I would now like to refer to the RU1 Zoning in the **Tweed LEP 2014** policy document which states the following:

Zone RU1 Primary Production

1 Objectives of zone

- To encourage sustainable primary industry production by maintaining and enhancing the natural resource base.
- To encourage diversity in primary industry enterprises and systems appropriate for the area.
- To minimise the fragmentation and alienation of resource lands.
- To minimise conflict between land uses within this zone and land uses within adjoining zones.
- To protect prime agricultural land from the economic pressure of competing land uses.

2 Permitted without consent

Environmental protection works; Extensive agriculture; Home occupations; Intensive plant agriculture

3 Permitted with consent

Agricultural produce industries; Animal boarding or training establishments; Aquaculture; Bed and breakfast accommodation; Boat launching ramps; Boat sheds; Cellar door premises; Dual occupancies (attached); Dwelling houses; Environmental facilities; Extractive industries; Farm buildings; Farm stay accommodation; Flood mitigation works; Forestry; Group homes; Helipads; Home-based child care; Home businesses; Home industries; Industrial retail outlets; Intensive livestock agriculture; Jetties; Open cut mining; Plant nurseries; Roads; Roadside stalls; Rural workers' dwellings; Turf farming; Water recreation structures; Water storage facilities

4 Prohibited

Any development not specified in item 2 or 3

To bring to your attention the objectives of the RU1 Primary Production zone.

- In the case of the Cudgen Plateau it has been allocated this RU1 State Significant zoning because it has been identified as a sustainable agricultural industry, that relies on the rare natural resource of the volcanic rich soils of the Cudgen Plateau. This natural resource is rare and unique to the North Coast Region. These farmlands being coastal have a higher yearly rainfall than other drought prone farming areas. These farmlands have been given protection because they have been identified as precious and important to the sustainability and the future of Australia's food bowl.
- One of the objectives of this RU1 zoning is to prevent fragmentation and alienation of resource lands. If the hospital is put on the Cudgen site, it will threaten and fragment the whole RU1 zone in this region. If more land is acquired for future hospital associated development, as the Tweed population grows, then the State Significant zoning will fall to a low hectare level, making it too small an area to sustain its agriculture industry, and allowing developers to purchase the farmlands in the future. I cannot stress how important it is that we protect these majestic farmlands for future food security and jobs for agriculture workers in the future.
- The final objective of the RU1 Zoning in the **Tweed LEP** is to protect the farmland from economic competing pressures of other land uses. As I have already detailed earlier in my submission there is a real threat to the whole State Significant Zoning, as more of the land will be under pressure to be acquired for a medical precinct, private hospital and other hospital

associated development in the future. Every time we lose a farm in the RU1 zone, it chips away at the economic viability for the agriculture industry in the region. The smaller the State Significant Zone gets, the less economically viable it may be for other industries associated. For example, the transport/distribution companies will reduce the number of loads of produce that they consider economically viable to pick up from farms in the area. Other associated economic problems occur, if there are less farms, there is less employment opportunities. It is all about economies of scale

The hospital site is very close to other farmlands. As noted in the **Appendix J of the EIS – Land Use Conflict Risk Assessment**.⁴ There are some issues here. **The Living and Working in Rural Areas Handbook** has been used to assess the conflict risks associated with the building of a hospital on the Cudgen site. There are recommended buffer distances to residential areas from farming activities. There is a buffer of 300 metres from State Significant Farmland to residential areas.:

- In the vicinity of the hospital, the distance between the closest proposed hospital building and vegetable cropping to south is only 100 metres.
- The distance between the closest proposed hospital building and the disused plant nursery next door is 60 metres.
- The distance between the closest proposed hospital building and the sweet potato farm to the south west is approximately 280 metres
(See page v of the Appendix J of EIS)

A comment written by Tim Fitzroy who has written **Appendix J of the EIS - Land Use Conflict Risk Assessment Mixed Agricultural Use and Proposed Tweed Valley Hospital, Cudgen** is as follows:

“It is important to note that the **Living and Working in Rural Areas Handbook** does not include reference to separation distances between agriculture and commercial activity such as those proposed on the Project Site. While a default buffer area of 300m width is recommended between State and Regionally Significant Farmland and residential development the DPI does not stipulate a setback from commercial/industrial developments to State and Regionally Significant Farmland.”

I would like to argue that just because the handbook does not “include reference” to the separation distances between agriculture and commercial activity such as those on the proposed Hospital site, that does not mean that these buffers should not apply.

⁴ Tim Fitzroy, ‘Land Use Conflict Risk Assessment – Mixed Agricultural Use on Proposed Tweed Valley Hospital’, from EIS for Tweed Valley Hospital Development, Appendix J, 2018.
<https://majorprojects.accelo.com/public/23b09627725bfb89da3e6b302cf5fdb6/Appendix%20J%20Land%20Use%20Conflict%20Risk%20Assessment.pdf>

It means that they have not considered what to do in the case of a commercial development, at the time of writing the handbook. I would like to point out that it is equally important that these buffer zones are applied to a public commercial building such as a hospital. It is very important that people with vulnerable health should not be subjected to chemical residue from agriculture sprays, chemical odour, and fine red dirt dust from tractor ploughing. I therefore argue that these same buffer zones should apply to the hospital development. This buffer zone issue does therefore threaten the RU1 objective of minimising the impact of conflict of land uses within the zones.

A land use conflict risk that was not considered in the **Appendix J** of the EIS for Tweed Valley Hospital is the **red soil dust** that is frequently spread into the air while tractors on the surrounding farms are ploughing. The red dust from the Cudgen Soil is quite dense and spreads far and wide when ploughing in windy conditions. This could be an issue for people who have vulnerable health such as respiratory problems or low immune systems. As the hospital is a facility where some ill people are quite vulnerable to bad air quality. The red dust at times could be an irritant to some groups of people like asthmatics or cancer patients etc. Also this red dirt will have some chemical and bacterial residue from farming activities. It would be negligent of the NSW Government not to investigate what risks there may be on Hospital patient's health, being too close to agriculture activities, and not within the safe buffer zones. The NSW Government should do an impact study to make sure that the daily agriculture activities will not have to be changed or stopped due to complaints from hospital patients and staff.

A 30 metre Vegetative buffer that Tim Fitzroy recommends is placed on borders of the hospital site where agriculture sprays etc. could blow over to the hospital site, as the hospital is not outside 300 metres of agriculture farmlands. This vegetative buffer is able to fail as a method of protection if not maintained to a high standard, and takes quite some time to establish. The vegetative buffer also is a fire hazard, as it would not be in the buffer zone required for bush fire prevention being too close to the hospital building. Health Infrastructure needs to do further study into the problems that could arise from a Vegetative Buffer being used as a protection method against agriculture practices. A hospital being so close to farmlands needs to consider the Land Use Conflicts that arise from the building being inside the 300 metre buffer zone, and the ramifications that could arise from both the perspective of patient's health, and also considerations to the agriculture practices of the surrounding farmers not being restricted due to the hospital being located too close to the State Significant Farmlands.

This leads me to bring to your attention the NSW Department of Primary Industries (DPI), **NSW Right to Farm Policy**.⁵ The Department of Planning and Environment should refer to this policy when considering the ramifications that may flow from the re-zoning of the site at 771 Cudgen Road, and the Land Use Conflicts that it may cause between a Hospital SSD, and the surrounding agriculture businesses. As mentioned above, the hospital will be not be in the

⁵ NSW Department of Primary Industries, 'NSW Right to Farm Policy Summary Document', https://www.dpi.nsw.gov.au/__data/assets/pdf_file/0007/587185/NSW-Right-to-farm-policy-summary_final.pdf

recommended buffer zone distance of 300 metres from the surrounding farms. This will inevitably cause land conflict issues with the farmers 'Right to Farm'. As stated in the NSW Government's **NSW Right to Farm Policy Summary document**, I quote the following:

"The NSW Government recognises the value of agriculture for growing food and fibre for domestic and international markets and is concerned about the potential loss or impaired use of agricultural land." "The NSW Government will plan for land use near agriculture that minimises conflicts"

I would also like to refer to the **North Coast Regional Plan 2036**, published in 2017 by the NSW Planning and Environment Department.⁶ I refer to **Direction 11: Protect and Enhance Productive Agricultural Lands**. I will quote from the document on page 38:

"The North Coast's rich soils, reliable rainfall and range of landscapes support a diverse and important agricultural sector. The most important farmland has been mapped to support long-term agricultural production."

I would like to highlight that the above are the words of the NSW Government. I would like to point out that you should do as you preach and protect the Cudgen Plateau State Significant Farmlands. I would also like to refer to "Appendix B" of the **North Coast Regional Plan 2036** the following points from the "Important Farmland Interim Variation Criteria". It states that Important Farmland may be suitable for uses other than farmland if:

- *"The land is isolated from other important farmland and is not capable of supporting sustainable agricultural production."* My comment here is that the proposed hospital site on Cudgen Plateau is not isolated farmland. It is part of a thriving and active Agriculture industry.
- *"The land use does not increase the likelihood of conflict and does not impact on current or future agricultural activities in the locality."* My comment is that the use of this land for a hospital will threaten surrounding State Significant Farmlands by more land being needed in the future for a medical precinct. It will also cause a land use conflict, as the buffer zone is 300 metres, there is active farming surrounding the Hospital site, the development would threaten the farmers 'Right to Farm'. Hence conflicting and impacting the future of the agriculture industry on the Cudgen Plateau.

I would also like to suggest that the NSW Department of Planning and Environment when considering re-zoning, read and consider the document published in 2005 – **Northern Rivers Farmland Protection Project: Final Recommendations**.⁷ This report documents the study that was done from 2002 to 2005

⁶ NSW Department of Planning and Environment, 'North Coast Regional Plan, 2036', March 2017. <https://www.planning.nsw.gov.au/~media/Files/DPE/Plans-and-policies/north-coast-2036-regional-plan-2017.ashx>

⁷ NSW Department of Primary Industry, 'Northern Rivers Farmland Protection Project: Final Recommendation', February 2005. <https://www.planning.nsw.gov.au/~media/Files/DPE/Other/northern-rivers-farmland-protection-project-final-recommendations-2005-02.ashx?la=en>

to put State Significant Zoning on the Cudgen Plateau and other Farmlands in the Northern Rivers. This document is a very comprehensive study, that was undertaken when the zoning for agriculture land in the Tweed region was being decided. The report on page 26 in relation to State Significant Farmland and urban and rural residential development states:

“State significant farmland cannot be considered for urban (including housing, retailing and other uses normally located within towns) or rural residential rezoning. ”

The report also says on page 29, point 9 the following:

*“Public infrastructure is permitted on land mapped as state or regionally significant where **no feasible** alternative is available. Councils or state agencies proposing public infrastructure on such land should select alternative sites where possible”*

In section 5.2.4 of the EIS⁸ for the Tweed Valley Hospital, and in the **Tweed Valley Hospital Site Selection Report - Summary**,⁹ the NSW Government give their reasons for the other shortlisted sites at Kings Forest, Chinderah and the Upgrade of current Tweed Valley Hospital as not being preferred sites, but they are feasible. I would like to challenge the reasons that the NSW Government have given for the other alternatives as not being appropriate, as our community still sees these alternative sites as feasible, and therefore should be considered instead of threatening our State Significant Farmland - for the following reasons:

CHINDERAH SITE

As you will see from the TWEED VALLEY HOSPITAL DEVELOPMENT SITE SELECTION REPORT there are many advantages of the site being placed at the Chinderah Site location, and it is a very feasible alternative to the proposed site.

- It is right next to the M1 Motorway, so everyone in the Tweed-Byron region can easily access the site from the motorway.
- Public transport - the site is well situated to take advantage of existing bus routes and services.
- Minimal flood proofing of the M1 and exit to this site would be required, compared to problems faced by the Tweed Coast Road in a flood to the proposed Cudgen Site. This is an advantage compared to proposed site in Cudgen which would require massive funding to upgrade the road for the increased traffic going to/from the hospital and to flood proof the road from the various flood events that occur on Tweed Coast Road, cutting access to the Kingscliff region. There is no funding provided from the NSW Government to upgrade the Tweed Coast Road to the hospital site. The government is relying on the council to provide the funding for the upgrade. These funds are currently not available in the Tweed Council's budget, they have indicated that the funding to upgrade Tweed Coast Road will only be available by contributions to funding the upgrade by the developers LEDA and GALES HOLDINGS when their housing developments are approved, this could be up to ten years after the hospital is scheduled to be completed.

⁸ Geolink, 'Environmental Impact Statement – New Tweed Valley Hospital (Concept Proposal & Stage 1 Works)', p.72. <https://majorprojects.accelo.com/public/a8dc0620a640c2713d3f0a914ced7708/2682-1118%20Tweed%20Valley%20Hospital%20EIS%20V6%20Final.pdf>

⁹ NSW Government, 'Tweed Valley Hospital Site Selection Summary', July 2019. http://www.tweedvalleyhospital.health.nsw.gov.au/www_tweed/media/tweedvaley/180716-site-selection-summary-report_july-2018_issued.pdf

- Flooding, is an issue for all the sites, including the proposed hospital site on the Cudgen Plateau. The Chinderah site would need to be engineered so it is above the maximum flood levels. This is not an uncommon practice in construction. I feel that by building the site on the Chinderah location, and building it up above the maximum flood level it is a feasible solution to the massive flooding problems the Kingscliff region experiences. As, the Chinderah site is close to the M1, if the small section of the M1 that floods is improved, then access to the hospital during a flood would be highly accessible to the Northern and Southern communities of our region. As they would not need to go down Tweed Coast Road or Wommin Bay road, which are the two main access roads into the town of Kingscliff that get completely cut off in a flood. The proposed Cudgen site is not accessible to the Northern Community during a flood, the Chinderah alternative site if selected could be a more feasible option, as it can be built above the flood levels, and the small part of the M1 that floods in major flood events could be built up for less cost than flood proofing the Tweed Coast Road, the main access road to the proposed Cudgen Site. The **Tweed Valley Hospital Site Selection Report** and the **Appendix W – Flood Assessment, from the Tweed Valley Hospital EIS**, suggests that the Northern Tweed Community in a flood events goes north to the Robina hospital in 30 minutes. This is incorrect, it has proven in a flood, that the M1 gets gridlocked with traffic. There has been no modelling done by the NSW Government, on the route from Tweed to Robina Hospital in a flood event, so there is no certainty that it is a feasible option for the community of Tweed to go North to the Robina Hospital. In fact, it is well known that in a Gold Coast Flood event, that often the access road from the M1 to Robina Hospital is cut off because there is a golf course next to the hospital that has creeks and lakes that overflow during a major storm, flood the road and prevent traffic from passing. In a flood event in the Tweed and Gold Coast regions, there are delays on the M1 freeway due to the flood situation, so there is no guarantee that the Tweed community in a flood will be able to access the Robina hospital in 30 minutes. The NSW Government need to pay for proper flood modelling to be done on the route from Tweed to Robina if they are going to require the community north of Kingscliff to go to Robina in a flood if the proposed Cudgen site is where the hospital goes. It is negligent of the NSW Government not to do proper flood modelling of the Tweed – Robina Hospital route, before making a decision on selection of the proposed Cudgen site, major delays of people getting to a hospital could result in death or negative patient outcomes.
- The Chinderah site is zoned for housing and other development for 1500 residential properties, and a business and knowledge precinct. It is not zoned State Significant Farmland therefore is a very feasible location for the hospital.
- The Chinderah site is unlikely to have much objection from the community. It is away from the main township of Kingscliff, so will cause minimal disruption to the seaside atmosphere of the town that tourists and residents love., it will also not threaten further State Significant Farmland, in regard to the requirement for more land for a medical precinct and other hospital services.
- There is no immediate development in the Chinderah location, so would be favourable to make good planning decisions for the whole hospital and health precinct, it is a clean pallet.
- Building construction will have minimal disruption to the flow of the traffic and township of Kingscliff if put in this location.
- EVERYONE WOULD BE HAPPY - Farmers, the wider Tweed-Byron Community, tourists and Kingscliff Community.

The main reason I can see that the NSW Health Infrastructure have not chosen the Chinderah site, is because of the potential extra capital cost. The land will have to be built up to be above a 1 in 20-year flood level, which is engineering wise not a problem. This is a small price to pay to keep a profitable \$10 million farming industry and thriving tourist industry alive that provides jobs and food for the Australian Community. Also to keep the disruption and impacts of such a massive development to a minimal level on the township of Kingscliff. I believe the Chinderah site is a very feasible option, and the government needs to consider this site in order to protect the State Significant Farmland zoning on the Cudgen Plateau.

THE KINGS FOREST SITE

As you will see from the **Tweed Valley Hospital Site Selection Report**, there are many feasible reasons why the Tweed Valley Hospital could be built at Kings Forest:

- It is within a few minutes drive from M1 Motorway, so everyone in the Tweed-Byron region can easily access the site from the motorway. The problems associated with flooding can be addressed as if the Kings Forest development is to go ahead, this would trigger funding to be contributed to the upgrade and flood proofing of the Tweed Coast Road. Tweed Shire Council are relying on the developers LEDA to provide funding for this road in order for development to go ahead.
- The Kingscliff Forest is largely zoned for housing and other development with 4500 proposed residences, town centre and other amenities. This site would allow room for not only the hospital but also there would be room to accommodate other hospital services, plenty of room for a medical precinct. This is therefore a very feasible option.
- It is away from the main township of Kingscliff, so will cause minimal disruption to the seaside atmosphere of the town that tourists and residents love.
- Building construction will not disturb the flow of the traffic and township of Kingscliff if put in this location.

The main reasons that I can see that the NSW Health Department have not chosen this site, is because it considers that the opportunity for use of current education facilities are more limited, however, it is within minutes drive of the TAFE, so not really an issue. The report has said that the “healing view” is not as good as the Cudgen site, but the natural views are still very beautiful in this location. The Koala plan needs to be approved, which I understand is being worked on and refined with associated Koala committees. The Kings Forest site is a feasible alternative and should be considered by the NSW Government to preserve the State Significant Farmland.

Current Tweed Hospital Re-Development

As you will see from the **Tweed Valley Hospital Site Selection Report** there are many feasible reasons why the Current Tweed Hospital could be upgraded.

A feasibility study has already been done by the NSW Government for the upgrade of the current Tweed Hospital. The NSW Government is currently spending \$48 million upgrading a section of the Tweed Hospital to keep up with the demands of the hospital. It would therefore be feasible for the hospital upgrade to continue as per the government's plans that were already done:

- The cost to the Tweed economy would be less if the government continues to upgrade the current hospital, as there is already a network of associated health services and private hospitals in the vicinity of the current hospital.
- The medical professionals who have bought property in the vicinity of the hospital for convenience of shift work, would not be disadvantaged by the move of the hospital.
- The elderly and other residents who have bought property in the vicinity of the hospital for convenience due to their health needs would not be disadvantaged by the move of the hospital.
- The majority of the Tweed /Byron population lives in the city of Tweed, and in close proximity to the hospital.
- The new Tweed Police Station is very close to the current hospital, which is important due to risk of violent patients that are now common place at hospital locations.
- In the event of a flood, the majority of the Tweed population and staff will still be able to reach the hospital in an emergency, this is not the case with the proposed Cudgen Site.

The upgrade or rather re-development of the current Tweed Hospital is also therefore a feasible alternative to the proposed Cudgen Site. I therefore would like to emphasise how State Significant Farmland zoning should **only be allowed if there is no other feasible option**. All three options – Chinderah, Kings Forest, and Upgrade of current Tweed Hospital are all feasible alternatives. Like the Cudgen site, not all sites are perfect, but nor is the proposed Cudgen site.

I request that the NSW Department of Planning and Environment do not allow re-zoning of the RU1 State Significant Farmland based on all the arguments that I have listed in this submission. I would like the NSW Department of Planning and Environment to consider the ramifications that placing the hospital will have on the surrounding State Significant Farmland, and the threats to the entire zoning on the whole Cudgen Plateau. I would like the NSW Government/Health Infrastructure and NSW Department of Planning and Environment to reassess the feasibility of the alternative sites in order to provide protection to the State Significant Farmlands of the Cudgen Plateau for generations to come.

Building Height Limits - R1 – Residential Rezoning

I object to the size and magnitude of the proposed nine story building on the property at 771 Cudgen Road, Cudgen, NSW 2487, is out of keeping with the Coastal/Rural Town of Kingscliff. The Kingscliff tourism economy benefits from a unique beautiful scenic experience. People flock to our town on weekends and for holidays to soak up the beautiful and dramatic landscape of the Cudgen Volcanic Red Soils, the views of Mt Warning and to experience our beach culture and vibrant café strip. Our tourism industry will be under threat, as people will no longer come here for a holiday to relax if our town becomes a hospital city.

Currently our town enjoys views of Mt Warning in the distance as we leave the town. The proposed nine story hospital building will block this vista of Mt Warning from many vantage points from the Kingscliff Hill. The proposed hospital site is already an elevated block of land on a hill. If a nine story building is placed on top of this hill, it will totally dominate the landscape of the town, and will be seen from kilometres away.

We already have height limits in Kingscliff, as this is what the community of Kingscliff has voted for. We do not want to become a city, Tweed Heads is our city, it is zoned for high rise, and development such as hospitals. Our town has a different focus. The Kingscliff/Cudgen economy is based on beach tourism, eco-tourism and a thriving agriculture industry. People come to live here for a beach lifestyle, not a city lifestyle. The community of Tweed expects to have our hospital close to the majority of its population in the City of Tweed. The scale of development on the proposed site is totally inappropriate, and not in keeping of the philosophy of the town of Kingscliff.

Unacceptable Community Consultation of Site Selection on State Significant Farmland.

I object to the RU1 State Significant Farmland being re-zoned at 771 Cudgen Road, due to a flawed Community Consultation process that was granted to the community of the Tweed/Byron region after the community was shocked by the announcement by Brad Hazzard and Geoff Provest on the site, in April 2018. A large portion of our community do not support the hospital being put on this State Significant Farmland. Yes, we are all very grateful to be getting funding for a hospital, but it is important that the NSW Government listen to the many concerns that we have about the position of the proposed site on State Significant Farmland. We value our farming lands, and the NSW Government should respect this, and also value them. Our community have collected over 8000 petition signatures, have written a large number of letters to various ministers in the government, requesting that the NSW Government relocate the site to a more suitable location, or go through with the NSW Governments previous plan to re-develop the current Tweed hospital.

I would like to bring to your attention the Community Consultation that took place for six weeks to ask the community to nominate alternative sites for the hospital. This consultation was not conducted extensively or appropriately. I am requesting that the NSW Government/Health Infrastructure have the consultation process done again before the NSW Department of Planning Minister makes a decision on re-zoning the RU1 State Significant Farmland. My justifications for this request are documented below:

I am an Information Scientist with a degree in Bachelor of Applied Science (Information) from the University of Technology, Sydney. I have also been employed in the past in market research roles. I would like to refer to **Appendix H, Volume 2 of the Tweed Valley Hospital Project and Stakeholder and Community Consultation Report** by Elton Consulting.¹⁰

I am extremely concerned as an Information Professional about how the Community Consultation was conducted. I am questioning how Elton Consulting could possibly obtain the quantitative data that they presented in the two pie charts in **The Tweed Valley Hospital Site Selection Report** when their consultation program was conducted using qualitative research methods?

Qualitative research is a method of information gathering based on observation to collect non-numerical data. Quantitative research is a data collection method used that results in numerical values i.e.

¹⁰ Elton Consulting, 'Appendix H, Volume 2 of the Tweed Valley Hospital Project and Stakeholder and Community Consultation Report', Tweed Valley Hospital EIS, 18th October 2018.
<https://majorprojects.accelo.com/public/8500a879574f6a2d4b1b9a027d7924da/Appendix%20H%20Consultation%20Report%20Part%202.pdf>

Surveys, interviews and questionnaires that collect information or count data by using **closed-ended questions**.

I would like to question the pie charts utilised to demonstrate community opinion from the **POP-UP** consultation sessions and the **Written consultation** results about the proposed Tweed Valley Hospital Site at Cudgen.

It appears from feedback we have had from some people in our community, who attended the POP-UPS that the consultations were casual and non-structured. People in our community who attended the POP-UPS said that none of the consultants wrote down their feedback in front of them.

There is no evidence in the report (Appendix H, Volume 2) of what questions people at POP-UPS were asked, and it appears there was no structured questionnaire utilised to ask the community closed ended questions such as:

“Are you either:

- a) Opposed to the selection of the proposed site?
- b) Support the proposed site?
- c) Neutral over the selection of the proposed site?”

If Elton Consulting had asked and physically recorded answers to such a closed-ended question, then they would be able to tally up how many people responded to each option, hence then they could have recorded a numerical value, and then reported it on a pie chart. There is no evidence to show that Elton Consulting used quantitative research methods such as this, to collect data to support the figures they have presented in the POP-UP and Written Response Pie Charts that were published in the **Tweed Valley Hospital Site Selection Report**.

I would now like to refer to the Written Pro-Forma forms that were presented to our community to fill-in online or in person. We were asked to submit either Part A/Part B or both. It is my professional opinion that the layout of these forms were not user friendly. Many people in the community found this form extremely daunting, hard to understand the instructions, and difficult to fill in. My concern is that this written feedback form was not designed to encourage people in the general community to fill it out.

As an Information Professional, it is usually our aim to design questionnaires, surveys and forms in an easy to use format, so that the general public can easily complete. A simpler and better structured feedback form would have been a far more appropriate method to get the community to give numerically measurable feedback on the proposed site and alternative sites to build a hospital. The form should have been designed to gather both quantitative and qualitative data to get the best overall insight into what the community concerns or favourable reactions to the proposed site at Cudgen or alternative sites were.

These forms did not have any questions that would lead to quantitative data collection. The information collection method used was qualitative, asking people to express their own views on the chosen hospital site, and also to present alternative site options.

So once again, where did Elton Consulting get their figures that they displayed on the two Pie Charts? It is not professional practice in the Information Industry to interpret qualitative information and convert it into quantitative data. Qualitative information is about collating people’s views and opinions, and can be interpreted in varied ways by the information worker. The only way you can report numerically and

accurately how people feel about an issue is if you ask them directly, through closed-ended questions, and give them options that would best describe their opinion.

Below are the two questionable pie charts for your reference:

Figure 2 Support for the Proposed Site – Pop-Ups

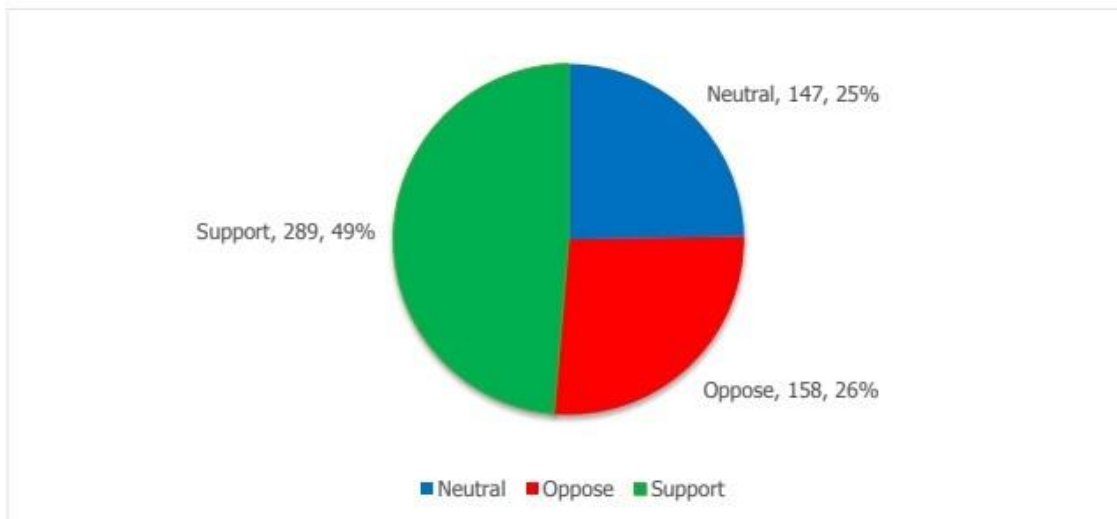
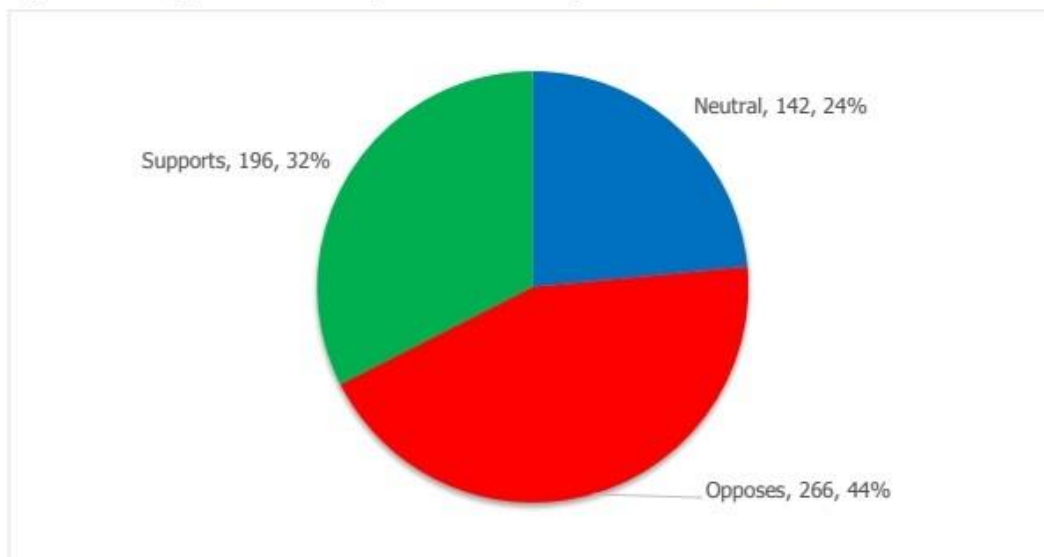


Figure 5 Support for the Proposed Site – Unique Written Submissions



My next concern regarding the Community Consultation is in relation to Health Infrastructure, Geoff Provest, Minister Brad Hazzard and Elton Consulting. They claim that the Community Consultation process was “**extensive**” and reached a large diverse sample of people over a wide demographic area. I would like to dispute this claim for the following reasons. From the data provided in **Table 1. Pop-Ups and Proposed Site Support** Elton Consulting list 19 locations that they randomly picked to Pop-Up at. See table below:

Table 1 Pop-Ups and Proposed Site Support

Pop-Up Date	Location	Time	Number of People Actively Engaged	Support for the Proposed Site		
				Neutral	Opposes	Supports
Saturday 19 May 2018	Murwillumbah Finders and Makers Market	8am – 2:30pm	54	13	13	28
Wednesday 23 May 2018	Murwillumbah Farmers Market	7am – 11am	27	6	10	11
Friday 25 May 2018	Tweed Mall	10am – 2:30pm	48	11	16	21
Saturday 26 May 2018	Kingscliff Markets	7:30am – 1pm	29	4	11	14
Sunday 27 May 2018	Murwillumbah Showground Markets	7am – 11:30am	34	8	6	20
Wednesday 30 May 2018	Kingscliff Shopping Village	10:30am – 2:30pm	42	9	10	23
Thursday 31 May 2018	Tweed City Shopping Centre	10:30am – 2:30pm	52	9	12	31
Friday 1 June 2018	Tweed Hospital Reception	11am – 1pm	14	5	1	8
Friday 1 June 2018	Kingscliff Lantern Markets	4pm – 7pm	27	9	10	8
Saturday 2 June 2018	Uki Farmers Market	7:30am – 11:30am	16	8	2	6
Sunday 3 June 2018	Pottsville Beach Neighbourhood Centre Markets	7:30am – 11am	56	17	11	28
Monday 4 June 2018	The Tweed Hospital Staff Forum ¹	1:30pm – 2pm	18	0	0	0
Tuesday 5 June 2018	Kingscliff Shopping Village	10am-2pm	39	6	9	24
Thursday 7 June 2018	Tweed Mall	9am – 12:00pm	42	7	19	16
Monday 11 June 2018	The Tweed Hospital reception	1pm – 3pm	8	1	6	1
Friday 8 June 2018	Tweed City Shopping Centre	10am – 2pm	52	9	12	31
Friday 8 June 2018	Byron Bay Hospital Reception	11am – 1pm	5	4	0	1
Saturday 9 June 2018	Banora Point Shopping Village	9am – 11:30am	14	7	3	4
Sunday 10 June 2018	Chillingham Markets	7am – 11:30am	32	13	7	12
Tuesday 12 June 2018	Murwillumbah District Hospital Reception	12pm – 2pm	3	1	0	2
Tuesday 12 June 2018	Murwillumbah District Hospital Staff Forum	2:30pm – 3:30pm	13	0	0	0
TOTAL			625	147	158	289

As you will see in Table 1. there are 19 Community POP-UP locations, and 2 Staff Forum POP-UPs.

Elton Consulting indicate in their report that the POP-UP locations were placed to reach members of the whole Tweed/Byron Community.

I would like to dispute the claim that the POP-UP forums reached a wide sample of the Tweed/Byron community. If you look at the locations chosen to POP-UP, they are not extensively spread out throughout our community. In fact, there was a lack of consultation in some of the major main population areas of our region.

Areas that were NOT Consulted, which should have been in order to give an extensive representation are:

- **Cabarita Shopping Centre** (Woolworths) – there were no POP-UP stations placed here, where a wide and diverse cross section of the town of Cabarita visit.
- **Casuarina Shopping Centre** (Coles) – there were no POP-UP stations placed here, where a wide and diverse cross section of the town of Casuarina visit.
- **Salt Village** (Café area/IGA) – there were no POP-UP stations placed here, where a wide and diverse cross section of the suburb of Salt Village visit.
- **Brunswick Heads** (Shopping area) – there were no POP-UP Stations placed here.
- **Byron Bay Shopping Centre** (Woolworths) - there were no POP-UP Stations placed here.
- **Mullumbimby** (Shopping area) - there were no POP-UP Stations placed here
- **Ocean Shores** (Shopping area) - there were no POP-UP Stations placed here.
- **Terranora Shopping Village** – there were no POP-UP Stations placed here.
- **Bilambil Heights** – there were no POP-UP Stations place here.

These are major centres in our region, where the population was not consulted about the Tweed Valley Hospital chosen site and site selection process. These are areas that should have been reached, according to the parameters stated in the Appendix H, Volume 2 report, of covering the Tweed/Byron region. **I therefore, feel our community has every right to dispute the claim that the study reached a wide and diverse section of our population.**

The other point I would like to make is that many of the chosen sites were Markets. It is fine to have some POP-UP stations at the markets, but 8 of the POP-UP locations were at markets. A narrow sample group of people attend markets; they are a demographic that does not represent the wider community as a whole. For instance, people who do not like market stall shopping would not be attending, people who are tourists to the area and not residents would be quite a large section of the market community. Yes, having POP-UPs at perhaps a few market locations would be fine, but 8 is excessive. Some of those POP-UPs would have seen a more varied sample range of people if been located at some of the sites/areas that I have listed above, where Elton Consulting did not set up POP-UP stations.

I am also concerned that the POP-UP stations did not make contact with many people at most of the locations. Some of the POP-UP stations had very low numbers of people actively engaged with the consultants.

If you refer to table 1, the sessions at many of the POP-UP stations were very short. On average 4 hours long. Most of the consultations were held during the week, and during work hours.

I would have liked to see a few more of these POP-UP sessions to have been held at peak times when people are visiting shopping centres in the evening on their way home from work. The people in this demographic were poorly represented in the sample.

I would have also liked to have seen data on how many of the people consulted were, male, female, young, elderly, middle age, working, students, retired etc. then we would have had a better idea if a good cross section of the community was consulted.

I would also like to question why there were such low numbers of people consulted at the POP-UP stations in the receptions of the hospitals? For instance, the pop up in the Tweed Hospital Reception was for a total of 2 hours, and recorded 14 people being consulted (7 per hour). Byron Bay Hospital Reception, POP-UP session was 2 hours and 5 people were recorded as being consulted (2.5 people per hour). Murwillumbah Hospital Reception also for 2 hours, and only 3 people were engaged to be consulted (1.5 people per hour). These numbers are very low, and not a good representation of our community as a whole.

I am concerned about the **content** and the **coverage** of the information given at the POP-UP consultations. The aim of the Community Consultations as stated by Elton Consulting was to:

- Engage with a broad spectrum of community ranging from those where they were vocal in opposition to those not aware of the project.
- Elton Consulting aimed on conducting consultation to hear feedback from all geographic areas in region, and all age ranges at varying times of the day. That they aimed to consult people in the main population centres within the Tweed-Byron Region.
- The aim of consultation was to provide the opportunity for community members to discuss the site selection process and provide comment on the proposed site and alternative site nominations.

My concern is that Elton Consulting did not achieve these goals. Feedback from members of our community about the POP-UP consultations say that the consultants were promoting the proposed site on the Cudgen Plateau. Feedback from people who attended the POP-UPs said that the consultants did not give them information about the alternative sites, and did not record the concerns or opinions that they expressed. Some comments from various members of our community that went to the POP-UPS are as follows (below comments taken from people from our community who attended the POP-UPs, and wrote about their experience on the "Relocate Tweed Valley Hospital Facebook Page").

- "Information was biased so only one side had their point of view addressed"
- "no one asked me to sign anything! No one took any notes!"
- "Not once at the Tweed City Pop Up stall did they ask questions regarding 'for' or 'against' NOR did they document ANY information that would contribute to this argument they believe existed during their 'consultations'. They also told us no definitive information about Tweed or Murwillumbah Hospitals closing. The man was VERY vague and avoided all factual questioning."

- "I attended a booth at the Murwillumbah Makers and Finders Market. The young man listened to what I said but did not take notes or fill out any documents in front of me. He said he would record my opinion afterwards."
- "at the Kingy markets pop up. No recording of any feedback, advised me site was a done deal & they were only consulting about the clinical services the community wanted at the hospital. Yes, took no documentation re my feedback at all."

From the comments in our community about the POP-UP sessions, I am extremely concerned, as already mentioned, how Elton Consulting came up with their "Opposed", "Support" and "Neutral" results, when it appears they did not have any structure to their consultations, that would allow them to record genuine quantitative data from the community members they saw.

Qualitative research methods, such as face to face consultations, are well known in the Information Industry to be at times not always accurate. This is due to the fact that the interviewer who questions at a face to face consultation can influence a person's answer by prompting an answer, giving additional information or show emotions via facial expressions and head nodding. So, the information gathered at these types of face to face consultations can be contaminated if not structured and controlled.

From the evidence that Elton Consulting presents in their report, there does not seem to be any formal structured format to their POP-UP consultations. This is fine if the aim was just to present information to the community, but not fine if they are then going to use these consultations as data collecting portals, especially if they are claiming to have acquired quantitative data, to place on their pie chart.

From feedback from people who attended some of these POP-UP sessions, they stated that they were mainly given information only about the Cudgen site, and that the people running the consultations did not have much knowledge about the other shortlisted sites, and were not presenting information to the community about the other sites. People who attended these POP-UPs commented that when they expressed their concerns about the Cudgen site, the consultants were not writing down their answers. One person asked them if they were going to record their feedback, and the consultant said they "would write it down later".

My concern is that the POP-UP consultations were designed to give the community a lot of information about the proposed site, and not much information about the alternative sites. This is illustrated in the information boards that were put up at the POP-UP session which highlight the benefits of the Cudgen site, but did not do the same for the shortlisted alternative sites. The instructions on how to nominate an alternative site were complex, confusing, and not easy for the wider community to understand.

A more structured survey, would have been a preferred method of data collection, mixing both qualitative and quantitative information collection to get a better overall sense on where the community would want the hospital built. Proper interviews should have been conducted, where answers were written down and recorded in front of the community member. Information on all of the shortlisted site options should have been presented to the community members, as well as the proposed site.

I would like to request that Health Infrastructure, and the NSW Government re-do the Community Consultations for both POP-UP and Written Consultations. I would like the Community Consultation conducted properly, so that the NSW Government can really find out what the community wants, where the community would prefer the hospital. I would like the consultation process to be planned properly, so that both quantitative and qualitative data is collected professionally, with proper structured questionnaires that are not open to bias, but conducted to receive an uncontaminated outcome.

I would like POP-UPs to be placed in locations where you will get a broad and varied sample of our community and their opinions. To cover a wide range of demographics from young to elderly people, of different ethnic groups etc. and an even spread of male and female sample groups.

I also insist that the consultants who conduct consultations, inform people they consult equal weighted information on all the shortlisted sites for the hospital and the pros and cons for each site, including redevelopment of the current Tweed Valley Hospital.

In addition to the POP-UPs, and Written Consultation, there were the Community Drop-in Sessions. 32 people were engaged in 9 booked sessions. The qualitative data collected from these sessions was indicative of a group of people who gave many valid concerns about the selected site at Cudgen. I am concerned that the NSW Government/Health Infrastructure did not take into account this community feedback, as they seemed to be preoccupied with looking at the pie charts that Elton Consulting produced that only took into account responses from POP-UPs and Written Responses. The same so called "quantitative" reporting (Pie Chart) was not applied to the results of these Community Drop-In Sessions most probably due to the fact that most of the responses seem to be of a "concerned" or rather an "Opposed" nature.

I am sure if Elton Consulting had put together the same type of questionable pie chart on the Community Drop-In Sessions the pie would have been very red in colour with a lot of "opposed" statistics. Of course I would never suggest that any Information Professional convert qualitative data into quantitative data as it is not a conventional way of reporting accurately.

This consultation process has evidently been done in a rush. Little thought and planning has been put into the structure of the consultation program. Our community was only granted this consultation as an afterthought, once a negative reaction was demonstrated by the community of Kingscliff/Cudgen when the shock announcement was made by Geoff Provest and Brad Hazzard on the 4th April 2018. Proper community consultation should have been done at the same time as the initial site selection process was taking place, for the community to voice concerns and opinions about any site that was being shortlisted before it was announced.

Our community has collected over 8000 petition signatures and presented them to the NSW Parliament. The volume of people who have signed this petition is a good indication that there are a large portion of the community who object to the hospital being placed on our State Significant Farmlands. The volume of people who have signed the petition indicates that the community would like the government to re-consider the other feasible short-listed sites, or the re-development option of the current Tweed Hospital.

I as an Information Scientist I have many concerns about the validity of the results from the community consultation that was conducted regarding the site selection. I challenge the accuracy of the reporting,

due to the research methods that were used to collect the data that was represented in the pie charts. I also challenge the claim that Health Infrastructure, Geoff Provest and Brad Hazzard made that the community consultation was “extensive”. I request that the NSW Government/Health Infrastructure, before proceeding with the bid to approve both the EIS and SEPP, re-do the community consultation, and that the consultation be conducted in a fair manner where they educate the community at the consultations equally about each of the shortlisted site options, that they ask them directly if they are opposed, support or are neutral about the proposed site, record what their opinions are, consult people in all areas of the community and at different times of the day and week. Use quantitative and qualitative methods of research and professionally record in front of the community members their answers and opinions to survey questions. Then accurately present and report the results of the consultation.

Conclusion

I object to the re-zoning of the RU1 land at 771 Cudgen Road, Cudgen, NSW. I would like the NSW Department of Planning and Environment, and the NSW Government/Health Infrastructure to select an alternative site, as the location for the Tweed Valley Hospital. The RU1 Primary Agriculture, State Significant Land should stay protected for our future generations. This State Significant Farmland should never have been allowed to be considered as a suitable site for the Tweed Valley Hospital. There are other large parcels of land in the near vicinity available and zoned for this type of development, the shortlisted sites were Kings Forest, and Gales Holding’s Chinderah Site. Both are very feasible alternatives. Or alternatively, find a way to re-develop the current Tweed Valley Hospital. The NSW Government should be able to **find a solution** so that we can protect our precious State Significant coastal farmlands, and have a wonderful new hospital. We can have both.

I appreciate you reading and considering my objections, arguments and solutions to the proposed Tweed SEPP.

Kind regards,

Karina Hall

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Agreed to false or misleading information statements: yes

Name: Roger GRAF

Organisation: Personal ()

Email: commercialtransactions.au@gmail.com

Address:

Unit 3

FINGAL HEAD, NSW

2487

Content:

Please find attached; EIS Submission, New Tweed Valley Hospital as at 13 Dec 18 & My proposal for the locality of the Tweed Heads Hospital given the infrastructure and the population density as at Dec 17

IP Address: cpe-1-158-37-233.nb14.nsw.asp.telstra.net - 1.158.37.233

Submission: Online Submission from Roger GRAF of Personal (object)

https://majorprojects.accelo.com/?action=view_activity&id=300850

Submission for Job: #9575 New Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_job&id=9575

Site: #4045 Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_site&id=4045

To Whom It May Concern:

EIS Submission, New Tweed Valley Hospital

For Information:

State Member for Tweed **Geoff Provest MP**

As being on the committee since the inception of the Tweed Valley Hospital [TVH] approx. mid-year 2018 I have listened intently as to why the location of the TVH is best sought for the locality and future trends in population density between the village of Cudgen and the township of Kingscliff N.S.W. upon a two-lane road called Cudgen Roadⁱ.

Last night's meeting displayed two features by the Consumer & Community Reference Panel on the topic of architectural planning and ability to ingress/egress the hospital site which I will outlay as follows:

- ✚ The N.S.W. State Government is funding large developmental infrastructure projects and especially in the largest populated city in Australia. One that stands out is the football stadium which as my wife and I will be burdened by a stadium specifically for fans in this region who will be required to pay to gain entry and other treats, seems a bit rich for the regional sector of the state. We also are experiencing a cost blow out for the Light Rail Project of approx. \$550 million, just under our projected TVH payment of \$582 million. Not only that but in the last decade or two, both state and federal governments are selling our once paid tax funded payments from the people of this nation, infrastructure like the Poles & Wires, Snowy Mountain Hydro Scheme and the most notorious sell-off is the N.S.W State Lottery which was continually making a profit?
- ✚ So, this brings me to the architectural design footprint as there could be a huge saving made if the hospital was 'rectangular', specifically being a hospital for patient's to ingress and egress once cared for with little time to enhance the design concept as which is being considered. I put this to the meeting, including an underground three level car park and some individuals suggested that some patients could be in the hospital for as long as three months and that you can't build infrastructure projects with underground vehicle parking due to terrorism threats. I retorted that [to terrorism] are we going to include refuge locations within the hospital for domestic violence victims and their families? Any patient that must be greater than approx. a month due to recovery from rehabilitation or palliative care etc. in my opinion needs to be outsourced to that caring unit and it should not burden the purpose of what the intent of the hospital is to provide medical care to patients in need. This is a public hospital and to make it look like a five-star retirement centre, to me is a 'cost blow-out'. You could trim the design features to cater for less design and more needs to be treated at home or to specialised care units. Rectangular means that you have a functional hospital being simplistic in design but the emphasis on treating the patient with less distractions. For longer term patients they will have the ability to view from the northern sector of the hospital, the ocean and Cook Island. Someone stated that the architectural design is already budgeted for... big deal, reduce the budget costs then, it's better than being

overbudgeted or send the costs to care for domestic violence victims and families, palliative care and home visitation by health care workers etc?

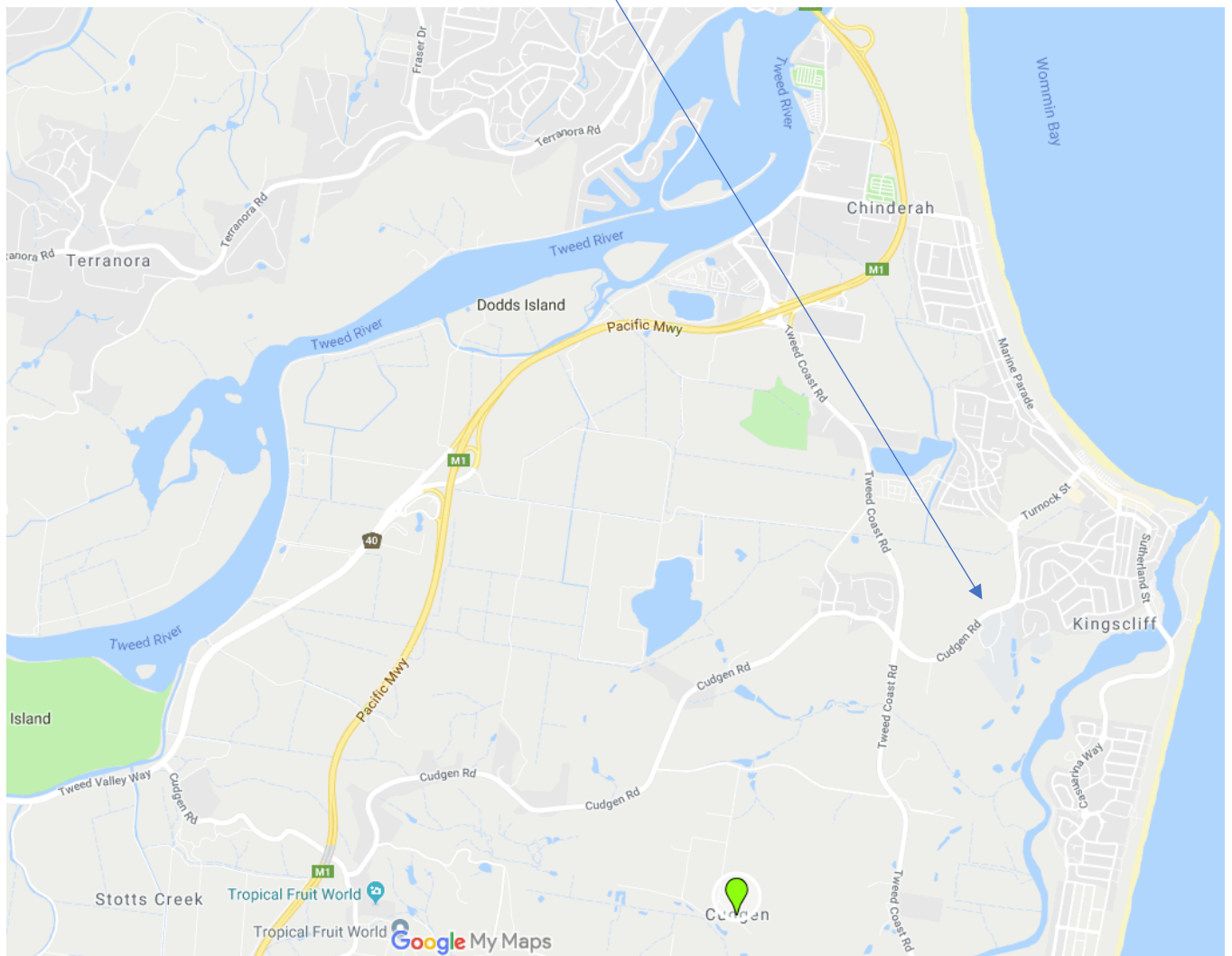
- ✚ When it comes to the transport infrastructure to ingress and egress the hospital the planning adopted for 2022 could be totally different to the future transportation in a decade or two. Take the mobile scooter that could be for an individual or for two to travel on to what pathway? If you align the pathway to cyclist and pedestrians and to include wheelchair bound disabilities and prams etc. you will need a single lane roadway to be divided for all the above to use... has this been considered?
- ✚ Our state government is aware of the flooding of major arterial routes especially from the most densely populated area of the Tweed, namely Tweed Heads, Coolangatta, West Tweed and the environs of those that live close to the river, the Broadwater and ocean which was only flooded by the storm depression of ex Cyclone Sandy and Tweed Shire Council is still clearing up the carnage that it reeked. Now that the IPCC has directed a dire warning as to global warming and future extreme climate weather events which we must take a note of seriousness in that the placement of this hospital could mean that the largest population density could miss out on treatment at the closest hospital. The closest public hospital on the northern side of the river is Robina Hospital, which as the crow flies is 24kms from the Barneys Point Bridge to Robina.
- ✚ Like the infrastructure to the Badgerys Creek International Airport is by a road that is well established for many a year, without any sensible intelligent consideration to place a rail line from the city direct to the airport, similarly we have the M1 Motorway [which floods] to link with a two lane road with no ability to move off the road for emergency vehicles. In all aspects, the infrastructure takes priority to allow; firstly a levee bank where flooding occurs on the M1, to mitigate any stoppage for patient care that live to the north of the Tweed River and including Fingal Head and Chinderah due to flooding, and allow for future road usage of Tweed Coast Road to be widened to four lanes and a medium strip dividing the carriageway before you proceed with the hospital.

It's time for me to submit this document before COB

Sincerely

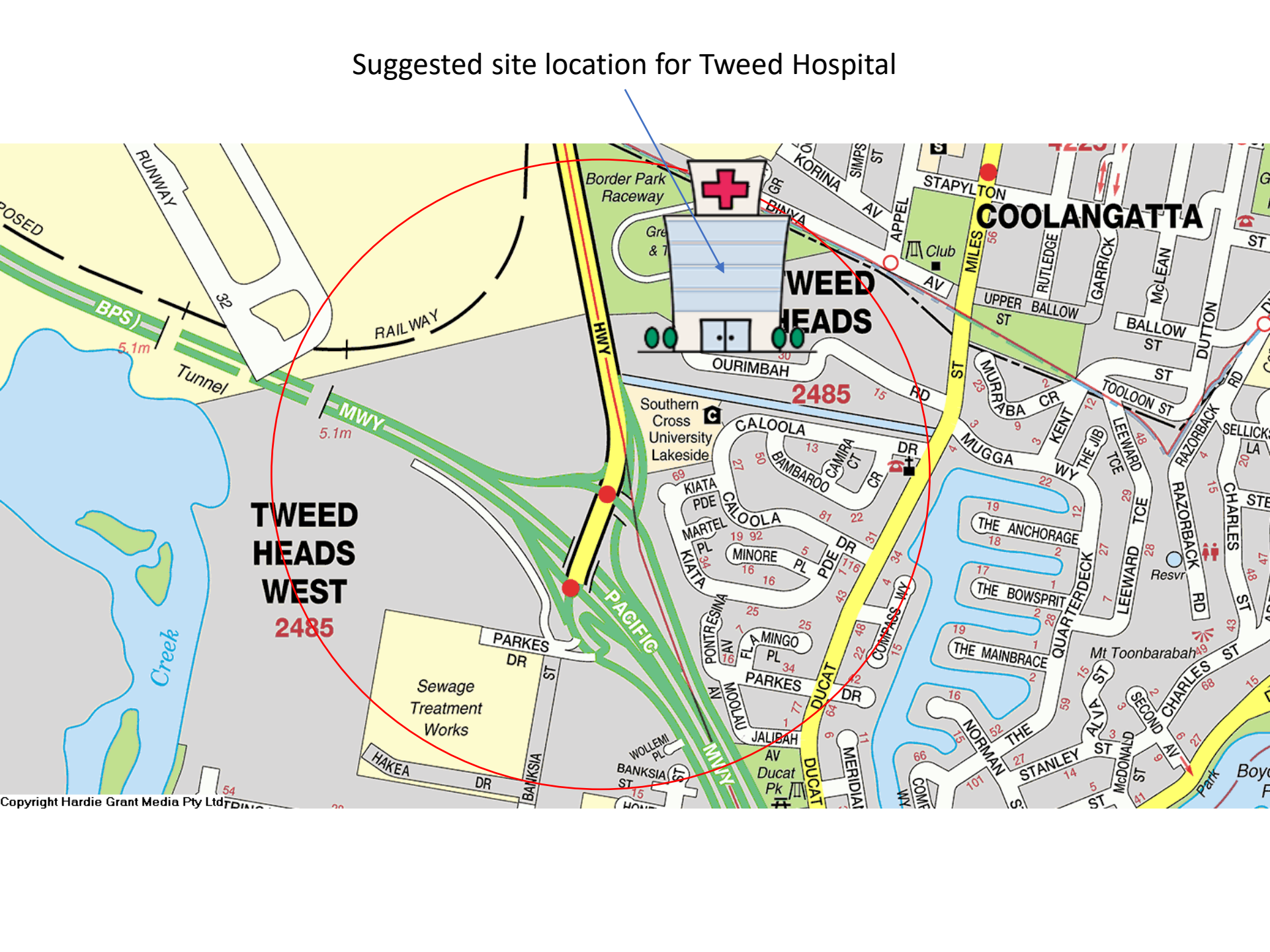
Roger Graf

Location of Tweed Valley Hospital



Suggested site location for Tweed Hospital

The map displays the coastal area of Tweed Heads and Coolangatta. A red circle highlights a specific site location in Tweed Heads, marked with a red cross and labeled 'Tweed Heads' with the number '2485'. This site is situated near the Pacific Highway (HWY 1) and the railway line. To the west of this site is Tweed Heads West, also marked with a red cross and labeled 'Tweed Heads West' with the number '2485'. The map includes various streets, including Runway, BPS, Tunnel, MWY, Pacific Highway, and several residential streets in Coolangatta such as Stapylton, Miles, Rutledge, Upper Ballow, Garrick, McLean, Dutton, Ballow, Toooloon, Leeward, Razorback, Sellick, Charles, and Boye. Other landmarks include the Border Park Raceway, Southern Cross University Lakeside, and a Sewage Treatment Works. The map also shows the Pacific Creek and the Pacific Highway (HWY 1) running through the area.



SSD 0423

Uploaded separately due to size. Please see submissions folder on the Department's website.

SSD 0423M1

Uploaded separately due to size. Please see submissions folder on the Department's website.

SSD 0424

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SSD 0425

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SSD 0425D1

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SSD 0425M1

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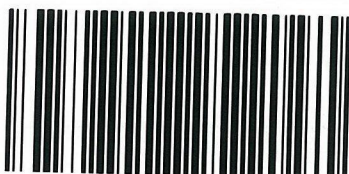
SSD 0425M1D1

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SSD 0426M1

Uploaded separately due to size. Please see submissions folder on the Department's website.



PCU077472

OBJECTION TO EIS**Application Number****SSD 18_9575****New Tweed Valley Hospital**

To make a submission, please fill in the following fields. Those marked with an asterisk "*" are mandatory.



I am making a personal submission

Name: *

Mr

TITLE

JEREMY

GIVEN NAME(S)

CORNFORD

FAMILY NAME

Please tick this box if you do not want your name published in the list of submitters on the department's website

☐

"Name withheld on request" will appear on the list, instead of your name.

YOUR DETAILS

Email

Address: *

Address 1

P.O. Box 1304

Address 2

Suburb *

Kingscliff

DoPE will publish your suburb in the list of submitters with your submission

State / Postcode

NSW

2487

Detach pages 13 → 15 and insert in envelope provided

Department of Planning
Received
13 DEC 2018
Scanning Room

MY SUBMISSION: *

I object to this exhibited EIS because:

See insert page - (next)

Detach pages 13 → 15 and insert in envelope provided

- Failure to provide the community sufficient time to absorb, interpret, and respond to a highly controversial, highly complex, and yet inadequately documented EIS.
- Targeting State Significant Farmland when other site options exist. These lands were designated to be protected, not destroyed by the Government.
- Revising the 2017 North Coast Regional Plan by Ministerial decree to shift the Tweed Hospital away from the City of Tweed Heads to the Town of Kingscliff with no prior community consultation whatsoever.
- Severely compromising Kingscliff's beach village and fresh local produce based tourism industry. Changing the core business focus and culture of the town from tourism and small crop agriculture to health services without any discussion with the community.
- Undermining the community's hard fought 3 story limit in Kingscliff (and the coastal villages) by changing its character through an iconic multi-storey building that will over-whelmingly dominate the skyline
- Gutting the economy of Tweed Heads by removing the key economic driver (the hospital) and betraying Tweed Heads residents with medical issues who invested their life savings in homes with hospital proximity.
- Failing to consult with the community prior to the site choice decision announcement, contrary to claims made in the EIS.
- Ignoring any mention in the Community Consultation appendices of the two petitions with well over 8000 signatures that went to the Upper & Lower Houses of NSW Parliament, nor of the 4700 followers of the "Relocate" FaceBook page. These were the strongest community responses recorded in ANY forum.
- Ignoring any mention of the resolution by Tweed Shire Council to oppose siting of the Tweed Hospital on prime agricultural land when considering social impacts and community responses.
- Falsely asserting that the chosen site was the "best" and "chosen by experts" when in fact it was a commercial decision from the limited land for sale at one particular point in time in 2017. The "experts" never considered any land that was not for sale. Using the same compulsory acquisition powers currently being exercised over the reluctant owner of the Cudgen site, they could have selected ANY site in the Tweed Valley.
- Isolating the majority of Tweed's residents (Tweed Heads & Banora) from access to the Tweed Regional Hospital during major flood events, contrary to claims of improved flood access in the EIS
- Diminishing Kingscliff residents' quality of life with intense urbanization, increased traffic congestion and parking demand, 24hr ambulance emergency sirens, 24hr helipad emergency aircraft arrivals, all-night floodlighting of entire site, loss of amenity, loss of rural ambience, lifestyle, etc. Not properly disclosing these long term impacts.
- Disguising the full costs of relocating the Hospital development by assigning the future costs of extending transport and utility infrastructure to other public Authorities. E.g. light rail proposed from Gold Coast airport to Tweed Heads CBD.
- Business & residential migration to the hospital precinct will increase property demand and therefore real estate prices in Kingscliff, rendering it unaffordable for family offspring to live there in the future



Disclose reportable political donations *

The requirement to disclose depends on:

- whether your submission is about a relevant planning application, and
- the value and timing of any political donation/s you or your associate have made.

To determine whether the reporting requirements apply to you, read Parts 3 and 4 of [Disclosure of Political Donations and Gifts](#).

I have made a reportable political donation. No ▼

5. AGREE TO THE FOLLOWING STATEMENTS

I have read the Department's [Privacy Statement](#) and agree to the Department using my submission in the ways it describes. I understand this includes full publication on the Department's website of my submission, any attachments, and any of my personal information in those documents, and possible supply to third parties such as state agencies, local government and the proponent.

I agree to the above statement ☒

6. LODGE YOUR SUBMISSION

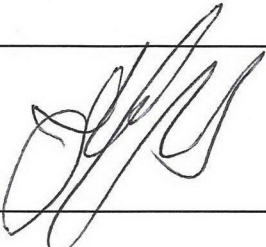
Unless you agree with the statements at step five and tick the box you will not be able to lodge your submission. If you do not yet agree with the statements at step five, you may wish to read the [Privacy Statement](#) and/or remove personal information from your submission and any attachments.

7. OFFENCE TO PROVIDE FALSE OR MISLEADING INFORMATION

It is a serious criminal offence under the Crimes Act 1900 to provide information to the Department of Planning and Environment knowing that, the information is false or misleading or the information omits any matter or thing without which the information is misleading.

I have read and understood the above ☒

I understand that by making this Submission, I am providing the information contained in this form to the Department of Planning and Environment and confirm that that information is not false or misleading ☒

Signature		Date 9/12/2018
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Detach & place your 6 submission pages i.e. pp. 7-9 and 13-15 (only) along with any attachments into the addressed envelope provided, calculate postage and post via Australia Post before 5pm Friday 7th DEC · 2018.

Affix stamp here

**Attention: Deputy Secretary – Planning Services
Department of Planning and Environment
GPO Box 39,
SYDNEY, NSW 2001**

2001

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Agreed to false or misleading information statements: yes

Name: Diane Morrison

Email: [REDACTED]

Address:

[REDACTED]

Clothiers Creek, NSW

2484

Content:

I am a retired town planner who has lived in the Tweed for almost 19 years.

IP Address: [REDACTED]

Submission: Online Submission from Diane Morrison (object)

https://majorprojects.accelo.com/?action=view_activity&id=300109

Submission for Job: #9575 New Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_job&id=9575

Site: #4045 Tweed Valley Hospital

https://majorprojects.accelo.com/?action=view_site&id=4045

NEW TWEED VALLEY HOSPITAL

OBJECTION TO SSD APPLICATION (SSD 18-9575)

1. I wish to strongly object to the proposal to build the new Tweed Valley Hospital on lands at Cudgen. As indicated in my concurrent objection to the proposed amendment to the State Environmental Planning Policy. My primary concern in the first instance is with the proposed rezoning of State Significant Farmland.
2. The SSD application is based on the premise of rezoning and removal of approval of the various height, lot size and FSR for the subject site.
3. The SSD application seeks approval for
 - a. A concept development application, and
 - b. Stage 1 (Early and Enabling works)

The applicant advises this is to be followed by a much more detailed application for Stage 2 works.

THIS VERY PROCESS EXPOSES THE FATAL FLAWS IN ANY APPROVAL OF A CONCEPT DEVELOPMENT APPLICATION.

4. The concept development plan details the proposed major building footprint and height. This in turn results in a maximum gross floor area, said to be 65,000 m².

The accompanying EIS documentation does not clearly indicate how this GFA then relates to hospital bed numbers, emergency and outpatient numbers, staff numbers and associated on-site allied health and non-medical facilities (shops, cafeteria, accommodation).

This level of detail is essential to properly assess impact.

5. The proposed Stage 2 DA (not under consideration at present) and the later Stage 'Facility Expansion and Renewal' (Fig. 33 Appendix C, EIS) must all be examined initially.

It is neither professional, considerate of the local communities nor fair and reasonable to merely seek the approval of a Stage 1 development footprint and building height without properly assessing total mitigating total off site impacts and implications.

6. TRAFFIC AND CAR PARKING ASSESSMENT

6.1 The assessment of traffic generation and car parking demand is only as good as the data fed into the “model”. It is clear that Bitzios assessment is only based on a plan for 430 beds and 1050 staff in 2032 (with a comment that the hospital is likely to commence operations in 2022/23 with 407 beds).

6.2 Even these basic statistics are questionable and contradicted elsewhere in the EIS. For example, the Social and Economic Impact Assessment says (p. 26) there will be a net increase of 195 beds (92% increase in beds) but

“Once operational the new Tweed Valley Hospital at Kingscliff (sic) will employ approximately 1335 FTE workers, an estimated increase of 280 on the base case” (p. 36)

Presumably this relates to staff estimates in 2032 or does the term “once operational” refer to 2022/23?

It is hard to correlate this 92% increase in beds, plus the range of additional facilities to be offered with such a small increase in staff numbers. Total (not FTE) numbers at the existing Tweed Hospital were 1100 (including VMO’s and students) in July 2017. (NSW Health, Food and Beverage Opportunity for lease, the Tweed Hospital).

6.3 The traffic and car parking modelling also says nothing about and fails to extrapolate the 21% increase in Emergency Department presentations at the existing Tweed Hospital from 2012/13 – 2015/16 (47,905 presentations 2015/16). Given a modest 10% increase in ED presentations there would be about 240 presentations per day by 2022/23.

6.4 Nor does it feed in relevant estimates of visitors. The July 2017 report released by NSW Health estimates 80,200 visitors (p. 9) to the existing General Hospital at Tweed Heads and 84,368 visitors to Outpatient Clinics. These local statistics have not even been referred to by Bitzios Consulting.

6.5 Bitzios does not reference any traffic generation statistics for a Level 5 hospital offering similar services in Australia preferring to rely on the US Institute of Transportation Engineers (ITE) daily rate of 11.81/trips/bed/day for “hospital” (uses undefined).

6.6 Similarly, Bitzios does not in any way analyse potential real carparking demand. Their assessment merely comments that the Stage 1 proposal would meet Council’s car parking requirements for “hospital”.

6.7 Even given all these limitations and contradictions in the EIS documentation it is unprofessional for the client to direct the consultant to only consider traffic and parking for the Stage 1 proposal. It is quite clear elsewhere in the EIS documentation (See Fig. 33) and even Bitzios report on Master Planning p. 1) that a much larger Regional Health Precinct is being proposed with potentially a 900 bed hospital (public and private) a far

wider range of outpatient and allied health facilities and associated residential, commercial and educational activities.

THIS IS MAJOR INFRASTRUCTURE DEVELOPMENT THAT MUST BE PROPERLY EXAMINED AT THESE INITIAL STAGES BEFORE ANY POORLY RESEARCHED AND FLAWED STAGE 1 DA IS CONSIDERED.

- 6.8 As evidenced elsewhere in Australia significant hospital expansions/developments have led to major conflict with local communities particularly in relation to traffic and car parking (Gold Coast, Coffs Harbor, Wagga Wagga, Warragah)

It is totally inadequate and professionally irresponsible to say

“Further demand and feasibility studies as well as staff and community consultation in relation to car parking, will be undertaken prior to lodgement of the Stage 2 SSD application” (p. 33)

7. SOCIAL AND ECONOMIC IMPACTS AND LAND USE CONFLICT RISK ASSESSMENT

- 7.1 Much of the Social and Economic Impact Assessment report prepared by SGS Economics and Planning relates to the positive impacts of expanded and improved hospital facilities for Tweed. I agree the need for these facilities is justified.

Economic stimulus in the region will be considerable associated with this major development. This is not location specific and was considered a major driver in the ongoing development of Tweed Heads as a Regional City Centre, in the NCRP (2036).

- 7.2 The more location specific social and economic impacts to be addressed relate to Tweed Heads V Kingscliff/Cudgen and the adjacent State Significant Farmland.

SGS Economics clearly point out (pp 34 & 35) the negative impact of hospital, outpatient and allied health services on certain sectors of the local Tweed Heads community, particularly those without private vehicle access and the ability to use public transport.

THESE NEGATIVE IMPACTS ARE CONSIDERABLE AND SHOULD NOT BE UNDERESTIMATED

- 7.3 The future of the Regional City of Tweed Heads without its major economic driver and associated ancillary services and the ongoing ability of Tweed Heads to attract alternative major functions including a rail link from the Gold Coast Airport has not been addressed.
- 7.4 Negative impacts also relate to the high percentage of elderly who currently live in close proximity to the existing Tweed Hospital and its associated services. Many of these elderly people have chosen specifically to locate near the existing hospital. The

consultants should have analysed these statistics from ABS data which confirms in Tweed Heads 65% of the population are aged 65+.

- 7.5 In contrast, the proposed Tweed Valley Hospital in its greenfields location on Cudgen Road has effectively no local population within walking distance of the site, very limited bus services (which are not really suitable for the sick elderly anyway) and no adjacent allied health services.
- 7.6 And of course, from the alternative perspective should these allied health and associated residential and retail services be developed proximate to the proposed hospital the nature of Kingscliff, Cudgen and the adjacent farming land would be changed forever. (See SEPP Submission on total change to regional planning focus).
- 7.7 The off-site impacts of 65,000m² “hospital” floorspace on the adjacent rural lands cannot be shrugged off by this Study (p. 33) where they say:
- “Subject to ... risk management measures, the Project Site should be able to accommodate the new Tweed Valley Hospitals with minor impacts on the operation of rural lands nearby”.
- 7.8 Traffic volumes on both Tweed Valley Way and Cudgen Road will significantly impact the farmers’ rights to drive tractors and farm machinery on these roads. Similarly, difficulties will occur with the backing of large produce trucks into and out of the farms.
- Proper protection of farmland needs far more than a 12m vegetated buffer from the Support Building to Cudgen Road – even if such a buffer could be maintained.
- 7.9 There are many negative social and economic impacts related to developing the hospital and potential ‘Health Precinct’ on this greenfields site.
- 7.10 The Land Use Conflict Risk Assessment Report prepared by Tim Fitzroy and Associates is very general and offers little reassurance. For example, the Report suggests
- “random plantings of a variety of tree and shrub species of differing growth habits, at spacings of 4.5m for a minimum width of 30m” (emphasis mine) on the southern boundary.
- How can this occur when the Concept Plan requests approval of a 33m long “support” building set back only 12m from Cudgen Road?
- 7.11 **IT IS CONSIDRED THIS REPORT UNDERESTIMATES THESE SITE SPECIFIC SOCIAL AND ECONOMIC IMPACTS AND THERE SHOULD BE FAR MORE SERIOUS CONSIDERATION GIVEN TO RELOCATION OR REDEVELOPMENT ELSEWHERE.**

8. ENVIRONMENTAL IMPACTS

- 8.1 The major environmental impacts of both the current SSD application, Stage 2 SSD Application (foreshadowed) and the later Stage 1 ‘Facility Expansion and Renewal’ relate to

- protecting the important local coastal wetlands, riparian corridor and Tweed River Floodplain to the north (mapped under SEPP (Coastal Management))
- ensuring the Bushfire Prone Land to the north includes an appropriate vegetation buffer, and
- ensuring the State Significant Farmland is protected by an appropriate vegetation buffer.

8.2 The relevant EIS Reports outline a range of mitigation measures, management plans and safeguards to be put in place.

How the status and proposed protective measures relate to protecting the sensitive ecosystem and habitat to the north including the part of the lot not identified as the project site is unclear.

8.3 A Habitat Management Plan, Biodiversity Management Plan and Water Quality Management Plan at the least should commence prior to any site works (including Stage 1 (Early and Enabling Works)).

8.4 **My concern relates to the environmental capacity of the relatively small site to sustain the full extent of land uses, internal transport networks and hard surfaces for the three-stage development.**

I refer particularly to the following Plans in the EIS:

1. Masterplan Concept Plan, Masterplan Boundary Setbacks
2. Facility Expansion and Renewal Plan (Fig. 33)
3. Wetlands (site) (Fig. 7 GreenCap)
4. Coastal Management SEPP (Illustration 5.2 GeoLink) (note the “proximity area for coastal wetlands”)
5. Masterplan Asset Protection Zone (Fig. 20)

It is totally unclear, in attempting to superimpose these Plans on each other how the Road Footprint, Building Footprint and associated works ensures the protection of the coastal wetland system and proper fire management measures and provides an appropriate buffer to adjacent State Significant Farmland (see Northern Rivers Farmland Protection Project (Feb. 2005) and Living and Working in Rural Areas (2007).

I QUESTION WHETHER THE PROJECT SITE IS LARGE ENOUGH TO ACCOMMODATE THESE ENVIRONMENTAL CONSTRAINTS.

9. VISUAL ASSESSMENT

9.1 I concur with the GeoLink Assessment in Appendix K that

“the main hospital building to be developed and articulated within the planning envelope, would generally be an obvious modification within the local visual environment when viewed from various viewpoints in the surrounding locality” (emphasis mine).

The scale, height and bulk of the 9 level primary building are clearly shown in the accompanying photo montages. The changes to the existing visual environment are massive.

- 9.2 GeoLink do not discuss the additional visual impacts of the Primary Building Support Building and Stage 1 surface car parking at ground level. The Support Building is approximately 63m in length set back only 12m from Cudgen Road.
- 9.3 The Visual Assessment also makes no reference to the impact of the 24 hour security lighting and lighting for helicopter landing on the roof of the hospital both within the rural site context and from the urban viewpoints of Kingscliff and Cudgen.
- 9.4 GeoLink subjectively assess the visual environment of the area as being at the rural/urban interface as being of Medium Value. This is despite their reference to the “Visual Management System for NSW Coast, Tweed Pilot 2004” where it is described as a “high visual quality rural landscape with low capacity for change” and their reference to the Draft Kingscliff Locality Plan and Development Control Plan which refers to the “high scenic area of the Cudgen district”.
- 9.5 **IT IS OBVIOUS THAT ANY APPROVAL OF BUILDINGS OF THIS SCALE, HOWEVER ARTICULATED, WILL TOTALLY CHANGE THE HIGH QUALITY RURAL LANDSCAPE. WHETHER VIEWED FROM ADJACENT RESIDENTIAL OR RURAL AREAS OR FROM THE ROAD THE SITE IS HIGHLY VISIBLE. THIS SHOULD NOT BE PERFUNCTORILY DISMISSED AS IN THE EIS.**

10. CONCLUSION

- 10.1 This application is for a very major proposal which, if effected in part or full will substantially change the regional and local planning directions of the Tweed Shire and Tweed Heads, Cudgen and Kingscliff in particular.
- 10.2 The accompanying EIS documentation is considerable (over 3000 pages), repetitive and often contradictory. Most of the technical commentary is qualified by the need for further data, research and consultation. This application process is severely flawed and is an attempt to “put the cart before the horse”. **This is not how the planning for a major health precinct should be done.**
- 10.3 The dual process of consideration of a rezoning and a development application concurrently is confusing and in no way can be considered “user friendly” for the community. I also note that recent correspondence from Health Infrastructure and the nature of the community panels, essentially assume the proposal is going ahead. This is not fair or reasonable.
- 10.4 The proposed closure of the existing Tweed Hospital and its outpatient clinics is of major concern to many of the local residents who have located nearby. This matter appears to have been perfunctorily dismissed in the EIS Report. Many of these people do not use the internet and to my knowledge, there have been no community workshops or similar to help these people come to terms with the possible closure.

10.5 I have addressed, to a limited extent, four primary matters of concern in my objection:

- Traffic and car parking;
- Social and economic impacts;
- Environmental impacts; and
- Visual impacts.

In each case I question the assumptions, data and initial assessments made. It is clear much of this is inadequate and in some cases, incorrect or biased.

10.6 **I OBJECT STRONGLY TO THIS DEVELOPMENT APPLICATION. IF AS SUGGESTED IN THE SGS SOCIAL AND ECONOMIC IMPACT ASSESSMENT “THERE WILL BE A SIGNIFICANT SCOPE AND OPPORTUNITY TO DEVELOP A REGIONALLY SIGNIFICANT HEALTH AND EDUCATION PRECINCT OVER TIME”, THIS MUST BE PROPERLY ADDRESSED IN THE FIRST INSTANCE.**

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation:

Agreed to false or misleading information statements: yes

Name: Matthew Prichard

Organisation: Cudgen Road Farms Pty Ltd and MN and HJ Prichard (Director and owner)

Email: matthewprichard@hotmail.com

Address:

752 Cudgen Road

Cudgen, NSW

2487

Content:

My business operates directly opposite the site, where we process all our crops not only produced on this farm but throughout Cudgen. Therefore impacting our 60 hectares of farmland. 115000 cartons of sweetpotato a year, 120 semi trailer loads hauled p.a. from this site. Definite impact, particularly with traffic and access. We have at least 10 heavy vehicle movements on the site each week. How will motor vehicles access my roadside stall easily with increased traffic? How will I move my excavator from farm to farm on this busy road? I have a permit to operate on the road.

There is upward pressure on land values and rent already. I have been asked for substantially more rent recently from one landlord.

Production is not significantly lower on sloping blocks. Slopes on most of the property are similar to Macadamia farms around Alstonville. Mechanical harvesters etc operate OK on these slopes.

Potentially under utilised farmland will not be taken up by farmers because the landholders want it to look unproductive to realize their land banking goals.

Sweetpotatoes are not produced every 3 years. 2 year rotation max. The Cudgen area has transitioned through Dairy, Sugarcane, tomatoes, bananas, and sweetpotatoes as the major crops in 150 years of farming. Crops will change again.

Estimates of the value of Sweetpotato production alone in Cudgen are around \$12 million. Cudgen leads the world with sweetpotato production figures, averaging 68 tonnes/ha. Louisiana in the US averages 20 tonnes per hectare.

There has been no recognition of the culture and heritage of the Cudgen area. Many farmers and residents of Cudgen are 5 and 6 generation Cudgen farmers, and have had strong relationships with the Aboriginal community providing them with work over many generations also. This development will change the area forever, and our heritage will be under threat.

How will the hospital impact the area with crime? More people=more crime. Emergency department/outpatients/ drug and alcohol abuse/mental patients etc in our neighbourhood. Crime will rise and I will have things stolen.

There's NO doubt.

Please relocate this hospital and save Cudgen.

IP Address: - 203.40.70.252

Submission: Online Submission from Matthew Prichard of Cudgen Road Farms Pty Ltd and MN and HJ Prichard (comments)

https://majorprojects.accelo.com/?action=view_activity&id=300251

Submission for Job: #9659

https://majorprojects.accelo.com/?action=view_job&id=9659

Site: #0

https://majorprojects.accelo.com/?action=view_site&id=0

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation:

Agreed to false or misleading information statements: yes

Name: Clair Maiden

Email: Stairwells@hotmail.com

Address:

8 Boomerang st

Kingscliff, NSW

2487

Content:

I would like to object to the proposed location of the new hospital at Cudgen. I feel the EIS is under representing the impact the hospital will have. The infrastructure required to support what will likely be the 2nd biggest hospital in NSW north of Newcastle will be expensive and disruptive to the area.

Over 700000 people movements per year to the site will require massive changes to a small village of 7000 people. Not to mention the amount of water and electricity that will be needed.

I have concerns about the hospital being so close to school with over 1000 students and the impact on the access for parents teachers and students.

Please consider another site or reclaim houses carparks and commercial interests around the current hospital.

IP Address: - 49.197.93.30

Submission: Online Submission from Clair Maiden (comments)

https://majorprojects.accelo.com/?action=view_activity&id=300832

Submission for Job: #9659

https://majorprojects.accelo.com/?action=view_job&id=9659

Site: #0

https://majorprojects.accelo.com/?action=view_site&id=0

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation:

Agreed to false or misleading information statements: yes

Name: Clair Maiden

Email: Stairwells@hotmail.com

Address:

8 Boomerang st

Kingscliff, NSW

2487

Content:

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IP Address: - 49.197.93.30

Submission: Online Submission from Clair Maiden (comments)

https://majorprojects.accelo.com/?action=view_activity&id=300840

Submission for Job: #9659

https://majorprojects.accelo.com/?action=view_job&id=9659

Site: #0

https://majorprojects.accelo.com/?action=view_site&id=0

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation:

Agreed to false or misleading information statements: yes

Name: Clair Maiden

Email: Stairwells@hotmail.com

Address:

8 Boomerang st

Kingscliff, NSW

2487

Content:

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I have concerns about the hospital being so close to school with over 1000 students and the impact on the access for parents teachers and students.

Please consider another site or reclaim houses carparks and commercial interests around the current hospital.

IP Address: - 49.197.93.30

Submission: Online Submission from Clair Maiden (comments)

https://majorprojects.accelo.com/?action=view_activity&id=300846

Submission for Job: #9659

https://majorprojects.accelo.com/?action=view_job&id=9659

Site: #0

https://majorprojects.accelo.com/?action=view_site&id=0

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation:

Agreed to false or misleading information statements: yes

Name: MARGARET FREEMAN

Email: [REDACTED]

Address:

[REDACTED]

TWEED HEADS, NSW
2485

Content:

For the last 43 years I have lived, worked, conducted a business for 15 of those years, retired and paid rates on the Tweed.

I strongly believe my State Government should save our State Significant Farmland on the Cudgen Plateau and use the new hospital funding to redevelop the new Regional hospital on its current site within Tweed Heads Regional City.

I object to the proposed EIS because:

1. This proposal will seriously undermine the existing economic viability of the Regional City Hub of Tweed Heads (refer 2017 North Coast Regional Plan).
2. This proposal will reduce the quality of life for many elderly residents, including my husband and myself, who have chosen to purchase their last independent -living residences in Tweed Heads.
3. State Significant Farmland should be solely used to produce a regular supply of farm products for consumption by present and future generations.
4. This proposal will destroy the current way of life of the Kingscliff and the coastal Villages and their tourism focus.
5. The proposed new hospital will be well above the coastal villages 3 storey height limit, thus destroying the community's hard-fought campaign for that control.
6. In the City Hub of Tweed Heads the height limit for a new Regional hospital is, I believe, 10-12 storeys. This would mean that planning regulations would not have to be changed or any infringements occur.
7. This proposal will isolate a significantly large number of residents from Tweed Heads, Tweed Heads South, Tweed Heads West, Banora Point and Banora Heights from accessing health services at a hospital on the Cudgen Plateau during major flooding. The closest public hospital will be at Robina in Queensland, creating transport difficulties for many urgent patients.

Objection to EIS - Application Number 9575 New Tweed Valley Hospital

My Submission Margaret Agnes Freeman Dated 13/12/ 2018

IP Address: [REDACTED]

Submission: Online Submission from MARGARET FREEMAN (comments)

https://majorprojects.accelo.com/?action=view_activity&id=300666

Submission for Job: #9659

https://majorprojects.accelo.com/?action=view_job&id=9659

Site: #0

https://majorprojects.accelo.com/?action=view_site&id=0