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
MRS	FAITH ELIZABETH	GODDARD

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: faith.goddard@hotmail.com

Address: *

Address 1: 22 Crescent St

Address 2:

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:

* Cudgen (which means red soil) proposed site is state significant productive soil. farmland it would appear is the one and only site the state government want!

* Ignoring Tweed Shire Councils stance on opposition of siting the hospital on the Cudgen plateau

* The farmers livelihood will be stripped from them by restrictions to their farming practises There will be loss of jobs not to mention the demise of produce.

* The total loss of the amenity of life synonymous with Cudgen/Kingscliff will be gone forever!

* Haven't you learnt anything from the Juggerawah Hospital on the North in Sydney You're forging ahead to build this hospital before any adequate infrastructure is in place This will make living in the vicinity impossible

Detach pages 13 → 15 and insert in envelope provided

Attach additional pages if space insufficient

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 4/12/18

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 SEPP

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: *

MRS	FAITH ELIZABETH	GODDARD
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: faith.goddard@hotmail.com

Address: *

Address 1: 22 Crescent St,

Address 2:

Suburb*: Cudgen

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

State / Postcode: NSW 2487

Detach pages 7 → 9 and insert in envelope provided

MY SUBMISSION: *

I object to this proposed SEPP because:

* With the stroke of a pen state significant farmland in Cudgen, 1 of only 2 sites in Australia that is frost-free with sufficient rainfall and fertile quality will disappear FOREVER

* The 9 storey limit proposed will have a domino effect reproducing another Surfers Paradise

* It is a bullying tactic that negates the Tweed LEP 2014 which has protected the interests and lifestyle of residents of the Tweed Shire.

* It would appear that hiding behind "A Hospital" which seeks to manipulate peoples' emotions (because who wouldn't want a great new hospital, right?) will see the demise of farming in Cudgen

* Bulldozing ahead without appropriate approvals

* If the state government can forcefully acquire any land under the title 'state significant' leave our state significant farmland in Cudgen and move the hospital to another site!

Detach pages 7 → 9 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. No

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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 4/12/18

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: *

Ms	[redacted]
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: *

Suburb*

State / Postcode

[redacted]

Detach pages 13 → 15 and insert in envelope provided

MY SUBMISSION: *

I object to this exhibited EIS because:

(SEE Attached)

Detach pages 13 → 15 and insert in envelope provided

Attach additional pages if space insufficient

MY SUBMISSION:

NEW Tweed Valley Hospital – Objections to EIS

I totally object to the choice of the proposed hospital site at Cudgen, because it will destroy land that is classified as "State Significant Farmland", which must be protected at all costs. This land is extremely important to the people of NSW and to the local community because of its very high quality producing soils for agriculture.

The site location for the hospital has been poorly chosen and does not achieve any balance between existing social, economic or environmental objectives. The proposed development will change our culture from tourism and crop agriculture to a health precinct, which will diminish our quality of lifestyle and enjoyment of a town which boasts unspoilt beaches and the best rural agricultural land in NSW.

The EIS states that no significant adverse impacts are expected and if these occur they will be minimised and managed. The EIS also states that the project will result in a net benefit for the community. I do not agree in any way with these statements, which are inaccurate and distressing to say the least.

I envisage a very substantial increase in noise levels, particularly after the hospital is built. There will be the continuous sound of sirens from ambulances and the noise from helicopters at all hours of the day and night. I find these to be very significant impacts and I question how they can be minimised or even managed. Then there will the continuous delays to traffic and transport services on our local roads associated with the building works and the parking problems in the region if the hospital is built. It is a common fact the most people will not pay for parking services and will leave their car on nearby streets and in existing service centres such as the TAFE College nearby. I see no benefit whatsoever for the community with any of these matters of concern. In addition, I also consider the hospital will most likely attract drug addicts visiting meth clinics at the facility. This could also result in an escalation of crime in the area through break-ins and so on.

Of particular concern is that people living north of the Tweed River or from Murwillumbah will not be able to access the selected hospital site during times of extensive flooding. This was case during the extensive flooding in 2017 associated with the remnants of Cyclone Debbie. Of even more concern is that the NSW Government have indicated they are not funding the infrastructure to the hospital site and have assigned this to other public Authorities.

I also wish to emphasise how daunting and insulting it will be to most elderly persons in the Tweed area who bought their residences to be close to existing hospital facilities and will now have to travel a lengthy journey most likely by public transport to the reach the Cudgen site.

In view of the above, I fail to see how the proposed development of a hospital at this site achieves a best outcome or has properly addressed issues such as the destruction of valuable farmland [redacted]

7-12-2018

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.

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I have made a reportable political donation. No ▼

5. AGREE TO THE FOLLOWING STATEMENTS

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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.

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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 ☑

[redacted]

Date

7-12-2018

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 SEPP

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: *

Ms	[redacted]
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: *

Suburb*

State / Postcode

[redacted]

Detach pages 7 → 9 and insert in envelope provided

MY SUBMISSION: *

I object to this proposed SEPP because:

(SEE Attached)

Detach pages 7 → 9 and insert in envelope provided

MY SUBMISSION:

NEW Tweed Valley Hospital – State Environmental Planning Policy (SEPP)

My name is [redacted] and I have been a resident of [redacted] since 2013.

I most definitely oppose the proposed rezoning of **State Significant Farmland** to allow for the development of a hospital on the land selected for the project. I also disapprove of the rezoning, as it will trigger subsequent rezonings of additional fertile farmland in the area to be more compatible with the hospital and its uses.

This land is of great environmental importance to the people of NSW and to our local community. The rich fertile soil at this site is capable of sustaining high levels of food productivity even in times of drought or flood. This is extremely important when you consider how the recent drought conditions adversely affected farmland throughout most areas of Australia. The loss of this land will have a huge impact on the social values of the people in Kingscliff and Cudgen and for the Tweed Shire as a whole.

I understand that the importance of this land as being **State Significant Farmland** was identified as earlier as 1997, if not earlier and was given this status after a huge amount of data was collected and appraised. **State Significant Farmland** means **important farmland**, not only to the local community, but to the people of NSW and further afield. Consequently, a hospital **should not** take precedence over agricultural farmland which is identified as being of the highest order.

I am also strongly opposed to the height of the proposed hospital facility, which greatly exceeds the height limitations set out in the current Tweed Local Environmental Plan (TLEP). A lot of community consultation and petitioning has been carried out in order to protect the Kingscliff/Cudgen areas from high rise development. This monstrosity will be situated on a hill overlooking the entire Kingscliff/Cudgen region. It will impact the views of a number of residents and the lights from the hospital at night will more than likely be an additional annoyance to local residents.

[redacted]

Disclose reportable political donations *

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- 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.

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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 ☑

[redacted]

Date

7-12-2018

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation:

Agreed to false or misleading information statements: yes

Name: [redacted]
Email: [redacted]

Address:

Content:
I strongly object to the hospital site proposed on Cudgen Road Cudgen.

This site is gazetted in the 2017 North Coast Regional Plan and therefore should be protected as such. Any change would be a breach.

The current height limit restrictions in the Tweed LEP are being breached which were established through extensive community consultation.

The roads in and around the proposed site will not cope with the amount of traffic that a large hospital will bring, rendering the streets to be clogged with parked cars.

IP Address: - [redacted]
Submission: Online Submission from [redacted] (comments)
https://majorprojects.accelo.com/?action=view_activity&id=300082

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]

Content:
I strongly disagree with the hospital being located in the proposed site at Cudgen. The land should stay as State Significant Farmland to ensure food security for future generations. It is a very productive land and also drought proof.

Also, aside from years of community consultation and planning by the Kingscliff and local residents, the main economic driver of the Tweed Heads area will be taken away. Businesses will close, the local economy will suffer and all the retirees that bought into Tweed Heads to be close to medical services will be greatly disadvantaged by the closure of the current hospital.

Why have the details of the studies of the other sites that were supposedly considered not been available for review?

If the original approved plan to upgrade the current Tweed Heads Hospital was started when originally proposed then the district would already have a state of art hospital.

IP Address: [redacted]
Submission: Online Submission from [redacted] (object)
https://majorprojects.accelo.com/?action=view_activity&id=300076

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 object to to is this hospital bein placed at Cudgen for the following reasons
◾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.
◾Ruining Kinscliff'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.
◾Undermining the community's hard fought 3 story limit in K'cliff (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 (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 priior to the site choice decision, 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 4600 followers of of the "Relocate" FaceBook page. These were the strongest communtiy 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 curently 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
◾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 floolighting of entire site, loss of the Kingscliff Pool and Libary as the carpaks will be full of hospital vehicles avoiding paying for parking, loss of rural ambience, lifestyle, etc
◾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.
◾Business & residential migration to the hospital precinct will increase property demand and therefore real estate prices in Kingscliff, rendering it unafforable for family offspring to live there in the future
◾There is no mention of the effect to Eco tourism in the EIS, this is somthing that the region has been building on over many years and I feer this hospital will adversly effect.

IP Address: - [redacted]
Submission: Online Submission from [redacted] (object)
https://majorprojects.accelo.com/?action=view_activity&id=300078

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]

Content:
I am a long-term Kingscliff resident and strongly object to the hospital being built on State Significant Farmland for the following reasons,

ï‚§ The choice of Cudgen State Significant Farmland is a poor option when at least two other sites have been identified. The proposed site was designated State Significant Farmland for a reason to be protected, not to be paved over and destroyed forever by the State Government the very people entrusted to protect it.
ï‚§ The local community of Cudgen and Kingscliff will be changed forever if this hospital is built in the proposed location for the everlasting determent to the local farming community as well as residents.
ï‚§ Loss of local amenities will be immediate. Kingscliff Pool and Library will be no longer viable as the carparks will be filled continuously by hospital visitors & staff avoiding the paid parking that is present at every hospital. This will result in the loss local jobs for those who work in these facilities, one of these will be my wife.
ï‚§ The minister â€oeChanged his mindâ€ and by Ministerial decree the 2017 North Coast Regional Plan (Over 6 years work) has been dumped. There was no community consultation at all.
ï‚§ The Tweed has for many years been developing Eco food tourism industry. The placement of a 900-bed hospital at Cudgen will forever change this local dynamic in the Kingscliff restraint strip.
ï‚§ I am very concerned that building a multi-story hospital will open the flood gates to more structures greater than the current 3 stories. The local area will become another Gold Coast and the local area will lose the character we have worked hard to maintain.
ï‚§ I fear that closing the current Tweed Heads Hospital will be the key that results in further stress on the local businesses in Tweed Heads, residents with medical issues who invested their life savings in homes around the current Tweed Hospital proximity have been betrayed
ï‚§ Are you aware that over 8000 signatures that went to the Upper & Lower Houses of NSW Parliament, and that there are over 4800 followers of the â€oeRelocate Tweed Valley Hospitalâ€ Facebook page. I believe this is a remarkable local community response and should not under estimated.
ï‚§ Please also note that Tweed Shire Council is oppose siting of the Tweed Hospital on prime agricultural land when considering social impacts and community responses.
ï‚§ The majority of Tweedâ€™s residents that live in Tweed Heads, Banora Point and Terranora will not be able to access the hospital when the next major flood event occurs if it is boult at Cudgen.
ï‚§ Cudgen & Kingscliff residentsâ€™ quality of life feel the full brunt of traffic congestion and parking demand, ambulance sirens causing distress to those not directly affected with the incident and emergency aircraft arrivals.
ï‚§ This local community deserves better planning than is currently being proposed by the State Government.

IP Address: - [redacted]
Submission: Online Submission from [redacted] (comments)
https://majorprojects.accelo.com/?action=view_activity&id=300589

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: Jeffrey Beatty
Email: [redacted]

Address:
[redacted]

Tumbulgum, NSW
2490

Content:
I am a long term resident of the Tweed and I object to this EIS because:
* Up until March 2017, the North Coast Reginal Plan (NCRP) and NSW Health future plans were focused on the rejuvenation and expansion of the hospital precinct at the existing Tweed Heads site.
* The Regional Health Precinct supported all our-of-hospital services be clustered around a new much enlarged hospital, acting as the main economic driver for the city of Tweed Heads.
* High rise high density residential development would take advantage of the hospital and public transport within close proximity. Local Environmental Plans and Development Control Plans were developed by the Tweed Council to support the NCRP.
* Despite these endorsed plans the NSW Government announced a drastic reversal with apart from some out-of-hospital services possibly remaining on the current site all services would relocate to Kingscliff without any community consultation contrary to the claims made in the EIS.
* There are over 8000 residents over the age of 65 in Tweed Heads/Banora Point many of whom have purchased homes to be close to ageing health services, and may have limited transport options.
* The removal of health related services, exodus of hundreds of jobs from Tweed Heads will remove the key economic driver. The impact on surrounding retail and other industries is expected to be significant. Community and economic impact studies have not been conducted.
* The current land is zoned as RU1 and has been classified as State Significant Farmland (SSF) for more than 10 years after years of consultation and research. This parcel of unique red soil with exceptional quality and growing properties must be protected as SSF for not just my generation but my son's and many generations to come.
* The project team has also falsely asserted that the chosen site was the best, given that compulsory acquisition is currently being exercised, this could have been exercised to select a more appropriate site in the Tweed Valley off SSF.
* The chosen site needs to be situated so that it can it be transformed into a significant health and knowledge precinct in line with the GCUH without impacting on the Locality Plans endorsed by the Kingscliff and Cudgen communities.
* There are so many reasons to relocate this hospital to one of the other very viable alternatives that are better locations out of the town and most importantly not on SSF.

IP Address: - [redacted]
Submission: Online Submission from Jeffrey Beatty (object)
https://majorprojects.accelo.com/?action=view_activity&id=300384

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:

Agreed to false or misleading information statements: yes

Name: Jeffrey Beatty
Email: [redacted]

Address:
[redacted]

Tumbulgum, NSW
2490

Content:
I am a long term resident of the Tweed Valley and I object to this SEPP because:
â€¢ The current land is zoned as RU1 and has been classified as State Significant Farmland (SSF) for more than 10 years after years of consultation and research. This parcel of unique red soil with exceptional quality and growing properties must be protected as SSF for not just my generation but my sonâ€™s and many generations to come.
â€¢ This parcel of SSF is one of only two SSF drought free pockets of land in NSW. Figures from the NSW Department of Primary Industries (DPI) confirm that every part of the state except for our 1% here on the Cudgen Pateau, is in drought and the NSW Government has only recently announced more than $1billion in drought relief measures. This demonstrates how special and valuable this SSF is for food security not just our local area but across the State and Country.
â€¢ The Cudgen Plateau supports up to 20 farms, growing primarily sweet potatoes for eastern seaboard city populations with a typical return in the order of 55 â€" 65 tonnes a hectare, grossing more than $100,000/ha in a good market. These farms provide agriculture based careers and employment for locals who want to work and specialise in this sector which is important for our local economy.
â€¢ The extended Regional Health Services Precinct Plan puts at risk the remaining farmland for eventual supplementary rezoning to support the hospital site which will inevitable put the viability threshold of 500ha and the potential loss of the Plateauâ€™s special protection as SSF.
â€¢ The Kingscliff Locality Plan also supports the town retaining architectural and design guidelines built around coastal character.
â€¢ The tourism industry here also brings in over $446 million a year and employs thousands of locals with Kingscliff loved for being a tourist mecca with a jewel coastline ringing our volcanic farmland.
â€¢ The transfer to Kingscliff of the upgraded Tweed Hospital and associated private health infrastructure and support services will achieve the opposite to the community vision expressed during consultation creating a City of Kingscliff/Cudgen once intended for Tweed Heads.
â€¢ This development renders years of community consultation and planning redundant through the massive social and economic footprint of the hospital.
â€¢ The whole of the Tweed Shire wants and deserves a new hospital and I believe that it needs to be in a better location to cater for all our needs into the future. Up until March 2017, the State Government Regional Plan and NSW health future plans were focused on the rejuvenation and expansion of the hospital precinct at the existing Tweed Heads site.

IP Address: - [redacted]
Submission: Online Submission from Jeffrey Beatty (comments)
https://majorprojects.accelo.com/?action=view_activity&id=300392

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:

Agreed to false or misleading information statements: yes

Name: [redacted]
Email: [redacted]

Address:
[redacted]

[redacted]

Content:
Dear Deputy Secretary

I wish to object to the SSD application (SDD 18_9575) proposed Tweed Valley Hospital being situated on State Significant Farmland at Cudgen.

Reasons for my objection are as followsX

Wrongful reòoning of State Significant Farmland in an area that is currently developing and being promoted as a fresh food tourism area

Both the Kingscliff community and Tweed Heads Community have not been adequately informed and consulted on the impacts of building such a significant development at Cudgen and the impacts to Tweed Heads with the removal of a major Public Hospital.

The scale of the overall master proposal and the impacts on the local area have not been effectively eñplained and are out of line with the eñisting height limits for development in the Kingscliff region.

Having been involved personally in the development of major hospital projects for the past 35 years, it is clear from the scale of the proposed masterplan, -looking to eñpand to 900 beds (which is larger than the Gold Coast rniversity Hospital) that the surrounding area will be significantly impacted by the construction activities for an eñtended length of time.

The sheer siòe of the development will also lead to more symbiotic development in the immediate area, as already mooted with announced plans for an eñtended Regional Health Services Precinct be that an eñpansion of the TAFE, consulting suites for clinicians, apartments for staff, or a co-located private hospital, leading to more State Significant Farmland being reòoned.

The current infrastructure and road network will not cope without major upgrades within Kingscliff and Cudgen, which do not appear to have been adequately budgeted for and again not clearly eñplained to the people it will impact, and again the likelihood that more farmland will be resumed to accommodate road and infrastructure upgrades

• It has also not been made clear how the large numbers of staff required for such a major hospital will get to work, or where they will park. The Gold Coast University Hospital is now dependent on the Light Rail network to deliver the staff to work, given that parking within the whole suburb is restricted to 2 hours and the cost of privately operated carparking on site is exorbitant.

• Tweed Heads Community have not been well informed about the impact of removing such a large and integral piece of infrastructure from their neighborhood, the likely downturn in local business and how the void will be filled

As noted above, I am very much in favour of major hospital developments given they have provided me a career and am excited by the prospect of being involved in such an important project, not only for having a project closer to home, but also to cater for my aging parents who have lived in the Coolangatta/Tweed Heads area for 40 years. However I cannot see why State Significant farmland needs to be rezoned to accommodate the development when there are other options available that will not impact on land use and local amenity.

IP Address: - [redacted]
Submission: Online Submission from [redacted] (comments)
https://majorprojects.accelo.com/?action=view_activity&id=300227

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: John Hagan
Email: jhagan7@hotmail.com

Address:
24 Bambery Street

Fingal Head, NSW
2487

Content:
1. The land for the proposed Tweed Valley Hospital is significant farm land which is a limited resource and should be preserved for the production of food.
2. The impact of increased traffic flow and the requirements for parking ancillary medical services will have severe reprocussions on the social ammenities of this area.
3. The redevelopment of the existing site or the Kings Forest site is both demographically, environmentally and financially more appropriate.

IP Address: - 120.154.15.217
Submission: Online Submission from John Hagan (object)
https://majorprojects.accelo.com/?action=view_activity&id=300125

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:

Agreed to false or misleading information statements: yes

Name: John Hagan
Email: jhagan7@hotmail.com

Address:
24 Bambery Street

Fingal Head, NSW
2487

Content:
1. The proposed site at Cudgen is significant farmland and should be used as such.
2. Fertile farmland in a non drought area is a limited resource in Australia.
3. The local infrastructure is not suitable for the increase in traffic and the need for extra parking.
4. Redevelopment of the present hospital would be demographically and environmentally and economically much more appropriate.

IP Address: - 120.154.15.217
Submission: Online Submission from John Hagan (comments)
https://majorprojects.accelo.com/?action=view_activity&id=300133

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: William Love
Email: jeaylove@gmail.com

Address:
35 Gibson Street

Kingscliff, NSW
2487

Content:
Refer to the attached PDF file

IP Address: cpe-121-218-178-162.bpbn-r-034.cht.nsw.bigpond.net.au - 121.218.178.162
Submission: Online Submission from William Love (object)
https://majorprojects.accelo.com/?action=view_activity&id=300129

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

We moved to Kingscliff in 2004 to bring our children up in its relaxed village atmosphere; not wanting the Gold Coast with its rushed and busy life style. I left a well-paid but high-pressure position in Melbourne for a sea/tree change and have worked at a local Service Station for over ten years

The children attended both the primary and secondary schools and now love the coastal village charm that Kingscliff offers. They did Little A's, soccer at Kingscliff District Soccer Club, (now Football Club), and rugby at the club at Casuarina. We loved the community environment, I got involved with the soccer club, became president and then onto the Tweed Valley Kings, the Premier League soccer club. More recently I did my Bronze Medalion and do patrols with Cudgen Headland Surf Club.

The wonderful community feel of Kingscliff brought me to these volunteer roles and I am objecting to this EIS for the reasons below:

- Why target State Significant Farmland when other options exist. The Cudgen Plateau has been designated for protection.
- 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.
- This move disregards and undermines the hard fought 3 story height limit in Kingscliff. The multi-storey building will overlooking the town and together with the parking and other ancillary structures this massive site will dwarf our coastal village.
- 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.
- 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.
- There was no community consultation prior to the site choice. This is contrary to claims made in the EIS.
- More than 8000 signatures were presented to both Upper and Lower Houses of NSW Parliament and there are 4600 followers of the RELOCATE Facebook. These are incredibly strong responses and they have been ignored.
- 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 issue of flooding is spurious. 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.
- Funding for the project has not covered the transport and utility infrastructure. This will get pushed onto local councils and other authorities.
- It is accepted that real estate prices in Kingscliff will increase as a result of business and residential migration to the area putting making it unaffordable for my children and many other people from Kingscliff.

- When considering community responses and social impacts there has been no mention of a resolution by the Tweed Shire Council to oppose siting of the Tweed Hospital on prime agricultural land.
- Our 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.

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Agreed to false or misleading information statements: yes

Name: William Love
Email: jeaylove@gmail.com

Address:
35 Gibson Street

Kingscliff, NSW
2487

Content:
Refer to the attached PDF file

IP Address: cpe-121-218-178-162.bpbn-r-034.cht.nsw.bigpond.net.au - 121.218.178.162
Submission: Online Submission from William Love (object)
https://majorprojects.accelo.com/?action=view_activity&id=300131

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

We moved to Kingscliff in 2004 to bring our children up in its relaxed village atmosphere; not wanting the Gold Coast with its rushed and busy life style. I left a well-paid but high-pressure position in Melbourne for a sea/tree change and have worked at a local Service Station for over ten years

The children attended both the primary and secondary schools and now love the coastal village charm that Kingscliff offers. They did Little A's, soccer at Kingscliff District Soccer Club, (now Football Club), and rugby at the club at Casuarina. We loved the community environment, I got involved with the soccer club, became president and then onto the Tweed Valley Kings, the Premier League soccer club. More recently I did my Bronze Medalion and do patrols with Cudgen Headland Surf Club.

The wonderful community feel of Kingscliff brought me to these volunteer roles and I am objecting to this EIS for the reasons below:

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- 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.
- This move disregards and undermines the hard fought 3 story height limit in Kingscliff. The multi-storey building will overlooking the town and together with the parking and other ancillary structures this massive site will dwarf our coastal village.
- 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.
- 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.
- There was no community consultation prior to the site choice. This is contrary to claims made in the EIS.
- More than 8000 signatures were presented to both Upper and Lower Houses of NSW Parliament and there are 4600 followers of the RELOCATE Facebook. These are incredibly strong responses and they have been ignored.
- 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 issue of flooding is spurious. 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.
- Funding for the project has not covered the transport and utility infrastructure. This will get pushed onto local councils and other authorities.
- It is accepted that real estate prices in Kingscliff will increase as a result of business and residential migration to the area putting making it unaffordable for my children and many other people from Kingscliff.

- When considering community responses and social impacts there has been no mention of a resolution by the Tweed Shire Council to oppose siting of the Tweed Hospital on prime agricultural land.
- Our 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.

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Agreed to false or misleading information statements: yes

Name: William Love
Email: jeaylove@gmail.com

Address:
35 Cibson Street

Kingsclliff, NSW
2487

Content:
Please add this to my earlier submission. The attached file talks about the need for development of the coastal villages away from the coast.

IP Address: cpe-121-218-178-162.bpbn-r-034.cht.nsw.bigpond.net.au - 121.218.178.162
Submission: Online Submission from William Love (object)
https://majorprojects.accelo.com/?action=view_activity&id=300790

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

Article from Tweed Daily News 6-Nov-2018 Link:

https://www.tweeddailynews.com.au/news/demographer-shares-vision-for-tweed-as-economic-hu/3568743/

Demographer shares vision for Tweed as economic hub

THE Tweed is in for a bright future and could become a major economic and business hub by 2050, according to leading demographer Bernard Salt.

Mr Salt, managing director of The Demographics Group, says while the Tweed is known as a place for retirement, by the middle of the century it will be something different altogether.

…

Mr Salt said the Tweed's agricultural areas such as Cudgen were still "very functional" but would need to "add value to their agricultural product in the future".

…

Mr Salt said development of the Tweed's coastal villages such as Kingscliff should be "appropriately managed" but believed strategic planning was "better than ever".

"You need to make sure the urban development is in a style that is consistent with the building envelope at the moment, you don't want Surfers Paradise towers suddenly popping up there," he said.

"Much of the development can be off the coast in less sensitive areas, there's always going to be an impact but strategic planning can mitigate those risks and I think we're much better at strategic planning now, we don't get it right every time but we're more sensitive and better and that gives me confidence.

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Agreed to false or misleading information statements: yes

Name: Robin Jeffery
Email: robin.jeffery@hotmail.com

Address:
24 Bambery Street

Fingal Head, NSW
2487

Content:
1. The proposed site is significant farmland and should be used as such.
2. Fertile farmland in a non drought area, such as the proposed site, is a limited resource in Australia.
3. The local area would be dramatically affected by the new hospital and more farmland would be used for housing, roads and parking.
4. Redevelopment of the current hospital would be far more practical as the area is not cut off during floods as the proposed site is.
5. The redevelopment of the current hospital would have a far less environmental and social impact.
6. The current hospital site is demographically suitable for redevelopment.

IP Address: - 120.154.15.217
Submission: Online Submission from Robin Jeffery (object)
https://majorprojects.accelo.com/?action=view_activity&id=300143

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:

Agreed to false or misleading information statements: yes

Name: Robin Jeffery
Email: robin.jeffery@hotmail.com

Address:
24 Bambery Street

Fingal Head, NSW
2487

Content:
1. The prospect site is significant farmland and should be used as such.
2. Fertile farmland in a non drought area,such as the proposed site, is a precious and valuable resource in Australia.
3. The local infrastructure is not equipped for this size development and the surrounding farmland would be used for roads and housing reducing even more precious farmland.
4. The current hospital should be redeveloped as the infrastructure is set up for it therefore reducing cost and impact, ie public transport is in place and the area does not get cut off in major floods as the Cudgen site does.

IP Address: - 120.154.15.217
Submission: Online Submission from Robin Jeffery (comments)
https://majorprojects.accelo.com/?action=view_activity&id=300153

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: Nina Jackson
Email: ninajackson99@gmail.com

Address:
26 Quigan st

Kingscliff, NSW
2487

Content:
Please listen to the masses of people who actually live in this town. Yes to new hospital no to the current location

IP Address: pa49-197-52-185.pa.qld.optusnet.com.au - 49.197.52.185
Submission: Online Submission from Nina Jackson (object)
https://majorprojects.accelo.com/?action=view_activity&id=300170

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: Rohan Woodforth
Organisation: C/- Saunders Havill Group (Senior Town Planner)
Email: andrewmclean@saundershavill.com

Address:
9 Thompson Street

Bowen Hills, QLD
4006

Content:
Refer to Attachment 1.

IP Address: - 165.225.98.91
Submission: Online Submission from Rohan Woodforth of C/- Saunders Havill Group (object)
https://majorprojects.accelo.com/?action=view_activity&id=300195

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

saunders havill group

Saunders Havill Group Pty Ltd ABN 24 144 972 949
head office 9 Thompson St Bowen Hills Q 4006
phone 1300 123 SHG web www.saundershavill.com
Brisbane • Emerald • Gladstone

• surveying • town planning • urban design • environmental management • landscape architecture

Our Ref: 9511

Deputy Secretary – Planning Services
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

6 December 2018

Dear Deputy Secretary,

RE: SUBMISSION TO NEW TWEED VALLEY HOSPITAL – EIS/SEPP EXHIBITION (771 CUDGEN ROAD, KINGSCLIFF – LAND DESCRIBED AS LOT 102 ON DP870722)

On behalf of **Rohan Woodforth of Unit 4 / 188 Marine Parade, Kingscliff**, Saunders Havill Group make this submission regarding the EIS and SEPP exhibition, subject to the proposed Tweed Heads Hospital at 771 Cudgen Road, Kingscliff. The submission objects to the intended location of the hospital but should not be read as an objection to the facilitation of a new hospital within the Tweed Valley area given the pressing need for additional beds and facilities to service the area.

The submission is structured under the following headings-

1. Impacts on State Significant Farmland;
2. Impact on Tweed Town Centre;
3. Conflict with the Existing Character of the Cudgen Plateau;
4. Traffic and Transport; and
5. Lack of due process within the selection criteria.

By way of background, the development of the new Tweed Valley Hospital will be one of the largest and most significant infrastructure projects undertaken within the Tweed Valley. It will be one of the largest employers within the district and once established will generate the need for additional facilities and services to compliment the function of the hospital. This is a key consideration in the location of this important development.

Impacts on State Significant Farmland

Firstly, one distinct feature of the subject site, is the status of the land being recognised as State significant farmland. The development of the site will remove a substantive portion of farmland from productive purposes and in doing so create a dangerous precedent with regards to the future protection of State significant farmland. It will serve to erode the confidence in, and the application of, planning instruments that have been put in place by all levels of government to protect State significant farmland.

The protection of State significant farmland from urban and rural residential development is provided by local planning direction No. 5.3 (Farmland of State and Regional Significance on the NSW Far North Coast) under Section 9.1(2) of the *Environmental Planning & Assessment Act 1979* (EP&A Act). These legislative controls are recognised throughout the EIS. Within Section 5.2.4 of the EIS, the report explicitly states the following:

> *"The Direction states that SSF cannot be rezoned for urban or rural residential purposes except if the rezoning is consistent with:*
>
> - *The North Coast Regional Plan 2036; or*
> - *Section 4 of the report titled 'Northern Rivers Farmland Protection Project – Final recommendations'. February 2005, held by the DPE; in accordance with Clause (5) a) and b) of the Direction. "*

Within the recommendations of the Northern Rivers Farmland Protection Project, there are clear and direct measures to protect and manage the urban-rural interface and underscoring the relevance and importance of buffering of State Significant Farmland. The proposal cuts across these measures and will serve to erode the integrity of these documents.

The ultimate scale of the hospital campus and likely surrounding ancillary uses is unknown but is likely to result in further encroachment on productive land. Currently, the site is located on the most eastern portion of land within the RU1 (Rural Production). Therefore, any further expansion of the site will impact on the RU1 (Rural Production) which forms part of Tweed's only contiguous State Significant Farmland precinct. It is likely that further encroachment is anticipated as current documents refer to: *"Master planning for the additional health, education, training and research facilities necessary to support these health services, which will be developed with service partners over time"*

A recommendation is proposed regarding the provisioning of a buffer area around the hospital master plan to allow the adjoining agricultural land to operate without restriction or uncertainty. This provision should be established prior to the completion of the layout of the holistic development plan. The associated Agricultural impact report attached to the EIS submission does not provide guidance or forethought on the standard agricultural buffering requirements for adequate separation from agricultural land.

This submission supports the recommendation placed forth within the Tweed Shire Council's submission outlining the need to have setbacks imposed on the site to ensure the adjoining agricultural land will not be impacted by development of the hospital.

Impact on Tweed Heads Town Centre

One area, which this decision will affect most severely, is the Tweed Heads town centre and the residents of Tweed Heads. Throughout the EIS documentation there was little reference to, but one of the most prevalent impacts will be on the residents of Tweed Heads, who had chosen to co-locate with the hospital. These include members of the most vulnerable cohorts of the population including the sick and elderly. Therefore, the subject of reduced accessibility of the hospital, outpatient, allied health services and with the wider health services and facilitates becomes a key issue. Having a dramatic impact on the population, with many reports prepared with EIS stating the intention for there to be additional bus services provided. These services have yet to be outlined with detail or supported by the local Council or Surfside Buslines (the local provider). With the traffic report prepared by Bitzios Consulting as part of the EIS package, stating *'Tweed Valley Hospital's*

inclusion within any updates to the service planning and the inclusion of On-Demand services will occur over the coming years in consultation with TNSW, Surfside and other transport providers.' Therefore, outlining a solution, which has yet to have the appropriate planning and forethought with the potential of the additional services not being certain and leaving Tweed Head residents disadvantaged by having to be solely reliant on a private vehicle.

The second of the key issues', which effect the Tweed Heads town centre, is that of the economic loss of the hospital. With health services being recognised as the largest employer and economic generator within the Tweed Heads town centre. Thus, the removal of the hospital would reduce the economic function of the 'regional city'. Within the North Coast Regional Plan 2036, fostering the growth of health services within the Tweed Hospital precinct was outlined as a major strategy for the region.

Conflict with the Existing Character of Cudgen and Kingscliff

Kingscliff and Cudgen has a reputation for being a coastal town renowned by tourists for being a juxtaposition between a working agricultural hinterland within a high valued environmental context. Across all levels of planning, Kingscliff has consistently been zoned and had development controls in place to maintain the coastal town character and to protect the general character associated with the North Coast. Within the North Coast Regional Plan 2036, Kingscliff has been identified as being able to provide local services to the neighbouring coastal towns, not the facilitation of regionally scaled infrastructure. Within the Kingscliff locality plan the following has been outlined for the future of the Kingscliff township:

> *"The future vision for the Kingscliff Locality is for a vibrant coastal town servicing the needs of the local residents, higher order services for the broader network of Tweed coastal villages and as a popular coastal tourist destination. Future development will achieve a sustainable balance between a prosperous and healthy community life, local economy, employment opportunities, and diversity of housing choice nestled within a highly valued environmental context fringed with a working agricultural hinterland." -*

Cudgen, located on a plateau behind Kingscliff, has limited opportunity for growth being surrounded by significantly important agricultural land and steep topography. The existing and future character of Cudgen will be that of single dwelling houses within a village setting.

There will be a significant impact regarding the communities of Kingscliff, Cudgen and Tweed Heads due to the changing location of the hospital. Irrespective of site attributes, Kingscliff and Cudgen do not have the correct provisioning of infrastructure to support such a use. Notwithstanding the location of the M1, all other forms of infrastructure have been planned to suit a 'coastal town'. There are a wide range of additional impacts on Kingscliff as a township, including the increased traffic flows and the need for a severe increase of the networks capacity to facilitate the hospital. Therefore, it could be concluded that the full cost of moving the hospital to Kingscliff has not been outlined within the applicable material that has been provided. Throughout the entire material associated with the package there has been minimal consideration given to the social impacts of relocating the hospital into a coastal town.

Traffic and Transport

Concern is raised with the future impacts of traffic and transport the hospital will have on the local and wider road network of the area.

A number of upgrades are proposed and identified within the Traffic Impact Assessment (TIA), which forms part of the material prepared by Bitizios Consulting. The report outlines a number of key considerations for the hospital. Firstly, a model of the Cudgen Road/Tweed Coast Road Intersection, concluding that the intersection would operate outside acceptable performance limits. A series of upgrades referred to as Upgrade 1 were modelled. These upgrades however, do not include the traffic impacts from the hospital or the associated potential ancillary uses.

Secondly, there are a number of concerns surrounding the connections to the site in relation to active transport (walking and cycling) and the adjoining shared paths. It is of note that the TIA and concept plans show various pedestrian connections to the site. However, currently the shared path, which runs on the Tweed Coast Road (West), will currently be bisected by access point A (designated for Service Vehicles, Ambulances and Staff Parking).

Previously, it was expressed that the access point would be used only for authorised vehicles allowing for emergency access while maintaining the integrity of the shared path. The proposal should be clearer on the bisection of the pathway and the safety of uses. Alternatively, staff access could be provided through either one of the three higher order access points.

The application also provides a significant information gap, regarding the associated upgrades that are required on Cudgen Road. Cudgen Road currently has a rural, low road hierarchy treatment and cross section. The formalisation of the hospital access will necessitate a full range of upgrades to ensure that the road will meet the requirements of that required from a major regional infrastructure piece. These issues have been further addressed above, within the section above in the discussion of the Kingscliff Character section. These upgrades have been analysed in detail by Tweed Shire Council:

> '…*The upgrade of the full frontage of the site to an urban road cross section – that is installation of kerb and gutter, piping of open drainage, street lighting, signage and linemarking etc. The application does not include any detail on the final configuration of Cudgen Road, perhaps as it will be the subject to the Stage 2 SSD.*'

Lack of due process

It is considered there has been a lack of transparency regarding details of the ultimate development, footprint diagrams, visual impact, and the site selection process. With particular concern over the presentation of the associated cost of the continued development of the current Tweed Heads site including the provisioning of additional infrastructure for flood immunity. Additionally, throughout the entire process there appears to have been no clear criteria for the assessment of the flood impacts of each site. The site does not deliver the level of flood immunity and provisioning of safe access to the broader district at the time of significant flooding that should be sought for community infrastructure of this scale. With the Tweed Valley region's most heavily populated population centres: Tweed Heads and Tweed Heads South – Banora Point being cut off from the proposed hospital site within flood modelling undertaken to form part of the EIS application.

Little consideration has been given to the provision of allied health and other ancillary land uses being provided. It is assumed these additional uses will occur as a result of the hospital use. However, there has been little to no assessment of the cumulative impacts of these uses, particularly demands on transport and car parking demands.

The Department has previously refused modification requests for Kings Forest, with the key contributing factor being the risks it posed to the adjacent State significant farmland. It was also considered inconsistent with the rural character of the area and would potentially undermine the ongoing protection of the nearby wetlands. The proposed site has attributes similar to Kings Forest and the same conclusion should be drawn for this site. These issues are compounded by the lack of reference to the community consultation undertaken and the petition sent to the Department. These are in addition to strong opposition to the proposal site by the Tweed Shire Council. With the Council voting on many motions to not support the subject site. There appears to be a lack of consistent due process shown in the assessment of this proposal.

Conclusion

This submission opposes the proposed location of the new Tweed Valley Hospital based on its unacceptable impacts on state significant farmland, its impact on the character and amenity of Kingscliff and the lack of clear, transparent process followed in the site selection methodology.

The proposal will erode community confidence in zoning and other development controls which purport to provide clear, consistent direction for land use allocation and distribution. The proposal will result in a significant undermining of Tweed Shire's existing Local, Regional and State planning strategies.

Should there be further opportunity to provide input into the process I can be contacted on (07) 3251 9482 or andrewmclean@saundershavill.com.

Yours sincerely

Andrew McLean
Senior Planner

On behalf of Rohan Woodforth of Unit 4/188 Marine Parade, Kingscliff.

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation:

Agreed to false or misleading information statements: yes

Name: Rohan Woodforth
Organisation: C/- Saunders Havill Group (Senior Town Planner)
Email: andrewmclean@saundershavill.com

Address:
9 Thompson Street

Bowen Hills, QLD
4006

Content:
Refer to Attachment 1.

IP Address: - 165.225.98.91
Submission: Online Submission from Rohan Woodforth of C/- Saunders Havill Group (comments)
https://majorprojects.accelo.com/?action=view_activity&id=300203

Submission for Job: #9659
https://majorprojects.accelo.com/?action=view_job&id=9659

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

saunders havill group

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Brisbane • Emerald • Gladstone

• surveying • town planning • urban design • environmental management • landscape architecture

Our Ref: 9511

Deputy Secretary – Planning Services
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

6 December 2018

Dear Deputy Secretary,

RE: SUBMISSION TO NEW TWEED VALLEY HOSPITAL – EIS/SEPP EXHIBITION (771 CUDGEN ROAD, KINGSCLIFF – LAND DESCRIBED AS LOT 102 ON DP870722)

On behalf of **Rohan Woodforth of Unit 4 / 188 Marine Parade, Kingscliff**, Saunders Havill Group make this submission regarding the EIS and SEPP exhibition, subject to the proposed Tweed Heads Hospital at 771 Cudgen Road, Kingscliff. The submission objects to the intended location of the hospital but should not be read as an objection to the facilitation of a new hospital within the Tweed Valley area given the pressing need for additional beds and facilities to service the area.

The submission is structured under the following headings-

1. Impacts on State Significant Farmland;
2. Impact on Tweed Town Centre;
3. Conflict with the Existing Character of the Cudgen Plateau;
4. Traffic and Transport; and
5. Lack of due process within the selection criteria.

By way of background, the development of the new Tweed Valley Hospital will be one of the largest and most significant infrastructure projects undertaken within the Tweed Valley. It will be one of the largest employers within the district and once established will generate the need for additional facilities and services to compliment the function of the hospital. This is a key consideration in the location of this important development.

Impacts on State Significant Farmland

Firstly, one distinct feature of the subject site, is the status of the land being recognised as State significant farmland. The development of the site will remove a substantive portion of farmland from productive purposes and in doing so create a dangerous precedent with regards to the future protection of State significant farmland. It will serve to erode the confidence in, and the application of, planning instruments that have been put in place by all levels of government to protect State significant farmland.

The protection of State significant farmland from urban and rural residential development is provided by local planning direction No. 5.3 (Farmland of State and Regional Significance on the NSW Far North Coast) under Section 9.1(2) of the *Environmental Planning & Assessment Act 1979* (EP&A Act). These legislative controls are recognised throughout the EIS. Within Section 5.2.4 of the EIS, the report explicitly states the following:

> *"The Direction states that SSF cannot be rezoned for urban or rural residential purposes except if the rezoning is consistent with:*
>
> - *The North Coast Regional Plan 2036; or*
> - *Section 4 of the report titled 'Northern Rivers Farmland Protection Project – Final recommendations'. February 2005, held by the DPE; in accordance with Clause (5) a) and b) of the Direction. "*

Within the recommendations of the Northern Rivers Farmland Protection Project, there are clear and direct measures to protect and manage the urban-rural interface and underscoring the relevance and importance of buffering of State Significant Farmland. The proposal cuts across these measures and will serve to erode the integrity of these documents.

The ultimate scale of the hospital campus and likely surrounding ancillary uses is unknown but is likely to result in further encroachment on productive land. Currently, the site is located on the most eastern portion of land within the RU1 (Rural Production). Therefore, any further expansion of the site will impact on the RU1 (Rural Production) which forms part of Tweed's only contiguous State Significant Farmland precinct. It is likely that further encroachment is anticipated as current documents refer to: *"Master planning for the additional health, education, training and research facilities necessary to support these health services, which will be developed with service partners over time"*

A recommendation is proposed regarding the provisioning of a buffer area around the hospital master plan to allow the adjoining agricultural land to operate without restriction or uncertainty. This provision should be established prior to the completion of the layout of the holistic development plan. The associated Agricultural impact report attached to the EIS submission does not provide guidance or forethought on the standard agricultural buffering requirements for adequate separation from agricultural land.

This submission supports the recommendation placed forth within the Tweed Shire Council's submission outlining the need to have setbacks imposed on the site to ensure the adjoining agricultural land will not be impacted by development of the hospital.

Impact on Tweed Heads Town Centre

One area, which this decision will affect most severely, is the Tweed Heads town centre and the residents of Tweed Heads. Throughout the EIS documentation there was little reference to, but one of the most prevalent impacts will be on the residents of Tweed Heads, who had chosen to co-locate with the hospital. These include members of the most vulnerable cohorts of the population including the sick and elderly. Therefore, the subject of reduced accessibility of the hospital, outpatient, allied health services and with the wider health services and facilitates becomes a key issue. Having a dramatic impact on the population, with many reports prepared with EIS stating the intention for there to be additional bus services provided. These services have yet to be outlined with detail or supported by the local Council or Surfside Buslines (the local provider). With the traffic report prepared by Bitzios Consulting as part of the EIS package, stating *'Tweed Valley Hospital's*

inclusion within any updates to the service planning and the inclusion of On-Demand services will occur over the coming years in consultation with TNSW, Surfside and other transport providers.' Therefore, outlining a solution, which has yet to have the appropriate planning and forethought with the potential of the additional services not being certain and leaving Tweed Head residents disadvantaged by having to be solely reliant on a private vehicle.

The second of the key issues', which effect the Tweed Heads town centre, is that of the economic loss of the hospital. With health services being recognised as the largest employer and economic generator within the Tweed Heads town centre. Thus, the removal of the hospital would reduce the economic function of the 'regional city'. Within the North Coast Regional Plan 2036, fostering the growth of health services within the Tweed Hospital precinct was outlined as a major strategy for the region.

Conflict with the Existing Character of Cudgen and Kingscliff

Kingscliff and Cudgen has a reputation for being a coastal town renowned by tourists for being a juxtaposition between a working agricultural hinterland within a high valued environmental context. Across all levels of planning, Kingscliff has consistently been zoned and had development controls in place to maintain the coastal town character and to protect the general character associated with the North Coast. Within the North Coast Regional Plan 2036, Kingscliff has been identified as being able to provide local services to the neighbouring coastal towns, not the facilitation of regionally scaled infrastructure. Within the Kingscliff locality plan the following has been outlined for the future of the Kingscliff township:

> *"The future vision for the Kingscliff Locality is for a vibrant coastal town servicing the needs of the local residents, higher order services for the broader network of Tweed coastal villages and as a popular coastal tourist destination. Future development will achieve a sustainable balance between a prosperous and healthy community life, local economy, employment opportunities, and diversity of housing choice nestled within a highly valued environmental context fringed with a working agricultural hinterland." -*

Cudgen, located on a plateau behind Kingscliff, has limited opportunity for growth being surrounded by significantly important agricultural land and steep topography. The existing and future character of Cudgen will be that of single dwelling houses within a village setting.

There will be a significant impact regarding the communities of Kingscliff, Cudgen and Tweed Heads due to the changing location of the hospital. Irrespective of site attributes, Kingscliff and Cudgen do not have the correct provisioning of infrastructure to support such a use. Notwithstanding the location of the M1, all other forms of infrastructure have been planned to suit a 'coastal town'. There are a wide range of additional impacts on Kingscliff as a township, including the increased traffic flows and the need for a severe increase of the networks capacity to facilitate the hospital. Therefore, it could be concluded that the full cost of moving the hospital to Kingscliff has not been outlined within the applicable material that has been provided. Throughout the entire material associated with the package there has been minimal consideration given to the social impacts of relocating the hospital into a coastal town.

Traffic and Transport

Concern is raised with the future impacts of traffic and transport the hospital will have on the local and wider road network of the area.

A number of upgrades are proposed and identified within the Traffic Impact Assessment (TIA), which forms part of the material prepared by Bitizios Consulting. The report outlines a number of key considerations for the hospital. Firstly, a model of the Cudgen Road/Tweed Coast Road Intersection, concluding that the intersection would operate outside acceptable performance limits. A series of upgrades referred to as Upgrade 1 were modelled. These upgrades however, do not include the traffic impacts from the hospital or the associated potential ancillary uses.

Secondly, there are a number of concerns surrounding the connections to the site in relation to active transport (walking and cycling) and the adjoining shared paths. It is of note that the TIA and concept plans show various pedestrian connections to the site. However, currently the shared path, which runs on the Tweed Coast Road (West), will currently be bisected by access point A (designated for Service Vehicles, Ambulances and Staff Parking).

Previously, it was expressed that the access point would be used only for authorised vehicles allowing for emergency access while maintaining the integrity of the shared path. The proposal should be clearer on the bisection of the pathway and the safety of uses. Alternatively, staff access could be provided through either one of the three higher order access points.

The application also provides a significant information gap, regarding the associated upgrades that are required on Cudgen Road. Cudgen Road currently has a rural, low road hierarchy treatment and cross section. The formalisation of the hospital access will necessitate a full range of upgrades to ensure that the road will meet the requirements of that required from a major regional infrastructure piece. These issues have been further addressed above, within the section above in the discussion of the Kingscliff Character section. These upgrades have been analysed in detail by Tweed Shire Council:

> '…*The upgrade of the full frontage of the site to an urban road cross section – that is installation of kerb and gutter, piping of open drainage, street lighting, signage and linemarking etc. The application does not include any detail on the final configuration of Cudgen Road, perhaps as it will be the subject to the Stage 2 SSD.*'

Lack of due process

It is considered there has been a lack of transparency regarding details of the ultimate development, footprint diagrams, visual impact, and the site selection process. With particular concern over the presentation of the associated cost of the continued development of the current Tweed Heads site including the provisioning of additional infrastructure for flood immunity. Additionally, throughout the entire process there appears to have been no clear criteria for the assessment of the flood impacts of each site. The site does not deliver the level of flood immunity and provisioning of safe access to the broader district at the time of significant flooding that should be sought for community infrastructure of this scale. With the Tweed Valley region's most heavily populated population centres: Tweed Heads and Tweed Heads South – Banora Point being cut off from the proposed hospital site within flood modelling undertaken to form part of the EIS application.

Little consideration has been given to the provision of allied health and other ancillary land uses being provided. It is assumed these additional uses will occur as a result of the hospital use. However, there has been little to no assessment of the cumulative impacts of these uses, particularly demands on transport and car parking demands.

The Department has previously refused modification requests for Kings Forest, with the key contributing factor being the risks it posed to the adjacent State significant farmland. It was also considered inconsistent with the rural character of the area and would potentially undermine the ongoing protection of the nearby wetlands. The proposed site has attributes similar to Kings Forest and the same conclusion should be drawn for this site. These issues are compounded by the lack of reference to the community consultation undertaken and the petition sent to the Department. These are in addition to strong opposition to the proposal site by the Tweed Shire Council. With the Council voting on many motions to not support the subject site. There appears to be a lack of consistent due process shown in the assessment of this proposal.

Conclusion

This submission opposes the proposed location of the new Tweed Valley Hospital based on its unacceptable impacts on state significant farmland, its impact on the character and amenity of Kingscliff and the lack of clear, transparent process followed in the site selection methodology.

The proposal will erode community confidence in zoning and other development controls which purport to provide clear, consistent direction for land use allocation and distribution. The proposal will result in a significant undermining of Tweed Shire's existing Local, Regional and State planning strategies.

Should there be further opportunity to provide input into the process I can be contacted on (07) 3251 9482 or andrewmclean@saundershavill.com.

Yours sincerely

Andrew McLean
Senior Planner

On behalf of Rohan Woodforth of Unit 4/188 Marine Parade, Kingscliff.

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Agreed to false or misleading information statements: yes

Name: Matthew Smith
Email: matthew.smith182@gmail.com

Address:
8/13 Beach Street

Kingscliff, NSW
2487

Content:
I am a local resident and value the Cudgen farmland area immensely, I believe it plays an important role in the local area from a health and well-being perspective as it provides the means for local farmers to produce and provide fresh organic produce to the local community, but it also represents a symbol of social and cultural identity. To remove this land and the ability for families to do what they have done for generations would be the death knell for the community.
I feel hurt and let down when I learned the plans to site a new hospital on Cudgen farmland, the idea that the government is targeting State Significant Farmland when other site options exist seems absolutely ludicrous to me. I do not understand the decision made to site a new hospital on land which has been farmed for generations and provides fresh, organic vegetables and produce for the local community and surrounding area improving their health and well being. Perhaps if community consultation was undertaken, I might understand the reasons for the proposed siting, but at no point has this occurred.
Kingscliff is a quiet coastal community which aims to provide a beautiful and natural location for locals and holidaymakers to enjoy, a community which provides fresh organic produce for all who live here and visit to enjoy. The ability to do this will be negated if the government go ahead with plans to site the hospital in Cudgen. The impact on the local area will be immense and will destroy the town as it stands today. I am aware of the hard-fought battle that many local residents have endured to maintain a 3-story limit in Kingscliff. This battle will all have been for nothing if the hospital is allowed to progress, it will dominate the skyline, ruin the visual amenity for thousands of locals and all visitors to the area. It will be an eyesore.
I am completely confused as to why the tweed hospital location can not be regenerated and redeveloped to accommodate the requirement for increased capacity and function. The local area has always accommodated a hospital, it is set-up to work in symbiosis with local residents and their economy has been defined by the hospital's presence, why change that and move it to Cudgen/Kingscliff.
I would like to know who made the decision to site the hospital at Cudgen, as it makes no sense to me. I have heard claims that that the chosen site was the "best" and "chosen by experts" when in fact I believe it was a commercial decision from the limited land for sale at one particular point in time in 2017. Did the "experts" consider any land that was not for sale?
I am very worried what the siting of the hospital in an area just minutes from my home will do to my quality of life and that of my children. I imagine the area will see increased levels of traffic, congestion, demand for parking, noise, light pollution and ultimately the loss of a rural ambiance which has characterized the area for many years.

IP Address: dav3031370.lnk.telstra.net - 144.130.173.62

Submission: Online Submission from Matthew Smith (object)
https://majorprojects.accelo.com/?action=view_activity&id=300215

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:

Agreed to false or misleading information statements: yes

Name: Matthew Smith
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8/13 Beach Street

Kingscliff, NSW
2487

Content:
I am a local resident and value the Cudgen farmland area immensely, I believe it plays an important role in the local area from a health and well-being perspective as it provides the means for local farmers to produce and provide fresh organic produce to the local community, but it also represents a symbol of social and cultural identity. To remove this land and the ability for families to do what they have done for generations would be the death knell for the community.
I understand that as part of the SEPP the land will be rezoned, however I believe it is wrong to do this as it will firstly breach the protections gazetted in the 2017 North Coast Regional Plan, but it will also destroy land zoned as State Significant Farmland. It is obvious to me that a hospital such as that planned do not sit within their environs in complete isolation, there is other ancillary health services infrastructure and support organisations which are required to support its operation. With this in mind I am worried that this rezoning will trigger an eventual supplementary rezoning of land adjacent to the Hospital in accordance with the Minister for Planning & Environmentâ€™s announced plans for an extended â€oeRegional Health Services Precinctâ€• adjoining the Hospital site, thus undermining the remaining prime agricultural lands. This will set a precedent for 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.
I urge you to reconsider the plans for siting of this hospital, not only will the siting destroy the Cudgen plateau agricultural sector, but it will also destroy the local area as a viable tourist destination. Years of community consultation and planning have gone into creating a place where millions of people come on an annual basis to take holidays, this will be engulfed and eventually destroyed by the social and economic footprint of the hospital.

IP Address: - 144.130.173.62
Submission: Online Submission from Matthew Smith (comments)
https://majorprojects.accelo.com/?action=view_activity&id=300197

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: Matthew Smith
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Address:
8/13 Beach Street

Kingscliff, NSW
2487

Content:
I am a local resident and value the Cudgen farmland area immensely, I believe it plays an important role in the local area from a health and well-being perspective as it provides the means for local farmers to produce and provide fresh organic produce to the local community, but it also represents a symbol of social and cultural identity. To remove this land and the ability for families to do what they have done for generations would be the death knell for the community.
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I urge you to reconsider the plans for siting of this hospital, not only will the siting destroy the Cudgen plateau agricultural sector, but it will also destroy the local area as a viable tourist destination. Years of community consultation and planning have gone into creating a place where millions of people come on an annual basis to take holidays, this will be engulfed and eventually destroyed by the social and economic footprint of the hospital.

IP Address: - 144.130.173.62
Submission: Online Submission from Matthew Smith (comments)
https://majorprojects.accelo.com/?action=view_activity&id=300199

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: Yvonne Thompson
Email:[redacted]

Address:
[redacted]

Kingscliff, NSW
2487

Content:

I have lived in Kingscliff and nearby surrounds for forty years and taught at local schools for almost thirty years. I have had children born at Murwillumbah and Tweed Heads hospitals and reared my family here. During this time, my family and I have enjoyed the low-key lifestyle, the environment, locally grown food and the sustainable development that has carefully been planned to maintain the integrity of each area of Tweed Shire. It is wonderful that the shire will get updated hospital facilities but at present the lack of sound town planning using integrity, sustainability and thorough community consultation has chosen the wrong site. Therefore, Health Infrastructure NSW need to start a site selection again using formal and open community consultation and not use State Significant Farmland.

1. I object to the preliminary works started on a site which does not have complete development consent. The repeated, numerous fence signage along the road front, inferring that this is the site for the Tweed Valley Hospital, has been erected prior to the closing date for submissions. This appears as a ploy to persuade the local community that this site has been approved, accept it as inevitable and therefore not make their submissions of objection. It is a strategy to persuade commitment to the major SSD project prior to the full development consent. This is an abuse of process.

2. I object to the lack of and ineffective initial community consultation prior to the site choice announcement. It was extremely limited and therefore deceptive. Later informal community consultation was set up in limited locations. Some community members who were asked as they were going to shop, had insufficient time to absorb, research, interpret and respond to such a highly complex documented EIS. People attending the pop-up stalls were not given authenticated verification on how their responses were recorded or information given that their responses would be used as a statistical pie chart which would be used to influence site selection. I have no confidence in the process that has been taken. Formal and informed community consultation needs to be undertaken.

3. Community consultation needs to be undertaken regarding 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. The shift will remove the key economic driver of Tweed Heads and betray Tweed Heads residents with medical issues who invested in homes near the hospital. Clear, plain English disclosure of long-term impacts to the current Tweed Hospital need to be made during community consultation. Demographic research needs to be undertaken to show who will be using the facility the most and how they can access the Kingscliff site both night and day.

4. There has been limited acknowledgement of two petitions by thousands of NSW residents, that were presented to the NSW Houses of Parliament, objecting to the chosen hospital site. There has been a disregard to the opposition by the Tweed Shire Council opposing the hospital being built on prime agricultural land due to social impacts and the community outcry. Also disregard to the opposition by Kingscliff Ratepayers and Progress Association.

5. I object to the Government destroying the protected State Significant Farmland when many other alternate, viable site options exist. This was a commercial decision chosen from the limited land offered for sale. The Kingscliff site has been purchased through compulsory acquisition. Compulsory acquisition now broadens and opens numerous possible sites that were not offered for sale. This State Significant Farmland and nearby agricultural lands were successfully producing food even though NSW was in a 100% drought.

6. The long-term impact on nearby State Significant Farmland will be a further loss to agriculture and the fresh, local-based produce industry. In time, other services will inevitably be needed such as specialist centres, more buildings for parking as the hospital increases in size, increased demands for health educational facilities and allied medical services.

7. The character of the town of Kingscliff will be severely compromised, changing the core business focus of the laid-back, beach tourism industry to a health services industry.
It will undermine the community's hard fought three storey building limit to multistorey buildings as there is limited land, with the ocean to the east, the river to the north, a thin coastal strip and creek to the south and State Significant Farmland to the west.

The quality of life for Kingscliff residents and tourists will diminish with intense urbanisation, increased traffic congestion and demand for parking which is already at its limit in the CBD. Demand for parking in residential streets on Kingscliff hill will inevitably increase by hospital users who do not want to pay for parking.

The quiet rural ambience and lifestyle will change with increased noise levels with twenty-four-hour ambulance sirens, helipad aircraft and all-night flood lighting.

8. During the March 2017 floods Kingscliff was inaccessible by people at Tweed Heads and Banora Point areas. If the Kingscliff site is used it would limit access by residents north of the river in flood time. This is contrary to claims of improved flood access in the EIS.

IP Address: [redacted]
Submission: Online Submission from Yvonne Thompson (object)
https://majorprojects.accelo.com/?action=view_activity&id=300223

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:

Agreed to false or misleading information statements: yes

Name: Yvonne Thompson
Email: [redacted]

Address:
[redacted]

Kingscliff, NSW
2487

Content:

I have lived in Kingscliff and nearby surrounds for forty years and taught at local schools for almost thirty years, including Cudgen Public School. I have had children born at Murwillumbah and Tweed Heads hospitals and reared my family here. My family has grown fruit and vegetables on productive red volcanic soil. My family and I have enjoyed the low-key lifestyle, the environment, locally grown food and the sustainable development that has carefully been planned to maintain the integrity of each area of Tweed Shire.
It is wonderful the shire will get updated hospital facilities, but at present the planning is for the wrong site. Health Infrastructure NSW need to abandon the proposal to relocate the Tweed Hospital onto prime Cudgen farmland and start a site selection again not using any State Significant Farmland.

1. I object to the Government destroying the protected State Significant Farmland, currently zoned RU1 when many other alternate, viable site options exist. This valuable land needs to stay protected for food security for future generations. This State Significant Farmland and nearby agricultural lands is drought-proof and recently successfully produced food even though NSW was in a 100% drought. The site has mineral rich, fertile, arable, red, volcanic soil which holds moisture and is frost free all year round. Along with the northern sloping aspect, this land produces healthy, prolific, outstanding food throughout all seasons of the year. In past years my family have grown banana and zucchini crops on similar soil on north facing land in the Tweed shire, without using any irrigation whatsoever. However, the land was extremely steep and difficult to cultivate compared to the gentle slope of the selected Cudgen site. On the selected site there are spring fed dams which further drought proof the crops and it benefits from a subtropical climate. It is extremely difficult to find these farming conditions elsewhere in NSW, so it would be a disaster to take away the RU1 zoning, destroying and concreting this farmland.

2. This Kingscliff site was chosen from the limited land offered for sale. It has been purchased through compulsory acquisition. Numerous, viable alternative sites that were not offered for sale could now be considered by using compulsory acquisition when finding a more suitable site that does not have RU1 zoning. The North Coast Land Strategy 2005 zoned this farmland for protection and was only to be taken away if there is absolutely no other feasible property. It is devastating to think in 2018 that laws and well planned rulings can be easily changed to suit a government and commercial gains when there are other sustainable options.

3. The sweet potato industry at Cudgen produces $10 million per year, with this money staying in the Tweed shire and helping many other small businesses such as farm supplies, services and transport. When an alternate site location for the hospital is found, that is not on State Significant Farmland,

then the relocation of the hospital will be value adding to the local community instead of gradually taking away an industry.

4. The Minister for Planning and Environment announced eventual plans for an extended 'Regional Health Services Precinct' to adjoin the hospital site including relative accommodation, specialist centres, extended car parks, nurses' accommodation and doctors' rooms. This would facilitate supplementary rezoning of adjacent farmland effecting the at-risk viability threshold of 500 ha. A loss of approximately 30 ha could lose its special protection altogether. This would lead to the demise of agriculture on the Cudgen Plateau and lead to associated commerce and/or residential development on this precious food producing land. The protection of this farmland and its heritage is vitally important to the people of Kingscliff, Cudgen and others that come to the area looking for eco-tourism. Therefore, this current site location is flawed and a new site that is not prime agricultural farmland with RU1 zoning needs to be found.

5. The character of the town of Kingscliff will be severely compromised, changing the core business focus of the laid-back, beach tourism industry to a health services industry. This contravenes the 2014 Tweed LEP and throws out extensive planning by the Tweed Shire Council along with a multitude of community consultations.
It will undermine the community's hard fought three storey height limit to multistorey buildings as there will be limited land, with the ocean to the east, the river and protected environment to the north, a thin coastal strip, a creek and State Significant Farmlands to the south and State Significant Farmland to the west. Years of community consultation and planning around Kingscliff as a beach and food tourism town will be disregarded, including opposition to the site location from the Tweed Shire Council and the Kingscliff Ratepayers and Progress Association.
The tourist cafes and restaurants around Kingscliff have become known for serving locally produced food (paddock to plate). This valuable industry along with eco-tourism is rapidly increasing every year. The quality of life for Kingscliff residents and tourists will diminish with intense urbanisation, increased traffic congestion and demand for parking which is already at its limit in the CBD.
Kingscliff will change to become a hospital town because of the devastating social, economic and visual impact of the hospital. Therefore, this site location is too close to a small town with limited area, so another site location needs to be found.

There needs to be extensive, formal and open community consultation with clear information regarding a new location site for the Tweed Valley Hospital.
Employment of a panel of independent town planners to assist with finding an alternate site location for the hospital that would negate the need to permanently destroy protected RU1 State Significant Farmland or detrimentally change a tourist town. Research also needs to be undertaken on the social and economic impacts of relocating the Tweed Hospital away from the city of Tweed Heads and reference to the 2017 North Coast Regional Plan and to prior extensive planning.

IP Address: - [redacted]
Submission: Online Submission from Yvonne Thompson (comments)
https://majorprojects.accelo.com/?action=view_activity&id=300315

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: Juliet Kelly
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39 Eurobin Ave

Manly, NSW
2095

Content:
Can't afford to loose such prime farmland

IP Address: - 1.144.104.118
Submission: Online Submission from Juliet Kelly (object)
https://majorprojects.accelo.com/?action=view_activity&id=300243

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: Kristie Hedley
Email: [redacted]

Address:
[redacted]

Kingscliff, NSW
2487

Content:
Attached

IP Address: [redacted]
Submission: Online Submission from Kristie Hedley (object)
https://majorprojects.accelo.com/?action=view_activity&id=300253

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 register my objection to application SSD 18_9575 being the concept proposal for the relocation of the Tweed Hospital to 771 Cudgen Rd Cudgen.

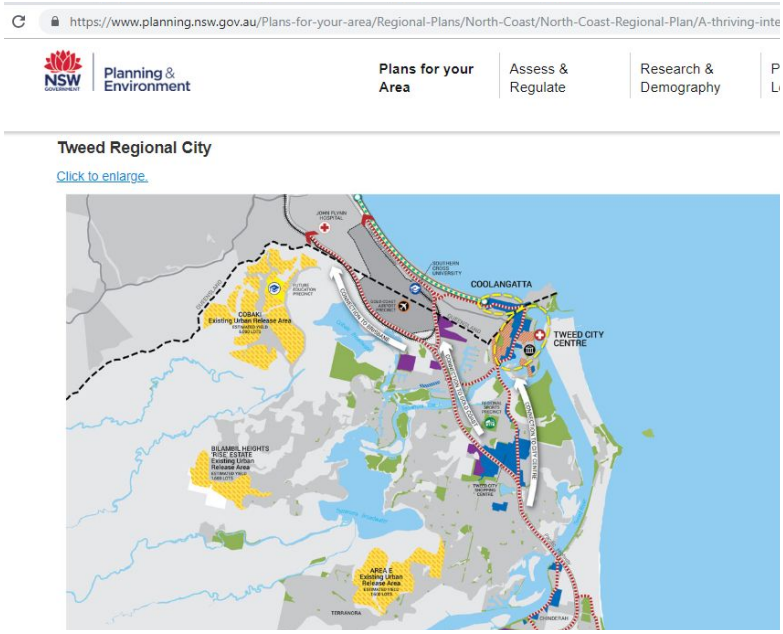
My name is Kristie Hedley and I am an educator in the Tweed community. I am 40 years old and have lived and owned my home in Kingscliff for going on 20 years. My husband and I bought into the area as we fell in love with the farm meets the sea lifestyle and wanted to invest in raising our children in a small community that valued the natural environment as well as access to locally grown fresh food.

I object to the aforementioned development application in the strongest terms for the following reasons:

1) There is an existing Masterplan for the redevelopment of the existing Tweed Hospital at Tweed Heads http://www.hpi.net.au/tweed-heads-masterplan. . This plan was 7 years of planning and consultation in the making and was in train until 2017 when a sudden need for a 'greenfield site' crept into the conversation. The minutes of the Northern NSW Local Health District Board reveal that up until March 29 the redevelopment of Tweed Hospital was still very much the plan and the board was calling on the state government to commit to the full funding of the redevelopment. Less than 3 months later Minister Hazzard announced that there was to be a brand new hospital (no previous discussion of reflected anywhere). Then in April 2018 the Minister announced the hospital was to be built at Cudgen, with absolutely no prior warning or consultation with the community. At a community meeting in June 2018 we questioned Minister Hazzard as to why he suddenly walked away from the long planned redevelopment of the existing Tweed Hospital and he responded, verbatim, "I changed my mind." This is a far from satisfactory answer. There is no record of a feasibility study having been completed to justify the abandoning of the redevelopment plans. There is no record of discussion of abandoning the plans in the NNSWLHD Board minutes. It is worth noting that on 26th September 2016 the then Health Minister sacked 3 NNSWLHD Board members and 3 more walked away.On 26th October new board members were appointed and only a few short months later there was a drastic departure from long held plans.
All this warrants the need for a full and transparent feasibility study of redeveloping and expanding the Tweed Hospital at its existing location in the regional centre of Tweed Heads, before even considering relocating the hospital to the small town of Cudgen.

2) Relocating the hospital from Tweed Heads to Cudgen goes against the endorsed North Coast Regional Plan 2018-2036, which declared Tweed Heads the regional city, and clearly

placed the hospital and health precinct in Tweed Heads. Tweed Heads will be the only regional city without a hospital.
https://www.planning.nsw.gov.au/Plans-for-your-area/Regional-Plans/North-Coast/North-Coast-Regional-Plan/A-thriving-interconnected-economy



3) Relocating the hospital from Tweed Heads to Cudgen will move the hospital away from not only the majority of the Tweed population north of the Tweed River, but also from the most vulnerable populations in the Tweed shire. Tweed Heads is home to the highest proportion of those aged 65 plus in the shire; is home to the highest proportion of those registered as needing care; is home to a higher proportion of those providing care; is home to the majority of the shire's aged care facilities; and per household also has lower car ownership than the rest of the shire presenting obvious access issues when the hospital is relocated 15 km south to a town with intermittent bus services. The EIS only points to a 'potential' in increased public transport facilities but this is insufficient. Community members, particularly those at risk, will need real travel solutions, not just promises of 'potential'.

4) The EIS makes it clear that the proponent (Health Infrastructure) is not going to provide the much needed local road upgrades that would be needed around the proposed site at Cudgen if this major piece of infrastructure were to go there. They have committed only to upgrading the lights at the intersection of Tweed Coast Rd and Cudgen Rd. They are relying on the upgrade of the easily flooded Tweed Coast Road (between the Motorway and Cudgen Rd) to be funded by the developers of Kings Forest, and yet there is no guarantee or requirement that developer will take that action by the time of the proposed hospital opening date of 2022. Again this is insufficient. This road will not cope with the expected increase of 5000 extra car movements per day quoted in the EIS. The Tweed Shire Council was recently unsuccessful in acquiring a Federal grant to upgrade this road and so ultimately the responsibility will fall to the Tweed Shire Council to fund this multi million dollar project. It is unreasonable on the Council and on the Tweed ratepayers that they should be forced to fund the road upgrades that this proposed

relocation of the hospital will force, when neither the ratepayers nor the Council were consulted adequately and transparently.

5) The proponent's claim of 'extensive community consultation' on this proposed relocation is false. The community knew nothing about it until Minister Hazzard and MP Geoff Provest made the announcement on site on April 4th 2018. Several days after this the local community held a community meeting expressing their upset at this surprise announcement to relocate the hospital onto State Significant Farmland at Cudgen, and then a second community meeting was held several days after that. At this second community meeting, under increasing public pressure, MP Geoff Provest announced he had asked Minister Hazzard to open up a period of 'an extended 6 week consultation'. This was not an 'extended' consultation, as that would imply there was one to begin with.

6) The EIS claims there is only 'some' community opposition to the relocation of the hospital from Tweed Heads to the site at Cudgen. This grossly misrepresents the reality. The EIS fails to mention that the Relocate Tweed Valley Hospital off State Significant Farmland group submitted an over 8000 signature petition to the NSW Lower House, and an over 800 signature petition to the Upper House, both in October, and both opposing the chosen site of Cudgen for the relocation of Tweed Hospital. The EIS also fails to acknowledge that the 'Relocate Tweed Valley Hospital From State Significant Farmland' facebook group has in the vicinity of 5,000 members. For the proponent to claim only 'some' community opposition is a gross misrepresentation.

7) Kingscliff and Cudgen's growing agritourism industry is built on the fact that Kingscliff is a small laid back town set on a world class beach, fringed by working agricultural lands. The EIS fails to acknowledge nor address the negative economic effects this proposed development will have on this industry and therefore the number of agriculture, tourism and hospitality jobs that will be lost. In fact the EIS admits to a loss of only 4 jobs (those of the farmers working the chosen site). The proponent should be required to honestly and objectively assess the impact this major development, on the main entrance into Kingscliff, will have on these flourishing industries.

8) The EIS does not sufficiently address how parking will be handled at the proposed hospital to avoid negative impacts on surrounding residents and businesses. The well frequented cafe strip of Kingscliff, is only 1km from the site. It is already difficult to et a carpark in Kingscliff to access services and the cafe. The proponent has only proposed 700 car spaces for a 405 bed hospital which is well under a best practice ratio. Given the carparks will be paid parks, it is inevitable that staff and visitors will seek to park off site in the surrounding streets. This will not only adversely affect residents and their visitors, but also tourists and day trippers attempting to access the cafe strip. The proponent has not addressed how this will be avoided and nor how the businesses of Kingscliff will be compensated when they lose ustom due to customers not being able to park nearby and therefore choosing to go elsewhere.

9) The selected site for this development is bordered to the north by a nature reserve that holds 5 endangered species. The nature reserve is also a recognised koala habitat and yet the proponent has not completed a comprehensive Koala Management Plan.

10) The proponent has stated that one of the reasons for selecting the site at Cudgen for this development is that it sits above the 1 in 10,000 year flood level (PMF). In the Tweed Valley Hospital Project Site Selection Summary Report, this criteria was applied unevenly to sites put forward in the EIS process. For example, the Kings Forest site was deemed not to meet the PMF criteria, despite the site also sitting above PMF level. The proponent, rather than only assessing the actual 30 hectare site put forward by Kings Forest for PMF suitability, chose to assess the whole almost 900 hectare Kings Forest estate, which does have areas within it that re below PMF. If this same criteria was applied to the Cudgen site (ie if a 900 hectare circle was drawn around the site) the same would be found - that being that the majority of that 900 hectares would fall below PMF (as an example, the majority of Tweed Shire residents live north of the Tweed River and will have to access the new proposed hospital site via Tweed Coast Road. This road was completely cut off in the March 2017 1 in 100 year flood). There are many other such uneven applications of criteria in the proponent's selection of the site at Cudgen, and these should be called into question. Members of this community have sought to obtain the FULL Site Selection Report (not the summary) but Health Infrastructure have been unwilling to provide it. There are several external reviews of GIPA requests that have been denied, that seek this report, currently under way. This lack of transparency on site selection should be scrutinised by your department closely.

Therefore, my position is that this development proposal should be refused.

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 object to the hospital being built on State Significant Farmland for the following reasons,

 The local community of Cudgen and Kingscliff will be changed forever if this hospital is built in the proposed location for the everlasting determent to the local residents.
 Loss of local amenities will be immediate. Kingscliff Pool and Library will be no longer viable as the carparks will be filled continuously by hospital visitors & staff avoiding the paid parking that is present at every hospital. This will result in the loss local jobs for those who work in these facilities.
 The choice of Cudgen State Significant Farmland is a poor option when at least two other sites have been identified. These lands were designated to be protected, not destroyed by the Government.
 The minister has "Changed his mind" and by Ministerial decree the 2017 North Coast Regional Plan (Over 6 years work) to shift the Tweed Hospital away from the City of Tweed Heads to the Town of Kingscliff The was with no prior community consultation whatsoever!
 The Tweed has for many years been developing Eco food tourism industry. The placement of a 900-bed hospital at Cudgen will forever change this local dynamic in the Kingscliff restraint strip.
 I am very concerned that building a multi-story hospital will open the flood gates to more structures greater than the current 3 stories, The local area will become another Gold Coast and the local area will lose the character we have worked hard to maintain.
 I fear that closing the current Tweed Heads Hospital will be the key that results in further stress on the local businesses in Tweed Heads by removing the key economic driver (hospital) and betraying Tweed Heads residents with medical issues who invested their life savings in homes with hospital proximity.
 Are you aware that over 8000 signatures that went to the Upper & Lower Houses of NSW Parliament, and that there are over 4800 followers of the "Relocate Tweed Valley Hospital " Facebook page. I believe this is a remarkable local community response and should not under estimated.
 Please also note that Tweed Shire Council is oppose siting of the Tweed Hospital on prime agricultural land when considering social impacts and community responses.
 The majority of Tweed's residents the live in Tweed Heads, Banora Point and Terranora will not be able to access the hospital when the next major flood event occurs.
 Cudgen & Kingscliff residents' quality of life feel the full brunt of traffic congestion and parking demand, ambulance sirens causing distress to those not directly affected with the incident and emergency aircraft arrivals.

IP Address: [redacted]

Submission: Online Submission from [redacted] (object)
https://majorprojects.accelo.com/?action=view_activity&id=300285

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:
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ï‚§ Loss of local amenities will be immediate. Kingscliff Pool and Library will be no longer viable as the carparks will be filled continuously by hospital visitors & staff avoiding the paid parking that is present at every hospital. This will result in the loss local jobs for those who work in these facilities.
ï‚§ The choice of Cudgen State Significant Farmland is a poor option when at least two other sites have been identified. These lands were designated to be protected, not destroyed by the Government.
ï‚§ The minister has â€œChanged his mindâ€□ and by Ministerial decree the 2017 North Coast Regional Plan (Over 6 years work) to shift the Tweed Hospital away from the City of Tweed Heads to the Town of Kingscliff The was with no prior community consultation whatsoever!
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ï‚§ Cudgen & Kingscliff residentsâ€™ quality of life feel the full brunt of traffic congestion and parking demand, ambulance sirens causing distress to those not directly affected with the incident and emergency aircraft arrivals.

IP Address: [redacted]
Submission: Online Submission from [redacted] (comments)
https://majorprojects.accelo.com/?action=view_activity&id=300287

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]

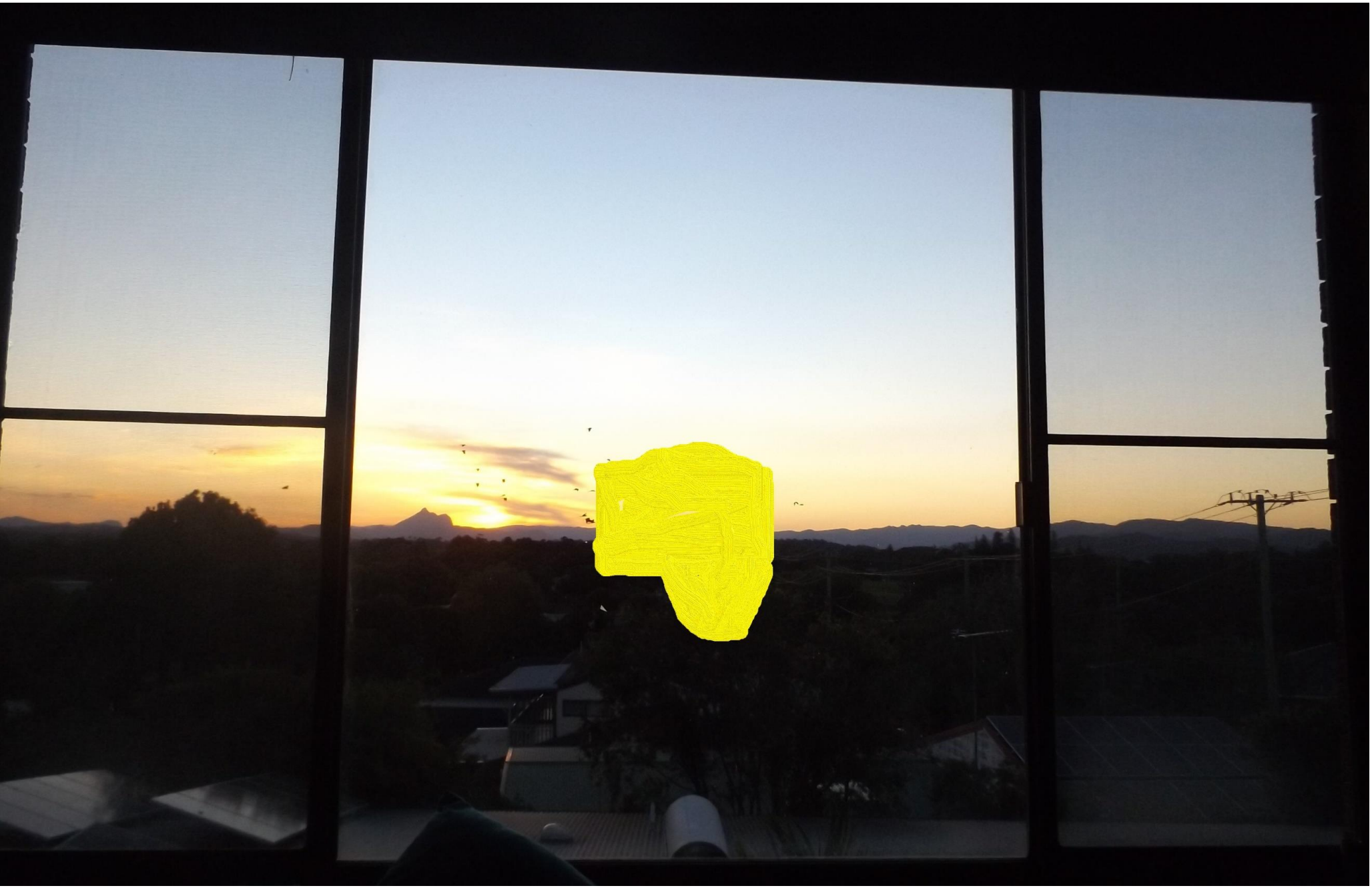
[redacted]
[redacted]

Content:
Please refer to attached submission

IP Address: - [redacted]
Submission: Online Submission from [redacted] (object)
https://majorprojects.accelo.com/?action=view_activity&id=300309

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 object to the proposed construction of the Tweed Valley Hospital on State Significant Farmland at Lot 771 Cudgen Road.

I have lived in Tweed Shire for approximately 20 years and I am a qualified Civil Engineer.

As well, I would like my name and details to be not publically displayed.

My reasons for objecting to the development are set out below.

1. **The details in the EIS are too preliminary to make any accurate forecasts of the impacts of this development.**

To support this I refer to the opening page of the Geotechnical Report.

*"It should also be noted that this report assesses the existing geotechnical conditions of the site and provides advice for the Stage 1 works based on the attached original Masterplan Site Plan**. Since the original investigation, a new Masterplan Concept Plan has been produced which includes areas which have not been assessed. It is therefore recommended that when this new Masterplan Concept Plan has been finalised, that additional drilling be carried out to include these additional areas and the report amended or a new report produced to reflect the changes**."*

It would appear that the site master plan has not been finalised and the submitted reports need to be modified in accordance with the revised master plan. How can a proper assessment of the impacts of the development be made, when this basic piece of information is incomplete and all the reports reliant on the master plan potentially need to be amended.

The Application should be withdrawn until the "***new Masterplan Concept Plan"*** has been finalised and final reports are available.

2. 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 being finalised 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".
- Health Infrastructure staff at their pop up displays have stated that the Cudgen Site is a "done deal".

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

The Geotechnical report identifies 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. 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 should be subject to additional assessment.

4 Stormwater Drainage

The drainage report is based on the DRAINS drainage program. The program itself is heavily reliant on parameters input into the program to produce meaningful results. The report in the EIS does not set out what parameters were input into the program to produce the results. Until these parameters are included in the report it cannot be adequately assessed.

5 Visual impact

The visual impact report is totally inadequate. It highlights the general lack of information that is available in the EIS documentation. In the whole documentation there is no drawing or elevations giving any clear (even concept) indication of what the main building tower will look like. Even the built form report has no elevations and only contains the following description.

> The gross floor area of the Concept Proposal is in the 55,000sqm to 65,000sqm ….The overall height of the hospital described in drawings AR-SKE-50-101, 201, 301 and 401 includes roof top helipad and vertical access lift core/ above roof level. The main ground level public entrance is to be at AHD +28 being Cudgen Road entry level, with the lowest basement level at approximately AHD +19m. The top of the helipad lift/stair core is at AHD +67m.

Drawing 401 shows 2 floors below the ground level and 6 above and then the building has a lift core and helipad above the sixth floor.

From this basic description the Visual Impact consultant has produced a series of boxes, drawn presumably using "Paint" program that purports to demonstrate the effects of the proposed multi story building on views from various locations in Kingscliff. The size of these drawings makes an appreciation of visual impact impossible. <u>This report is an insult to the local community.</u> A Consultant should surely have access to Photoshop or some similar program to give at least a concept representation of the building within the landscape. It would appear that the Master Plan is changing so rapidly that HI cannot even give a consultant a reasonable idea of what the building's form may look like.

For the McPhail Avenue view port, whether deliberate or not, the photo presented in the report by the consultant is taken from beneath the power lines. No resident lives below the power lines, so this is a totally misleading view port. For my part I have attached an equally amateur version of the visual impact as attachments 2 and 3 using Paint. The view is typical of those dwellings west of the water tank on McPhail Avenue. The attachments demonstrate the massive impact of this high rise development on our existing largely rural views that includes the iconic Wollumbin. As well, as the building the large areas of paving surrounding the building will also add a layer of black to the largely green view. The high rise will severely impact that outlook.

As well, I feel the visual impact may be even more dramatic at night (attachment 3). It is clear the hospital and surrounding car parks will be lit and these will have a massive impact on the night views where everything else is in darkness. This has not been assessed, nor has the impact of views from Terranora or Banora Point.

The visual assessment report is inadequate to assess impacts on views and therefore should not be relied upon.

6. Northern Rivers Farmland Protection Project (2005)

This project identified 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 and modern farm management practices. One of the main recommendations of the project was that **"state agencies proposing public infrastructure on (state significant farmland), should select alternative sites where possible."**

In this instance alternatives are available. Through the initial EOI process, 34 alternative sites were identified. After the initial summary site selection report was released a further 15 sites were also identified by the community. Clearly, the initial EOI process did not look at every alternative site within Tweed Shire, only those offered up during the EOI period. It is likely that alternative sites that have not been considered are available in the Tweed Valley, but because of the flawed EOI process they have not been identified. Instead of having experts assess the most appropriate site for a greenfield development HI has used an EOI process without any set criteria which appears to have been a means of obtaining not the most appropriate site for a new hospital, just a site that would be cheaply/easily acquired.

As well, the NRFP project recommended that a contiguous area of 500 hectares is necessary to remain within the State Significant Farmland (SSF) threshold. The current SSF area at Cudgen measures 534 hectares only just over that threshold. HI representatives, the Health Minister, the Local Member and even the Primary Industries Minister all continually quote that the site is only 0.1% of the SSF on the north coast. This is misleading because if the Tweed Valley Hospital is located on the Cudgen site it will mean the loss of 16 hectares or about 3% of the total Cudgen Plateau SSF area. The loss of this area when alternative sites are available will greatly jeopardise the viability of the surrounding farmland.

The EIS has not adequately addressed the loss of 3% of the Cudgen Plateau SSF on the impacts viability of the remaining Cudgen farmland

7. Site Selection Process

The Tweed community has never been told the full selection criterion and the weighting each criteria has. Despite numerous requests to have the full site selection report released, so far, Health Infrastructure has failed to release this report, so the community have had to determine the criterion from the two "summary" site selection reports, the first of which was released three weeks after the selected site was announced by Minister Hazzard and Local member Mr Provest.

The initial site selection was based on 35 sites, the exact location of all 35 of the sites was not clear in the summary report and again the community was left to determine which sites had been assessed by a criteria that was never explained to them. The initial summary selection report identified the following criterion on which the hospital site was chosen:

1. Location, Access and Traffic

2. Urban Context

3. Built Forms and Landscaping

4. Environment, Heritage and Culture

5. Time, Cost and Value.

I make the point again that none of these criteria are explained in sufficient detail that an average resident of the Shire could understand.

For example "Urban Context". What does that mean and why is it even relevant to a hospital? I am aware of two hospitals recently built by NSW Health, Byron Bay, which is 10 kilometres from the CBD area of Byron Bay and the other at Coffs Harbour, where the hospital is located in the middle of an industrial/commercial area. As well, the new Macksville Hospital is proposed on a site 3 kilometres north of the town centre. Why is urban context so important for the Tweed Valley Hospital, when it apparently does not matter to other hospital sites? It is also open to interpretation how this criteria is applied. For example it would appear that lands at Chinderah and Kings Forest were rated low for this criteria even though they are in the middle of areas zoned for urban expansion and the land at Chinderah is identified as a health precinct in the draft Tweed LEP. Surely the opportunity to master plan a hospital site into a projected urban area where the impacts can be managed through a proper development process, would rate more highly than locating it on SSF between two small villages.

Health Infrastructure as the "experts" so often quoted by our elected politicians in all forms of media, should have a standard list of criteria when assessing suitability of sites for potential public hospitals

and this criteria should be consistent for all sites (throughout the state) and easily understood by local councils and the local community.

The following quote comes from the Health Infrastructure website - https://www.hinfra.health.nsw.gov.au/our-projects/project-search/tweed-valley-hospital

"Following a comprehensive search, on 4 April 2018, the Minister for Health announced the site for the new hospital on land to the west of Kingscliff." (It should also be noted that the map on the same page as this announcement appears to show the hospital site as Tweed Heads and does not even extend to Kingscliff or Cudgen.)

How can they indicate that the search was comprehensive when the local community with no explanation of the site criterion or weightings, came up with an additional 15 sites that were apparently assessed as part of the second site summary report?

One final criteria that I would like to mention, is the one that apparently is one of the main reasons why the proposed hospital needs to be sited south of the Tweed River. "Population south of the Tweed River unable to access local acute hospital services if M1 is impacted by flooding". Where did this criteria even come from? Was it the result of one large flood in 2017? In this extremely rare flood event could not the hospitals at Byron Bay, Murwillumbah or Lismore be utilised for acute patients? All previous planning and consultation revolved around redevelopment at the existing site, which services the bulk of the Tweed Shire population. It should be noted that the current hospital site was not affected by the flood in 2017. I reiterate that this criteria, which was never explained to the local community was used to rule out a number of suitable sites north of the Tweed River.

For these reasons I believe that the site selection process for the Tweed Valley Hospital is flawed and therefore EIS should not be approved.

8. Planning

The list of long term strategic plans that the selected site directly contradicts includes:

Tweed LEP – The proposed site does not fit within the RU1 zoning, increases conflicts between land uses and fragments State Significant Farmland and therefore sets dangerous precedents. Also the proposed 9 storey hospital exceeds Kingscliff's three storey height limit.

North Coast Regional Plan 2036 – calls for the expansion of the existing hospital after years of planning and was endorsed by the Health Minister 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 fragment/destroy the existing SSF farmlands on the Cudgen plateau.

9. Community Consultation

It should be noted that there has been many years of community consultation involved in the formulation of the Tweed LEP, the North Coast Regional Plan and the 3 storey height limit at Kingscliff.

In contrast, there was **absolutely no community consultation** before the announcement of the Cudgen Road site for the proposed Tweed Valley Hospital and this is clearly evident from the Health Infrastructure announcement on the abovementioned website.

It should also be noted that a review of the recent court case into the valuation and subsequent compulsory acquisition of the site, indicates that Health Infrastructure began negotiations with the property owners in late 2017 and continued these negotiations until the announcement of the recent acquisition. This court decision and the HI website announcement, indicates that the site was selected and committed to, well before it was announced to the community and well before any community consultation took place.

The initial site selection report produced by HI listed key consultation undertaken with Tweed Shire Council. This is completely misleading as the Tweed Shire Councillors have now indicated that they were never advised that the Cudgen site was the preferred site prior to the Health Minister's

announcement. More recently Tweed Shire Council has indicated through Council Resolutions that they have objected to the proposed hospital site and re-zoning.

In fact, no community consultation occurred until a meeting was organised by concerned residents on 14 April 2018. Even at this meeting, Local Member Provest announced a "further 6 weeks to enable the community to come up with an alternative site." This despite (as mentioned in dot point 2 previously) that the full selection criterion and weightings were never explained or given to the community and that the initial site summary report was issued on 24 April 2018, three weeks after the announcement of the hospital site. It is interesting to note now, that Health Infrastructure has used this additional 6 weeks to promote the "community consultation" it carried out, in this period and labelled it as "Phase 2". There was no Phase 1 Community Consultation and it begs the question would there have been a "Phase 2" if the community had not organised that initial meeting. As noted in the second summary site selection report, a PR consulting firm was engaged, after the Minister's announcement, to undertake the community consultation. This process using pop up displays, which featured "selling of the selected site" and were generally held during normal work hours. It is uncanny how the dot points of listed "unsolicited" responses mirrors those of the "About the Site" dot points of the initial summary report. How can this process be described as transparent, as it was designed to deliberately not consult anyone who was opposed to the selected site. If HI truly wanted to consult they would have engaged with the community, including those opposed to the site, at the beginning of this process, as per DPE draft policy and best practice requires. It should be noted that "the beginning of the process" was in 2017, prior to HI committing to the Cudgen site. Therefore at a minimum HI had 6 months to advise/consult the community before the Minister's announcement.

I also refer to the second community meeting held on 18 June 2018, that was arranged by a local newspaper and featured a question and answer style forum attended by among others Minister Hazzard and a representative from Health Infrastructure. At that meeting Minister Hazzard went out of his way to state many times that a final site selection decision following the "6 Week consultation" period had yet to be made. However, a review of the Consultant's Documents for the EIS for the Tweed Valley Hospital indicates:

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

It would appear, that despite what the Minister said at the meeting, HI had engaged numerous consultants to prepare reports for an EIS on a site that was not yet confirmed. In Minister Hazzard's press release when the decision was finally made public on 30 June 2018 is the following statement:

"As announced at the community forum on 18 June, Health Infrastructure shortlisted three sites based on independent expert advice and the assessment process was overseen by an independent probity advisor."

Was the probity officer aware of these numerous consultancies? Was Minister Hazzard? Why didn't the HI representative correct Minister Hazzard at the meeting, because it appears that the site selection decision was made on or before 31 May, depending on how these numerous consultancies were procured?

Contrary to the statements of Health Infrastructure, Minister Hazzard and Local member Provest, extensive community consultation has not been carried out and so the EIS the should not be approved.

10. Initial Site Selection Summary report

The initial site Summary report was biased towards the site selected by HI and contained misleading information and therefore any community consultation that occurred was flawed.

Regarding bias and referring to sections of the summary report relating to the selected Cudgen site no "Key issues and considerations" were identified. For every other site these "Key issues and considerations" featured. It is interesting to note these "Key issues and considerations" contained all the negative aspects of the alternative sites and none of the benefits/positives. How can the community rely on this report and the subsequent report when none of the benefits of the alternative sites were presented?

A further example of bias was that for the Cudgen site the following "Key issues and considerations" that were listed to apparently exclude other sites, are applicable yet were not highlighted in that report:

- Primarily State Significant Farmland.
- major upgrade to road infrastructure required to provide access.
- Potential Aboriginal heritage impacts.
- Inaccessible in 2017 flood events for population north of Tweed River.

The second report issued in July 2018 well after the apparent "consultation period" ended, highlights major anomalies between the first and second reports. For example the "Key issues and considerations" in rejecting the Kings Forest site in the first report were:

- 70% of estate inundated in a PMF event, with site above PMF located adjacent to waste site in north-east corner
- Currently only one road in and out - major upgrade to road infrastructure required to provide access to the estate, which is dependent on timing of Stage 1 of Kings Forest development and includes Tweed Coast Road upgrade and roundabout and connection road to Duranbah Road
- No existing utilities infrastructure
- Site located within regional / sub regional wildlife corridor
- Lack of urban context – planned development has not yet commenced
- Decommissioned adjacent waste site creates migrating contamination/landfill gas risk
- Potential Aboriginal heritage impacts.

In the second report, which provided much greater detail into site selection, none of these Key issues and considerations" except "Lack of Urban Context" apparently applied. The site was above PMF, utilities infrastructure was available, alternative access during flood events was available and the decommissioned waste site or potential aboriginal heritage impacts were not even mentioned. Regarding urban context and I also draw your attention to **2. Site Selection** (above) the site is approximately 1.5 kilometres from a Coles supermarket with supporting restaurants, bottle shop, butcher, etc and child care centre across the road. This is considered "isolated", despite the fact that the Hospital would also be within an approved residential estate.

These major anomalies between the first and second reports highlight the bias in the first summary report. On the basis of the pop up displays and neglecting the large number of objections contained in the written submissions, HI has claimed broad community support for the Cudgen Site. The pop up displays featured the Initial Summary Report and because of the bias towards the Cudgen Site in that report the results of the pop up displays cannot be represented as broad community support for the site selection process.

The bias in the Summary Report towards the Cudgen Site contaminated any "consultation" that occurred, because it was the only piece of information regarding site selection released by HI and it did not supply both sides of the story, so that meaningful, informed discussions could be held.

Let's be clear, there is broad community support for a new Hospital in Tweed Shire, but due to bias in the Initial Summary Report the EIS should be not be approved.

Conclusion

For many reasons as set out above I believe the current EIS should be refused.

If the local community is to have any confidence in the NSW Government's planning processes, long term strategic plans and policies, then this entire proposal should be immediately refused.

At the very least this application should be withdrawn until the master plan is finalised with supporting finalised reports. How can a consent authority determine this application when some of the most important details of the project have not been finalised?

Yours faithfully

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 object to the development of the proposed site on the following grounds.

With regard to Appendix O (1.6 Limitations, p. 2) it is stated that:

"Historical aerial images to help understand the later use of the Project Site were requested from LPI but not available within the required timeframes of this report."

"No community consultation with the Australian South Sea Islander (ASSI) or other local community groups was undertaken to obtain oral evidence pertaining to the construction of the stone walls or other elements in the Project Site"

"No consultation was conducted with the existing or past occupants of the Project Site. The assessment was based solely on public records and therefore could not capture individual family histories, or tenancy and informal land use arrangements."

"Dense vegetation growth in various parts of the site meant that not all areas could be examined in detail."

It is abundantly clear that the Historical assessment in its current form has not been completed due to time constraints, which the authors clearly indicate. The Office of Environment and Heritage requirements state "c. include a statement of heritage impact for all heritage items (including a significance assessment)". In this regard, if there has not been any consultation with the ASSI community or the occupants, and if the site has not been completely inspected either on the ground or through aerial photographs, then this requirement has not been met. Consultation with ASSI community therefore needs to take place in order for the historical assessment to be complete. In addition, historical waste sites need to be properly inspected for the assessment to be complete.

With regard to Appendix R (Executive Summary, p. vi.) it is stated that:

"Anthropogenic wastes were noted in a small farm dump in the north western corner of the site. Visual assessment and soil analytical testing indicate the material in this area is inert waste, however some portions of the dump could not be assessed during the PSI/DSI due to vegetation overgrowth."

The project site contains dry-stone walls which are associated with South Sea Islander indentured labour from the nineteenth century. These walls would have required considerable effort to construct,

and were key to preparing the site for agriculture back in the plantation/Cornwell period. They are an important reminder of the complex agricultural history of the site. South Sea Islanders descendents continue to live in the local area, and it is their perspective that is required as to the significance of the suggested destruction of Wall 4 to construct a car park. An alternative site could be chosen that will not result in the destruction of heritage items.

With regard to Appendix R (Executive Summary, p. vi.) it is stated that:

"Anthropogenic wastes were noted in a small farm dump in the north western corner of the site. Visual assessment and soil analytical testing indicate the material in this area is inert waste, however some portions of the dump could not be assessed during the PSI/DSI due to vegetation overgrowth."

As per Appendix O (p. iii) "The Project Site once formed part of a historically significant sugar plantation, established in 1875, then a major local dairy farm that was subdivided into smaller farms from 1916". In addition, as per Appendix O (p. 36) with reference to the waste site "Initial inspection indicated some of the material may be 19th or early 20th century, while other material is more recent". It is therefore reasonable to assume that the waste site may also have been used to dispose of chemicals associated with sugar and dairy farming practices used during that period, as well as from more recent farming activities. In this regard, the site may yet contain significant levels of pesticides exceeding recommended limits for human health in areas which haven't been accessed. Furthermore, disturbance of chemical residues through excavation and piling activities could cause contamination of groundwater flowing from the waste site down to the reserve and impact on the associated ecological community. Complete testing of the waste site is required in order to mitigate potential harm to both the workers onsite and the adjacent reserve.

With regard to Appendix I (Part 2/2, H-1) it is stated that:

"All works and associated activities are to be delivered in accordance with an approved CEMP and sub plans, including a Soil and Water Management Plan, in order to avoid any impacts on groundwater, particularly during piling and excavation activities."

"While no site specific groundwater modelling data was available to the time of writing this report, the level that groundwater encountered in the bores which sit upslope from the wetlands is at a higher elevation that the wetlands, indicating that there is potential for groundwater to influence the wetlands and provide some base flow, however the extent to which groundwater influence flows and water quality within the wetlands is unknown based on available site information."

The EIS has failed to assess baseline groundwater flows from the project site to the wetland area, and the impact of piling on those flows.

Proposed construction activities present a number of risks to the integrity of the threatened habitat at the northern end of the site. Assessment of the potential impact of piling on groundwater flows is incomplete with respect to there being no baseline studies conducted. It is therefore impossible to state that any mitigation measures will be effective in managing the impact of the development. As stated by NSW Health [1] "Groundwater contamination can move from the original source of contamination over a wide area or very deep underground. Contamination can persist for a long time as groundwater moves slowly and often lacks the natural biological, chemical and physical processes that help cleanse surface water (e.g. sunlight)."

Studies have shown that piles may reduce aquifer transmissivity and alter groundwater and contaminant flow paths, therefore discharges of groundwater and potential contaminants to the wetland reserve at the northern end of the site may be affected [2]. This also has relevance to the waste site which has not been fully assessed and could be a hot-spot for contamination.

The construction site is also adjacent to high risk acid sulfate soils, and excavated soil may be acid generating [3] with altered rates of groundwater discharge potentially affecting the integrity of the reserve and threatened species such as the Wallum Froglet and Mitchell's Rainforest snail. Without understanding baseline flows to the reserve, ad hoc mitigation methods will be patchy in their effectiveness, putting threatened species and the whole reserve ecosystem at risk.

The current report has gone to considerable lengths to distance the impact of the development on the reserve, when in actual fact it is a continuous system. The claim that the site has limited biodiversity impacts due to it's "paddock" status compared to all other sites is misleading. At least two other non-plateau sites in the area fit a similar profile, with arguably less impact. These sites should be reconsidered as better locations with any necessary site augmentation factored into the overall cost of the project. In this regard, at no point during the site selection process was it ever justified by Health Infrastructure as to why filled sites should be discounted due to Probable Maximum Flooding scenarios.

With regard to Appendix H - in its entirety:

Failure by Health Infrastructure to address the key principles of community consultation, as per the International Association for Public Participation [4] which is the accepted best practice standard for community consultation / participation, and has been used by NSW Health in the Hunter Region [5].

Initial attempts at community consultation with respect to site choice were strictly limited to wealthy landholders via the EOI tender process. There was effectively no community consultation regarding site choice prior to the site being chosen. Strangely, a lack of consultation occurred despite numerous high profile attempts to rezone and develop certain sites adjacent to the project site - all of which resulted in a huge public outcry and were rejected by the community. These have been very well documented in the media for more than a decade. Furthermore, years of work went into ensuring that the fertile soils of the Cudgen plateau had the highest levels of protection through State Significant Farmland status [6]. Even MP Geoff Provest himself has acknowledged the importance of Cudgen plateau farmland in the media, following a previous unsuccessful attempt to rezone an adjacent block of land [7]. As such, there is no excuse for community consultation not to have occurred in the lead up to site selection, due to the local member being fully aware of the controversial history of farmland rezoning attempts in the area.

The core values of community participation / consultation have not been addressed. Consultation regarding site selection only occurred after public outcry over the selection process was complete, which shows that NSW Health was fully aware of significant opposition to the chosen site on the Cudgen Plateau. It also highlights the complete failure by NSW Health to acknowledge the community prior to the decision. In addition, the aged community in particular (which have limited access to internet resources) have been comprehensively left out of the site consultation process. In this regard, there has been no attempt by Health Infrastructure to engage in an appropriate manner with the many aged residents who have chosen to reside close to current Tweed Hospital services. Many were unaware of the expected closure of The Tweed Hospital and actually thought that they were getting two hospitals, which NSW Health failed to clarify at any point during the site consultation process. Huge gaps still remain with regard to the participation of the aged community up to this point, many of whom have significant health needs and limited transport options.

NSW Health has also failed to acknowledge objections from the Tweed Shire Council who have stated a number of times that they are opposed to the development of the chosen site, in line with community sentiment.

NSW Health / Health Infrastructure needs to acknowledge that the selected site is deeply unpopular amongst both community members and the local council. Site consultation needs to start again along best practice guidelines. The process needs to be opened up to potentially fillable sites closer to the M1 and not under a busy aviation flight path.

With regard to Appendix H (Part 2/2, 1.4 Conclusion, p. 8) it is stated that:

"Responses indicated that more people were supportive of or not opposed to the Proposed Site".

Lack of transparency in the consultation following the choice of site, rendering the outcome of the consultation null and void.

False information was communicated by Health Infrastructure to Relocate members, stating via email that "the community consultation process is about seeking feedback from the community on the proposed site as well as nomination of any alternative sites, rather than a `vote' as such" [attachment 1]. In direct contradiction to the advice provided by Health Infrastructure, information from the community consultation was subsequently used as a vote counting exercise to support the case for building the hospital on the Cudgen site.

There was no publication of the questioning strategies used in the "pop up" survey, and during this six week consultation there was no disclosure from Health Infrastructure that The Tweed Hospital would be closing. Many residents have thought that the region was gaining an additional hospital, without realising that they would lose nearby health services. Had this been the case, there would have been considerably greater opposition to the chosen location.

Elton Consulting has selectively chosen to communicate the supportive "pop up" results rather than the "written" submissions in their summary assessment. The fact that close to half of all written submissions were objections to the chosen site has been overlooked or ignored. Based on the results for written submissions, it is apparent that community objection to the Cudgen site is extremely high. Finally, there has been no disclosure by Elton Consulting or Health Infrastructure as to the framework for the assessment of consultation findings. There is no stated statistical "threshold" for which opposition to the site location is considered significant or not.

Site consultation needs to start again. If the consultation is going to be used to inform the decision making process in terms of community support (or lack thereof) then this needed to be implicitly stated at the start of the process. The community has been deceived in this respect, and also with regard to The Tweed Hospital closing which is a categorical failure of consultation.

As shown by written submissions, the site location is not supported by the community. There is also considerable bias within the assessment of results performed by Elton Consulting. Site location needs to be reassessed in line with community views.

With regard to Appendix H (Part 2/2, 3.1.2 Details, p. 13-15):

Elton Consulting's reasoning fails to recognise the development of the Cudgen plateau as a controversial issue, evidence of which has already been widely published in the media. This predisposes the "pop-up" face-to-face survey to substantial bias in results particularly for non-participation [8]. Evidence for this is provided by nearly a 50% jump in those opposed to the site (44%) for written submissions, compared to face-to-face "pop-up" consultations as reported [attachment 2]. In this case, community opposition to the site greatly exceeds those in favour of the site, but yet these results have been ignored.

There has been no attempt by Elton Consulting to address the issue of response bias, even though there is evidence within the "pop-up" consultation data that this has occurred. For example, subsequent consultation events held at both The Tweed Hospital and Tweed Mall show a substantial increase in those opposed to the site. Furthermore, consecutive results for Tweed City Shopping Centre appear to be duplicate errors [attachment 3].

Re-examine for evidence of non-participation and and response bias, and check data for potential errors.

With regard to Appendix H (Part 1/2, 2.2 Government Agency Consultation, p. 11-18):

Failure to consult with NNSWLHD regarding site selection.

Contrary to claims made by Health Infrastructure in the Site Selection Summary Report [9] consultation with the Northern New South Wales Local Health District did not occur. It is stated that "The Chair raised his concern on the wording in the Tweed Valley Hospital Development Site Selection Summary Report stating that the Board was consulted. The Site Selection was appropriately determined by the Site Selection Commitee and due to probity the Board were updated on progress and decision making which is different to consultation" [10]. There is no evidence that Health Infrastructure has consulted with the NNSWLHD Board with regard to site selection.

Health Infrastructure needs to consult with key stakeholders appropriately with respect to site selection. Probity is not an acceptable alternative to consultation.

With regard to Appendix I (Part 1/2, Section 2.4.7 Target Koala Survey p. 52) it is stated that:

"The survey was conducted in broad accordance with the SAT method (Allen & Phillips 2008) on the 13 July 2018 by Dr Damian Licari. Scat searches were undertaken in a 1m buffer area around the base of 30 trees for two person minutes per tree and no koala Phascolarctos cinereus scats were recorded."

Failure to collect baseline information on threatened species protected by the EPBC Act - koala.

There have been numerous historical sightings of koalas on the selected site, as evidenced by the Tweed Coast Koala Study 2015 [11] and reports submitted to the Atlas of Living Australia [12]. The current study describes conducting one koala scat survey in July during the entire EIS process, without conducting any direct observations.

As per EPBC ACT referral guidelines [14] for the vulnerable koala "direct observation methods may be appropriate where animals are being captured (i.e. for radio/satellite collaring or mark-resight methods), where abundance or density data is desired ...". The guidelines also state that direct methods are a useful census method for small to medium sites. In this regard, the current study has neglected to conduct any direct observations of koalas as per EPBC guidelines.

As per EPBC guidelines [14] "Direct observation surveys should be undertaken between August and January. This is the period when koala activity is generally at a peak, and resident breeding females with back-young are most easily observed. Direct observation surveys conducted outside of this period must take into account the potential for lower koala activity (reduced detectability) and other relevant seasonal considerations." In this regard, the current study has not been conducted during peak koala activity.

As per EPBC guidelines [14] "Scat surveys have been used to gather absolute abundance data, however, this approach requires a more complex methodology. Indirect survey method design must take into account the effects of various factors on sign detectability (i.e. heavy leaf litter known to reduce detectability of pellets) and sign persistence (i.e. flooding and rainfall known to affect scat decay)." For these reasons, scat surveys have been shown to be highly unreliable indicators of tree use by koalas [13]. The proposed site experienced consistent rainfall in the months leading to the July survey [15], which combined with other environmental factors such as leaf litter would have likely contributed to false negative results. In this regard, the current study has not been conducted with sufficient rigour to accurately determine koala activity on the proposed site.

It is apparent that spot assessments in all vegetation zones incorporating direct observation methods during peak activity periods during spring and summer is required to prevent mismanagement decisions for this species on site. Furthermore, a koala specialist should be recruited to provide an expert assessment of koalas and associated habitat on site. Koala sightings on the proposed site lie within a wildlife corridor that connects the Kingscliff and Kings Forest koalas, therefore any offsets need to facilitate animal movement between these populations in order to maintain genetic integrity.

With regard to Appendix I (Part 1/2, Section 3.1 Avoiding and Minimising Impacts on Biodiversity p. 57) it is stated that:

"That maintain connectivity, enabling movement of species and genetic material between areas of adjacent or nearby habitat is maintained"

"the northern section of the Site which falls within a mapped fauna corridor"

There has been a complete failure to consider the impacts of Regional Fauna Corridor fragmentation on threatened species.

The Biodiversity study is falsely claiming that the project area has been situated such that habitat connectivity is maintained by not developing the reserve area - an action which is not permitted anyway due to classification as a protected Coastal Wetland area. The project site traverses virtually the entire wildlife corridor [attachment 4] not just the northern section of the site where the reserve is located [16]. As such, development of the proposed project area will significantly fragment the Regional Fauna Corridor which runs south along the coastal fringe from the Tweed River through to the Cudgen and Kings Forest KPoM (Koala Plan of Management) areas. This will be further compounded by very large increases in traffic volume which will become a highly significant obstacle for dispersing wildlife, particularly koalas which are frequent victims of traffic strikes.

The situation with the local koala population is precarious, with the 2015 Tweed Coast Koala Study [11] estimating the population size of koalas on the Tweed Coast at between 25 and 267 animals (95% confidence interval). This puts the Tweed population at significant risk of extinction, as according to the NSW Koala Recovery Plan [17] "populations or meta-populations which fall below approximately 50 reproductive animals are likely to rapidly start losing a significant proportion of genetic diversity, particularly if numbers show high fluctuations due to events such as bush fires, car injuries and dog attacks." It is important to note that the Tweed Study visually observed one animal at the proposed site and another two further north, which is highly significant in the context of the current population size. It is therefore concluded that the project could potentially be a significant contributor to the imminent extinction of koalas in the Tweed Shire.

The proponent needs to consider the requirements of local wildlife in terms of their ability to disperse, particularly koalas. Serious consideration of the risk presented to the Tweed koala population needs to be undertaken, due to low population size.

Alternative project sites need to be considered, that will have a lower biodiversity impact. In this regard, there are considerable amounts of cleared land with limited biodiversity value in the Chinderah area which are close to the M1.

There is no notification in the initial site EOI that states that the selected site can not be augmented with fill to meet PMF criteria, and there is no precedent disqualifying such a site from the selection process.

With regard to Appendix I (Part 1/2, Section 2.4.4 Habitat survey for candidate threatened species p. 49-51) and Appendix I (Part 2/2, Appendix G-5) it is stated that:

"Over the course of this BAM assessment a range of technical difficulties with the BAM calculator were encountered."

"Of course I may have done something incorrectly!"

In this respect it is unclear if BAM assessment has been performed correctly by the consultant. BAM assessment needs to be reviewed for accuracy by an independent third party.

With regard to Appendix I (Part 1/2, Figure 17 p. 55.) and Appendix G (4.0 Mitigation Measures and Safeguards, p. 10):

Mitchell's Rainforest Snail - Zones 1, 2 and 3.

"During tree removal and major earth works a fauna spotter-catcher needs to be used at a minimum of one operator per machine."

Failure to collect baseline information on threatened species protected by the EPBC Act - Mitchell's Rainforest Snail [18].

Mitchell's Rainforest Snail is currently listed as a NSW Endangered & Commonwealth Critically Endangered Species, However there was no ground survey for this cryptic species in any of the vegetation zones. Habitat for this species is within leaf litter in lowland subtropical rainforest and swamp forest on alluvial soils. These vegetation communities are mapped within Zones 1, 2 and 3.

MRS status is and Commonwealth Critically Endangered. Habitat is within leaf litter in lowland subtropical rainforest and swamp forest on alluvial soils. These vegetation communities are mapped within the site and project area. MRS has been recorded in several areas near to the site including adjacent to Kingscliff Library and Kingscliff Shopping Village. MRS has been found in highly degraded locations at Kingsclliff, including under dumped sheets of roofing iron. These records have been confirmed by gastropod expert John Stanisic. In this respect, as per the EPBC recovery plan for this species "It is unlikely that the above mapping will identify all areas of potential habitat, particularly small areas of habitat. Recommendation will be made by the NPWS that identified potential habitat (action 8 above), all lowland rainforest and swamp sclerophyll forest".

It is likely that this species is present in all other vegetation zones across the project site also, NPWS habitat protection recommendations for this species encompass 50m buffer of "vegetation" around defined Coastal Wetland areas. This includes windrows and other vegetated areas irrespective of habitat attribute as per State Environmental Planning Policy (Coastal Management) 2018 - "remnants and vegetated areas within 50 m of SEPP No. 14 Coastal Wetlands in Tweed, Byron and Ballina Shires be protected from clearing or development in the relevant Local Environmental Plans and Regional Vegetation Management Plans" [19].

As such, due to the cryptic nature of this threatened species, a fauna spotter-catcher will be ineffective unless a thorough search is made of the leaf litter around vegetated areas of the project site, as well as around any buildings or dwellings on the site.

A comprehensive assessment is therefore required to be undertaken by a specialist fauna ecologist, to include all vegetation zones. The footprint of project intrudes upon legislated habitat buffers for EPBC protected species. An alternative site therefore needs to be selected as protected vegetation will be directly impacted by Stage 1 works. In addition, sections of windrows fall under protection of 50m buffer zone for this species and must not be cleared. Leaf litter and areas adjacent to dwellings must be carefully examined for the presence of Mitchell's Rainforest Snail.

With regard to Appendix I (Part 2/2, Aviation, H-2) it is stated:

"The helipad will be situated on the top of the multiple level hospital facility that is constructed on a ridge above the level of the floodplain. As such this location is considered to
be above the flight path altitude of any birds or bats and will therefore not interrupt any local migration or cause death through aircraft strike."

"This would therefore avoid aircraft movements in the peak periods of flying fox activity in the hours preceding dusk and dawn."

"Adaptive management actions may include actions such as auditory repellents, visual deterrents and physical barriers where birds, bats and other animals are an issue."

Failure to properly consider the risk to threatened fruit bat species with respect to helicopter operations.

A more thorough assessment of adjacent fruit bat colonies is required, due to health and safety concerns. Only a superficial assessment was provided with some highly questionable claims regarding the impact of proposed helicopter flight path on the flying fox colony located near Kingscliff Library. In the first instance, fruit bat colonies can become easily disturbed and therefore the risk of helicopter strike does not exist only during the late afternoon / early evening but also throughout the day. This assertion is supported by media reports of significant bat strike issues for a colony located adjacent to Charters Tower Hospital, which has raised serious concerns for human safety [20].

Furthermore as stated by the Australian Transport Safety Bureau, bat strikes often happen while helicopters are parked on the ground, or during cruise and approach to land [21]. In this respect, comments made in the EIS regarding helicopter flight mitigation measures are probably irrelevant. There is also a high risk that the Kingscliff Colony could become disturbed and take flight due to disturbance caused by helicopter noise. With the proposed site lying directly under the Gold Coast Airport flight path, the possibility of animal strike increases the risk to human health which has not been thoroughly assessed in the aviation report.

There is a risk of the bat colony being disturbed through helicopter noise, with no options for culling and EPBC restrictions on mitigation strategies for threatened species. It is suggested that either a different site be considered for the proposed development, or that a more thorough investigation into proposed helicopter operations in relation to animal strike and commercial flight path risks be conducted.

With regard to Appendix I (Part 2/2, Traffic, H-1) it is stated:

"Turnock Street currently creates a barrier in habitat connectivity of the overall patch of native vegetation in the Site area. In order to mitigate the potential of increase in wildlife vehicle strikes it is recommended that a wildlife crossing zone is installed where the road passes through the Paperbark swamp area along Turnock Street (between the roundabout and Cudgen road). This crossing would be triggered by car movement and would assist species to move across the road barrier (hostile gap)."

The wildlife crossing suggested for the reserve will address the risk of road strikes on a small section of Turnock St, but overall the project increases the risk of animal vehicle strikes. The risk of harm to wildlife during dispersal either to or from the site will become substantially elevated with a reduction in refuge areas that previously existed on the farmland, and due to increased traffic volume of around 5000 cars per day. The usefulness of the wildlife crossing in terms of mitigating the fragmentation of the fauna corridor is questionable, and other suggestions need to be canvassed in order to properly mitigate the effects of the development on fauna dispersal. This should be noted especially for threatened species such as the koala.

It is strongly suggested that an alternative site for the hospital be selected or another strategy to facilitate safe dispersal along the wildlife corridor across Cudgen Road.

In summary, the current proposal contains numerous defects to do with the site which relate to Contamination, Biodiversity, Geotechnology and Historical Artifacts. Community Consultation on site selection has been an abject failure. Together, these findings indicate that a new site should be chosen in line with human safety, community sentiment and preservation of threatened biota. There is no excuse not to follow due process because of inconvenient time frames.

[1] https://www.health.nsw.gov.au/environment/water/pages/groundwater.aspx

[2] https://iarjset.com/upload/2017/april-17/IARJSET%20nCORETech%206.pdf

[3] http://www.clw.csiro.au/publications/science/2009/Ch3-Acid-Sulfate-Soils-Natural-History.pdf

[4] https://www.iap2.org.au/Resources/IAP2-Published-Resources

[5] http://www.hnehealth.nsw.gov.au/about/Documents/framework-communities.pdf

[6] https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/northern-rivers-farmland-protection-project-final-recommendations-2005-02.ashx?la=en

[7] https://www.echo.net.au/downloads/tweed-echo/TweedEcho0315.pdf

[8] https://academic.oup.com/jpubhealth/article/27/3/281/1511097

[9] http://tweedvalleyhospital.health.nsw.gov.au/WWW_Tweed/media/TweedValey/180716-Site-Selection-Summary-Report_July-2018_ISSUED.pdf

[10] https://nnswlhd.health.nsw.gov.au/wp-content/uploads/Board-Minutes-2-May-2018-Signed.pdf

[11] https://www.tweed.nsw.gov.au/Download.aspx?Path=~/Documents/Environment/TSC06894_Tweed_Coast_Koala_Study_2015.pdf

[12] https://www.ala.org.au

[13] https://www.publish.csiro.au/am/AM12023

[14] http://www.environment.gov.au/system/files/resources/dc2ae592-ff25-4e2c-ada3-843e4dea1dae/files/koala-referral-guidelines.pdf

[15] https://www.tweed.nsw.gov.au/Rainfall

[16] http://tweedsc.maps.arcgis.com/apps/webappviewer/index.html?id=6194248d0d2449b3a619e0317ad1ab8e

[17] https://www.environment.nsw.gov.au/research-and-publications/publications-search/recovery-plan-for-the-koala-phascolarctos-cinereus

[18] http://www.environment.gov.au/cgi-bin/sprat/public/publicspecies.pl?taxon_id=66774

[19] http://www.environment.gov.au/node/16036#2

[20] https://www.abc.net.au/news/2010-02-09/bats-prompt-chopper-safety-fears/324260

[21] https://www.epa.nsw.gov.au/licensing-and-regulation/licensing/environment-protection-licences/authorised-officers/resources-and-training/contaminated-agricultural-land

[22] http://www.environment.gov.au/system/files/resources/6d4f8ebc-f6a0-49e6-a6b6-82e9c8d55768/files/referral-guideline-flying-fox-camps.pdf

IP Address: [redacted]
Submission: Online Submission from [redacted] (object)
https://majorprojects.accelo.com/?action=view_activity&id=300313

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

HI-TweedValleyHospital

to me

13 Jun View details

Hi [redacted]

It is absolutely fine to submit more than one feedback form; however the community consultation process is about seeking feedback from the community on the proposed site as well as nomination of any alternative sites, rather than a 'vote' as such ie the content will be registered and considered as opposed to the number of submissions in support or opposed to a particular site.

Kind regards,

[redacted]

Integrated Project Team

Tweed Valley Hospital Development
1800 992 634 | tweedvalleyhospital@health.nsw.gov.au

tweedvalleyhospital.health.nsw.gov.au

Figure 3: Verbal Feedback at Pop-Ups

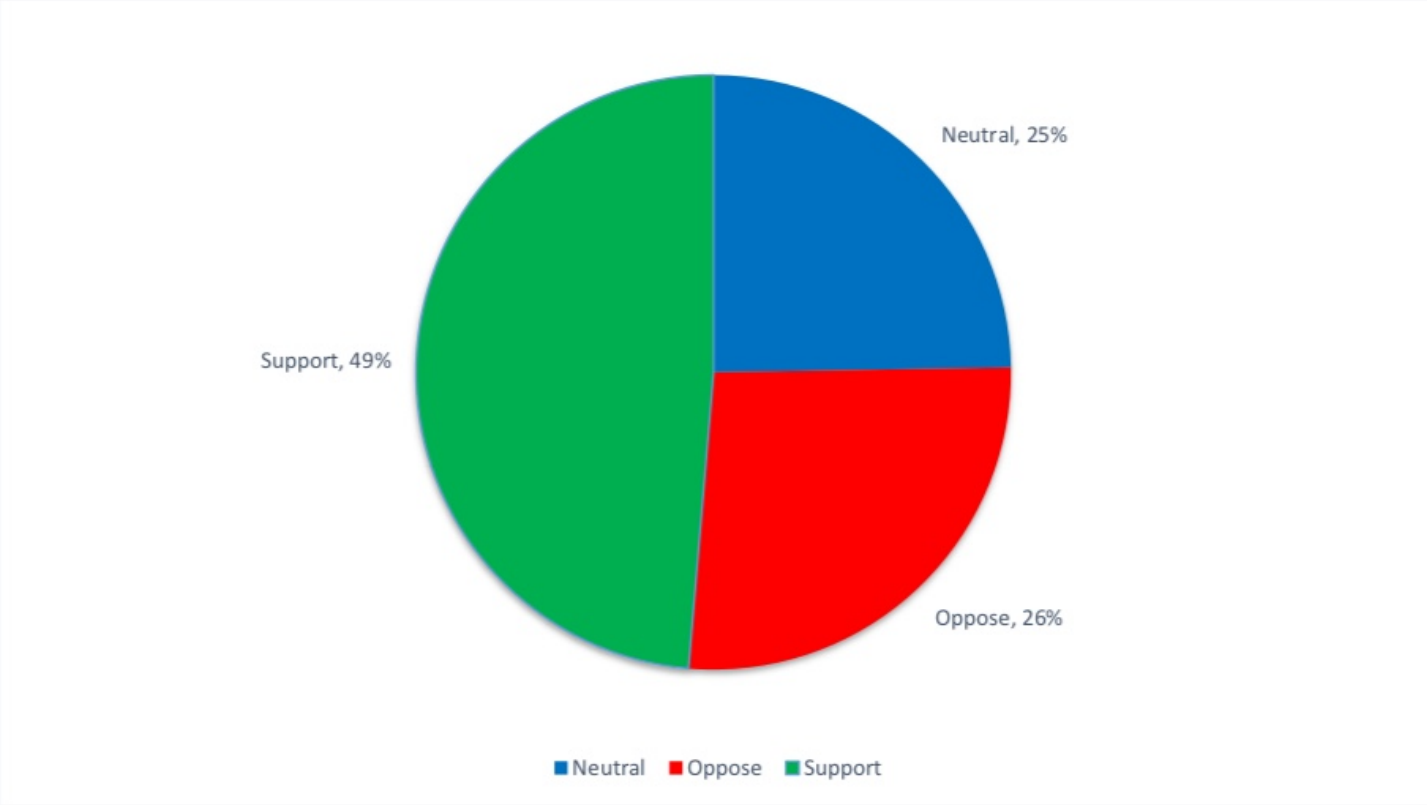
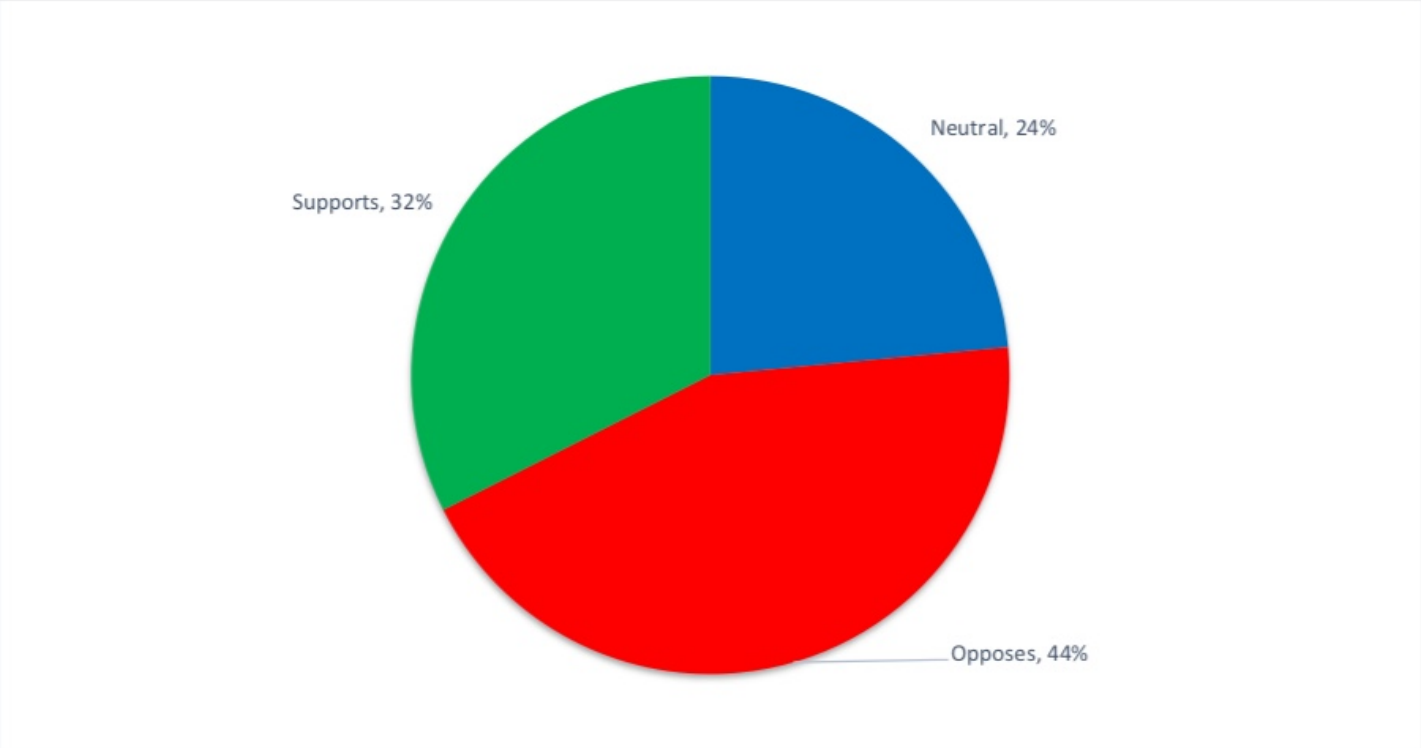


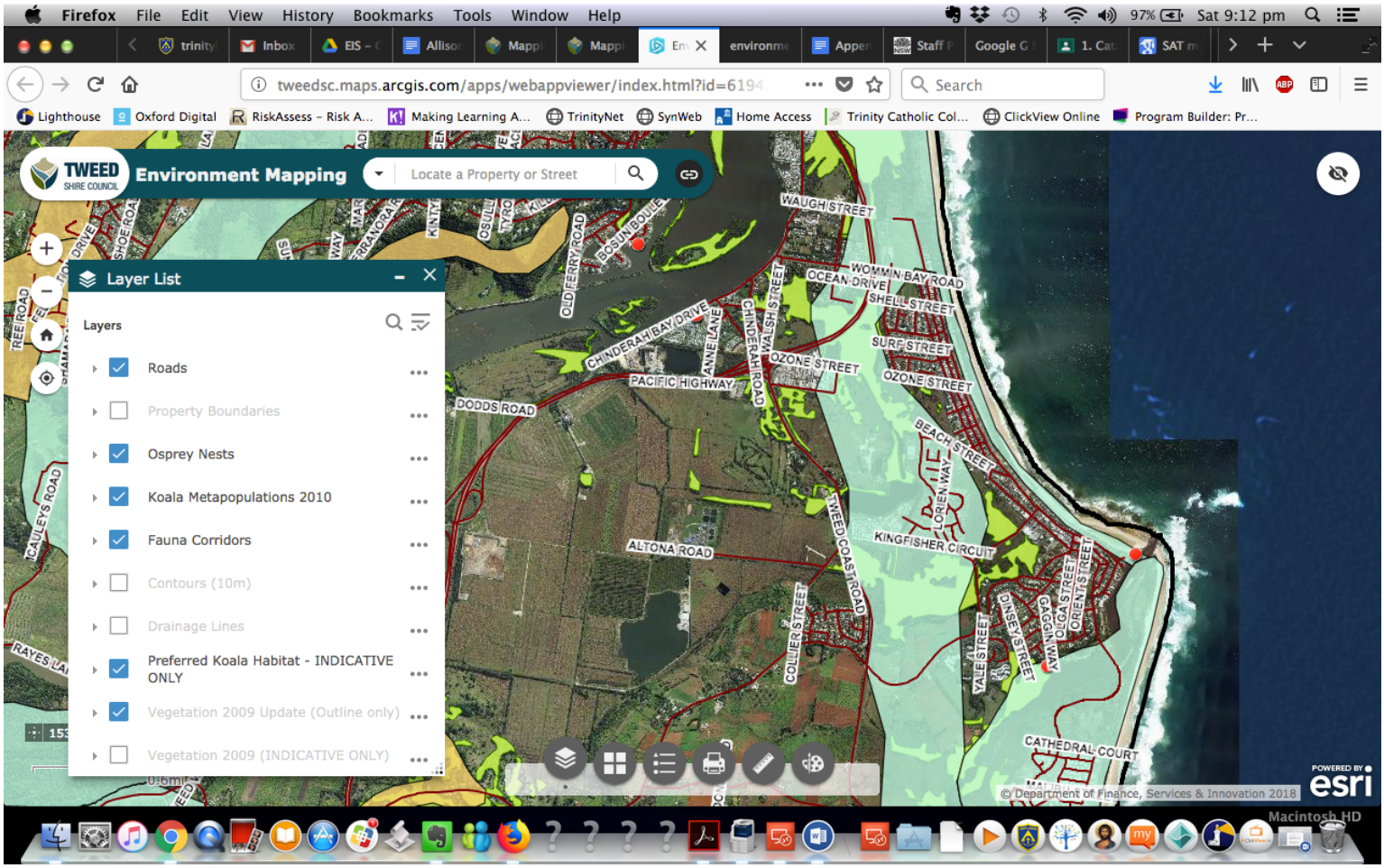
Figure 4: Written Feedback



(Scroll down to next page to see the table on the P

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


Firefox File Edit View History Bookmarks Tools Window Help
Sat 9:12 pm
tweedsc.maps.arcgis.com/apps/webappviewer/index.html?id=6194
Lighthouse
Oxford Digital
RiskAssess - Risk A...
Making Learning A...
TrinityNet
SynWeb
Home Access
Trinity Catholic Col...
ClickView Online
Program Builder: Pr...
TWEED SHIRE COUNCIL
Environment Mapping
Locate a Property or Street
Layer List
Layers
Roads
Property Boundaries
Osprey Nests
Koala Metapopulations 2010
Fauna Corridors
Contours (10m)
Drainage Lines
Preferred Koala Habitat - INDICATIVE ONLY
Vegetation 2009 Update (Outline only)
Vegetation 2009 (INDICATIVE ONLY)
WAUGH STREET
WOMMIN BAY ROAD
OCEAN DRIVE
SHELL STREET
SURF STREET
OZONE STREET
CHINDERAH BAY DRIVE
PACIFIC HIGHWAY
DODDS ROAD
ALTONA ROAD
TWEED COAST ROAD
KINGFISHER CIRCUIT
BEACH STREET
COLLIER STREET
CATHEDRAL COURT
© Department of Finance, Services & Innovation 2018
POWERED BY esri
Macintosh HD

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Agreed to false or misleading information statements: yes

Name: Jody van den Driest
Organisation: I am making a personal submission (2487)
Email: [redacted]

Address:
[redacted]

Kingscliff, NSW
2487

Content:
I object to the proposed site selection of Cudgen for the new Tweed Valley Hospital for the following reasons:
1. The site selection would damage State Significant Farmland (SSF) which is protected for its high value as farming land
2. The location of the SSF is drought free which is currently note the case in most of NSW
3. The land is capable of growing a wide variety of fruit and vegetables
4. The land is an important component of our very long term future for our local food bowl
5. Development of the hospital at this site will be detrimental to adjoining SSF and farmlands as more of our farm land will be required for further development of associated health services that will inevitably come with this regional hospital
6. Rezoning SSF sets a rezoning precedent for other works to be developed on our local SSF
7. The proposed hospital is up to 9 storeys and is forecast to change our beautiful sleepy coastal village into a 'city of Kingscliff'.
8. For decades of future planning this site has never been considered by Local Government as appropriate for a large referral hospital or what is wanted for the future of our area.
9. The roads within the township of Kingscliff and around the proposed hospital are narrow, winding and cannot handle the increase in traffic.
10. Parking for the hospital and around the township of Kingscliff will make travel difficult and will congest the streets.
11. The site is directly opposite existing farmlands whose production capacity will be reduced due to the hospital buffer zones.
12. The roads to the north of Kingscliff flood in a 1/100 year event reducing access to the hospital for the main population of the area to the north.
13. The proposed hospital is set high on the hill behind Kingscliff and will be a huge unpleasant aesthetic presence over the town.
14. The site is directly adjoining protected areas that endangered animal species inhabit.
15. Many people have chosen to live close to the existing Tweed Hospital and will be disadvantaged by this move and the closure of the existing hospital.
16. The economy of our existing city centre of Tweed Heads will suffer from the loss of the existing hospital and associated services.
17. Community consultation commenced after the proposed hospital site was announced which is a divisive way to conduct community consultation.
18. The height of the proposed hospital will set a precedent for building heights to rise in Kingscliff changing the aesthetic of the town forever.
19. Kingscliff is currently a highly sought after tourist destination because of its coastal aesthetic.

20. Damage to Kingscliff residents' quality of life with intense urbanisation, increased traffic congestion and parking demand, 24 hr ambulance emergency sirens, 24 hr helipad emergency aircraft arrivals, all-night floodlighting of entire site, loss of amenity, loss of rural ambience and lifestyle.

There are many other proposed sites in our area that would be more suitable for a regional hospital. Alternatively, the existing hospitals at Murwillumbah and Tweed could be upgraded as was the original intention of our Local Government.

IP Address: [redacted]
Submission: Online Submission from Jody van den Driest of I am making a personal submission (object)
https://majorprojects.accelo.com/?action=view_activity&id=300319

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:

Agreed to false or misleading information statements: yes

Name: Jody van den Driest
Organisation: I am making a personal submission ()
Email: [redacted]

Address:
[redacted]

Kingscliff, NSW
2487

Content:
I am a long term resident of Kingscliff, having lived here for the past 37 years and am concerned about the far-reaching impacts that rezoning and increasing height limits would have on the wider locale.

I wish to lodge my personal objection of the proposed SEPP.
The Cudgen Plateau features rich volcanic soils which are extremely rare and drought resistant which must be be protected for future generations, hence the reason they were declared areas of State Significance.

No to Rezoning:
The Government deemed that this Farmland was so rare that it should be protected as 'land of State Significance'. Not only do farmers currently provide healthy crops and derive income from this land, there is much earning potential for future agricultural farming businesses, which would be denied if rezoning for a hospital took place. This would be wrongful re-zoning.

The adjoining wetlands where an access road is planned to be used for this hospital development contains rare species of flora and fauna. Protected Melaleuca trees are broadly located right through the wetlands area, along with the endangered Wallum Froglet. It is concerning that the Government are prepared to endanger the future survival of rare species when there are so many other alternative sites for the Tweed Valley Hospital.

If re-zoning of State Significant Farmland for the hospital site occurs, there are many parcels of SSF right through the Cudgen Plateau that would be at risk. We all know that a regional hospital of this size will require additional developments such as allied health services, aged care facilities, car parks and affordable accommodation. These additional developments on surrounding SSF would jeopardise the protections placed on this land in the first place. Do we suddenly not value this land any longer?

If this regional hospital is to properly cater for the needs of this Shire for the next 50 years, the site selected needs to be located where appropriately zoned land already surrounds it to cater for future expansion itself, of car parks and of allied health services. Consultative and careful planning needs to occur now so that State Government are not forced to rebuild AGAIN in such a short period of time. Failing to plan is planning to fail.
Our Shire is growing and traffic congestion already exists on Tweed Coast Road and Cudgen Road.

Limit Building Heights to 3 storeys:
The Tweed Coast has long petitioned through community consultation to ensure that building heights never exceed 3 storeys. The unique appeal of the Tweed Shire is its' point of difference from the Gold Coast. Kingscliff and Cudgen hold appeal to tourists and residents alike due to their low-rise village-like natural environments. The decision to place a 9 storey hospital on State Significant Farmland without consulting the current LEP or the community has astounded myself and many others. Surely the thousands of residents know this area best and are well-placed to provide objective feedback so that a win-win arrangement can occur for the entire Tweed Shire. It is unfathomable that the Government would look to remove all building height limits both on State Significant Farmland, yet also right across the adjoining precious wetlands.

Maintain Minimum Lot Sizes:
To remove minimum lot sizes from the proposed site would open up the area for very high density development which certainly was not planned for in this areas LEP. It is concerning and worrying how this town ship would survive if this limitation is removed, the developer's would in effect be given the green light to turn Kingscliff and Cudgen into a high density over-crowded city, which would overpopulate and forever destroy the natural amenities of this rural landscape.

The social and economic impacts of a hospital of this size and scale would impact negatively on Kingscliff's already flourishing tourism industry. No community consultation has taken place to consider the large footprint of the hospital and how it would tower over the small town ship of Kingscliff/Cudgen.

There are a range of alternate sites that are already zoned appropriately for a development of this type. There is absolutely no need to destroy precious State Significant Farmland or Wetlands in the process of building a hospital.

IP Address: - [redacted]
Submission: Online Submission from Jody van den Driest of I am making a personal submission (comments)
https://majorprojects.accelo.com/?action=view_activity&id=300317

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: Jason Davies
Email: jasondavies46@me.com

Address:
97 Woodfords Road

Reserve Creek, NSW
2484

Content:
My name is Jason Davies. I live at 97 Woodfords Rd, Reserve Creek. I first visited the Tweed Shire over twenty years ago and now have been living here for six years. I have had a long association with the Tweed Shire.

I wish to object to the EIS for the following reasons:

The use of State Significant Farmland:
Many other options exist as a possible location for a new hospital, including the possible upgrade of the existing site, which is close to services and in an existing urban area. When the government designated these lands as SSF it was with the intention of protecting and preserving them for future generations. It appears to be a policy backflip.

Over-development of Kingscliff:
The three-storey limit on development in this town will be compromised by the building of a potentially nine-storey hospital. I believe this will open up the area for further development which will quickly overtake already stretched resources and infrastructure. I commute on the M1 every day and rapid population growth and unsustainable development will only worsen an already bad situation.

Failure of community consultation:
As Tweed Shire residents the first we knew of this development was a newspaper article proclaiming that it was going ahead. From our perspective there was no community consultation.

Poor site location for access during severe weather:
Most of the major population in Tweed is based north of the Tweed river. During the flooding that occurred in 2017 the M1 was closed just south of the river. Locating the hospital at Cudgen would make the hospital inaccessible for many Tweed residents during severe weather events.

Limited time allowed for community to respond to the EIS and SEPP:
When considering the implications of this project which is of a scale not seen before in Tweed Shire, an insufficient time frame has been allowed for community to understand the EIS in it's entirety, and respond accordingly. It would seem to be a very rushed process with a view to getting the EIS passed prior to upcoming elections next year.

The above are only some of my concerns. I believe the site location selection process has not been transparent, nor has it taken into consideration the views of the public. The only resolution I'm able to accept in this situation is the abandonment of the Cudgen site. My preference would be to further

develop the Tweed Heads site.

Regards,

Jason Davies

IP Address: - 1.128.108.203
Submission: Online Submission from Jason Davies (object)
https://majorprojects.accelo.com/?action=view_activity&id=300328

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:

Agreed to false or misleading information statements: yes

Name: Jason Davies
Email: jasondavies46@me.com

Address:
97 Woodfords Road

Reserve Creek, NSW
2484

Content:
My name is Jason Davies. I live at 97 Woodfords Rd, Reserve Creek. I first visited the Tweed Shire over twenty years ago and now have been living here for six years. I have had a long association with the Tweed Shire.

I wish to object to the SEPP for the following reasons:

The SEPP for this project breaches protections gazetted in the 2017 North Coast Regional Plan. This plan has been put in place to guide our area into the future and will be flawed if the SEPP is put into practice.

The SEPP will rezone the area in question from important RU1 farmland, vital to the community as a food growing area. The area has been deemed State significant farmland due to it's high quality soil and rainfall attributes.

Due to the size of this project eventual re-zoning of adjacent areas will occur. State significant farmland requires a 500ha threshold to qualify. This limit is currently very close to being crossed rendering the area no longer State Significant Farmland. Further re-zoning will cause the area to lose it current protection.

The SEPP regards the construction of buildings over the three story height limit currently established in the local area after extensive community consultation. These are conditions that the community has desired and wishes to continue in the future.

This will set a precedent for the Cudgen Plateau and surrounding areas. Development will be swift and irreversible. The spread of high rise and intense urbanization will outpace services as has happened and is currently happening all around Australia. Lets learn from previous mistakes made over and over with little or no long term vision of the future. Tweed heads already has a hospital in a built up area. This would be my preference for a new health precinct, as opposed to concreting over farmland that has been deemed by the government as Sate Significant Farmland. A growing population needs to be fed. Choose wisely as to how and where growth is directed.

Regards,

Jason Davies

IP Address: - 1.128.108.203
Submission: Online Submission from Jason Davies (comments)
https://majorprojects.accelo.com/?action=view_activity&id=300346

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: [redacted]

Address:
[redacted]

Cudgen, NSW
2487

Content:
I support the hospital in the Kingscliff site and I have attached my reasons in the PDF document.

The relocate team are wrongly telling Tweed/Banora residents that they want the hospital at the current River floodplain site. Then they are promising those south of the Tweed River that Labor will built it at Kings Forest for them. They promise both and are contractictory to each other and wrong.

IP Address: [redacted]
Submission: Online Submission from Nathan Jones (support)
https://majorprojects.accelo.com/?action=view_activity&id=300344

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

Attention:
Deputy Secretary – Planning Services
Department of Planning & Environment
GPO Box 39, SYDNEY NSW 2001

11th November 2018

Dear Deputy Secretary – Planning Services

Re: SSD 18_9575- Tweed Valley Hospital

I am writing in STRONG SUPPORT of the proposed State Environmental Policy - Tweed Valley Hospital SSD18_9575. I HAVE NOT made any political donations, reportable or otherwise, I the previous two years. I do not wishsh for my details to be identified when submissions are made public following close of the public exhibition period.

Proposed Amendments – Rezoning of the Land

- I support wholeheartedly the rezoning of part of 771 Cudgen Road, Cudgen from RU1 Primary Production and R1 General Residential to SP2 (Health Services Facility).

Proposed Amendments – Height of Buildings

- I support wholeheartedly the removal of the Height of Building Controls limiting the maximum height of buildings for that part of 771 Cudgen Road, Cudgen, proposed to be developed as health service facilities.

Proposed Amendments – Minimum Lot Size

- I support wholeheartedly the removal of minimum lot size controls for that part of 771 Cudgen Road, Cudgen proposed to be developed as health service facilities.

Proposed Amendments – Floor Space Ratio

- I support wholeheartedly the removal of the Floor Space ratio Controls for that part of 771 Cudgen road, Cudgen proposed to be developed as a health services facility.

I support the proposed amendments to height of buildings, minimum lot size and floor space ration with the full understanding that these proposed amendments relate only to the site at 771 Cudgen Road, Cudgen for the purpose of a Health Services Facility (Tweed Valley Hospital) and that the final height building controls, minimum lot size controls and floor space ration will be determined on merit during the assessment of any development applications for the site. I support this rezoning with the understanding this is relevant only to the site acquired for the purpose of building the new Tweed Valley Hospital.

After looking at over 50 sites in the Tweed, all the others were too small, too steep, too low-lying or too far from the population of the region. This is the only site that is large enough, not in a floodplain, above the probably Maximum flood, close to existing services and centrally located for the majority of Tweed residents. This is only 0.1% of the farmland in the Tweed region. 99.9% of the regions farmland remains and we will get a new, modern hospital in the best location. The relocate fanatics are exaggerating people. They ignore facts like flood levels and other 99.9% of farms in the Tweed that can continue as normal. They say that one hospital will mean everything gets rezoned and ends farming forever. KF will take years before the new levels of artificial sand/ground can settle before a building slab can be poured. We need a new hospital now and this is the best location and the best outcome for the Tweed/Byron people.

Yours sincerely

Submitted by a Planner: no

Disclosable Political Donation: no

Agreed to false or misleading information statements: yes

Name: [redacted]
Email: [redacted]

[redacted]

[redacted]

Content:
[redacted]

I object to the proposal to place a hospital on State Significant Farmland at Cudgen because

* This proposal cuts a swathe through nearly every adopted plan in the Shire. It is a betrayal of the promises made in writing to the people of the Tweed Valley - the adopted Planning Instruments mark a compact mutually agreed after consultation with them. It says these plans are valueless, and destroys public trust in future ones.
* I resent the contempt which has been displayed here for due process and for the principles behind it. Everyday recently while this exhibition has been in progress, supposedly to help decide whether the farmland will be destroyed or not, I have had to drive past hundreds of metres of 2m high signage on security fencing announcing the hospital is on its way. Behind it, earthmoving plant is actively destroying the farmland already. It is an insult designed to remind citizens that engaging in this process will be a waste of time.
* The principles of Ecologically Sustainable Development include a key tenet "Intergenerational Equity". This project will destroy some of the most fertile well watered land in Australia - a continent less endowed with it than any other except Antarctica. Despite the specious denials offered, it is blatantly obvious that such an huge solitary edifice cannot stand alone in the potato field indefinitely when there is such pressure for ancillaries to cluster at its feet. Further farmland will eventually succumb. And so on.
There is no discussion at all in the EIS's ESD section of this theft of vital heritage from future generations whose food supply will likely be compromised.
* A decision to rezone the farmland relies entirely on the argument that there is no other feasible alternative site for a hospital nearby. This argument is only sustained by semantic redefinitions of "feasible" away from its literal meaning (and the intent of the criterion's author) to "not cheap enough" or "not ideal". This is shameless sophistry not befitting a document of this importance.

* The removal of the Water Quality Management ponds from the Development Application to a Part 5 activity is a device contrived with no other motive than to avoid proper environmental scrutiny of their impact. The proponents know full well that the ponds entirely destroy the wetland proximity buffer defined in the new SEPP (Coastal Protection) 2018, which normally requires consent, subject to an intensive environmental study. They also know 50m of this buffer is identified by the Commonwealth as required to protect a listed species in the EPBC Act - Mitchell's Rainforest Snail. This species is frequently reported within 100m of the worksite, but essentially ignored in the EIS. The late exclusion of the ponds from the EIS suggests an ulterior motive because of a sudden last minute appreciation that destruction of the wetland is the only possible path to realising sufficient site area for a hospital. The major environmental impact of the proposed WQM ponds MUST be returned to within the EIS before its validity is accepted.

IP Address: [redacted]
Submission: Online Submission from [redacted] (object)
https://majorprojects.accelo.com/?action=view_activity&id=300914

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:

Agreed to false or misleading information statements: yes

Name: [redacted]
Email: [redacted]

Address:
[redacted]

Content:
[redacted]

I object to the proposal to place a hospital on State Significant Farmland at Cudgen because

â€¢ This proposal cuts a swathe through nearly every adopted plan in the Shire. It is a betrayal of the promises made in writing to the people of the Tweed Valley â€" the adopted Planning Instruments mark a compact mutually agreed after consultation with them. It says these plans are valueless, and destroys public trust in future ones.
â€¢ I resent the contempt which has been displayed here for due process and for the principles behind it. Everyday recently while this exhibition has been in progress, supposedly to help decide whether the farmland will be destroyed or not, I have had to drive past hundreds of metres of 2m high signage on security fencing announcing the hospital is on its way. Behind it, earthmoving plant is actively destroying the farmland already. It is an insult designed to remind citizens that engaging in this process will be a waste of time.
â€¢ The principles of Ecologically Sustainable Development include a key tenet â €oeIntergenerational Equityâ€. This project will destroy some of the most fertile well watered land in Australia â€" a continent less endowed with it than any other except Antarctica. Despite the specious denials offered, it is blatantly obvious that such an huge solitary edifice cannot stand alone in the potato field indefinitely when there is such pressure for ancillaries to cluster at its feet. Further farmland will eventually succumb. And so on.
There is no discussion at all in the EISâ€™s ESD section of this theft of vital heritage from future generations whose food supply will likely be compromised.
â€¢ A decision to rezone the farmland relies entirely on the argument that there is no other feasible alternative site for a hospital nearby. This argument is only sustained by semantic redefinitions of â€oefeasibleâ€ away from its literal meaning (and the intent of the criterionâ€™s author) to â€oenot cheap enoughâ€ or â€oenot idealâ€. This is shameless sophistry not befitting a document of this importance.

â€¢ The removal of the Water Quality Management ponds from the Development Application to a Part 5 activity is a device contrived with no other motive than to avoid proper environmental scrutiny of their impact. The proponents know full well that the ponds entirely destroy the wetland proximity buffer defined in the new SEPP (Coastal Protection) 2018, which normally requires consent, subject to an intensive environmental study. They also know 50m of this buffer is identified by the Commonwealth as required to protect a listed species in the EPBC Act â€" Mitchellâ€™s Rainforest Snail. This species is frequently reported within 100m of the worksite, but essentially ignored in the EIS. The late exclusion of the ponds from the EIS suggests an ulterior motive because of a sudden last minute appreciation that destruction of the wetland is the only possible path to realising sufficient site area for a hospital. The major environmental impact of the proposed WQM ponds MUST be returned to within the EIS before its validity is accepted.

Any rezoning must not include the wetland buffer in the urban area. I am not in favour of any rezoning of farmland except to protect the wetland

IP Address: [redacted]
Submission: Online Submission from [redacted]
https://majorprojects.accelo.com/?action=view_activity&id=300912

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:
Please see attached file

IP Address: - [redacted]
Submission: Online Submission from [redacted] (object)
https://majorprojects.accelo.com/?action=view_activity&id=300358

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 object to the proposed re-zoning of State Significant Farmland on 771 Cudgen road, to allow a large public hospital to be built on the farmland.

I have lived in Kingscliff all my life, I go to school at Kingscliff High School and am an active member of the Cudgen Headland Surf Club. My concerns are that my town will be overwhelmed by traffic, parking will be a problem, with increased noise and crime if this proposed re-zoning of state significant farmland goes ahead.

North Coast Regional Plan 2036

I believe that the State Government's long term plan was to upgrade the current Tweed Hospital and I have attended information booths at our local markets, run the Relocate Tweed Valley Hospital, protest group and I cannot understand why these plans have suddenly changed. My father was at the community meeting that Health Minister Hazzard, when asked why the plans were recently changed, advised the hundreds of locals present, that he had changed his mind. This is not a good enough reason to change long term strategic plans. These plans made by experts with community and business input should not be changed once they have been adopted by the various levels on government. What is the point of doing these long term plans if any Minister can change them on a whim? What about the elderly & vulnerable people of the Tweed & the businesses in the shopping centre close to the existing hospital. They will all be significantly impacted if the Tweed Hospital moves away.

Northern Rivers Farmland Protection Project (2005)

The proposed site is zoned as RU1 State Significant Farmland & therefore should not have ever been considered as a suitable site for a 450 (up to 900) bed Hospital. The whole point of the above project was to protect important/significant farmland from developments such as the one being forced upon us.

I have friends who are local farmers and they are now very concerned that by allowing this hospital proposal to go ahead, it will fragment the existing farms on the Cudgen plateau & open up the whole area for overdevelopment. This is not what the local community, nor the tourists that come here want to see happen.

Community Consultation

There has been no community consultation when choosing a site suitable for the new Tweed Valley Hospital. Surely the community should have been involved from the very beginning. Also given that my street will be one of the most impacted by the construction noise, increased traffic & loss of views, why is it that my friend down the road, who will be less affected, has received a newsletter about the proposed hospital, but none of us on the Kingscliff hill? In fact, no-one in the entire Shire, including the Tweed Shire Council, will know the full impact of this project until it is all too late. Not good enough, the community & those of us who have to live with the future consequences, deserves to know now!

Impact on Kingscliff and Cudgen

I love living at Kingscliff, it has a small town feel about it & most people know each other, but it is also a tourist town with an increasing number of overseas & interstate visitors. Do you think that any tourists will want to come to Kingscliff driving into town (if they can get through the traffic), past a major high rise public hospital, with parking congestion, crime etc. No way.

As stated, my home will be most affected as we have recently bought a house that is only several hundred metres away from the proposed site. My parents would not have bought this house had we known a nine storey hospital was going to be built & directly impact on our views from the kitchen & loungeroom spoiling our rural & Mount Warning views. Again why we have strategic plans!

I quote from the NCRP 2036: " *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."*

I thought the National party was formed by farmers to protect agriculture & rural voters, well they have got this wrong with the Hospital proposal.

Impact on Tweed Community

Has Health Infrastructure even considered the impact on the vulnerable & elderly of Tweed Heads? All the nursing homes on are on the north side of the river & should another flood like last year happen, they will not be able to get to the Tweed Valley Hospital. Despite this question being asked at a community meeting we were told they could go to Robina Hospital, but the HI "expert" was obviously not aware that this was cut off too in that 2017 flood.

I will finish by saying I object in the strongest terms about the proposed re-zoning of State Significant Farmland. There is plenty of more suitable sites in the Tweed region & I request that HI review it's proposal and not take drought proof farmland and in doing so destroy my town and the surrounding farms

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 also have an objection to EIS

IP Address: - [redacted]
Submission: Online Submission from [redacted] (comments)
https://majorprojects.accelo.com/?action=view_activity&id=300273

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 am writing to object to the proposed re-zoning of State Significant Farmland on 771 Cudgen road, to allow a large public hospital to be built on the farmland.

I have lived in Kingscliff all my life, I go to school at [redacted] and am an active member of the [redacted]. My concerns are that my town will be overwhelmed by traffic, parking will be a problem, with increased noise and crime if this proposed re-zoning of state significant farmland goes ahead.

North Coast Regional Plan 2036

I believe that the State Government's long term plan was to upgrade the current Tweed Hospital and I have attended information booths at our local markets, run the Relocate Tweed Valley Hospital, protest group and I cannot understand why these plans have suddenly changed. My father was at the community meeting that Health Minister Hazzard, when asked why the plans were recently changed, advised the hundreds of locals present, that he had changed his mind. This is not a good enough reason to change long term strategic plans. These plans made by experts with community and business input should not be changed once they have been adopted by the various levels on government. What is the point of doing these long term plans if any Minister can change them on a whim? What about the elderly & vulnerable people of the Tweed & the businesses in the shopping centre close to the existing hospital. They will all be significantly impacted if the Tweed Hospital moves away.

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I have friends who are local farmers and they are now very concerned that by allowing this hospital proposal to go ahead, it will fragment the existing farms on the Cudgen plateau & open up the whole area for overdevelopment. This is not what the local community, nor the tourists that come here want to see happen.

Community Consultation

There has been no community consultation when choosing a site suitable for the new Tweed Valley Hospital. Surely the community should have been involved from the very beginning. Also given that my street will be one of the most impacted by the construction noise, increased traffic & loss of views, why is it that my friend down the road, who will be less affected, has received a newsletter about the proposed hospital, but none of us on the Kingscliff hill? In fact, no-one in the entire Shire, including the Tweed Shire Council, will know the full impact of this project until it is all too late. Not good enough, the community & those of us who have to live with the future consequences, deserves to know now!

Impact on Kingscliff and Cudgen

I love living at Kingscliff, it has a small town feel about it & most people know each other, but it is also a tourist town with an increasing number of overseas & interstate visitors. Do you think that any tourists will want to come to Kingscliff driving into town (if they can get through the traffic), past a major high rise public hospital, with parking congestion, crime etc. No way.

As stated, my home will be most affected as we have recently bought a house that is only several hundred metres away from the proposed site. My parents would not have bought this house had we known a nine storey hospital was going to be built & directly impact on our views from the kitchen & loungeroom spoiling our rural & Mount Warning views. Again why we have strategic plans!

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I thought the National party was formed by farmers to protect agriculture & rural voters, well they have got this wrong with the Hospital proposal.

Impact on Tweed Community

Has Health Infrastructure even considered the impact on the vulnerable & elderly of Tweed Heads? All the nursing homes on are on the north side of the river & should another flood like last year happen, they will not be able to get to the Tweed Valley Hospital. Despite this question being asked at a community meeting we were told they could go to Robina Hospital, but the HI "expert" was obviously not aware that this was cut off too in that 2017 flood.

I will finish by saying I object in the strongest terms about the proposed re-zoning of State Significant Farmland. There is plenty of more suitable sites in the Tweed region & I request that HI review it's proposal and not take drought proof farmland and in doing so destroy my town and the surrounding farms.

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:
Please do not publish my name

IP Address: - [redacted]
Submission: Online Submission from [redacted] (comments)
https://majorprojects.accelo.com/?action=view_activity&id=300571

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 **am writing to object to the proposed re-zoning of State Significant Farmland on 771 Cudgen road, to allow a large public hospital to be built on the farmland.**

I have lived in Kingscliff all my life, I go to school at [redacted] and am an active member of the [redacted]. My concerns are that my town will be overwhelmed by traffic, parking will be a problem, with increased noise and crime if this proposed re-zoning of state significant farmland goes ahead.

North Coast Regional Plan 2036

I believe that the State Government's long term plan was to upgrade the current Tweed Hospital and I have attended information booths at our local markets, run the Relocate Tweed Valley Hospital, protest group and I cannot understand why these plans have suddenly changed. My father was at the community meeting that Health Minister Hazzard, when asked why the plans were recently changed, advised the hundreds of locals present, that he had changed his mind. This is not a good enough reason to change long term strategic plans. These plans made by experts with community and business input should not be changed once they have been adopted by the various levels on government. What is the point of doing these long term plans if any Minister can change them on a whim? What about the elderly & vulnerable people of the Tweed & the businesses in the shopping centre close to the existing hospital. They will all be significantly impacted if the Tweed Hospital moves away.

Northern Rivers Farmland Protection Project (2005)

The proposed site is zoned as RU1 State Significant Farmland & therefore should not have ever been considered as a suitable site for a 450 (up to 900) bed Hospital. The whole point of the above project was to protect important/significant farmland from developments such as the one being forced upon us.
I have friends who are local farmers and they are now very concerned that by allowing this hospital proposal to go ahead, it will fragment the existing farms on the Cudgen plateau & open up the whole area for overdevelopment. This is not what the local community, nor the tourists that come here want to see happen.

Community Consultation
There has been no community consultation when choosing a site suitable for the new Tweed Valley Hospital. Surely the community should have been involved from the very beginning. Also given that my street will be one of the most impacted by the construction noise, increased traffic & loss of views, why is it that my friend down the road, who will be less affected, has received a newsletter about the proposed hospital, but none of us on the Kingscliff hill? In fact, no-one in the entire Shire, including the Tweed Shire Council, will know the full impact of this project until it is all too late. Not good enough, the community & those of us who have to live with the future consequences, deserves to know now!
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I love living at Kingscliff, it has a small town feel about it & most people know each other, but it is also a tourist town with an increasing number of overseas & interstate visitors. Do you think that any tourists will want to come to Kingscliff driving into town (if they can get through the traffic), past a major high rise public hospital, with parking congestion, crime etc. No way.
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I quote from the NCRP 2036: " *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."*
I thought the National party was formed by farmers to protect agriculture & rural voters, well they have got this wrong with the Hospital proposal.

Impact on Tweed Community

Has Health Infrastructure even considered the impact on the vulnerable & elderly of Tweed Heads? All the nursing homes on are on the north side of the river & should another flood like last year happen, they will not be able to get to the Tweed Valley Hospital. Despite this question being asked at a community meeting we were told they could go to Robina Hospital, but the HI "expert" was obviously not aware that this was cut off too in that 2017 flood.
I will finish by saying I object in the strongest terms about the proposed re-zoning of State Significant Farmland. There is plenty of more suitable sites in the Tweed region & I request that HI review it's proposal and not take drought proof farmland and in doing so destroy my town and the surrounding farms.

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 object to the hospital being built on State Significant Farmland for the following reasons,

 The local community of Cudgen and Kingscliff will be changed forever if this hospital is built in the proposed location for the everlasting determent to the local residents.
 Loss of local amenities will be immediate. Kingscliff Pool and Library will be no longer viable as the carparks will be filled continuously by hospital visitors & staff avoiding the paid parking that is present at every hospital. This will result in the loss local jobs for those who work in these facilities.
 The choice of Cudgen State Significant Farmland is a poor option when at least two other sites have been identified. These lands were designated to be protected, not destroyed by the Government.
 The minister has "Changed his mind" and by Ministerial decree the 2017 North Coast Regional Plan (Over 6 years work) to shift the Tweed Hospital away from the City of Tweed Heads to the Town of Kingscliff The was with no prior community consultation whatsoever!
 The Tweed has for many years been developing Eco food tourism industry. The placement of a 900-bed hospital at Cudgen will forever change this local dynamic in the Kingscliff restraint strip.
 I am very concerned that building a multi-story hospital will open the flood gates to more structures greater than the current 3 stories, The local area will become another Gold Coast and the local area will lose the character we have worked hard to maintain.
 I fear that closing the current Tweed Heads Hospital will be the key that results in further stress on the local businesses in Tweed Heads by removing the key economic driver (hospital) and betraying Tweed Heads residents with medical issues who invested their life savings in homes with hospital proximity.
 Are you aware that over 8000 signatures that went to the Upper & Lower Houses of NSW Parliament, and that there are over 4800 followers of the "Relocate Tweed Valley Hospital " Facebook page. I believe this is a remarkable local community response and should not under estimated.
 Please also note that Tweed Shire Council is oppose siting of the Tweed Hospital on prime agricultural land when considering social impacts and community responses.
 The majority of Tweed's residents the live in Tweed Heads, Banora Point and Terranora will not be able to access the hospital when the next major flood event occurs.
 Cudgen & Kingscliff residents' quality of life feel the full brunt of traffic congestion and parking demand, ambulance sirens causing distress to those not directly affected with the incident and emergency aircraft arrivals.

IP Address: [redacted]

Submission: Online Submission from [redacted] (object)
https://majorprojects.accelo.com/?action=view_activity&id=300277

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 object to the hospital being built on State Significant Farmland for the following reasons,

ï,§ The local community of Cudgen and Kingscliff will be changed forever if this hospital is built in the proposed location for the everlasting determent to the local residents.
ï,§ Loss of local amenities will be immediate. Kingscliff Pool and Library will be no longer viable as the carparks will be filled continuously by hospital visitors & staff avoiding the paid parking that is present at every hospital. This will result in the loss local jobs for those who work in these facilities.
ï,§ The choice of Cudgen State Significant Farmland is a poor option when at least two other sites have been identified. These lands were designated to be protected, not destroyed by the Government.
ï,§ The minister has â€oeChanged his mindâ€• and by Ministerial decree the 2017 North Coast Regional Plan (Over 6 years work) to shift the Tweed Hospital away from the City of Tweed Heads to the Town of Kingscliff The was with no prior community consultation whatsoever!
ï,§ The Tweed has for many years been developing Eco food tourism industry. The placement of a 900-bed hospital at Cudgen will forever change this local dynamic in the Kingscliff restraint strip.
ï,§ I am very concerned that building a multi-story hospital will open the flood gates to more structures greater than the current 3 stories, The local area will become another Gold Coast and the local area will lose the character we have worked hard to maintain.
ï,§ I fear that closing the current Tweed Heads Hospital will be the key that results in further stress on the local businesses in Tweed Heads by removing the key economic driver (hospital) and betraying Tweed Heads residents with medical issues who invested their life savings in homes with hospital proximity.
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ï,§ Please also note that Tweed Shire Council is oppose siting of the Tweed Hospital on prime agricultural land when considering social impacts and community responses.
ï,§ The majority of Tweedâ€™s residents the live in Tweed Heads, Banora Point and Terranora will not be able to access the hospital when the next major flood event occurs.
ï,§ Cudgen & Kingscliff residentsâ€™ quality of life feel the full brunt of traffic congestion and parking demand, ambulance sirens causing distress to those not directly affected with the incident and emergency aircraft arrivals.

IP Address: - [redacted]

Submission: Online Submission from [redacted] (comments)
https://majorprojects.accelo.com/?action=view_activity&id=300281

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]

Content:
I am writing to object to the new proposed hospital being built on very usable A1 Agriculture Farmland at Cudgen.

It should be built on a parcel of land on Depot Road, also known as Kings Forest. This land is all sand and not that far away from the proposed site, under 2 minutes by road in fact.

The site picked at Cudgen by the NSW Government has upset a lot of people from all walks of life.

I'm a farmer in the Cudgen area and have leased this particular farm in the 80's, when we had bumper crops consisting of zucchini, sweet potatoes & peas. The farm has farmed very well ever since thanks to switched on farmers.

[redacted]

So why would the NSW Government build a monster of a hospital on quality farm soil that will feed Australia for hundreds of years instead of the Kings Forest site that is earmarked for future housing development.

I'd love a new hospital but in the right place.

Two petitions with well over 8000 signatures were ignored, these 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.

The rezoning of SSF sets a rezoning precedent for other works to be developed on local SSF. This would then cause an increase in council rates for the farming community.

Cudgen's SSF is drought free, only 2% of NSW can be grateful for this.

The Cudgen Plateau can grow a wide variety of fruit & vegetables, the volcanic soil & climate as well as different facing slopes ensure the farmlands are very productive.

Fruit & vegetable merchants in the capital cities are reliant on farmers from Cudgen to supply them with produce, this produce is then transported around the country.

The Tweed Shire restaurants, fruit & vegetable stores & markets are also reliant on local produce, it is part of what makes this area unique & why the tourists flock here.

The soil testing of the site has not been completed, this was described on pg. 21 of the Biodiversity Appendix. The area incompletely tested is a farm dump site, which was not tested because it was overgrown with vegetation. It could potentially be a hotspot of chemical contamination, posing a serious risk to human health etc. The site should be more thoroughly assessed before any works proceed, particularly if the soil is going to be used as fill around the hospital site

A hospital 9 storeys high is totally out of character for the Cudgen/Kingscliff area. This will cause an unpleasant aesthetic presence over the town.

There is no infrastructure available to cater for the masses of hospital visitors & staff, residential streets would be congested & there is already a shortage of parking in the commercial area of Kingscliff.

The proposed height limit contradicts the restrictions in the Tweed LEP which were established through extensive community consultation.

The height of the proposed hospital will set a precedent for building heights to increase in Kingscliff. The majority of the community have previously advised they do not want height increases

The roads into Kingscliff & around the proposed hospital site are narrow & are struggling to deal with the current traffic. The roads in the vicinity of Cudgen also have tractors that use them to go from farm to farm, semi-trailers are on them daily to collect the produce from farms to go to city markets. The roads are conducive for a rural setting.

Production on neighbouring farms will have their production capacity, which also means their livelihood reduced due to hospital buffer zones. Farming is a dirty business & nature controls the environmental impacts.

The area directly at the bottom of the hill is a protected wildlife corridor. The impact for these animals with lights & noise will be detrimental.

There are so many elderly people living in Tweed Heads, there are nursing homes/retirement villages that have been built there too, this is due to the Tweed Heads Hospital. The elderly reside there due to the hospital & will be disadvantaged by any closure or reduced services.

The roads around Cudgen/Kingscliff flood making access to this area impossible.

The 2017 flood also saw flooding on the Gold Coast which means that anyone living in the Tweed Heads area would not have been able to access any hospital if Tweed Heads Hospital had had its services moved.

Tweed Heads will struggle to maintain its commercial viability with the loss of any hospital services.

The Tweed Shire is quite large with so many more places that a hospital could be built that would be

more beneficial and that isn't State Significant Farmland. The hospital had always been planned for Tweed Heads, plans to extend the hospital were already drawn for this to happen.

The Local Area Command Police Station, is located in Tweed Heads.

I object to the proposed location at Cudgen for the new Tweed Valley Hospital for the following reasons:-

[redacted]

Targeting State Significant Farmland (SSF) when other site options exist. These lands were designated to be protected, not destroyed.

Land is currently zoned RU1 and is State Significant Farmland, It needs to be protected as a national asset, a valuable industry for the Tweed Shire and as food security for future generations. The Northern Rivers Farmland Protection Report 2005, reviewed by the CSIRO, states: "It must be noted that the threshold for state significance is very high compared with other jurisdictions." The Cudgen Plateau is the only area that has such classification in this shire.

It is likely to trigger the eventual rezoning of SSF adjacent to the Hospital. The Minister for Planning & Environment's announced plans for an extended "Regional Health Services Precinct" adjoining the Hospital site, this would then jeopardise the remaining prime agricultural land's already at-risk viability threshold of 500ha. It only needs loss of another 30ha to lose its special protection altogether.

Cudgen's SSF is drought free, only 2% of NSW can be grateful for this.

Automatic rezoning of adjoining land to support facilities associated with a Regional Hospital.

Contradicting current height limit restrictions in the Tweed LEP which were established through extensive community consultation.

Rendering years of community consultation and planning (around Kingscliff as a tourist destination) redundant, through the massive social and economic footprint of the hospital.

Setting a precedent for 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.

Rendering years of community consultation and planning (around Kingscliff as a tourist destination) redundant, through the massive social and economic footprint of the hospital.

Jobs will be lost both directly and indirectly with loss of farmland. It's not only the people that work directly on the farm but the transport companies, produce supply merchants, city selling agents for the produce, people who supply & repair farm equipment, irrigation suppliers. We are a small area & these people rely on this work, without it they will also suffer losses.

Ian Sinclair of Edge Land Planning is an expert in the field planning and food, he has the expertise in how it is integrated together. We all have to eat and this man understands the requirement for planning around this. https://www.youtube.com/watch?v=G_wAMm1R4Tg

Statistics from UN FAO Statistical Yearbook 2010 it states that the world average of arable land is 10.6%, Australia has only 5.7%.

Our coastal alluvial plains is a very significant food bowl. This means that the growing population

needs to integrate with the farmland very carefully, not to take over the farmland but to work around it. Once farmlands are concreted there's no going back.

IP Address: [redacted]
Submission: Online Submission [redacted] (object)
https://majorprojects.accelo.com/?action=view_activity&id=300361

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

CROPS THAT CAN BE GROWN AT CUDGEN

VEGETABLES

Sweet Potato
Potatoes
Carrots
Beetroot
Turnips
Parsnip
Swede
Radish
Cabbage
Brussel Sprouts
Broccoli
Cauliflower
Bok choy
Spinach
Alfalfa
Leek

Pumpkin
Corn
Zucchini
Eggplant
Celery
Squash
Beans
Peas
Capsicum
Cucumber
Bean Sprouts
Mushrooms
Sugar Cane
Coffee
Tea

Leek
Fennel
Shallots
Onions
Garlic
Ginger
Lettuce (all varieties)
Kale
Rocket
Chilli
Asian Greens
taro

FRUIT

Passionfruit
Grapes
Watermelon
Rockmelon
Honey Dew
Strawberries
Blueberries
Raspberries
Pineapple
Kiwi Fruit
Guava
Coconut
Lemons
Oranges
Mandarin

Nectarines
Plums
Peaches
Custard Apples
Avocados
Figs
Persimmons
Mango
Banana
Star Fruit
Pawpaw
Dragon Fruit
Limes
Grapefruit
Tomatoes (all varieties)

FLOWERS

Roses
Gladiolus
Sunflowers
Gerberas
Lilies
Chrysanthemums
Lavender
(100's Varieties flowers)

NUTS

Peanut
Pecan
Macadamia

HERBS

Coriander
Parsley
Rosemary
Thyme
Marjoram
Chives
Dill
Bay Leaves

Lemon Grass
Lovage
Basil
Sage
Nasturtium
Oregano
Sorrel
Tarragon

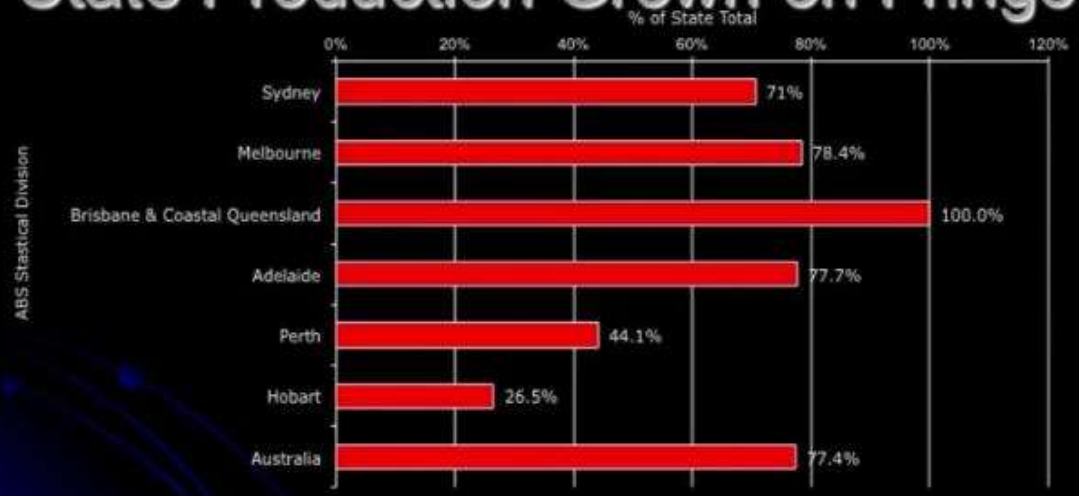
INTENSIVE FARMING

Beef
Pork
Chicken
Milk
Eggs

Food Security Issue is Complex

- To feed the world by 2050 OECD / FAO say need 60 % increase in production
- Climate Change
- Reduction in food availability
- Water scarcity & drought
- Competition for water from urban, mining, etc
- Access to food & socio economic issues
- Land Degradation
- Conversion into agrifuels
- Oil price increase and fertiliser price rise
- Rise in global food prices
- Food miles
- Healthy planning

Perishable Vegetables
State Production Grown on Fringe



Trend is the same with the 2005-06 & 2010 – 11 Agricultural Census

Darwin & NT are not high in Perishable vegetable production

Source: ABS Agricultural Commodities 2008-09

Planning and Food

- Food is important
- It is a necessity of life
- But it has been ignored by the planning profession
- Focus has been on housing, transport, infrastructure, environment but not food …
- Strange because we all have to eat …
- Focus of presentation will be on fresh vegetable production

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

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 quite upset at the proposed hospital being built on prime agricultural farmland at Cudgen, I would have thought that foresight of the future of our food security would have been as important as a new hospital.

I would love a new hospital but would prefer it to go in a more appropriate area. I know that a Masterplan for the area of the current Tweed Hospital has been done, at least in this area the hospital can be built many stories high instead of an urban sprawl. Kings Forest is another option, it is in a sandy area & is earmarked for future development.

I will be turning 88 years old on Christmas Eve so you can imagine that I do require medical facilities and hospitals but I also have an understanding that building a hospital on farmland isn't taking into consideration for future food security. You might also wonder why I would need to worry about that at my age, well I have family, children, grandchildren & great grandchildren, I worry about their future as should we all.

Our family has lived in the Tweed Shire since 1962, my family are originally from Tamworth which is where we also started our farming. Having moved around to a couple of farming areas we settled in the Tweed & purchased a farm, the climate was perfect and our crops & cattle thrived, how could we leave we were in paradise.

Obviously development happened along the way but it was in the already established commercial areas & obviously that was going to happen. There have been developments on other prime agricultural land but looking back it really should never have happened, like a lot of things in our history we cannot keep making the same mistakes.

I enjoy my visits to Kingscliff, parking is becoming a bit more difficult and at my age I do need to park in the disabled spaces as I can't walk far. It will be devastating for me socially if the hospital were to go ahead at Cudgen, from experience I know how hard it is to park around hospitals especially if it's paid parking, people park all over the streets if they don't have to pay. I don't want to become a house recluse, I like to be independent to shop & to visit friends.

IP Address: [redacted]
Submission: Online Submission from [redacted] (object)
https://majorprojects.accelo.com/?action=view_activity&id=300367

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

Australia's Food Production

- Inland areas – Murray Darling Basin, South Australia & Western Australia
  - Grain, Fibre, Vegetables, Vineyards, Orchards, etc
  - Sheep, Cattle, Pigs & some Poultry
- Metropolitan Fringe
  - Perishable Vegetables, Vineyards, Poultry, specialised niche agriculture
- Murray Darling Basin is one of the food bowls, not the food bowl of Australia
- **The peri-urban & coastal alluvial plains are a significant food producing area**

CROPS THAT CAN BE GROWN AT CUDGEN

VEGETABLES

Sweet Potato
Potatoes
Carrots
Beetroot
Turnips
Parsnip
Swede
Radish
Cabbage
Brussel Sprouts
Broccoli
Cauliflower
Bok choy
Spinach
Alfalfa
Leek

Pumpkin
Corn
Zucchini
Eggplant
Celery
Squash
Beans
Peas
Capsicum
Cucumber
Bean Sprouts
Mushrooms
Sugar Cane
Coffee
Tea

Leek
Fennel
Shallots
Onions
Garlic
Ginger
Lettuce (all varieties)
Kale
Rocket
Chilli
Asian Greens
taro

FRUIT

Passionfruit
Grapes
Watermelon
Rockmelon
Honey Dew
Strawberries
Blueberries
Raspberries
Pineapple
Kiwi Fruit
Guava
Coconut
Lemons
Oranges
Mandarin

Nectarines
Plums
Peaches
Custard Apples
Avocados
Figs
Persimmons
Mango
Banana
Star Fruit
Pawpaw
Dragon Fruit
Limes
Grapefruit
Tomatoes (all varieties)

FLOWERS

Roses
Gladiolus
Sunflowers
Gerberas
Lilies
Chrysanthemums
Lavender
(100's Varieties flowers)

NUTS

Peanut
Pecan
Macadamia

HERBS

Coriander
Parsley
Rosemary
Thyme
Marjoram
Chives
Dill
Bay Leaves

Lemon Grass
Lovage
Basil
Sage
Nasturtium
Oregano
Sorrel
Tarragon

INTENSIVE FARMING

Beef
Pork
Chicken
Milk
Eggs

Food Security Issue is Complex

- To feed the world by 2050 OECD / FAO say need 60 % increase in production
- Climate Change
- Reduction in food availability
- Water scarcity & drought
- Competition for water from urban, mining, etc
- Access to food & socio economic issues
- Land Degradation
- Conversion into agrifuels
- Oil price increase and fertiliser price rise
- Rise in global food prices
- Food miles
- Healthy planning

Planning and Food

- Food is important
- It is a necessity of life
- But it has been ignored by the planning profession
- Focus has been on housing, transport, infrastructure, environment but not food …
- Strange because we all have to eat …
- Focus of presentation will be on fresh vegetable production

Tweed Heads Masterplan

This Masterplan project offered options for increased services demand, providing for upgraded services with several new services and adjustments to the models of care in practice while maintaining or improving the functional relationships on the

site.

The strategic redevelopment roadmap included an additional podium and tower building accommodation inpatient units and tenancies, a new entrance and drop off point, an expansion of Emergency department to more than double existing capacity, amalgamation of Chemotherapy and Radiotherapy into an integrated Cancer Centre, expansion of Medical Imaging, medical records, service and support areas.

A New Inpatient/ Outpatient tower will provide Cardiology, mental health Medical / Surgical inpatients Paediatrics, Special Care Nursery and Maternity. As inpatient beds are relocated into the new block, the existing critical areas of the hospital can be expanded.

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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 object to the proposed location at Cudgen for the new Tweed Valley Hospital for the following reasons:-

I am a 4th generation farmer in Cudgen, I am very knowledgeable in the importance of retaining our State Significant Farmland. I know the value of the land, it has been keeping my family and for that matter a lot of the East Coast of Australia fed for many years.

Targeting State Significant Farmland (SSF) when other site options exist. These lands were designated to be protected, not destroyed.

Land is currently zoned RU1 and is State Significant Farmland, It needs to be protected as a national asset, a valuable industry for the Tweed Shire and as food security for future generations. The Northern Rivers Farmland Protection Report 2005, reviewed by the CSIRO, states: â€oeIt must be noted that the threshold for state significance is very high compared with other jurisdictions.â€• The Cudgen Plateau is the only area that has such classification in this shire.

It is likely to trigger the eventual rezoning of SSF adjacent to the Hospital. The Minister for Planning & Environmentâ€™s announced plans for an extended â€oeRegional Health Services Precinctâ€• adjoining the Hospital site, this would then jeopardise the remaining prime agricultural landâ€™s already at-risk viability threshold of 500ha. It only needs loss of another 30ha to lose its special protection altogether.

Cudgenâ€™s SSF is drought free, only 2% of NSW can be grateful for this.

Automatic rezoning of adjoining land to support facilities associated with a Regional Hospital.

Contradicting current height limit restrictions in the Tweed LEP which were established through extensive community consultation.

Rendering years of community consultation and planning (around Kingscliff as a tourist destination) redundant, through the massive social and economic footprint of the hospital.

Setting a precedent for 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.

Rendering years of community consultation and planning (around Kingscliff as a tourist destination) redundant, through the massive social and economic footprint of the hospital.

Jobs will be lost both directly and indirectly with loss of farmland. Itâ€™s not only the people that work directly on the farm but the transport companies, produce supply merchants, city selling agents for the produce, people who supply & repair farm equipment, irrigation suppliers. We are a small area & these people rely on this work, without it they will also suffer losses.

Ian Sinclair of Edge Land Planning is an expert in the field planning and food, he has the expertise in how it is integrated together. We all have to eat and this man understands the requirement for planning around this. https://www.youtube.com/watch?v=G_wAMm1R4Tg

Statistics from UN FAO Statistical Yearbook 2010 it states that the world average of arable land is 10.6%, Australia has only 5.7%.

Our coastal alluvial plains is a very significant food bowl. This means that the growing population needs to integrate with the farmland very carefully, not to take over the farmland but to work around it. Once farmlands are concreted thereâ€™s no going back.

IP Address: [redacted]
Submission: Online Submission from [redacted] (comments)
https://majorprojects.accelo.com/?action=view_activity&id=300352

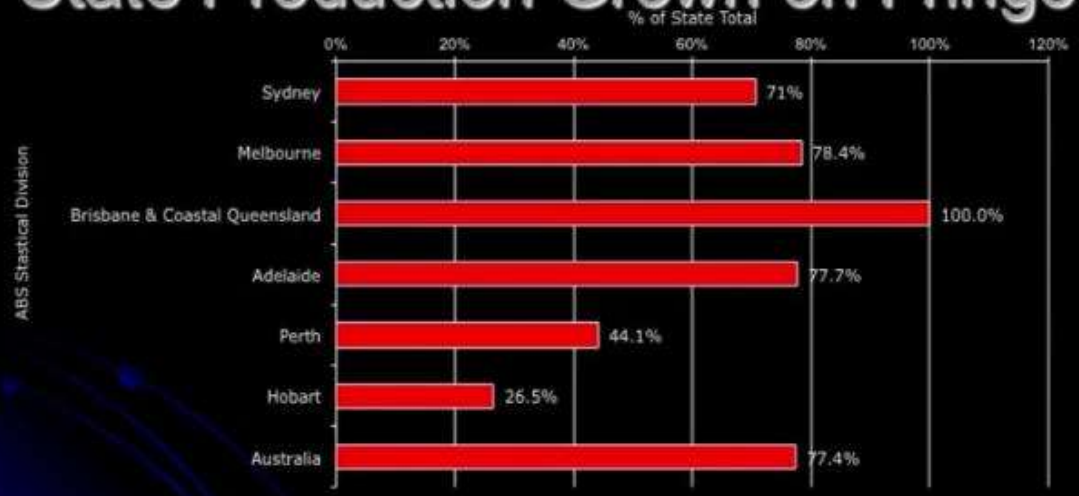
Submission for Job: #9659
https://majorprojects.accelo.com/?action=view_job&id=9659

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

Food Security Issue is Complex

- To feed the world by 2050 OECD / FAO say need 60 % increase in production
- Climate Change
- Reduction in food availability
- Water scarcity & drought
- Competition for water from urban, mining, etc
- Access to food & socio economic issues
- Land Degradation
- Conversion into agrifuels
- Oil price increase and fertiliser price rise
- Rise in global food prices
- Food miles
- Healthy planning

Perishable Vegetables
State Production Grown on Fringe



Trend is the same with the 2005-06 & 2010 – 11 Agricultural Census

Darwin & NT are not high in Perishable vegetable production

Source: ABS Agricultural Commodities 2008-09

Planning and Food

- Food is important
- It is a necessity of life
- But it has been ignored by the planning profession
- Focus has been on housing, transport, infrastructure, environment but not food …
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Northern Rivers Farmland Protection Project

Final Recommendations

February 2005

Department of
Infrastructure, Planning and Natural Resources

NSW DEPARTMENT OF **PRIMARY INDUSTRIES**

FINAL RECOMMENDATIONS

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1 PROJECT OVERVIEW

Introduction

Agriculture is an important industry on the North Coast. It is the region's third largest employer and exporter and fourth highest contributor to gross regional production.

Agricultural land is a finite resource and is under increasing development pressure. A great deal of good agricultural land has been lost to production already. Population pressures have resulted in substantial urban and rural residential encroachment onto farmland. This is having a significant impact on the economic and social value of agriculture in our region. In particular, the loss of critical mass of farms can make it difficult to maintain support services and infrastructure. Land use conflicts between farming and non-farming neighbours have increased, at times leading to farmers having to alter or even close their farming operations. Increasing land prices due to development pressure makes it difficult for farmers to purchase additional land to ensure the ongoing viability of their business.

What's the background of the Farmland Protection Project?

The protection of agricultural land on the NSW North Coast is a long-term government initiative. It was first identified in 1995 in the North Coast Urban Planning Strategy and subsequently in the NSW Coastal Policy (1997), the Northern Rivers Regional Strategy (1999), and the Northern Rivers, Upper North Coast and Mid North Coast Catchment Blueprints (2002). It is consistent with the goals and strategic directions of the state government.

The Northern Rivers Catchment Management Blueprint was developed to provide a direction for action and investment by stakeholders in the catchment's natural resources. Land Use Planning Management Target 2.1 of the Blueprint is to have:

'100% of those large contiguous areas of land mapped as most important for current and/or future food, fibre and timber production and rural employment permanently protected in agricultural reserves by 2008.'

The related Blueprint action 2.1.1 is to:

'Develop criteria to identify the areas of agricultural land that need to be conserved for future agricultural use, and map the agricultural reserve boundaries at a cadastral level'

The target and action form the basis for the Farmland Protection Project.

Where does the project apply?

The project area includes the Tweed, Richmond and Brunswick catchments, these being the previous Northern Rivers Catchment Management area. It includes land in the Tweed, Byron, Kyogle, Lismore, Richmond Valley and Ballina local government areas.

Who is carrying out the project?

Stage One of the Project was coordinated by Lismore Living Centres, as part of the former Department of Urban Affairs and Planning/PlanningNSW. That stage of the project was overseen by the Living Centres Reference Group, which comprised representatives from state and local government as well as regional industry and community interests. PlanningNSW has since been merged with the former Department of Land and Water Conservation to form the Department of Infrastructure, Planning and Natural Resources (DIPNR). The Northern Rivers Catchment Management Authority secured federal funding to continue the Project, and

contracted DIPNR to carry out Stages Two and Three of the project through DIPNR's North Coast office in Grafton. The former NSW Agriculture, now Department of Primary Industries, is a major partner in the project.

The project team comprised:

- Claire Aman, DIPNR, (environmental planning), project coordinator for Stages Two & Three. The coordinator for Stage One was Wendy Stuart, (natural resource planning) Lismore Living Centres
- Carlie Boyd, DIPNR, (environmental planning)
- Max Boyd, former Northern Rivers Catchment Management Board
- Roy Hayward, DIPNR, (geographic information systems)
- Jim Hindmarsh, NSW DPI, (agricultural land assessment)
- Michael Kennedy, DIPNR, (geographic information systems)
- David Morand, DIPNR, (soil survey)
- Graeme Short, DIPNR, (land resource mapping)
- Rik Whitehead, NSW DPI, (agricultural land use planning)
- Greg Yeates, DIPNR, (environmental planning)

Local government planning staff had input to project team meetings on a regular basis during the second and third stages of the project. Agricultural industry representatives were consulted during the project.

What does the project seek to do?

The Farmland Protection Project seeks to protect important farmland from urban and rural residential development by mapping farmland and developing planning principles. The project team has endeavoured to put forward policies which can be of genuine long-term benefit to agriculture in the region without imposing unnecessary restrictions on farmers.

The project aims to protect a broad range of lands to cater for a range of agricultural industries that may be important currently or in the future, thereby keeping land options open for new crops and farming methods. Urban and rural residential development will be limited on land identified by the project so that areas with the most potential for production are not lost to urban uses.

Farmland protection has the potential to provide a range of broad benefits. By keeping agricultural land available for farming, it will help to maintain the agricultural land resource in the long term. It will minimise farming/residential land use conflicts. Farmers, knowing whether their locality is to be protected from residential encroachment, will have greater certainty for investment in agriculture and sustainable land management systems.

The project will not force a change to current land use. There will be no requirement for agricultural activity to occur on land. The intention is to protect the land's farming potential, so land uses that alienate farmland, such as residential development, will be limited. The main effect of the project will be that mapped farmland will be avoided in the planning process for future residential areas. The project will result in a greater level of certainty about the development potential of farmland.

The project does not aim to protect any scenic views associated with farmland. Its focus is on protecting the agricultural land resource for current and future production. The quality of any visual landscape has not been a criterion for identifying significant farmland.

What's happened so far?

First stage

The project commenced in July 2002. The first stage began with the project team developing criteria for mapping lands suitable for agricultural protection. The mapping process is described at section 2. The team prepared draft maps using these criteria. Draft planning rules were developed as a starting point for discussion. In the first half of 2003, the draft maps and planning rules were presented to agricultural industries, local and state government and the broader community for discussion. The community consultation process is detailed in section 3. The first stage was coordinated by Lismore Living Centres.

Second stage

During Stage 2, DIPNR implemented a policy to protect farmland as a holding measure while the project was being completed. The policy is a Section 117 Direction under the Environmental Planning and Assessment Act, and is called the Section 117 Direction (January 2004) on interim protection for farmland of state and regional significance on the NSW far north coast. It prevents urban and rural residential rezoning of state or regionally significant farmland identified on maps dated January 2004, unless the land is within a settlement strategy agreed between councils and DIPNR. It refers to the maps which were drafted in the first stage of the project, using the methodology as developed at the time.

Stage 2 was a review phase. After examining the feedback which resulted from the 2003 community consultation, the project team reviewed the mapping methodology and the planning rules, taking into account the key themes which had emerged. Those themes are presented at section 3.

The reviewed draft maps and planning rules were placed on public exhibition between mid-August and the end of September 2004. The draft planning rules exhibited in the second stage focused on strategic planning rather than land use on farms, in response to community feedback given during the first consultation.

Third stage

The third stage was a further review stage which examined community feedback received in response to the stage 2 consultation phase. This feedback guided the project team in developing the third stage maps and the planning recommendations in this Final Report. The key themes highlighted by the community in response to the 2004 maps and planning rules are at section 3. This stage also included an independent methodology review by CSIRO Sustainable Ecosystems.

What happens next?

The Section 117 Direction on interim protection for farmland is currently still in place. As a next step, DIPNR intends to recommend to the Minister for Planning to update the Section 117 Direction to refer to the finalised maps and the planning principles proposed at section 4.

Again this would be an interim situation, pending the completion of the department's Far North Coast Strategy, which is expected to be completed in late 2005. The Strategy, in planning for the region's next 30 years, will consider a range of issues including population growth, infrastructure, transport, housing affordability, coastal management, environmental protection and economic growth. The outcome of the farmland work will form one of many layers of the Strategy. The Section 117 Direction will be superseded by the Strategy.

2 THE MAPS

How the maps were developed

A detailed account of the methodology is available in a separate document as part of this package. The following is a summary.

The steps

The steps in the mapping process are summarised below:

Stage One (July 2002 to June 2003)

a) investigate available mapping data sets
b) identify preferred data set (soil landscape mapping) and criteria for identifying significant agricultural land
c) Initial selection of soil landscapes which meet criteria
d) identify draft criteria to differentiate selected soil landscapes as state, regional or local.
e) prepare preliminary draft maps based on draft criteria
f) observe the maps broadly for coverage, distribution and anomalies
g) amend maps where required
h) workshop preliminary draft maps with local government planners, government agencies and industry bodies
i) identify cadastral boundaries of best fit for areas identified as state significant
j) run sensitivity analysis to identify scale error for cadastral boundaries
k) workshop draft maps with the community in conjunction with draft planning rules
l) compile community feedback and submissions for consideration at review stage (Stage Two)

Stage Two (July 2003 to August 2004)

m) check mapping anomalies and inconsistencies identified by public submissions and project team assessment
n) refine soil landscape selection/classification in response to previous step
o) prepare revised draft maps applying refined selection/classification
p) assess revised maps, check for anomalies and inconsistencies
q) steps p) – r) repeated four times
r) prepare new draft maps, exhibit to the public with revised planning rules

Stage Three (September 2004 to February 2005))

s) independent review of methodology
t) check for mapping anomalies and inconsistencies identified by public submissions
u) soil landscape data review
v) refine soil landscape selection
w) refine distinction between state and regionally significant farmland
x) final check of maps for consistency
y) print final maps

Soil landscape mapping

The first steps in the project were to investigate various mapping data and decide on a suitable method of identifying significant agricultural land. The method chosen by the project team was based on soil landscape mapping undertaken by the former Department of Land and Water Conservation (now DIPNR).

Soil landscape mapping uses soil, landforms and geology to identify soil landscapes. Descriptions of vegetation, land use, land degradation and rural and urban capability are included in each soil landscape description in the accompanying soil landscape reports (Morand 1994). Soil landscape mapping has nothing to do with 'landscape' in the visual or scenic sense. Soil landscapes are areas of land with unique landform features containing a characteristic set of soils. Since landscapes and their soils are formed by the same natural processes, soil landscapes are the best way of presenting soil and land resource information. A particular soil landscape can occur widely, or it can be unique to a small area. For example, the Ophir Glen soil landscape occurs in numerous small alluvial fans and valley in-fills throughout the Burringbar Hills, including near Mooball, Upper Burringbar, Crystal Creek and North Tumbulgum.

A major reason for using soil landscape mapping is that it uses a combination of criteria to identify a land's rural capability - that is, the ability of land to sustain permanent agricultural or pastoral production without permanent damage. An additional major advantage of soil landscape mapping is that there is complete coverage of the Northern Rivers.

Soil landscape selection

The rural capability evaluations described in soil landscape reports have formed the basic criteria for selecting the soil landscapes to be included in the proposed farmland areas. Consideration was given to those with low to moderate limitations. These evaluations are a broad adaptation of the Rural Land Capability classes and generally refer to erosion and land degradation risk. This risk can be independent of agricultural quality. Landform is also an important factor. For, example, soils on steep slopes, irrespective of their quality, will be subject to high erosion risk, and therefore would be given a less favourable rural land capability ranking than those areas of the same soils on gentler slopes. Consequently, using rural land capability alone is not feasible due to a variety of map units per land area and therefore fragmented nature of mapping. It was used as an initial indicator for lands suitable for inclusion in a farmland area. The additional factors of soil type, soil characteristics, drainage, mass movement risk, landform and land use history were also used to assist in choosing which soil landscapes were to be considered. Another important factor was the distinction between cultivation and grazing country. Good cultivation country is generally also good grazing country. However, good grazing country also includes those steeper soil landscapes that have high limitations for cultivation.

Soil landscape selections were reviewed during Stages Two and Three of the project. They were refined using feedback from community consultations and also after re-appraisal following field inspections or reconsideration of some of the borderline inclusions or exclusions.

Table 1 shows the characteristics of the soil landscapes which were selected as significant farmland.

Refining the maps

The task of developing the methodology involved a series of re-evaluations of mapping rules and production of a number of map versions. Refinement of the mapping continued throughout Stages Two and Three of the project in response to issues identified through consultations and by the project team. Public submissions referring to the mapping of specific properties were collated, details recorded and each query investigated. Changes to the mapping during the review process were made on a 'global', data basis rather than on an individual property level. No individual property was excluded from the mapping. When a submission referred to a particular property, the whole soil landscape was assessed. If a decision was made that the particular soil landscape should be included or excluded, the maps were adjusted to reflect this change wherever that particular soil landscape occurred. A detailed account of the methodology and mapping rules can be found in the Stage Three Methodology Report.

TABLE ONE SELECTED SOIL LANDSCAPES FOR INCLUSION AS STATE AND REGIONALLY SIGNIFICANT FARMLAND

More detailed information about selection of soil landscapes is in the Methodology Report 2005.

Soil Landscape	Landform	Slope <25% (Y or N)	Slope <15% (Y or N)	Soil Type	Soil Depth >1m (Y or N)	Landscape drainage	Rock outcrop <10% (Y or N)	Flood free (Y or N)	Other Constraints/ hazards	Current predominant ag land use
Dungarubba (du)	Floodplain	Y	Y	HG	Y	Poor	Y	N		Grazing, sugar cane, soybeans
" (dua)	Levee	Y	Y	BRE	Y	Moderate	Y	N		
Eltham (el)	Floodplain	Y	Y	K	Y	Well drained	Y	N		Grazing, soybeans, fodder crops
" (ela)	Floodplain	Y	Y	K, PS	Y	Well drained	Y	N		
" (elb)	Floodplain	Y	Y	K, PS	Y	Well drained	Y	N		
Empire Vale (ep)	Floodplain	Y	Y	PS	Y	Moderate	Y	N		Sugar cane
" (epb)	Floodplain	Y	Y	HG, PS	Y	Poor-moderate	Y	N		Sugar cane
Leycester (le)	Floodplain	Y	Y	BE	Y	Moderate	Y	N		Grazing, soybeans, fodder crops
Mullumbimby (mu)	Floodplain	Y	Y	BRE	Y	Moderate	Y	N		Grazing, some sugar cane
Tatham (ta)	Floodplain	Y	Y	BC, GC	Y	Moderate	Y	N		Grazing
Terania (te)	Floodplain	Y	Y	BRE	Y	Moderate	Y	N		Grazing
Crabbes Creek (cr)	Floodplain	Y	Y	BRE	Y	Moderate	Y	N		Grazing
Cudgera (cd)	Floodplain	Y	Y	YE, A	Y	Moderate	Y	N		Grazing, sugar cane
Oxley (ox)	Floodplain	Y	Y	PS, A	Y	Moderate	Y	N		Grazing
Rous (ru)	Floodplain	Y	Y	BRE, RE	Y	Moderate	Y	N		Grazing
Tweed (tw)	Floodplain	Y	Y	HG	Y	Poor	Y	N	Acid sulfate soils	Sugar cane, some grazing
" (twb)	Floodplain/ sandplain	Y	Y	PS	N	Moderate	Y	N	Sand restricts soil depth	
Brays Creek (bc)	Floodplain	Y	Y	PS, A	Y	Moderate	Y	N	Stony soils common	Grazing
Cobaki (cb)	Estuarine plain	Y	Y	HG	Y	Poor	Y	N	Acid sulfate soils	Sugar cane, grazing
Ewingsdale (ew)	Low hills	Y	Y	K	Y	Well drained	Y	Y	Local run-on	Grazing
McKee (mc)	Low hills	Y	Y	CS, PS	N	Well drained	Y	Y		Grazing, dairy, poultry
" (mca)	Low hills	Y	N	CS, PS	N	Well drained	Y	Y		Grazing
Wollongbar (wo)	Rises	Y	Y	K	Y	Well drained	Y	Y		Horticulture, grazing
" (woa)	Rises	Y	Y	K	Y	Well drained	Y	Y	Small topographic	Horticulture, grazing

Soil Landscape	Landform	Slope <25% (Y or N)	Slope <15% (Y or N)	Soil Type	Soil Depth >1m (Y or N)	Landscape drainage	Rock outcrop <10% (Y or N)	Flood free (Y or N)	Other Constraints/ hazards	Current predominant ag land use
									extent	
" (wob)	Rises/low hills	Y	N	K, PS	N	Well drained	Y	Y	Small topographic extent; localised rock and slopes>20%; mixed soils. Soil depth is variable, but generally shallow.	Horticulture, grazing
Disputed Plain (dp)	Fans, footslopes	Y	Y	BE	Y	Moderate	Y	N	Run-on	Grazing
Myocum (my)	Drainage plains	Y	Y	BE, W	Y	Poor	Y	N	Run-on	Grazing
Tyagarah variant (tyc)	Backbarrier plain	Y	Y	HG	Y	Moderate	Y	N		Sugar cane
Cudgen (cu)	Rises	Y	Y	K	Y	Well drained	Y	Y	Localised stony soils	Horticulture, vegetables
Carool variant (caa)	Rises	Y	Y	K	Y	Well drained	Y	Y		Horticulture, vegetables
Bangalow (bg)	Low hills	N	N	K	Y	Well drained	Y	Y	Localised: slopes>25%; mass movement	Grazing, macadamias, bananas
Rosebank (ro)	Rolling hills	N	N	K, CS	Y	Well drained	Y	Y	Localised: slopes>25%; mass movement; rock outcrop.	Grazing, horticulture
" (rob)	Rolling low hills/hills	Y	N	K	Y	Well drained	Y	Y		Grazing, horticulture
Ophir Glen variant (oga)	Terrace	Y	Y	RP	Y	Well drained	Y	Y		Grazing
Frederick (fr)	Rises, low hills	Y	Y	PS, BE, K	N	Moderate	Y	Y	Localised rock, variation in soil depth	Grazing
Western Richmond Soil Landscapes - the following is based on draft information which in many cases is still awaiting field investigation. No lab data is currently available. Map linework is also subject to change.										
Haystack Mountain (hm)	Rises, low hills	Y	Y	PS, CS, K	Y	Well drained	Y	Y		Horticulture, grazing
" (hma)	Bench surfaces	Y	Y	PS, CS	N	Well drained	Y	Y		Grazing
Roseberry (rb)	Low hills, hills	Y	N	CS, PS, BE	Y	Well drained	Y	Y		Grazing
Frederick variant (fra)	Rises	Y	Y	K, PS	Y	Well drained	Y	Y		Grazing
Horseshoe Station Creek (hs)	Low hills, hills	Y	N	CS, PS, BE	N	Well drained	Y	Y		Grazing
Ironpot Creek (ir)	Floodplains	Y	Y	PS, BE, GP	Y	Moderate	Y	N		Grazing

NOTES TO TABLE 1:

1. 'Soil Type' is the great soil group of Stace *et al*. (1968). The codes are:

Soils of high fertility (from Murphy et al. 2000):	
Group 4*	
CS	Chocolate Soil
K	Krasnozem
BC	Brown Clay
GC	Grey Clay
Group 5*	
BE	Black Earth
PS	Prairie Soil
Other soils	
HG	Humic Gley
BRE	Brown Earth
W	Weisenboden
A	Alluvial Soil
YE	Yellow Earth
RE	Red Earth
YP	Yellow Podzolic Soil
RP	Red Podzolic Soil
SH	Soloth
P	Podzol
AP	Acid Peat
GP	Gleyed Podzolic Soil

*

Group 4: soils with a high level of fertility in their virgin state, but this fertility is significantly reduced after only a few years of cultivation.
Physically, Krasnozems are better than most soils but they have some undesirable chemical features.

Group 5: soils with high fertility that generally only require treatment with chemical fertilisers after several years of cultivation.

(from Murphy et al. 2000)

What the maps show

The policy map set has been derived from soil landscape data which was produced for use at a scale of 1:100,000 or smaller. The map set comprises four sheets at a scale of 1:100,000. Each grid is equivalent to 2,500 hectares.

The maps show three farmland categories: state significant (yellow), regionally significant (brown) and significant non-contiguous (hatched). Significant farmland boundaries reflect soil landscape boundaries. The maps are proposed to be reviewed in the future to incorporate any reviews of soil landscape data.

State and regionally significant farmland

The distinction between state and regionally significant farmland was established to recognise the diversity within the region's 'important' farmland. There was a need to distinguish between very high quality and unique agricultural soils/lands and other lands that were also important to agriculture but which were more extensive and less productive generally per unit area.

This distinction allows greater flexibility in planning controls. Rules about urbanisation of farmland can afford stronger levels of protection to smaller unique significant areas compared to expansive areas that contain a more diverse range of soils, landscapes and opportunities for agriculture.

Table 1 lists the soil landscapes which were selected as significant farmland. Four of those soil landscapes were further identified as state significant due to the presence of the following attributes:

1. Slope generally less than 15%.

2. Consists predominantly of any of the following soil types:
    - Chocolate Soils
    - Euchrozems
    - Krasnozems
    - Some Grey, Brown and Red Clays
    - Black Earths
    - Chernozems
    - Prairie Soils

These soils are groups 4 and 5 in Table 8.2 from Murphy *et al*. (2000). They are soils of high fertility. Group 4 soils have a high level of fertility in their virgin state which is significantly reduced after only a few years of cultivation. Group 5 soils generally only require treatment with chemical fertilisers after several years of cultivation. Physically, Krasnozems are better than most soils but they have some undesirable chemical features. Australian Soil Classification equivalents are Dermosols, Ferrosols and Vertosols. The above soils are generally characterised by well-developed structure, high fertility and good drainage.

3. Soils are generally deeper than 1 metre.

4. Well drained landscape.

5. Rock outcrop less than 10%.

6. Flood free.

7. Not affected by other constraints/hazards either within the soil landscape or originating in adjoining soil landscapes (eg: run-on, mass movement, localised flooding).

The soil landscapes generally consistent with these criteria are:

- Wollongbar
- Wollongbar variant (woa)
- Cudgen
- Carool variant (caa)

Contiguity

One of the criteria set by the Northern Rivers Catchment Blueprint was that 'large contiguous areas of land' be considered for farmland protection. 'Contiguous' is defined as 'touching, in contact with, in close proximity, near.' The need for contiguous areas is to assist with diversity, resilience, economies of scale and freedom from conflicts in agricultural areas.

To assist in identifying contiguous areas, mapping rules applying to minimum sizes of selected land units were developed. A minimum contiguous mass of state significant land was determined to be 500 hectares. The minimum size for a regionally significant land mass comprising an alluvial or alluvial-influenced soil landscape was set at 500 hectares. The minimum size for a regionally significant land mass on other soil landscapes was set at 1000 hectares. The minimum size rules are detailed in the Methodology Report.

Hatched areas

The 2003 maps showed state, regional and locally significant land. On the 2004 maps, land previously identified as locally significant was excluded on the basis of the project's regional nature and scale. These 'local' areas comprised lesser quality land, as well as better quality land units which were too small to be included as state or regionally significant, given the project's emphasis on contiguity and the size rules referred to above.

However, exclusion of the fragmented, better quality units resulted in islands of valuable farmland not being given any protection or status at all by the project. So as not to overlook the local importance of these lands, the final maps identify soil landscape units which are selected as state or regionally significant, but are smaller than the minimum unit size and larger than 40 hectares. Those lands are identified as 'significant non-contiguous farmland' and are shown hatched on the maps. Proposed planning principles applying to the various farmland categories are outlined in section 4.

Excluded areas

Areas excluded from the maps are:

- State Forests and National Parks
- Water bodies
- Areas identified as having committed urban uses. These are indicated pink on the maps and equate to:
    - land zoned urban and rural residential,
    - rural land isolated within urban areas,
    - open space which is zoned open space or identified as open space in council strategies or plans,
    - roads and drains in urban areas,
    - environmental protection areas within urban areas,
    - land zoned private open space which allows urban uses,
    - land identified for urban (including industrial) purposes in a development control plan,
    - land zoned rural but used for urban purposes (eg airport, waste facility, industry).

Future settlement areas

Future settlement areas identified in councils' settlement strategies are not shown on the maps. These areas are recognised through written planning rules in this report rather than as part of the mapping process. The maps include a text box as follows:

Land identified in an agreed council settlement strategy can be considered for urban or rural residential rezoning even if it is mapped as significant farmland. The council strategy must have been agreed to between December 1994 and December 2004 (or placed on public exhibition by the end of 2004 and subsequently approved) under clauses 20 or 38 of the North Coast Regional Environmental Plan. Land identified in a settlement strategy is not automatically approved for development; further investigations occur as part of the rezoning process. Agreed strategies can be seen at council offices.

Environmental values

Some areas identified as state or regionally significant include important habitat or remnant vegetation. While the maps indicate the existence of significant farmland, this should not mean agriculture should take precedence over environmental values. A text box is included on the maps as follows:

Significant farmland status does not imply that vegetation and habitat values are secondary to agricultural values, or that land has to be used for agriculture.

Changes to the maps between 2004 and 2005

Feedback from the 2004 consultation suggested that the classification of some areas needed review. The final maps reflect the following revisions.

Soil landscape data revisions

On checking source soil landscape data for a number of areas, the data in the Lismore-Ballina maps (Morand 1994) appeared to contain some anomalies. These were due to the variable or dissected nature of some of the soil landscapes, and the gradual refinement of the soil landscape mapping process (the Lismore-Ballina map was the first to be completed within the Northern Rivers). The Tyagarah (ty), Rosebank (ro), Wollongbar (wo) and Empire Vale (ep) soil landscapes were of particular concern.

The project team agreed that it would be of value to utilise reviewed data which is to become part of Version 2 of the published soil landscape maps. The review of soil landscapes utilised radiometric data, the latest colour aerial photography, latest geology maps and field work carried out since publication of the original 1994 maps. The review focused on areas about which the project team had held reservations in terms of its agricultural value. Some of these areas had also been queried in submissions. Below is a list of soil landscape changes which consequently affected the Farmland Project maps.

- The Tyagarah soil landscape is found around the Tuckean Swamp area, west of Brunswick Heads, west of Byron Bay, near Tyagarah, northwest of Lennox Head, between Ballina and Lennox Head and near Newrybar Swamp. Most of it is poorly drained and has poor soils. However, an area extending from Newrybar south to the Ballina Nature Reserve, having a basaltic influence, was found to have better soils (Prairie Soils, Black Earths and Humic Gleys with associated Humus Podzols). The hydrology of this landscape has been altered by the establishment of an extensive drain network. This area was remapped as a new variant (tyc).

- The Rosebank soil landscape, extending over various districts north, northeast and south of Lismore was acknowledged to be steep in a number of areas. However, the overall presence of krasnozem

soils make the less steep parts of this soil landscape valuable for agriculture. The steeper (over 25% slope) areas of this dissected soil landscape were remapped as Coolamon soil landscape, which comprises steep slopes on basalt – as found adjacent the northern side of the Coolamon Scenic Drive.
Parts of the Rosebank soil landscape around Bagotville and west of Mullumbimby were remapped as the Rosebank variant (roa) due to their long narrow ridge slopes.
In the Dorroughby area, some Rosebank soil landscape was remapped as Minyon (mi) because of its rhyolite geology.

- The Wollongbar soil landscape was originally mapped on the Alstonville Plateau and in smaller areas around Eureka, Modanville, Dunoon, and Rosebank plateaux. The Modanville, Dunoon and Rosebank Plateaux were remapped as Wollongbar variant (wob) because of their more dissected landscapes which include shallower, stonier soils with localised rock outcrop. The Eureka, Fernleigh and Newrybar Plateaux remained in the Wollongbar soil landscape.

- The Empire Vale soil landscape comprises the coastal floodplain of the Richmond River, Maguires Creek and Emigrant Creek. Some variation was found between the eastern and western sections of this soil landscape, and immediately south of the Richmond River. An eastern strip and the area immediately south of the river were remapped as a new variant (epa) reflecting the poorly drained humic gley soils of that area which distinguish it from the rest of the Empire Vale soil landscape. The western area was mapped as epb, reflecting where estuarine soil materials have mixed with alluvial soil materials. A new estuarine variant, Burns Point variant (bpa), has replaced some of the area around Maguires Creek that was previously mapped as Empire Vale. Subsequent soil investigations have shown this area to be distinct from the Empire Vale soil landscape.

- The Mullumbimby soil landscape variant (mua) was created so as to distinguish the more estuarine conditions that occur in this part of the Brunswick catchment. This variant occurs north and east of Mullumbimby, with poorly drained Humic Gleys being a common soil.

- The description of the Bangalow soil landscape was slightly revised, resulting in the incorporation of some small Wollongbar variant (woa) polygons. These changes have not affected the farmland maps (although Bangalow soil landscape is now regional - see dot point below).

- Much of country mapped as McKee (mc) soil landscape in the draft Western Richmond soil landscape map included areas which were seen as anomalous and not conforming to the original McKee landscape description. Further field work (currently in progress) will probably show that the soils are also different. These areas were remapped as two new soil landscapes - Roseberry (rb) and variant (rba), and Horse Station Creek (hs) and variant (hsa).

A more detailed account of the soil landscapes review is in the Stage Three Methodology Report. The review resulted in the following changes to Farmland maps

<u>Changes from state significant to regionally significant</u>

- The Bangalow soil landscape was reclassified from state to regionally significant. The widespread occurrence of slopes over 15% made it inconsistent with criteria for state significance.
- The Wollongbar variant (wob) was reclassified from state to regional, due to its shallower soils and rock outcrops rendering it inconsistent with the criteria for state significance. These units include land around Modanville, Rosebank and Dunoon Plateaux.

Changes from regionally significant to 'other rural land'

The following soil landscapes were reclassified from regionally significant to 'other rural land' on further consideration of their qualities.

- The Ophir Glen (og) soil landscape is found as small alluvial fans throughout the Burringbar Range. Its high incidence of dispersive soils made it ultimately unsuitable for regional significance.
- The Disputed Plain soil landscape variant (dpa), also found as alluvial fans and valley infills within the hills north of Mullumbimby, was reclassified because of its poor soils.
- The Limpinwood (li) soil landscape north of Tyalgum and its variant (lia) were reclassified because of the incidence of localised steep and benched slopes with shallow, rocky soils.
- The Pumpenbill (pu) soil landscape, west of Tyalgum, was reclassified because of the incidence of shallow rocky soils.
- The Tyagarah (ty) soil landscape was reclassified because of its general poor drainage and soils. (The new tyc variant was assigned regional significance.)
- The Georgica (ge) soil landscape and its variants comprise much of the land between Lismore, Nimbin and Kyogle. They include substantial areas which are steep, with shallow, stony soils. These qualities make them generally unsuitable for regional farmland status.
- The part of the Empire Vale (ep) soil landscape which was remapped as (epa) was given 'other rural land' status due to its poor drainage and estuarine influence.
- The Rosebank variant roa (see above) was reclassified because of its long, narrow and steep ridges
- The Everlasting (ev) soil landscape, comprising estuarine backswamps of the Richmond River, was reclassified because, despite some areas being used for cane, it is a swamp soil landscape.
- The part of the McKee (mc) soil landscape remapped as the Roseberry variant (rba) was reclassified because of its shallower soils. (The main Roseberry soil landscape was classified as regionally significant because of its expected deeper soils, but field investigation is still in progress for this map.)
- The part of the McKee soil landscape remapped as the Horse Station Creek variant (hsa) was reclassified because of its steeper slopes and shallower soils. The main Horse Station Creek soil landscape was given regional significance because of its expected deeper soils, but field investigation is still in progress.
- The McKee variant mcd was reclassified because it is now part of Horse Station Creek soil landscape variant (hsa).
- The North Casino (nc) soil landscape and its variant (nca), the Oxley variant (oxa), and the Tweed variant (twa) were reclassified because they comprise swamp landscapes. They were originally included as regional because of their small extent and occurrence within more agriculturally valuable soil landscapes.
- The Mount Burrell variant (mba) was reclassified because of its steep slope and rock outcrops.
- The Yorklea (yo) soil landscape and its variants (yoa) and (yob) were reclassified because of its poorer soils and drainage.
- The Kingscliff variant (kib) was reclassified because of its sandy soils.
- The Coolamon (co) soil landscape was reclassified because of its steep slopes and shallow soils.
- The Calico variant (cla) was reclassified because of its erodible, dispersive soils.
- The Afterlee (af) soil landscape was reclassified because of its poorer quality soils (field investigation still in progress).The Dyraaba Arm (da) soil landscape was reclassified because of its poorer quality soils (field investigation still in progress).
- The Ghinni Ghi (gh) soil landscape was reclassified because of its poorer quality soils (field investigation still in progress).
- The Cudgen variant (cua) was reclassified because it represents a narrow drainage depression within the Cudgen soil landscape.

Peer review

As set out in the project workplan developed in 2003, the methodology was subjected to a peer review. CSIRO Sustainable Ecosystems (CSE) was contracted to carry out the review. The review commenced in October 2004, focusing initially on the maps which had been exhibited in August and September of that year. As the Farmland Protection Project team responded to community feedback from the consultation, revisions were made to the methodology. The CSE review team took these revisions into account in their review. Additionally, the CSE review team made some recommendations during the process, which the Farmland project team incorporated into the final mapping.

The reviewers were asked to examine:

1. criteria applied for selecting the soil landscapes used to classify farmland of state and regional significance;
2. the scope and contribution of the consultation process and the extent to which this process influenced the final draft maps;
3. the consultation report;
4. the map validation method;
5. the use of a 'master log' for recording and dealing with issues arising from public submissions and ongoing project analysis; and
6. impurities and inherent limitations in the mapping process.

The CSE report provided the following conclusions and recommendations:

'*Transparency*
While the initial Soil Landscape classification and associated criteria were not as transparent as desirable as per current practice, the project team rectified this problem and provided clear criteria.

Revisions of criteria and mapping during the process.
A more rigorous assessment of Soil Landscape and other criteria before the consultation process commenced may have reduced community uncertainty and concern. Subsequently, the project team have incorporated more recent information (notably radiometric data for some areas) and considered additional technical information in submissions and from other scientists to produce a revised methodology and mapping that reflects best available knowledge. Additional refinements can be expected in future. The team had the best available land resource scientists with long standing mapping experience.

Categories - State and regional.
The final maps show significant land defined by a rigorous and transparent classification system. It must be noted that the threshold for State significance is very high compared with other jurisdictions.

Spatial Resolution.
The mapping scale is smaller than that commonly applied for these purposes where maps at 1:25000 or 1:50000 are common. In combination with the contiguity and polygon size thresholds, this means that some significant land will not be defined for protection and that inevitably there will be inliers of land of lower quality. The methodology does however ensure that large contiguous areas of farmland will be protected for the future. The boundary review process, which incorporates finer scaled land capability mapping, will significantly alleviate the spatial resolution problem when urban land conversion proposals are considered in close proximity to significant farmland

Consultation process.
The project team employed a comprehensive and appropriate process and took action to incorporate suggestions wherever relevant and legitimate in terms of the policy framework. (Many economic and land development opinions cannot be resolved in this assessment process.)

Overall approach/methodology for the determination of significant landscapes
The criteria for selecting soil landscapes as important farmland is well defined in the final version of Table 1 in the Methodology document. Based on the published and unpublished soil landscape mapping, the criteria outlined in Table 1 and the rules of contiguity defined in methodology, the rules for selecting important farmland have been consistently applied across the mapped area of the Northern Rivers.

Contiguity.
A further condition for land to be considered as significant farmland was the size rule of minimum contiguous areas of 500 ha. This was based on a rather arbitrary premise that 500 ha represents a reasonable-sized cluster with efficient workable areas for intensive farming on the best farmland. It also aims to avoid conflict where agricultural land is actually or potentially fragmented by urban or rural residential settlement. As a result of this rule, significant agricultural land may not be protected and a further category called significant non-contiguous areas was formed - the protection of which becomes the responsibility of local councils/agencies. The reviewers believe that it would be possible that novel agricultural/horticultural industries may develop below the minimum contiguous area size of 500 ha and important soil landscapes should be protected. Examples of this may be seen in European countries such as Switzerland and Holland.

Applicability to other regions
Due to the influences of the Mt Warning shield volcano in soil landscape development, the NSW Northern Rivers landscape is arguably more complex than other areas of NSW. The approach that the Northern Rivers Farmland Project team has undertaken to select significant soil landscapes has been influenced by the availability of published and unpublished (draft) soil landscape maps for the northern rivers region of NSW and the skills of an experienced soil surveyor (David Morand). The applicability of this approach to other regions will vary depending on circumstances and the availability of soil landscape mapping and skilled staff. While soil landscapes in other regions of the state are likely to be less complex than the Northern Rivers region, the availability of soil landscape mapping may be a limitation to applying this methodology widely.
In a review by Thompson and Beckman (1986) there was limited evidence to suggest that soil taxonomy was relevant to broadscale land use planning in south-eastern Queensland. The review found that while soil taxonomy is able to separate soils that are different from one another, it could separate soils that have similar land use potential. Many of the attributes used in soil taxonomy seem to have little relevance to local land use while other attributes of known local importance were not used. Soil types may not be useful categories in themselves, but to the extent that they correlate with agriculturally relevant parameters such as soil depth, fertility etc, they can provide the basis for capability and significance ratings. For example, some of the criteria Thompson and Beckman suggested as important to land use in southern Queensland included: depth of soil; A-horizon depth ; surface condition; water holding capacity; presence of stone or stony bands in the profile; amounts of gravel and concretions throughout the profile. Other local data such as soil moisture regimes, depth classes, temperature classes and sodicity should also be considered and these will depend on the local circumstances.

Future methodology for farmland protection would benefit from including additional agriculturally relevant soil based criteria, especially locally significant indicators. e.g salinity risk in risk prone areas. Further consultation of the literature (see reference list) is encouraged.

3 CONSULTATION: WHAT WE LEARNT

The Farmland Protection Project included two consultation periods. The consultations aimed to:

- inform people about the project and provide them with opportunity to provide input into the project
- seek feedback about the selection of farmland areas
- seek feedback on the planning rules
- identify issues that had been overlooked in the development of the project

The 2003 consultation

The first, 2003 phase, presented draft maps derived from a variety of sources including cadastral information and some LEP agricultural protection zones. The maps showed state, regionally and locally significant agricultural land. The maps were accompanied by ideas for planning rules restricting new housing entitlements and rural subdivision on farmland. The draft also suggested restricting various other developments on farmland including workers dwellings and most tourism. A detailed account of the 2003 consultation is in the Farmland Protection Project Consultation Report, October 2003.

The community was engaged by the following means:

- community forum (evening meetings in Ballina, Condong, Casino, and Mullumbimby)
- agricultural industry forum (Casino, Murwillumbah - representatives from the following industries: sugar, dairy, macadamias, soy, forestry, coffee, bananas, beef, ti-tree, olives, stone fruit, avocados, passionfruit, bush foods, custard apples, citrus, mangoes, herbs, and organic producers)
- local government planning staff forum
- state government (former Department of Land and Water Conservation, former NSW Agriculture, National Parks and Wildlife Service) forum
- Exhibition at local government offices
- Exhibition on the internet
- Radio interviews on ABC Rural Report
- Local and regional newspapers
- Television coverage (Prime News)
- Fact sheets

The consultation ran from 13 May until 30 June, 2003. Submissions were received electronically and in hard copy, on feedback forms and by letter. A total of 94 written submissions were received during the submission period, and 171 people attended community forums.

Key themes in 2003

Although the community expressed diverse views about how to protect agricultural land, the majority response to the project was positive and constructive. A high level of support was expressed for the principle of preserving farmland. Several key themes emerged, around which a diversity of voices was heard. The project team in reviewing the draft planning rules endeavoured to address these key themes, outlined below. Text in italics indicate how the themes were addressed in stage 2 of the project.

<u>Agricultural viability and profitability</u>
A clear message emerged that many farmers are experiencing serious difficulties in making a living from their land. Some people asked why farmland should be preserved. At the same time, many felt it was important to preserve productive land for the future, particularly at Alstonville and Cudgen. Another clear message was that farm diversification can assist viability, and that the system should support this.

Action

Subsequent draft planning rules focused on strategic planning rather than imposing new restrictions on farm use. The 2004 Proposals Report recommended that councils could permit developments such as farm bed and breakfasts, rural (value-adding) industry, produce markets, farm-related tourism and on-farm restaurants in farmland areas. The report also included a section on further ways in which agriculture might be protected. It highlighted some existing areas of assistance for farmers, as well as additional potential mechanisms. That section is included in this Final Recommendations Report as section 5.

Land values and financial issues

Many people were concerned that speculation is driving land prices up, disadvantaging farmers by making it difficult to buy farming land. This was seen as demoralising for farmers in areas where more money could be made in subdivision than in farming. On the other hand, many other people believed that any lack of increase in land prices resulting from the project would be a negative outcome.

Action

Advice from the valuation industry indicated that the existence of policies which influence whether the land might be rezoned at some point in the future does not play a critical role, as the valuation focuses on the current planning situation rather than a hypothetical future scenario. It is therefore doubtful whether 'devaluation' of land would occur.

Flexibility

Many people felt that blanket land use controls create impediments to farmers, and that a variety of land uses are suitable for different areas. Several people advocated locality planning.

Action

The project team reviewed the draft land use codes which had been exhibited in 2003, aiming for an approach which was flexible enough to respond to local issues while maintaining an overall strategic approach based on the protection of significant agricultural land. Subsequent recommendations placed responsibility for land use controls in rural zones with local government, thus enabling a more locally responsive approach.

Extent of regulation

Many people believed existing planning controls already protect agricultural land, and that farmers have too many restrictions. On the other hand, many people supported the draft planning controls fully. While most people support agricultural land protection, there is a resistance to tighter rules about permissible land uses, subdivision, dwellings and workers dwellings.

Action

In subsequent stages, the project team endeavoured to formulate planning rules which could prevent important agricultural land being lost to urban and rural residential development while allowing farmers the freedom to carry out their rural activities without adding any unnecessary impediments. The project's emphasis turned to strategic urban planning rather than prescribing rules about on-farm uses in rural zones. The project team resolved not to recommend new rules about subdivision of land zoned rural, or dwellings on rural land, or uses of land zoned rural but to recommend that these matters remain under councils' local environmental plans (LEPs).

Land use conflict

Land use conflict is a serious problem for farmers. Farmers should be able to farm without the threat of conflict with residential encroachment. The issue of how to manage the interface of agricultural and residential land was raised often. The use of buffer zones was widely advocated. Coordinated strategic planning and a precautionary approach by local and state government were seen as important.

Action

The subsequent 2004 Proposals Report recommended strategic planning controls to avoid the creation of potential land use conflict situations. These draft controls included the principle of buffers being established outside farmland areas where new development expands towards a farmland area, and conflict risk assessments being undertaken where new development is established within a farmland area.

Social issues

The importance of the family farm was emphasised by many people. Many said the ability to build additional dwellings on a property was important in keeping family members on the farm. The project proposed that boundary adjustments could occur which excised a small lot with a house while the residue was amalgamated with a neighbouring farm. This approach was supported in feedback.

Action

DIPNR subsequently encouraged councils by letter to include provisions in their local environmental plan to allow applicants to apply for boundary adjustments as outlined above.

Local and state decision-making

Some people felt that local government could not be trusted to act impartially to protect agricultural land, and that state government was more responsible. Others felt that agricultural production should be left with local government, and that the project came from a centralised bureaucracy based in Sydney. Clear roles should be identified for local and state government, unified by a clear set of principles.

Action

The project subsequently identified clear roles for state and local government. The 2004 Proposals Report recommended that the state government focus on protecting farmland by strategic settlement planning, while local government retain responsibility for land use controls in rural zones.

Environmental issues

Many people were concerned about how environmental values of agricultural lands could be protected in a farmland area. Concern was expressed that environmental values may be considered secondary. The issue of unmanaged land came up frequently, as did weed issues. Some people felt that environmental management issues were strongly linked to farm viability.

Action

The subsequent 2004 maps included a text box indicating that significant farmland status does not imply that vegetation and habitat values are secondary to agricultural values, or that land has to be used for agriculture.

Mapping and land classification

Some people expressed doubt about the accuracy of the mapping. Many properties or districts were recommended for review - some for inclusion in the project and others for exclusion.

Action

The project team reviewed the methodology, using feedback from submissions as well as its own observations.

Process

Many submissions suggested that more information and consultation would be necessary to allow rural communities to become aware of the project.

Action

The next (2004) consultation was designed to maximise participation. Efforts were made to notify all rural landowners about the project by mail. All-day information stalls were conducted in eight locations to increase flexibility and convenience for community members wishing to talk with the project team. Additionally, all

people who wrote submissions or registered their names at public meetings or left their details by telephone were kept informed as the project continued.

Strategic planning

Several people commented on the importance of planning for population growth in areas not needed for agriculture. Many pointed to the need to control urban sprawl.

Action

The project team consulted local government planning staff on an on-going basis to ensure a consistent and compatible relationship between councils' strategic planning work and the Farmland Project.

Regional economic issues

The point was made that agriculture is a valuable contributor to the regional economy, and that a region's ability to produce food is important. However, some people felt that residential growth provides more jobs than agriculture. Many submissions identified the need for technical information and extension services, which could bring regional economic benefits through assisting farmers.

Action

The 2004 Proposals Report included a section on further ways in which agriculture might be protected. It highlighted some existing areas of assistance for farmers, as well as additional potential mechanisms.

The 2004 consultation

After considering the key themes which arose in 2003, the project team reviewed the mapping methodology and drafted new planning rules which addressed those themes where possible. The new draft maps and planning rules were placed on public exhibition between 12 August and 30 September. A detailed account of the 2004 consultation can be seen in the Farmland Protection Project Consultation Report, 2004. A summary of that report was mailed to all those who had written submissions or expressed interest in being updated about the project. The full report was available upon request.

Feedback in 2003 had suggested that not enough landholders were made aware of the project. As a response, efforts were made to notify all rural landholders of the 2004 consultation. An information flyer was inserted with rate notices for Ballina Council and Richmond Valley residents. Rural occupants in Byron Shire received the flyer through Australia Post direct mailing. An advertisement was placed in the council newsletters for Tweed, Lismore and Kyogle Councils. People who had written submissions in the previous consultation were advised by letter that the new draft maps were on exhibition. Additionally, all those who had asked at meetings or by telephone to be kept informed received a letter of notification.

The maps were exhibited at Tweed, Lismore, Kyogle, Richmond Valley, Ballina and Byron council offices, as well as at DIPNR offices in Grafton, Alstonville and Murwillumbah and the DPI office in Wollongbar. Copies of a Proposals Report giving an overview of the project and outlining proposed planning rules were available, along with a summary document and a Methodology Report describing in detail how the maps had been developed.

An internet site was developed for the project showing the maps and reports. However, on-going technical problems made the site difficult to access for many people. The project team sent compact discs of the exhibited material to people who requested this. Television, radio and press coverage accompanied the consultation.

To provide flexibility for community members, the project team held information days in Cudgen, Alstonville, Murwillumbah, Woodburn, Kyogle, Casino, Bangalow and Dunoon. Team members were available throughout

the day to answer questions, discuss the maps and provide information. Approximately 250 people attended information days.

Submissions were received by mail, by email, by telephone and as comments at information days, both verbally and in the comments book provided. The project team received a total of 95 submissions.

The project team offered to present the draft maps and reports to a range of agricultural industry groups. Several organisations took up the offer including NSW Farmers, NSW Cane-Growers Association, North Coast Horticultural Producers Consultative Committee and Byron Creek Landcare. The project was exhibited at the Lismore Organic Produce Market.

Key themes in 2004

Key themes which arose from the 2004 consultation are below. The text in italics indicates the project team's response or any action proposed to address the issue. Page numbers indicate the location in this report of any proposed action.

<u>Mapping/methodology: indication of future settlement areas on farmland maps</u>
Some submissions urged that future settlement areas be shown on the farmland maps so people can see clearly which land is able to be considered for development.

Action

To give the community a clearer picture about which land can be considered for future development, a box is be included on the farmland maps stating:

'Land identified in an agreed council settlement strategy can be considered for urban or rural residential rezoning even if it is mapped as state or regionally significant farmland. The council strategy must have been agreed to between December 1994 and December 2004 under clauses 20 or 38 of the North Coast Regional Environmental Plan (or placed on public exhibition by the end of 2004 and subsequently approved. Land identified in a settlement strategy is not automatically approved for development; further investigations occur as part of the rezoning process. Agreed strategies can be seen at council offices.'

<u>Mapping/methodology: adequacy of the criteria</u>
Some people argued that the soil landscape methodology is too narrow for identifying significant farmland and is not useful in identifying all of the factors that limit agricultural production on a particular parcel of land. They pointed to the NSW Agricultural Lands Classification system as superior, on the basis that it takes a greater range of factors into account.

Action
The farmland maps continue to be based on soil landscape mapping. The Farmland Protection Project's emphasis is on long-term protection of the agricultural land resource. It does not take into account factors which are relevant in the short-term such as availability of labour, availability and cost of land locally and elsewhere, local farming and marketing structures or the presence of local supporting infrastructure. NSW Land Classification criteria can be used to provide finer detail when verifying boundaries. NSW Agricultural Suitability mapping if available should be used additionally by councils in their planning to provide a greater level of information.

<u>Mapping/methodology: the need for more detailed assessment of farmland areas for exclusion from mapping</u>
A large number of submissions called for the project to allow on-going assessment and verification of the farmland mapping, as the mapping's broad scale makes it subject to inaccuracies on a property level.

Action
The project team proposes a verification process of the map boundaries as part of one-off council-initiated strategic investigations over a nominated settlement area which has merit in terms of other planning issues and the overall regional strategic direction.

Mapping/methodology: review of farmland maps
Some submissions suggested that the farmland maps should be reviewed from time to time.

Action
The project team proposes that the Farmland maps be updated as part of any review of the Far North Coast Strategy, utilising any reviewed soil landscape data.

The principle of farmland protection: government regulation
Some submissions expressed the view that the government puts too many restrictions on rural land, and that rural planning should be kept in the hands of local government rather than state government.

Action
The project team proposes that the Farmland maps be used as a strategic settlement planning tool rather than an agricultural resource tool. Councils will not be required to base their agricultural protection zones on the farmland maps. The maps are proposed to be used for strategic planning, to show areas where urban and rural residential development is not suitable due to the presence of significant farmland. The farmland policy is only intended to apply where a change of zoning is proposed – from rural to urban, rural residential or industrial. Councils will be responsible for rural zones. The farmland policy will not make rules about subdivision of land zoned rural, or dwellings on rural land, or uses of land zoned rural. These matters are intended to remain under councils' local environmental plans.

The principle of farmland protection: support for farmland protection
A number of submissions indicated support for the project's intent. There was a wide acknowledgement that farmland is a finite resource, and that we need to preserve the better farming areas for the future. Some submissions cautioned against any weakening of the project in response to development pressures.

Action
The final maps will be based on the best data and technical expertise available, objectively applied and based on an independently reviewed methodology. The final maps and strategic planning rules are proposed to be implemented through a Section 117 Direction as an interim measure. The Section 117 Direction will be superseded by DIPNR's Far North Coast Strategy which will direct the region's growth for the next 30 years. That strategy will consider a range of issues including farmland, population growth, infrastructure, transport, housing affordability, coastal management, environmental protection and economic growth. It is due to be completed in late 2005.

Socio-economic issues: viability
Many submissions raised the issue of farm viability and profitability. It was emphasised frequently that many farmers face agricultural viability problems and find it difficult to make a living from their farms.
Many people commented that developing land for residential use represents superannuation for farmers, and that selling off small valuable parcels to newcomers is seen as a viable source of income for farmers

Action
The project acknowledges that many farmers are experiencing difficulties. The Farmland Protection Project does not impose new restrictions on farm use which may limit farm viability. It does not introduce new rules about dwellings, or minimum lot sizes, or which developments are allowed on farmland. The buying or selling of farms is not affected by the project. The project does not prevent niche crops being grown on small or large

properties. Section 4 of this report makes recommendations on initiatives for natural resource management which build on the valued status of significant farmland.

Socio-economic issues: land values

A view was expressed in some submissions that the Farmland Protection Project may cause the financial value of a farm to decrease, because the likelihood of the land being rezoned in the future would be removed.

Action

No action. A future urban or rural residential development 'right' or potential does not exist for land zoned rural. The Farmland Project introduces clearer rules about what should be considered significant agricultural land. Land valuation takes many factors into account, based on the situation applying at the time. The existence of policies which influence whether the land might be rezoned at some point in the future does not play a critical role in formal valuations, as the valuation focuses on the current planning situation rather than a hypothetical future scenario.

Socio-economic issues: equity

Some submissions questioned the equity of the project, in that some landowners will be able to have their land rezoned for residential use while others cannot. Some submissions called for farmers to be compensated for looking after the land in the public interest while not being able to have development expectations.

Action

No action. As outlined above, a future development 'right' does not exist for land zoned rural. The Farmland Project will not change the way farms can be bought or sold. Nor does it propose any change to existing planning rules about subdivision or houses on land zoned rural. The current rules regarding land zoned rural clearly do not allow urban or rural residential development.

Avoiding land use conflict at the residential/rural interface

Submissions widely acknowledged that one of the problems for Northern Rivers farmers is the movement of urban people to farmland areas, bringing urban expectations and associated land use conflict. There was general support for the urban-rural interface provisions suggested in the Proposals Report.

Action

This report recommends urban-rural interface rules to be applied where new urban or rural residential development is likely to affect farmland. The recommended rules are largely the same as those put forward in the Proposals Report. They clarify that the onus is on the encroaching urban or rural residential development to avoid conflict through the provision and maintenance of buffers. The need to separate residential from rural uses through buffers is also addressed as part of the recommended strategic boundary review process. The principle that legitimate rural uses (farming, conservation, extractive industry, forestry, rural industry) have priority over non-rural uses in farmland areas is included in the regional agricultural objectives at section 4.

Environmental protection

Submissions indicated support for the text box on the 2004 maps clarifying that significant farmland status does not imply that vegetation and habitat values are secondary to agricultural values, or that land has to be used for agriculture. The principle of retaining existing environmental protection zones identified as farmland was supported.

Action

The maps retain the text box clarifying the status of environmental values. Environmental protection zones are proposed to be retained where farmland is identified, as recommended in the 2004 Proposals Report. Additionally, a regional agricultural objective of protecting agricultural land from development that may result in environmental degradation is proposed.

Strategic and local planning: future land availability

Some submissions urged that the Farmland Protection Project should be integrated with a range of other planning considerations. Some reflected a concern that the region is experiencing a shortage of residential land, and that the Farmland Project would further reduce opportunities by limiting land available for rezoning.

Action
In decisions about where to locate settlement, significant agricultural land is only one consideration. The maps and strategic planning rules are expected to form a layer of the Far North Coast Regional Strategy, which will direct the region's growth for the next 30 years. That strategy will consider a range of issues including population growth, infrastructure, transport, housing affordability, coastal management, environmental protection and economic growth. The Far North Coast Strategy is expected to be completed in late 2005.

Land identified in agreed local government settlement strategies (agreed to by DIPNR between December 1994 and December 2004 or placed on public exhibition by the end of December 2004 prior to agreement) can still be considered for rezoning regardless of its farmland significance. This report recommends strategic planning rules applying to farmland which:

- *direct rural residential development away from state and regionally significant farmland*
- *direct urban development away from state significant farmland*
- *allow urban and industrial development in regionally significant farmland only under limited circumstances*

Strategic and local planning: settlement strategies

Some submissions did not support the exemption of land identified in councils' urban and rural residential settlement strategies from the farmland rules. They advocated the winding back of agreed strategies where significant farmland was identified.

Action
DIPNR has worked with councils in the development of local government settlement strategies and formally approved them. Councils have expended significant resources in development of the strategies and private and public investment decisions have been based on their approved status under the North Coast REP (clauses 20 and 38). The status traditionally given to strategies approved under the REP helps the community to maintain confidence in the planning system. Land identified in current approved strategies is proposed to be exempt from the farmland policy. However, councils may choose to review their settlement strategies at any time. In such a review, a council would be able to delete future settlement areas located on farmland, if they wished. However, new settlement areas could not be identified on farmland (unless consistent with criteria proposed for urban development in regionally significant land).

Strategic and local planning: land uses on farmland

There was general agreement with the proposal that councils' local environmental plans should continue to set rules about subdivision, houses and uses of farmland. Boundary adjustment provisions suggested in the Proposals Report were also supported, although some people felt they had limited applicability. Support was indicated for dwelling entitlements not being removed from rural properties.

Action
Councils will not be required to base their agricultural protection zones on the farmland maps. Councils will be responsible for rural zones. The project team does not propose to introduce new rules about subdivision of land zoned rural, or dwellings on rural land, or uses of land zoned rural. These matters will remain under councils' local environmental plans (LEPs). DIPNR has encouraged councils by letter to include provisions in their local environmental plan to allow applicants to apply for boundary adjustments as outlined in the 2004 Proposals Report.

4 RECOMMENDATIONS FOR USE OF THE FARMLAND MAPS

While the planning system cannot solve all of the problems which are faced by farmers, it can go some way towards protecting agricultural land resources. Planning can protect the resource security of today's farmers by avoiding the creation of new land use conflict situations. This can be achieved by setting principles for avoiding land use conflicts where farmland is near a proposed new residential area. The planning system can also protect the land resource for future generations of farmers by keeping farmland available for agriculture. This means taking a strategic approach to urban and rural residential planning which avoids using the best agricultural land for housing or commercial uses. In addition to keeping land available and avoiding land use conflicts, the planning system can support farmers in optimising their farm income potential. This can be by facilitating boundary adjustments for farm amalgamation and retirement, and by allowing a range of agriculture-related farm diversification developments.

The farmland maps are proposed to be used as a strategic settlement planning tool rather than an agricultural resource tool. Councils will not be required to base their agricultural protection zones on the farmland maps. The maps are intended for strategic planning, to show areas where urban and rural residential development should not be targeted. Councils will continue to administer rural zones through their local environmental plans. The farmland project does not introduce rules governing subdivision of land zoned rural, or dwellings on rural land, or uses of land zoned rural. These matters are intended to remain under councils' local environmental plans.

Regional farmland objectives

The following objectives are recommended to guide decision-making on development in farmland areas:

1. To establish the priority of legitimate rural uses (farming, conservation, extractive industry, forestry, rural industry) over non-rural uses, without one rural use necessarily having preference over another rural use.
2. To recognise and conserve the best agricultural land in the region for current and future rural uses.
3. To prevent fragmentation, alienation and encroachment of the most important agricultural areas by land uses unrelated to agriculture and rural uses.
4. To keep options open for future generations to produce a range of agricultural goods throughout the region on allotment sizes which optimise production potential.
5. To allow for a range of activities that support agriculture, including farm diversification and value-adding, without compromising long-term agricultural production potential.
6. To provide for management of important agricultural land for a range of rural uses.
7. To protect agricultural land from development that may result in environmental degradation.

Planning principles

The following principles are recommended to implement farmland protection objectives, in conjunction with the maps.

1 <u>State significant farmland: urban and rural residential development</u>

State significant farmland cannot be considered for urban (including housing, retailing and other uses normally located within towns) or rural residential rezoning. The only exception is where the land is identified in a council settlement strategy which has been agreed to between December 1994 and December 2004 under clauses 20 or 38 of the North Coast Regional Environmental Plan (or placed on public exhibition by the end of 2004 and subsequently approved). Councils when preparing new settlement strategies cannot consider state significant farmland for inclusion.

2 Regionally significant farmland: rural residential development

Regionally significant farmland cannot be considered for rural residential rezoning. The only exception is where the land is identified in a council rural settlement strategy which has been agreed to between December 1994 and December 2004 under clause 20 of the North Coast Regional Environmental Plan (or placed on public exhibition by the end of 2004 and subsequently approved). Councils when preparing new rural residential settlement strategies cannot consider regionally significant farmland for inclusion.

3 Regionally significant farmland: urban development

Regionally significant farmland can be considered for urban rezoning if it is identified in an existing urban settlement strategy which has been agreed to between December 1994 and December 2004 under clause 38 of the North Coast Regional Environmental Plan (or placed on public exhibition by the end of 2004 and subsequently approved).

4 Regionally significant farmland: future urban strategies

Regionally significant farmland is not an absolute constraint to future strategic urban development. Councils when preparing new urban settlement strategies under clause 38 of the North Coast Regional Environmental Plan can consider regionally significant farmland for future urban use if all of the following apply:

- the proposed new urban area or use would form part of the urban areas of Lismore, Murwillumbah, Kyogle, Casino or Ballina[1] and no viable alternative land is available in proximity to those towns, or it would form a minor 'rounding-off' [2] on the edge of an urban centre which would make good planning sense given the nature of the locality; and
- it would be adjacent or close to an existing zoned urban area; and
- it would not significantly undermine the integrity of a regionally significant farmland area by creating wedges or spikes of urban development; and
- it would not compromise local or regional agricultural potential by alienating agricultural infrastructure or agricultural transport routes, or decreasing 'critical mass' for any existing agricultural industry; and
- it would not create impacts which would compromise the agricultural use of nearby regionally significant land; and
- it would not be located in an area where there was an identified risk of land use conflict near an existing agricultural enterprise; and
- it would not involve filling part of a floodplain unless consistent with a floodplain management plan prepared in accordance with the Floodplain Management Manual.

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[1] The Department of Planning's 1995 North Coast Urban Planning Strategy listed sub-regional centres and major district centres which formed the basis of a regional 'settlement hierarchy' on which to build future growth. This means they are towns which have been given a regional role in that regional strategy. The towns identified above are those which are located within or beside regionally significant farmland and are included in the North Coast Urban Planning Strategy's list.

[2] 'Minor rounding-off' means developing a small area of land occupying a gap in an urban zone.
'Good planning sense' means there would be some improved outcome for a settlement, such as:

- alleviation of existing land use conflict (eg by the incorporation of a buffer),
- efficient and economic use of infrastructure, or
- greater contiguity of an urban zone resulting in improved linkages or access.

Note that if the above criteria can be met, the proposal would still also need to satisfy the normal requirements for urban settlement strategy preparation. The Department of Infrastructure, Planning and Natural Resources will monitor the use of the above criteria to observe any cumulative impact. If necessary, it will review the criteria.

5 Regionally significant farmland: industrial development

Industrial development is generally located within urban areas, in which case the principles applying to urban development in regionally significant land apply to any proposal to create or expand an industrial area. However, some large industry is of a type which does not suit an industrial estate and needs to be located out of town. In these circumstances, regionally significant farmland is not an absolute constraint to industrial development.[3] Councils would be able to consider regionally significant farmland for stand-alone future industrial use if all of the following apply:

- it would not significantly undermine the integrity of a regionally significant farmland area; and
- it would not compromise local or regional agricultural potential by alienating agricultural infrastructure or agricultural transport routes, or decreasing 'critical mass' for any existing agricultural industry; and
- it would not create impacts which would compromise the agricultural use of nearby regionally significant land; and
- it would not be located in an area where there was an identified risk of land use conflict near an existing agricultural enterprise; and
- it would not involve filling part of a floodplain unless consistent with a floodplain management plan prepared in accordance with the Floodplain Management Manual; and
- no viable alternative land is available which is suitable for the proposed industrial use.

6 Hatched areas – significant non-contiguous farmland

Hatched areas represent land that has the general characteristics of state or regionally significant farmland but does not fit within the definition of 'large contiguous areas' which are the primary focus of the Farmland Protection Project. Notwithstanding, such areas may have significant agricultural value when considered at the local level.

Generally these areas should not be considered for land use change through the rezoning process. However if there are compelling reasons to consider them for settlement as part of a council-initiated strategic planning process, then councils will be required to undertake a merit-based assessment of the agricultural value of such land, in consultation with Dept of Primary Industries and DIPNR. If the land is found to have agricultural importance, an agricultural emphasis should be maintained, to the exclusion of urban or rural residential development.

7 Managing the urban-rural interface

Where expansion of urban or rural residential zones towards farmland would create a potential conflict, such zones would not be permitted to extend to the boundary of significant farmland. A suitable buffer must be provided outside the farmland area, designed to separate the residential zone from mapped farmland. The onus is on the developer of the encroaching residential zone to avoid conflict through the provision and

[3] This proposed planning rule would not apply to rural industry, which is defined as handling, treating, processing or packing of primary products and includes the servicing in a workshop of plant or rural equipment used for rural purposes in the locality. Rural industry is recommended to be allowed in farmland areas, without restriction.

maintenance of buffers, and acquisition of buffers must form part of the overall development. Buffers must minimise the potential for conflict, protect the rights of all parties, provide an agreeable quality of living and enable farmers to undertake legitimate activities. The buffer may continue to be used for agriculture but could represent a transition zone. It may incorporate a physical separation distance accounting for topography, plantings of vegetation or other combinations of measures which reduce the potential for conflict.

In cases where a new urban zone may be considered in regionally significant farmland (see principle 4), a conflict risk assessment is required at the time the council develops its urban settlement strategy. The assessment is to address a range of suitable measures to minimise future conflict, applying the principle that any buffer should be provided as part of the development.

8 Environmental protection

Some areas identified as state or regionally significant farmland include important habitat or remnant vegetation. Some of those areas are currently zoned environmental protection. While the maps indicate the existence of significant farmland, this should not be taken to mean that vegetation and habitat values are secondary to agricultural values, or that land has to be used for agriculture. Where land is now zoned for environmental protection, the zoning should not be altered to agricultural protection. However, if the environmental protection zone is to be removed because of an absence of environmental values, the land should then be protected in an agricultural zone.

9 Infrastructure & facilities

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.

Councils and state agencies proposing public infrastructure on hatched (significant non-contiguous) land must assess the agricultural importance of this land, and should select alternative sites where possible if agricultural value is identified.

Strategic boundary review

While soil landscape mapping has its advantages, it also has disadvantages. One disadvantage is its broad scale (1:100,000). The maps were prepared for regional planning purposes. The minimum mappable area is 40 hectares. Farmland significance identified may not necessarily be accurate at the property scale. It is possible that there will be some inclusions of lower quality lands. Some degree of boundary verification will be necessary in assisting councils to overcome these limitations when defining boundaries for future settlement strategies. The following strategic boundary review process is recommended.

The mapped boundary is the default. However, when a future settlement strategy is being prepared, the boundaries of significant farmland will be able to be reviewed – not property by property but as part of one-off council-initiated strategic investigations over a nominated settlement area which has merit in terms of other planning issues and the overall regional strategic direction.

Boundary review is to be limited to within 150 metres of the mapped significant farmland boundary. One hundred and fifty metres is nominated on the basis of the 150 metre confidence limit for 1:100,000 mapping advocated by Ridler (Agricultural Classification Paps – Uses and Limitations: 2 Reliability and Scale Advisory Note 2/87, November 1987, Agdex 525.)

Boundary review can be carried out on boundaries between significant farmland and ‘other rural land’. Areas wholly within mapped significant farmland are not able to be reviewed. To allow exemptions of small areas within farmland areas would create potential conditions for rural-residential/farmer conflict. Boundary review

cannot be carried out on shared boundaries between committed urban uses and significant farmland as shown on the maps.

The boundary review process uses agricultural land classification descriptions as prepared by NSW Agriculture. Each soil landscape generally corresponds to an agricultural suitability class. A map has been prepared showing agricultural suitability classes as an overlay on Farmland maps. Land subject to boundary review is to be checked against the description of the corresponding agricultural suitability class. Descriptions can be seen at Agfact AC 25 Agricultural Land Classification (Hulme, Grosskopf & Hindle) - available on the DPI website. If the land is found not to meet the description, then the boundary should be varied either to the point where consistency with the description could be met, or to a distance of 150 metres, whichever comes first. For example, the Cudgen soil landscape generally corresponds to classes 1/2. If a boundary assessment found land of generally class 3, the boundary could be varied. But the Myocum soil landscape is generally class 3. The boundary would have to be checked against the class 3 description.

Any land found to be outside the farmland mapping as a result of the review process should be considered as being 'outside the farmland area' in terms of the following interface management approach, as recommended in section 4.
'Where expansion of urban or rural residential zones towards farmland would create a potential conflict, such zones would not be permitted to extend to the boundary of significant farmland. A suitable buffer must be provided outside the farmland area, designed to separate the residential zone from mapped farmland.'

DIPNR is the lead agency for receiving submissions from councils re boundary review. DIPNR will consult specialists within DPI and other specialists within other organisations on a needs basis for advice.

<u>Examples of where the boundary review process would apply:</u>

A council is preparing a new rural residential strategy which includes a new rural residential zone occupying mostly 'other rural land' – but one corner of the investigation area is mapped as state or regionally significant. Under the buffer rules, the development would have to stop short of the farmland area, maintaining a separation between the residential and agricultural uses. But the farmland boundary could still be reviewed within 150 metres. The assessment might show the boundary should be moved 100 metres into the mapped regional farmland area. Of the 100 metres, 80 might be required as a separation distance, depending on the circumstances. But the area identified to be included in a rural residential zone could extend further than if the line had not been reviewed.

A council is preparing a village expansion strategy. The village borders on 'other rural land', with the state or regionally significant farmland boundary beginning some 300 metres away. The village is proposed to expand towards the farmland area (including a buffer). The farmland boundary could be reviewed.

<u>Where the boundary review process would not apply:</u>

A council is preparing a new urban strategy and wants to consider regionally significant land for inclusion. The land can be included if the requirements listed in planning principle 4 at section 4 are all met, despite its farmland status. There would be no need for review of the farmland boundary.

A council is preparing an urban settlement strategy, and wishes to expand an urban area which is completely surrounded by state significant land. The boundary between the farmland and the existing urban zone could not be reviewed. The urban area could not expand into the farmland area.

A council is preparing a rural residential strategy and wishes to establish a rural residential zone wholly within state significant or regionally significant farmland. As above, the farmland area could not be reviewed. No rural residential zone could be established.

Mapping review

The project team proposes that the Farmland maps be updated as part of any review of the Far North Coast Strategy, utilising any reviewed soil landscape data.

Additional recommendations

During the course of the Farmland Protection Project, rural communities put forward many issues which were of great concern to them. Most of these related to farmers' difficulties in remaining agriculturally viable while coping with current land use conflict, land management problems such as erosion, and problems of agricultural economics. The planning system with its zones and land use rules cannot solve these difficulties. The following recommendations are made in recognition that the valued status of farmland should be reflected as widely as possible, including outside the planning system.

1 Funding opportunities should be investigated for developing voluntary Codes of Practice for specific agricultural industries operating in farmland areas to clarify and protect farmers' responsibilities and rights. (For example, the 2003 'Code of Practice for Noise Management of On-farm Processing of Macadamia Nuts ' was developed jointly by Dept State and Regional Development, Lismore City Council, DIPNR's Living Centres Program and the Australian Macadamia Society.)

2 DIPNR should endeavour to contact all residents of farmland areas by letter:
* advising of the area's farmland status
* emphasising the priority of legitimate rural uses (agriculture, conservation, rural industry, forestry) over non-rural uses in these areas.
* enclosing the series of brochures on 'Living in a Rural Area'.

3 DIPNR should provide farmland maps and supporting information to all Northern Rivers real estate agents, with a letter which emphasises the priority of rural uses within farmland areas.

4 DIPNR should encourage councils to consider indicating farmland status on Section 149 certificates given to land purchasers.

5 The Northern Rivers Catchment Management Authority (NRCMA) should consider accessing funding to assist agricultural industry bodies in farmland areas to develop sustainable land management programs. Priority should be given to industries operating in state significant farmland – eg vegetable growers and orchardists.

6 Funding opportunities should be investigated for employment of a coordinator to assist implementation of the Byron Sustainable Agriculture Strategy.

7 Action 3.4.1 in Northern Rivers Catchment Blueprint is to develop a program to establish Best Management Practice for key industries impacting on water quality, and to encourage and promote its adoption. Agricultural industries on state significant land (horticulture, orchards) should be targeted by the NRCMA as a high priority in any project arising from this action, with regionally significant land as a next priority.

5 FURTHER WAYS IN WHICH AGRICULTURE MIGHT BE PROTECTED

The mechanisms discussed below may, in conjunction with planning controls, assist farmers to manage their land or conduct their business, thus increasing potential profitability. This report does not attempt to canvas all possible options for farmers. Rather, the intention is to draw attention to some of the existing areas of assistance for farmers in the Northern Rivers and highlight some additional potential mechanisms that might be implemented by farmers and/or other organisations in the short or long term.

Farm forestry

Farm forestry involves the integration of tree crops into traditional agricultural farming to produce forest products and/or maintain or enhance the natural resources upon which the production capacity of the property relies. There are several benefits from farm forestry, including (NSWAg 2002):

- Supplemented farm income from the sale of timber and other products (eg oils, medicines, bush foods)
- Shade and shelter for livestock
- Reduced wind speed and evaporation within crops and pastures
- Increased soil and water stability/quality
- Increased biodiversity and habitat quality
- Fewer pests through the maintenance of beneficial, natural predators
- Economic returns from under-utilised areas, such as laneways and areas with soil problems
- Creation of a buffer between properties or other uses, resulting in reduced potential for conflict
- Creation of a suitable area for effluent disposal from intensive livestock operations
- Flexibility in tree cropping times, allowing for more efficient use of farm resources and increased commercial stability
- Increased aesthetic value of the property
- Additional on-farm employment opportunities for farming families and rural workers
- Source of timber for on-farm activities such as building and fencing

There are several organisations that are able to assist farmers in establishing and running a forestry operation on their farms. Appendix A provides some additional information on relevant organisations, the assistance they can provide, and contact details.

Carbon trading

Carbon trading may be an option for farmers in the Northern Rivers, through various methods such as farm forestry, plantations or revegetation. 'Carbon credits' are the credits a landholder can gain for removing greenhouse gases from the atmosphere. There may be potential for landowners to form a 'carbon credits collective' to promote carbon sequestration in the Northern Rivers area (TEDC 2002). This may be a more viable approach than individual landowners, especially where individual landholdings are smaller than the optimum.

There are several options for landholders to consider regarding carbon credits. These are:

- Renting your land to an organisation (such as State Forests NSW or a private afforestation company) so that they may plant forests for carbon credits
- Establishing a planted forest for carbon credits on your own land
- Establishing a planted forest on your own land for other reasons (such as environmental enhancement)

All three options have specific issues, benefits and costs, which must be fully considered prior to deciding whether to go ahead. State Forests provide a useful plain English document Growing Trees for Carbon Credits – A Guide for Landowners, which covers these issues. Another document, Generating Carbon Benefits from Public and Privately Owned Forests gives additional information on carbon credits, carbon markets and options to generate revenue. See Appendix A for more contact details.

Farmers' markets

Producers can sell fresh produce to the public at weekly or fortnightly markets. This has advantages in terms of local markets, producers being able to sell directly to the public, consumers being able to buy fresh local produce, increased ability to supply locally unique products, less energy used in transport and refrigeration, and social benefits (CVC 2001). Consumers seeking large quantities of produce often purchase from markets and this direct contact can benefit farmers. Direct selling allows farmers to network and can help to identify new markets. Farmers can also use markets to trial new products and sell produce that is not suitable for sale elsewhere (eg 'seconds' and non-export quality produce) (FOE 2002).

Farmers' markets are regularly held in several locations within or near to the Northern Rivers, including Lismore, Byron Bay, Banora Point, Tumbulgum, Uki, Mullumbimby, Bangalow, Grafton and Maclean. Lismore has an organic market as well as a market for general produce. Farmers' Markets are also held further afield but within a reasonable distance from parts of the Northern Rivers, including those at Mudgeeraba, Mt Cotton, Brisbane and Toowoomba, within south-east Queensland. Contact details for all of these markets are listed in Appendix A.

Groups of farmers may prefer to establish their own farmers' market. This would involve forming a group to organise, hold and manage the market, as well as secure commitments from participating producers. Costs may be involved in relation to gaining legal advice, insurance and a regular venue (TEDC 2002).

The Australian Farmers Markets Association Inc may be able to provide additional information. It can be contacted through Jane Adams, Interim Chair, at this email address: jacom@bigpond.net.au

Farmers' cooperative(s)

Farmers within the Northern Rivers could establish a farmers' cooperative, according to produce type or farming location, or on a larger regional scale across industries. The cooperative could provide a tool for networking amongst farmers, provide information, facilitate educational and extension activities and promote the region's produce to existing and potential markets (TEDC 2002). Links with other organisations and marketing bodies could be maintained through this cooperative. Financial support would be provided by participating farmers. Initially, a feasibility study should be conducted across the various industries to determine the likely benefits or otherwise of forming such a cooperative within the Northern Rivers and the level of support amongst potential participants.

Information for non-farming residents

Farming groups could distribute information to non-farming residents advising of production and land management activities taking place as part of necessary farm operations, or changes to normal operations, as well as activities being undertaken to increase or maintain the environmental value of farming land (TEDC 2002). The information could describe how the landowner has considered and managed potential impacts to neighbours and other community impact zones such as schools, community buildings and public spaces and demonstrate how the operations meet relevant land use planning and development codes or industry codes of practice. This educational process may assist in reducing complaints against farmers regarding their operations, facilitate greater recognition of the positive role farmers play in resource management, and encourage better neighbour relations.

Information products could also be used to advise non-farming residents on ways that they can assist in building a better relationship with nearby farmers. For example, advice could be included regarding the impact on farming operations from roaming dogs and other domestic pets. Cooperation could be sought from residents to assist in the control of such animals in rural areas.

The former PlanningNSW (now DIPNR) and NSW Agriculture (now Department of Primary Industries) has produced a set of information brochures that provide advice for rural residents, titled:

- Living in a rural area – What to expect living in a rural area

- Living in a rural area – Being a better rural neighbour
- Living in a rural area – Who to contact about conflicts

The brochures are available through the DIPNR and Department of Primary Industries offices (see Appendix A).

Cooperative farming

A group of farmers may decide to run their properties as a unit, increasing productivity and sharing infrastructure and equipment and transport costs (CVC 2001). Land title and tenure would not change, but the farms would become one business unit. Opportunities for linking production and/or land management activities between producers may be identified through property level resource audits. This innovation is being trialled on the New England Tablelands at Tilbuster by the Institute for Rural Futures at the University of New England in Armidale. This project involved 'the establishment of procedures for joint decision making by the landowners, the reorganisation of property boundaries and fencing to create commons for livestock production and for conservation of bushland, and the investigation of the use of property law to formalise the rights and responsibilities of the participating landowners' (IRF 2004). The project reflects the European use of common property regimes, where benefits such as economies of scale, management efficiencies, market opportunities and resilience against climatic variability can be obtained. A book dealing with the common property concept titled Reinventing the Common: Cross-boundary for a Sustainable Future has been released by the Institute. A review of the success of this concept within the trial should be undertaken to determine its possible application to the Northern Rivers.

Value Adding

Despite the move towards value adding to products away from the farm gate, there may be opportunities for value adding activity within the Northern Rivers (Tayner 1999). For example, the national trend towards organically grown, clean and green food is especially evident on the Northern Rivers, where social and cultural attributes have lead to a greater demand for fresh, 'environmentally friendly' produce. The desire to buy locally grown produce has also grown.

The lack of additional processing in food can also be a form of value adding. Clever marketing of fresh, reliable, unprocessed produce of high quality and presentation can yield results for farmers. However, large investments in market research and building networks may be involved (Tayner 1999).

Farmers may also add value to their experience and resources through the formation of groups for collective gain (refer to Cooperative farming and Formation of farmers' cooperative(s) for more information on these options) or through the diversification of property use (see Farm Forestry and Farm-based tourism).

Farm-based tourism

Tourism is a growing industry in the Northern Rivers, with increasing opportunities arising from the proximity of the area to south-east Queensland's expanding domestic and international tourism market (TEDC 2002).

Low-key, low-impact agricultural related rural tourism can contribute to a landholder's income. It can include a range of tourism opportunities associated with on-farm activities such as farm activity holidays, bed and breakfast establishments or farm and nature-based retreats with an ecological and agricultural education focus. Councils could set out clear guidelines and processes for establishing farm-based tourism, with a focus on farm experience, farm product consumption, and protecting the landscape and the environment.

A joint project between Tourism Queensland, Sustainable Tourism CRC and AgForce Queensland[4] has produced an assessment tool to assist landowners to determine the potential of their property for a farm and

[4] AgForce is Queensland's premier rural lobby group, representing broadacre producers and small business operators across the state. The equivalent organisation in NSW would be the NSW Farmers Association.

country tourism business. Farm and Country Tourism on Your Property comes in two parts: Stage 1 Assessment Tool and Stage 2 Workbook. These documents will assist farmers to consider important issues regarding the suitability of their land for such as business, including the attractiveness of both the region and individual property to tourists in terms of natural values, heritage and cultural values and recreational opportunities, as well as the relative accessibility of the property to the target market. The documents are not specifically targeted towards Queensland properties and may be used in a general way by landowners within the Northern Rivers, as a first step towards investigating potential sources of additional on-farm income. Alternatively, a similar project could be undertaken within the Northern Rivers to assist those farmers in a more direct manner. CRC for Sustainable Tourism can be contacted through its Regional Tourism Research contact in Lismore: Mr Dean Carson, phone 6620 3785.

Community-supported agriculture

Under this scheme, urban people subscribe directly to local farmers to grow their food. Fifty families might each pay the farmer $1,500 per year, and be guaranteed a box of fresh produce each week. In this way, the farmer is not subject to outside price mechanisms, urban people would be able to eat fresh, locally produced food, and food would be transported less. Economic, environmental and community benefits would be significant (CVC 2001). This system is being implemented in Tasmania, California, Canada and across Europe (FOE 2002) and is also being trialled in Byron Bay. The system creates stronger links within the community as well as between consumers and producers. Friends of the Earth Brisbane (FOE) have published a report titled Towards a Community Supported Agriculture which discusses the benefits and issues involved with this type of scheme. Some other benefits for farmers outlined in this report include:

- A reliable income for farmers at the beginning of the season from 'shareholders' within the community
- A guaranteed market for their produce
- Sharing of the risks of food production with consumers (shareholders)
- A reduction in the burden of farmers' debt
- Reduction in loss and waste from harvested farm produce
- Direct connections formed with the community
- A reduction in required effort to market produce, allowing more time to be spent on farm management
- Environmentally sustainable farming practices may be easier to adopt though increased support

The report is available for purchase from FOE (phone 07 3846 5793 or email foebrisbane@uq.net.au) or can be downloaded free from their website at www.brisbane.foe.org.au . The website also has additional information on community supported agriculture case studies, including different models that may be applied (eg, individual farmers versus a collective producer approach).

Rural support services

There are several organisations offering rural support services in the Northern Rivers. The Northern Rivers Rural Financial Counselling Services offices based in Casino offer free rural financial counselling and financial planning services, farm debt mediation, facilitation for family business meetings, assessment of farm enterprise viability for Farm Help assistance, advice on government and non-government assistance schemes, assistance with Rural Assistance Authority applications and personal or family counselling or referral to other services.

Other specific programs include the Water Reform Structural Adjustment Program (Waterwise), Natural Disaster Relief Scheme, NSW Special Conservation Loan Scheme and NSW Farmbi$. The Rural Assistance Authority administers most of these services.

A rural leadership skills course is underway through Casino Business Enterprise Centre, which appears to be successful in helping agricultural industries develop strategic planning. TAFE runs farm and business related courses at several campuses.

The Department of Primary Industries' Agriculture section (formerly NSW Agriculture) provides extension services to rural landowners. Many of these services are provided through the Wollongbar Agricultural Institute. The Institute can provide advice to landowners through its Agricultural Environment Officer, Soils Advisory Officer, Irrigation Officers and Environment Extension Co-ordinator. A library available for use by members of the public is also located on site. Several laboratories for research, analytical and diagnostic services in relation to soils water, plants, fertilisers, feeds, essential oils, animal diseases and dip sites are also provided. A Chemical Residues Laboratory in Lismore is able to test plant and animal food products for pesticide residues. The Centre for Tropical Horticulture in Alstonville also employs research and extension horticulturists to provide advisory, research and regulatory services. The Department can also provide advice on a range of rural issues. For example, it has produced an extensive range of publications and information sheets on drought management and recovery and available assistance services. This includes the NSW Guide to Drought Support Services, a quick reference guide containing contact information for a range of personal, financial and information services, from a range of organisations. A booklet titled Support Services for Rural Families and Businesses is also available, which provides a more comprehensive list of services available for support or advice during the drought. These publications are available online. For contact details and other information see Appendix A.

Environmental support is available through the Department of Infrastructure, Planning and Natural Resources. In particular the Department can provide advice on rivercare issues (such as riverbank erosion), groundwater resources (mapping, availability, monitoring, irrigation bores licensing and general advice), water extraction (licensing and advice), farm forestry, and native vegetation. See Appendix A for further details.

Additional environmental advice can be obtained by the Department of Environment and Conservation, National Heritage Trust, Department of Primary Industries (including the former NSW Agriculture and NSW Fisheries agencies), Northern Rivers Catchment Management Authority, Wetland Care Australia and Greening Australia.

The former PlanningNSW (now DIPNR), through its Living Centres program, has produced the booklet Northern Rivers Directory of Agricultural and Rural Services: A guide to government and community programs to assist rural landholders, which provides further details on available services, programs and publications. The booklet is available from the DIPNR planning office in Grafton and from councils.

Community Landcare Coordinator

Jackie Luethi has been appointed Community Landcare Coordinator with Richmond Landcare Inc. Jackie will be working with Northern Rivers farmers over the next year on projects aimed at developing sustainable land management practices.

Together with Landcare community support officers in the Tweed, Brunswick and Richmond catchments, she will work with networks of farming groups across the catchments. In particular, she will be involved with NSW Department of Primary Industries on sustainable agriculture projects such as Prograze, Soil Sense – Soil Health Card and Soil test interpretation, Landscan and Floodplain Backswamp Management. These projects, and Jackie's position, are federally funded through the National Landcare Program with the funds being made available through the Northern Rivers Catchment Management Authority.

Jackie is also keen to conduct any projects that enhance the uptake of sustainable farming practices in other agricultural industries. Jackie has a degree in Environmental Science and has worked in the cotton, macadamia, horticulture and beef industries. She is based at the Department of Primary Industries Wollongbar institute and invites people to contact her on 6626 1329.

Land purchaser information

It is necessary to seriously address the educational and awareness issues associated with buying property in or near to traditional farming areas. Councils could provide more information to land purchasers on 149(5) planning certificates, issued under the Environmental Planning and Assessment Act 1979, to make land

purchasers aware of the planning situation applying to their land. New land purchasers should be adequately informed as to the agricultural nature of the area in which the property is being purchased. As part of this initiative, information regarding typical rural activities should be readily available and accessible to potential buyers of rural property, new residents, real estate agents and conveyancing firms, to ensure that rural living issues are understood at the very earliest time possible.

Register of complaints

A register of complaints received could be established and maintained by local councils to assist in monitoring occurrences of conflict in relation to the application of planning, development and conflict management controls. This would help to determine over time the success or otherwise of such controls, and therefore assist in identifying gaps, strengthening existing control measures and/or determining more adequate measures, such as different buffer widths or types.

Conflict management

Where situations of conflict occur, involved parties should be encouraged to invest effort in communication, negotiation and mediation, rather than using litigation to deal with the issue. Outside and third parties should only be brought in after these methods have been pursued, or where a breach of the law is involved. This may help reduce the financial burden for farmers arising from dispute management.

Voluntary Conservation Agreements (VCAs)

VCAs could be promoted more as a means to protect high conservation value land. A VCA may be applied to a whole property or part of a property. Landholders who enter into a voluntary conservation agreement may be eligible for rate relief and tax deductions.

Environmental Enhancement Funding Programs

The Natural Heritage Trust (NHT) funds several programs which help landowners and communities to care for the environment in their area. Funding is available by application under the Landcare, Bushcare, Rivercare and Coastcare programs. There are several groups already operating in the Northern Rivers.

Regional Natural Resource Management Facilitators are employed to provide advice and assistance regarding the above programs. The Northern Rivers Facilitator is Kerri Francis. She can be contacted at the Alstonville DIPNR office (PO Box 664, Alstonville, 2477), by phone on 02 6627 0114 or by email at kerri.francis@dipnr.nsw.gov.au . More information on the programs can also be obtained from the NHT website: www.nht.gov.au/index.html . Follow the links on the webpage to the 'programs' area.

The 2003 Northern Rivers Funding Compendium is available on the CANRI website at www.canri.gov.au. Search for 'funding compendium.' This website gives details of a range of funding avenues which may be of benefit to farmers. It is currently being updated.

Property planning

The Farming for the Future program has been replaced by Property Management Planning through Farmbi$ coordinators. This can help farmers manage their land and integrate environmental management. It includes financial management training.

The new Northern Rivers Catchment Management Authority (CMA) will provide landowners with access to data and relevant information to prepare Property Vegetation Plans (PVPs). Landowners will be encouraged to prepare PVPs under the new Native Vegetation Act 2003, which will replace the current legislation (the Native Vegetation Conservation Act 1997) later in 2004 once the supporting regulations have been prepared. The new legislation will provide for the allocation of funds through the CMA to support the development of PVPs, including financial incentives to landholders for native vegetation management. The CMA will also be providing education and training on natural resource management, especially in the area of vegetation management.

The Northern Rivers CMA General Manager is Michael Pitt. He can be contacted at PO Box 618, Grafton, 2460, or by email at northern@cma.nsw.gov.au . The web address for the CMA is www.northern.cma.nsw.gov.au .

Management plans and sub-catchment plans

Landholder groups can develop voluntary management strategies, such as the cane industry's drain management project or Landcare projects.

Leasing

Farmers may in some cases be able to increase their productivity and resilience by leasing land from other landowners. Alternatively, farmers can lease or agist land they are not using.

Best practice management guidelines

A comprehensive range of guidelines is available to help landowners improve management in various agricultural industries. These are available through individual government agencies such as the Department of Infrastructure, Planning and Natural Resources, Department of Primary Industries and Department of Environment and Conservation.

APPENDIX A – Additional Information

Farm Forestry and Carbon Trading

Several organisations are able to assist farmers in establishing and running a forestry operation on their farms. The following information and sources may be of particular use:

Department of Primary Industries (former NSW Agriculture): www.agric.nsw.gov.au

Publications and other sources of information include:
- Farm Forestry NSW – Potential for diversification
- Farm Forestry NSW – Trees for coastal regions and nearby ranges
- Farm Forestry NSW – Recommended tree planting times
- Farm Forestry Strategy for NSW
- Farm Forestry Contacts
- NSW Agriculture Agroforestry Unit

Department of Primary Industries (NSW State Forests section): www.forest.nsw.gov.au

Publications include:
- Growing Trees for Carbon Credits – A guide for Landowners
- Forest Facts – Generating Carbon Benefits from Public and Privately Owned Forests

Department of Infrastructure, Planning and Natural Resources (former Department of Land and Water Conservation): www.dipnr.nsw.gov.au

Publications and other sources of information include:
- DIPNR Farm Forestry Extension workers, Northern Region, Grafton, ph 02 6640 2000
- Information and factsheets on various farm forestry issues, such as related legislation
- Guidance Code for landholders wanting to invest in plantations
- Plantation Regulation in NSW (factsheet)

Subtropical Farm Forestry Association: www3.turboweb.net.au/~sffa/

Publications and sources of information include:
- Subtropical Farm Forestry Association Manual
- Membership benefits, such as:
  - Free professional advisory service
  - Low cost introductory farm forestry courses
  - Current information on commercial opportunities
  - Access to seminars, field days, conferences, research trials and demonstrations

Northern Rivers Regional Plantation Committee (aka Northern Rivers Private Forestry), through the Northern Rivers Regional Development Board: www.privateforestry.org.au/

Publications include:
- Information sheets on Government Policy, legislation, production, planning and establishment, pasture and grazing and management, including Introduction to Plantation Forestry.
- Range of useful publications, such as:
  - Planning for Farm Forestry
  - Farm Forestry Manual and Planner
  - What Wood Where

Other useful organisations include:

- Australian Forest Growers – www.afg.asn.au
- NSW Office of Private Forestry – www.opf.nsw.gov.au
- Greening Australia – www.greeningaustralia.org.au
- Commonwealth Department of Agriculture, Fisheries and Forestry – www.affa.gov.au
- Association of Consulting Foresters of Australia – www.australianconsultingforesters.org

Rural Support Services

Department of Primary Industries (former NSW Agriculture) – www.agric.nsw.gov.au

Office	Location	Phone
Wollongbar Agricultural Institute including Chemical Residues Laboratory	1243 Bruxner Highway, Wollongbar	02 6626 1200
Centre for Tropical Horticulture	Bruxner Highway, Alstonville	02 6626 2400
Casino District Office	134 Barker St, Casino	02 6662 2288
Kyogle District Office	38 Summerland Way, Kyogle	02 6632 1900
Murwillumbah District Office	Main St, Murwillumbah	02 6672 2770

Department of Infrastructure, Planning and Natural Resources – www.dipnr.nsw.gov.au

Office	Location	Phone
North Coast Regional Office	76 Victoria St, Grafton	02 6640 2000
Alstonville District Office	Suite 3 The Plaza, Alstonville	02 6627 0100
Murwillumbah District Office	135 Main St, Murwillumbah	02 6672 5488
North Coast Regional Planning Office (formerly PlanningNSW)	49 Victoria St, Grafton	02 6642 0622

- For Rivercare advice, contact Peter Boyd at the Murwillumbah District Office
- For Farm Forestry advice, contact Bruce Cole-Clark at the North Coast Regional Office
- For Groundwater advice, contact Richard Green at the North Coast Regional Office
- For copies of Northern Rivers Directory of Agricultural and Rural Services: A guide to government and community programs to assist rural landholders, contact the North Coast Regional Planning Office

Casino Business Enterprise Centre
100 Barker St, Casino
Shirley McNaughton (Manager), ph 02 6662 5055 or email casbec@nor.com.au
Adrienne John (Farmbi$ Co-ordinator) ph 02 6663 1421 or email john@nrg.com.au

Rural Assistance Authority
161 Kite St (DX 3037), Orange, 2800 (no office in Northern NSW) - www.raa.nsw.gov.au
Ph 02 6391 3000 or freecall 1800 678 593 or email rural.assist@raa.nsw.gov.au

Northern Rivers Rural Financial Counselling Service
100 Barker St, Casino
Terry Pearce (Financial Counsellor), ph 02 6662 6503 or email ruralc1@bigpond.net.au
Fiona Grose (Financial Counsellor), ph 02 6662 3107 or email ruralc3@bigpond.net.au

Farmers' Markets

Contact details for markets held within or near to the Northern Rivers:

Market	Contact name	Contact phone	Notes / restrictions
Byron Farmers' Market	Joni Teal, Byron Farmers' Market Association*	02 6685 9792	Byron Shire produce unless product is new to that market
Bangalow Farmers' Market	Joni Teal, Byron Farmers' Market Association*	02 6685 9792	Byron Shire produce unless product is new to that market
Mullumbimby Farmers' and Country Craft Market	Sue Constable or Lyn McDonald, Mullumbimby Show Society	02 6684 1675 (Sue) 02 6684 3608 (Lyn)	Produce from all areas
Lismore Farmers' Market	Ian Mulligan	02 6621 5916	Produce from all areas
Rainbow Region Organic Markets (Lismore)	Dave Roby	02 6628 1084	Produce from all areas - must be certified organic
Tweed Valley Farmers' Market (Tumbulgum)	Paul Brouwer	02 6670 2440	Tweed Shire produce only
Banora Point Farmers' Market	Tony & Debbie Pereira	07 5590 4862	Produce from all areas
Uki Produce Markets		02 6679 5004	
Kingscliff Beachside Farmers and Friends Market	Margaret Kiss	07 5524 2102	Produce from all areas
Grafton Farmers' and Growers' Market	Henk van der Merwe or John Pullinger	02 6643 1967	For Clarence producers, but open to others
Maclean Farmers' Market	Mr Priddle	02 6645 3170	
SE Qld Markets			
Mudgeeraba Farmers' Market (Qld)	Clinton Parsons	07 5525 3525	Produce from Northern Rivers and south east Queensland
Redlands Farmers' Market (Mt Cotton)	Liz Venzin	07 3821 4460	Produce from all areas
Brisbane Powerhouse Farmers' Markets		07 3358 8622	
Toowoomba Farmers' Market	Nick Rutland	0422 155 223	SE Qld producers or unique product from other areas

* Note: Byron Farmers' Market Association is looking to establish a farmers' market in the Ocean Shores area in the near future. Contact the Association for more information or to express interest.

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Department of Land and Water Conservation (1999). Soil and Regolith Attributes for CRA/RFA Model Resolution, Upper North-east and Lower North-east Regions.

Morand, D.T. (1994). Soil Landscapes of the Lismore-Ballina 1:100 000 Sheet, Soil Conservation Service of NSW, Sydney.

_____ (1996). Soil Landscapes of the Murwillumbah-Tweed Heads 1:100 000 Sheet, Department of Land and Water Conservation, Sydney.

_____ (2001). Soil Landscapes of the Woodburn 1:100 000 Sheet, Department of Land and Water Conservation, Sydney.

Northern Rivers Catchment Blueprint 2002

Tweed Heads Masterplan

This Masterplan project offered options for increased services demand, providing for upgraded services with several new services and adjustments to the models of care in practice while maintaining or improving the functional relationships on the

site.

The strategic redevelopment roadmap included an additional podium and tower building accommodation inpatient units and tenancies, a new entrance and drop off point, an expansion of Emergency department to more than double existing capacity, amalgamation of Chemotherapy and Radiotherapy into an integrated Cancer Centre, expansion of Medical Imaging, medical records, service and support areas.

A New Inpatient/ Outpatient tower will provide Cardiology, mental health Medical / Surgical inpatients Paediatrics, Special Care Nursery and Maternity. As inpatient beds are relocated into the new block, the existing critical areas of the hospital can be expanded.

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Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Agreed to false or misleading information statements: yes

Name: Maree Beatty
Email: [redacted]

Address:
[redacted]

Kingscliff, NSW
2487

Content:
I am a long term resident of Kingscliff and I object to this EIS because:
* Up until March 2017, the North Coast Reginal Plan (NCRP) and NSW Health future plans were focused on the rejuvenation and expansion of the hospital precinct at the existing Tweed Heads site.
* The Regional Health Precinct supported all our-of-hospital services be clustered around a new much enlarged hospital, acting as the main economic driver for the city of Tweed Heads.
* High rise high density residential development would take advantage of the hospital and public transport within close proximity. Local Environmental Plans and Development Control Plans were developed by the Tweed Council to support the NCRP.
* Despite these endorsed plans the NSW Government announced a drastic reversal with apart from some out-of-hospital services possibly remaining on the current site all services would relocate to Kingscliff without any community consultation contrary to the claims made in the EIS.
* There are over 8000 residents over the age of 65 in Tweed Heads/Banora Point many of whom have purchased homes to be close to ageing health services, and may have limited transport options.
* The removal of health related services, exodus of hundreds of jobs from Tweed Heads will remove the key economic driver. The impact on surrounding retail and other industries is expected to be significant. Community and economic impact studies have not been conducted.
* For Kingscliff and Cudgen, the social, community, economic and environmental impacts of the completed works have not been conducted and declared to the public.
* As a resident of Kingscliff with a family growing up in this town, I believe that we are entitled to be given access to the full implications of the long term dramatic changes to our lifestyle before an irreversible commitment is made.
* I have personally attended workshops to ensure I and my family had input into the Kingscliff Locality Plan and Development Control Plan which was two years in the making. I strongly believe that our community supports and wants to retain the 11 metre and 13.6 metre building heights keeping its low key coastal settlement atmosphere, proximity to the beaches, expansive coastal foreshore, agricultural and farming back drop. Current hospital planning contradicts the current height limit restrictions supported through extensive consultation.
* The current land is zoned as RU1 and has been classified as State Significant Farmland (SSF) for more than 10 years after years of consultation and research. This parcel of unique red soil with exceptional quality and growing properties must be protected as SSF for not just my generation but my son's and many generations to come.
* The EIS has failed to mention lack of community consultation prior to the site selection, the two petitions well over 8000 signatures that were submitted to both the Upper and Lower Houses of NSW Parliament, as well as the 46000 followers of the "Relocate" Facebook page. This demonstrates how strongly the community oppose the current site.
* The location of this hospital will diminish Kingscliff and Cudgen residents' quality of life with intense

urbanization, increased traffic congestion, parking demands, 24 hour helipad and emergency vehicles and lighting across the site. Hospital traffic and strict parking limits that come with major hospitals will consume Kingscliff and Cudgen and hinder access to current infrastructure.
* The project team has also falsely asserted that the chosen site was the best, given that compulsory acquisition is currently being exercised, this could have been exercised to select a more appropriate site in the Tweed Valley off SSF.
* A probable maximum flood event of Q10,000 or one in 10,000 years is well over and not in line with other health sites including the Gold Coast University Hospital (GCUH) and Robina which has been set at Q500 or one in 500 year flood event.
* The chosen site needs to be situated so that it can it be transformed into a significant health and knowledge precinct in line with the GCUH without impacting on the Locality Plans endorsed by the Kingscliff and Cudgen communities.
* There are so many reasons to relocate this hospital to one of the other very viable alternatives that are better locations out of the town and most importantly not on SSF.

IP Address: - [redacted]
Submission: Online Submission from Maree Beatty (object)
https://majorprojects.accelo.com/?action=view_activity&id=300375

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:

Agreed to false or misleading information statements: yes

Name: Maree Beatty
Email: [redacted]

Address:
[redacted]

Kingscliff, NSW
2487

Content:
I am a long term resident of Kingscliff and I object to this SEPP because:
â€¢ The current land is zoned as RU1 and has been classified as State Significant Farmland (SSF) for more than 10 years after years of consultation and research. This parcel of unique red soil with exceptional quality and growing properties must be protected as SSF for not just my generation but my sonâ€™s and many generations to come.
â€¢ This parcel of SSF is one of only two SSF drought free pockets of land in NSW. Figures from the NSW Department of Primary Industries (DPI) confirm that every part of the state except for our 1% here on the Cudgen Pateau, is in drought and the NSW Government has only recently announced more than $1billion in drought relief measures. This demonstrates how special and valuable this SSF is for food security not just our local area but across the State and Country.
â€¢ The Cudgen Plateau supports up to 20 farms, growing primarily sweet potatoes for eastern seaboard city populations with a typical return in the order of 55 â€" 65 tonnes a hectare, grossing more than $100,000/ha in a good market. These farms provide agriculture based careers and employment for locals who want to work and specialise in this sector which is important for our local economy.
â€¢ Strategies within the Kingscliff Locality Plan and Development Control Plan promote and support agriculture including new diversifying and â€˜value addâ€™ industries.
â€¢ The extended Regional Health Services Precinct Plan puts at risk the remaining farmland for eventual supplementary rezoning to support the hospital site which will inevitable put the viability threshold of 500ha and the potential loss of the Plateauâ€™s special protection as SSF.
â€¢ I have personally attended workshops to ensure that I and my family had input into the Kingscliff Locality Plan and Development Control Plan which was two years in the making. I strongly believe that our community supports and wants to retain the 11 metre and 13.6 metre building heights keeping its low key coastal settlement atmosphere, proximity to the beaches, expansive coastal foreshore, agricultural and farming back drop. Current hospital planning contradicts the current height limit restrictions supported through extensive consultation.
â€¢ The Kingscliff Locality Plan also supports the town retaining architectural and design guidelines built around coastal character.
â€¢ The tourism industry here also brings in over $446 million a year and employs thousands of locals with Kingscliff loved for being a tourist mecca with a jewel coastline ringing our volcanic farmland.
â€¢ The transfer to Kingscliff of the upgraded Tweed Hospital and associated private health infrastructure and support services will achieve the opposite to the community vision expressed during consultation creating a City of Kingscliff/Cudgen once intended for Tweed Heads.
â€¢ This development renders years of community consultation and planning redundant through the massive social and economic footprint of the hospital.

â€¢ The whole of the Tweed Shire wants and deserves a new hospital and I believe that it needs to be in a better location to cater for all our needs into the future. Up until March 2017, the State Government Regional Plan and NSW health future plans were focused on the rejuvenation and expansion of the hospital precinct at the existing Tweed Heads site.

IP Address: - [redacted]
Submission: Online Submission from Maree Beatty (comments)
https://majorprojects.accelo.com/?action=view_activity&id=300388

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: Rhonda James
Email: goorambil2@bigpond.com

Address:
1628 Reserve Creek Road

Cudgera Creek, NSW
2484

Content:
As a long term farmer and conservationist residing on the Tweed Coast I strongly object to the proposal to construct a hospital on State Significant Farmland.

I object on the following grounds;
The subject land is zoned under the Tweed LEP as Rural, is protected under the North Coast Regional Plan and is State Significant Farmland.The rezoning of this land will set a precedent and open up the area to further requests for rezonings resulting in the remaining adjacent farmland being reduced to below the threshold for State Significant Farmland.

The EIS was prepared in a very short time and requires further consultation with the community and studies to justify the development.

Alternate sites were provided but the inadequate consultation did not provide for full consideration of the alternate sites.

The change would also contravene the current Tweed LEP by exceeding the current height limit. High rise building is not compatible with the surrounding residential area, TAFE and farmland.This has been actively debated in Kingscliff and low rise was the adopted preference in the village.

The rezoning is in an identified wildlife corridor which currently provides open space for fauna movement south from the wetland to buffers along Cudgen Road then south to the Kingscliff remnant. The northern section of the site is a significant wetland under Coastal SEPP Wetland and adjacent sclerophyll vegetation provides habitat for Koalas. Two species are listed under EPBC Act. See attachment.

it appears that the buffer to the wetland will be used for drainage infrastructure. This is likely to have detrimental impacts on the adjacent wetland. A 50m planted buffer should be put in place to protect the wetland and associated vegetation.

Land zoned for a hospital will not be compatible with adjacent farming activities such as machinery noise and chemical sprays. Apart from constructing on farmland a hospital does not fit with a rural landscape and associated activities.

It appears that work has already commenced on the site without any approvals in place.

We MUST retain our farmland on red soils not pave them with concrete and inappropriate

development.

Regards
Rhonda James

IP Address: cpe-121-216-196-186.bpxt-r-033.ken.nsw.bigpond.net.au - 121.216.196.186
Submission: Online Submission from Rhonda James (object)
https://majorprojects.accelo.com/?action=view_activity&id=300377

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

Comments Biodiversity Assessment Report and Appendices 26 November 2018

The whole of the site was assessed using the Biodiversity Assessment Method (BAM).

The construction footprint is adjoined by a Coastal Area Wetland Proximity Area (Coastal SEPP) as shown in Figure 8, Preferred Koala habitat (Tweed KPoM) and the site is part of a north south Regional Fauna Corridor as shown in Figure 9.

The following point require further consideration:

- No ecosystem or species credits required to offset the development. The BAM calculator generated nine ecosystem credits and two species credits.
  Although the report acknowledges the project has the potential to cause prescribed impacts the assessor considers "mitigation measures including adaptive management strategies will reduce the likelihood and consequence of any residual impacts to low levels that do require an offset".
- Windrows located through the project area consisting of piled rock, regrowth rainforest and woody weeds were classified as PCT 1302 subtropical rainforest. It is accepted that they do not conform as an EEC.
  These windrows were dismissed and had limited assessment. No information if there was on ground assessment for fauna particularly reptiles in these locations.
- The project site is located within a north south Regional Fauna Corridor. The current land use provides for fauna movement through the site. The windrows and remnant vegetation along Cudgen Road provide refuge for fauna movement.
- The report does not include any details of on ground assessment for the presence of fauna except for a spot assessment undertaken within the eastern zone 6 for Koala presence.
  A document includes a comment from a fauna ecologist that it was the wrong time of year, August September, to assess for selected Threatened Species.

The above points need to be addressed taking into consideration that problems have been encountered with the BAM calculator, no evidence of on ground fauna assessment (except SAT for Koalas), additional consideration and assessment required for Koalas and Mitchel Rainforest Snail.

Fauna

Two cryptic species require additional consideration, predicted species Koala *Phascolarctos cinereus* and candidate species Mitchell's Rainforest Snail *Thersites mitchellae*.

Koala

The BAM classified Koalas as a predicted species in Zone 1. The assessor undertook a SAT assessment in Zone 6 resulting in no evidence of Koalas recorded. The assessment was undertaken in July, a period when Koalas are generally inactive.

"The koala Phascolarctos cinereus was removed from Zone 6 based on the result of the habitat survey that was conducted". See Section 2.4.7.

- The assessment for Koalas is inadequate to identify if Koalas utilise the project area. Tweed Shire Council mapping identifies the northern vegetation within the project area and adjacent areas as Preferred Koala Habitat and maps the location of Koala sightings from 1949 to 2016. The site is also located within a Regional Fauna Corridor.

Tweed Shire Council mapping shows sightings are located within the site, on the east and near the house on Cudgen Road, and on lands adjacent to the site. Koalas have been recorded in nearby areas adjacent to the library and swimming pool, Kingscliff High and Kingscliff TAFE (Koala Rescue Unit and friends of Koala). November 2018 a Koala was observed crossing the Tweed Coast Road to the south of the site.
Zone 6 includes 20% canopy cover of preferred Koala feed tree Tallowwood.
Koalas are likely to feed in Zone 6 and move through the site including the construction area to access habitat on adjoining lands. Zone 5 on the west which includes Flooded Gum west and remnant trees along Cudgen Road and within the project area are likely to provide refuge for Koalas.

A comprehensive Koala assessment is required to be undertaken by a specialist Koala fauna ecologist. Assessment to include spot assessment in all vegetation zones and observation in these zones timed to Koala activity, Spring and Summer.

Mitchell's Rainforest Snail

The BAM classified Mitchell's Rainforest Snail (MRS) as a candidate species in Zone 1. There appears no to be no on ground survey for this species.

- MRS status is NSW Endangered - Commonwealth Critically Endangered.
  Habitat is within leaf litter in lowland subtropical rainforest and swamp forest on alluvial soils. These vegetation communities are mapped within the site and project area.
  MRS has been recorded in several sites near to the site. Sites include adjacent to Kingscliff Library and Kingscliff Shopping Village. MRS has been found in highly degraded locations at Kingsclliff, including under dumped sheets of roofing iron. These records have been confirmed by gastropod expert John Stanisic.

  A comprehensive assessment is required to be undertaken by a specialist fauna ecologist. Assessment to include all vegetation zones particularly .

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Agreed to false or misleading information statements: yes

Name: Gregory Beatty
Email: [redacted]

Address:
[redacted]

Kingscliff, NSW
2487

Content:

I am a long term resident of Kingscliff and I object to this EIS because:
* Up until March 2017, the North Coast Reginal Plan (NCRP) and NSW Health future plans were focused on the rejuvenation and expansion of the hospital precinct at the existing Tweed Heads site.
* The Regional Health Precinct supported all our-of-hospital services be clustered around a new much enlarged hospital, acting as the main economic driver for the city of Tweed Heads.
* High rise high density residential development would take advantage of the hospital and public transport within close proximity. Local Environmental Plans and Development Control Plans were developed by the Tweed Council to support the NCRP.
* Despite these endorsed plans the NSW Government announced a drastic reversal with apart from some out-of-hospital services possibly remaining on the current site all services would relocate to Kingscliff without any community consultation contrary to the claims made in the EIS.
* There are over 8000 residents over the age of 65 in Tweed Heads/Banora Point many of whom have purchased homes to be close to ageing health services, and may have limited transport options.
* The removal of health related services, exodus of hundreds of jobs from Tweed Heads will remove the key economic driver. The impact on surrounding retail and other industries is expected to be significant. Community and economic impact studies have not been conducted.
* For Kingscliff and Cudgen, the social, community, economic and environmental impacts of the completed works have not been conducted and declared to the public.
* As a resident of Kingscliff with a family growing up in this town, I believe that we are entitled to be given access to the full implications of the long term dramatic changes to our lifestyle before an irreversible commitment is made.
* I strongly believe that our community supports and wants to retain the 11 metre and 13.6 metre building heights keeping its low key coastal settlement atmosphere, proximity to the beaches, expansive coastal foreshore, agricultural and farming back drop. Current hospital planning contradicts the current height limit restrictions supported through extensive consultation.
* The current land is zoned as RU1 and has been classified as State Significant Farmland (SSF) for more than 10 years after years of consultation and research. This parcel of unique red soil with exceptional quality and growing properties must be protected as SSF for not just my generation but my son's and many generations to come.
* The EIS has failed to mention lack of community consultation prior to the site selection, the two petitions well over 8000 signatures that were submitted to both the Upper and Lower Houses of NSW Parliament, as well as the 46000 followers of the "Relocate" Facebook page. This demonstrates how strongly the community oppose the current site.
* The location of this hospital will diminish Kingscliff and Cudgen residents' quality of life with intense urbanization, increased traffic congestion, parking demands, 24 hour helipad and emergency vehicles

and lighting across the site. Hospital traffic and strict parking limits that come with major hospitals will consume Kingscliff and Cudgen and hinder access to current infrastructure.
* The project team has also falsely asserted that the chosen site was the best, given that compulsory acquisition is currently being exercised, this could have been exercised to select a more appropriate site in the Tweed Valley off SSF.
* A probable maximum flood event of Q10,000 or one in 10,000 years is well over and not in line with other health sites including the Gold Coast University Hospital (GCUH) and Robina which has been set at Q500 or one in 500 year flood event.
* The chosen site needs to be situated so that it can it be transformed into a significant health and knowledge precinct in line with the GCUH without impacting on the Locality Plans endorsed by the Kingscliff and Cudgen communities.
* There are so many reasons to relocate this hospital to one of the other very viable alternatives that are better locations out of the town and most importantly not on SSF.

IP Address: - [redacted]
Submission: Online Submission from Gregory Beatty (object)
https://majorprojects.accelo.com/?action=view_activity&id=300379

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:

Agreed to false or misleading information statements: yes

Name: Gregory Beatty
Email: [redacted]

Address:
[redacted]

Kingscliff, NSW
2487

Content:
I am a long term resident of Kingscliff and I object to this SEPP because:
â€¢ The current land is zoned as RU1 and has been classified as State Significant Farmland (SSF) for more than 10 years after years of consultation and research. This parcel of unique red soil with exceptional quality and growing properties must be protected as SSF for not just my generation but my sonâ€™s and many generations to come.
â€¢ This parcel of SSF is one of only two SSF drought free pockets of land in NSW. Figures from the NSW Department of Primary Industries (DPI) confirm that every part of the state except for our 1% here on the Cudgen Pateau, is in drought and the NSW Government has only recently announced more than $1billion in drought relief measures. This demonstrates how special and valuable this SSF is for food security not just our local area but across the State and Country.
â€¢ The Cudgen Plateau supports up to 20 farms, growing primarily sweet potatoes for eastern seaboard city populations with a typical return in the order of 55 â€" 65 tonnes a hectare, grossing more than $100,000/ha in a good market. These farms provide agriculture based careers and employment for locals who want to work and specialise in this sector which is important for our local economy.
â€¢ Strategies within the Kingscliff Locality Plan and Development Control Plan promote and support agriculture including new diversifying and â€˜value addâ€™ industries.
â€¢ The extended Regional Health Services Precinct Plan puts at risk the remaining farmland for eventual supplementary rezoning to support the hospital site which will inevitable put the viability threshold of 500ha and the potential loss of the Plateauâ€™s special protection as SSF.
â€¢ The Kingscliff Locality Plan also supports the town retaining architectural and design guidelines built around coastal character.
â€¢ The tourism industry here also brings in over $446 million a year and employs thousands of locals with Kingscliff loved for being a tourist mecca with a jewel coastline ringing our volcanic farmland.
â€¢ The transfer to Kingscliff of the upgraded Tweed Hospital and associated private health infrastructure and support services will achieve the opposite to the community vision expressed during consultation creating a City of Kingscliff/Cudgen once intended for Tweed Heads.
â€¢ This development renders years of community consultation and planning redundant through the massive social and economic footprint of the hospital.
â€¢ The whole of the Tweed Shire wants and deserves a new hospital and I believe that it needs to be in a better location to cater for all our needs into the future. Up until March 2017, the State Government Regional Plan and NSW health future plans were focused on the rejuvenation and expansion of the hospital precinct at the existing Tweed Heads site.

IP Address: -[redacted]
Submission: Online Submission from Gregory Beatty (comments)
https://majorprojects.accelo.com/?action=view_activity&id=300390

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:
My family have lived in the Tweed Valley since 1911 and were pioneering dairy farmers. Consequently, I have a strong connection to and respect for the land and for value of farmland to this community. This history has also given me a deep knowledge of the valley's history and a passion for its environment and culture.

I wish to submit an objection to the proposed development of the Tweed Valley Hospital at Cudgen / Kingscliff for the following reasons:

- the environment of the Cudgen and Kingscliff areas is unique, but this will be irrevocably changed and diminished by the proposed Hospital and the infrastructure and associated services necessary for a Health Service of this size
- building a hospital on on the Cudgen Plateau which has been officially designated as State Significant Farmland for over 10 years further diminishes the supply of viable cropping farmland in NSW and Australia at a time when we are facing devastating drought in many other regions, thereby further eroding our food security
- other site options that were not State Significant Farmland do exist and would not have the environmental impact of this plan
- the current site has no capacity to house the projected planned growth as outlined by Health Infrastructure and the adjacent State Significant Farmland will be subsumed to facilitate the growth, further eroding and eventually destroying the SSF status.
- the roads surrounding the planned hospital are simple village type roads to service the current farms and villages. To cater for the planned hospital will require significant and substantial roadworks. Such works do not appear to be budgeted for or planned and will forever change the low key atmosphere of the area.....not to mention the disruption and devastation to the surrounding environs in establishing the required new roadwork
- the social and cultural environments of Kingscliff and Cudgen are renowned for their relaxed village atmosphere and the North Coast Regional Plan 2018-2036 reaffirmed the intention to protect and maintain these features. The hospital and the sheer volume of traffic and services, plonked in the middle of a small farming and seaside village will devastate the area, resulting in traffic congestion and chronic parking problems. Kingscliff is not large enough, nor does it have any of the necessary infrastructure to cater for such a large health service. Parking is already a significant issue in Kingscliff without the addition of a large hospital.
- the hard fought 3 story building height limit established to give Kingscliff its relaxed village atmosphere will be placed under significant pressure to cater for the sheer demand in such a small location
- this site ignores the masterplan for the Tweed Heads Hospital developed in 2013 and submitted to

and approved by the NSW Minister for Health in 2014 for the redevelopment of that hospital in 3 Stages, with Stage 1 to be completed in 2017.
- these plans remained current in March 2017, when they were summarily overturned by the new Minister for Health without community consultation. No 'real' comprehensive consultation has been undertaken - it has been done by decree
- the economic impact on Tweed Heads will be massive, with the removal of the hospital as a central plank of its economy
- comprehensive flood mapping has not been undertaken and while the planned hospital will never flood, it will not be accessible from most areas of the Tweed in times of serious flooding, be it from the north, south or west. As an example, people in neighbouring Chinderah, just down the road, are cut off in any sizeable floods and will not be able to get to the hospital, let alone residents from further afield. Staff will not be able to get to work.
- the current hospital arrangement, with a hospital at Tweed Heads and one in Murwillumbah, provides better coverage for a greater percentage of the population than the new plans

IP Address: [redacted]
Submission: Online Submission from [redacted] (object)
https://majorprojects.accelo.com/?action=view_activity&id=300381

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]

Content:
My family came to the area in 1911 and were early dairy farmers, consequently I feel passionately about the preservation of our State Significant Farmland and the conservation of our way of life in our villages and small towns. Tweed Heads has long been designated as the area of the valley for some high rise and as our valley centre for development.

I wish to strongly object to the SEPP on the following grounds:

- the Cudgen plateau is currently zoned as State Significant Farmland (RU1) and needs to be preserved and protected into the future for food security, given the decline in arable crop land due to drought and development
- with the Minister for Planning and Environment's announcement of plans for a future extension to develop the hospital to a Regional Health Services Precinct, the adjacent State Significant Farmland will apparently need to also be rezoned to facilitate this development. This risks the whole SSF zone on the Cudgen plateau as the loss of only 30 additional hectares will take it under the area needed for a viable SSF zone
- further development of ancillary health services to achieve a Regional Health Services Precinct with all the associated building and housing, will inevitably lead to the suburbanisation of all the agricultural land on the Cudgen plateau as the push to accommodate the precinct takes precedent over arable land
- Extensive community consultation over many years has firmly established the current height limit restriction as the community's choice. The Hospital Precinct contradicts this established limit and will place pressure on it to be raised
- Years of community consultation and planning has also established and protected the identity of Kingscliff and Cudgen as a relaxed seaside and farming community with associated tourism. The Hospital Precinct will override this identity and change it forever
- all of this could be avoided by staying true to the Masterplan for the Tweed Heads hospital developed in 2013 through true consultation with community and the relevant government departments and submitted and signed off in 2014by NSW Minister for Health. We could have a Hospital Precinct to be proud of which would adequately service the growing community and allow the SSF to flourish

IP Address: - [redacted]
Submission: Online Submission from [redacted] (comments)
https://majorprojects.accelo.com/?action=view_activity&id=300774

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: Cheryl Beatty
Email: [redacted]

Address:
[redacted]

Tumbulgum, NSW
2490

Content:
I am a long term resident of the Tweed and I object to this EIS because:
* Up until March 2017, the North Coast Reginal Plan (NCRP) and NSW Health future plans were focused on the rejuvenation and expansion of the hospital precinct at the existing Tweed Heads site.
* The Regional Health Precinct supported all our-of-hospital services be clustered around a new much enlarged hospital, acting as the main economic driver for the city of Tweed Heads.
* High rise high density residential development would take advantage of the hospital and public transport within close proximity. Local Environmental Plans and Development Control Plans were developed by the Tweed Council to support the NCRP.
* Despite these endorsed plans the NSW Government announced a drastic reversal with apart from some out-of-hospital services possibly remaining on the current site all services would relocate to Kingscliff without any community consultation contrary to the claims made in the EIS.
* There are over 8000 residents over the age of 65 in Tweed Heads/Banora Point many of whom have purchased homes to be close to ageing health services, and may have limited transport options.
* The removal of health related services, exodus of hundreds of jobs from Tweed Heads will remove the key economic driver. The impact on surrounding retail and other industries is expected to be significant. Community and economic impact studies have not been conducted.
* The current land is zoned as RU1 and has been classified as State Significant Farmland (SSF) for more than 10 years after years of consultation and research. This parcel of unique red soil with exceptional quality and growing properties must be protected as SSF for not just my generation but my son's and many generations to come.
* The project team has also falsely asserted that the chosen site was the best, given that compulsory acquisition is currently being exercised, this could have been exercised to select a more appropriate site in the Tweed Valley off SSF.
* The chosen site needs to be situated so that it can it be transformed into a significant health and knowledge precinct in line with the GCUH without impacting on the Locality Plans endorsed by the Kingscliff and Cudgen communities.
* There are so many reasons to relocate this hospital to one of the other very viable alternatives that are better locations out of the town and most importantly not on SSF.

IP Address: - [redacted]
Submission: Online Submission from Cheryl Beatty (object)
https://majorprojects.accelo.com/?action=view_activity&id=300386

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:

Agreed to false or misleading information statements: yes

Name: Cheryl Beatty
Email: [redacted]

Address:
[redacted]

Kingscliff, NSW
2490

Content:
I am a long term resident of the Tweed Valley and I object to this SEPP because:
â€¢ The current land is zoned as RU1 and has been classified as State Significant Farmland (SSF) for more than 10 years after years of consultation and research. This parcel of unique red soil with exceptional quality and growing properties must be protected as SSF for not just my generation but my sonâ€™s and many generations to come.
â€¢ This parcel of SSF is one of only two SSF drought free pockets of land in NSW. Figures from the NSW Department of Primary Industries (DPI) confirm that every part of the state except for our 1% here on the Cudgen Pateau, is in drought and the NSW Government has only recently announced more than $1billion in drought relief measures. This demonstrates how special and valuable this SSF is for food security not just our local area but across the State and Country.
â€¢ The Cudgen Plateau supports up to 20 farms, growing primarily sweet potatoes for eastern seaboard city populations with a typical return in the order of 55 â€" 65 tonnes a hectare, grossing more than $100,000/ha in a good market. These farms provide agriculture based careers and employment for locals who want to work and specialise in this sector which is important for our local economy.
â€¢ The extended Regional Health Services Precinct Plan puts at risk the remaining farmland for eventual supplementary rezoning to support the hospital site which will inevitable put the viability threshold of 500ha and the potential loss of the Plateauâ€™s special protection as SSF.
â€¢ The Kingscliff Locality Plan also supports the town retaining architectural and design guidelines built around coastal character.
â€¢ The tourism industry here also brings in over $446 million a year and employs thousands of locals with Kingscliff loved for being a tourist mecca with a jewel coastline ringing our volcanic farmland.
â€¢ The transfer to Kingscliff of the upgraded Tweed Hospital and associated private health infrastructure and support services will achieve the opposite to the community vision expressed during consultation creating a City of Kingscliff/Cudgen once intended for Tweed Heads.
â€¢ This development renders years of community consultation and planning redundant through the massive social and economic footprint of the hospital.
â€¢ The whole of the Tweed Shire wants and deserves a new hospital and I believe that it needs to be in a better location to cater for all our needs into the future. Up until March 2017, the State Government Regional Plan and NSW health future plans were focused on the rejuvenation and expansion of the hospital precinct at the existing Tweed Heads site.

IP Address: - [redacted]
Submission: Online Submission from Cheryl Beatty (comments)
https://majorprojects.accelo.com/?action=view_activity&id=300396

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: C Organisation:
personal () Email:
hawkerville@gmail.com

Address:
98 hammond drive

clothiers creek, NSW
2484

Content:
I am objecting to amendments to Tweed LEP 2014 to enable an assessment of the hospital project on its merits
The proposal on the Cudgen subject site is not mentioned in any of the forward planning documents for the Tweed shire and contravenes the Tweed Town centre where the expansion of the existing hospital is pivotal to its future economic viability.
In particular a large proportion of the elderly who are not car reliant have chosen to live handy to the existing facility .This is a special problem in Tweed Shire which has a very high proportion of over 65's in its population.
The existing facility is well served by public transport contrasting with the paucity of services to the Cudgen subject sites.
With the mooted extension of light rail services to the Gold Coast airport hub it is not fanciful to imagine a likely future scenario of a further southward extension to the Tweed Town Centre and its integrated hospital precinct.
The subject site would see a very car dependent client base with very few pedestrian visitations in stark contrast to the existing Tweed Hospital.
Another attractive aspect of expanding the existing facility is that Council has already indicated neighbouring sites surplus to their needs which could allow the hospital to expand.
Another specious argument is that during an expansion of the existing hospital construction disruption would severely compromise patient welfare.
This would seem to be at odds with hospital expansion across the nation where development of existing facilities has been managed without apocryphal consequences.
Lastly I very strongly object to the loss of prime farming land if the subject site is developed.
By the government's own published data this site is part of most valuable farming areas in the State known as the Cudgen plateau.In this era of global food security this proposal will see the State's limited reserves of high quality farmland being further reduced.
As a nation we inhabit one of the world's most arid continents where droughts and poor farm management practices highlight the pressing need to secure our most valuable arable farmland for future generations.
I totally support a hospital upgrade but not at the expense of State significant farmland. While cities like Adelaide and Melbourne seek to protect valuable agricultural'food bowls' on the fringes of their metropolitan areas this proposal apparently flies in the face of this convention.
I STRONGLY OBJECT TO THIS DEVELOPMENT APPLICATION AS IT CONTRAVENES SOUND PLANNING PRINCIPLES

IP Address: cpe-58-166-69-28.bpbn-r-035.cht.nsw.bigpond.net.au - 58.166.69.28
Submission: Online Submission from ronald krieger of personal (object)
https://majorprojects.accelo.com/?action=view_activity&id=300420

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: Beverley Love
Email: bevhlove@gmail.com

Address:
35 Gibson Street

Kingscliff, NSW
2487

Content:
As a mother of three children who grew up in this area I asked them and their friends what was important to them in the future. The overwhelming response was to have a laidback beach lifestyle to come back to, protected for their children to experience. There is plenty of access to bustling towns nearby for work and activities. Let Kingscliff be the point of difference.

As a midwife involved in community activities the village atmosphere and support of a small community is vital as young people begin their parenting journey. I feel this is what Kingscliff has that is important. A bustling hospital and the infrastructure involved would dilute this forever.

Historically farmers have applied to have their land rezoned so they could sell off parcels for housing. This was rejected due to the State Significant Farmland status, and the then government had the foresight to value the land's farming ability - this remains even more important today.

I object to this Development Application as follows:

1. 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.
2. 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.
3. 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.
4. There was no community consultation prior to the site choice. This is contrary to claims made in the EIS.
5. 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.
6. Why target State Significant Farmland when other options exist. The Cudgen Plateau has been designated for protection.
7. 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.
8. The issue of flooding is dubious. 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.
9. 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.
10. 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.
11. 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.
12. Funding for the project has not covered the transport and utility infrastructure. This will get pushed onto local councils and other authorities.
13. 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.
14. 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.
15. 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.
16. Not only will we lose the important food production but the livelihoods of many farming businesses and farm workers would go with it.

IP Address: cpe-121-218-178-162.bpbn-r-034.cht.nsw.bigpond.net.au - 121.218.178.162
Submission: Online Submission from Beverley Love (object)
https://majorprojects.accelo.com/?action=view_activity&id=300444

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:

Agreed to false or misleading information statements: yes

Name: Beverley Love
Email: bevhlove@gmail.com

Address:
35 Gibson Street

Kingscliff, NSW
2487

Content:
As a mother of three children who grew up in this area I asked them and their friends what was important to them in the future. The overwhelming response was to have a laidback beach lifestyle to come back to, protected for their children to experience. There is plenty of access to bustling towns nearby for work and activities. Let Kingscliff be the point of difference.

As a midwife involved in community activities the village atmosphere and support of a small community is vital as young people begin their parenting journey. I feel this is what Kingscliff has that is important. A bustling hospital and the infrastructure involved would dilute this forever.

Historically farmers have applied to have their land rezoned so they could sell off parcels for housing. This was rejected due to the State Significant Farmland status, and then government had the foresight to value the landâ€™s farming ability â€" this remains even more important today.

I object to this Development Application as follows:
1. The area has been made State Significant Farmland because of its beautiful fertile red soil which is drought free.
2. The 2017 North Coast Regional Plan protects the land for the proposed Tweed Valley Hospital.
3. The Minister for Planning and Environment announced plans for an extended â€oeRegional Health Services Precinctâ€ adjoining the Hospital site, thus undermining the remaining prime agricultural landâ €™s already at-risk viability threshold of 500ha.
4. Leading to automatic rezoning of adjoining land to support facilities associated with Tweed Regional Hospital.
5. 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.
6. Kingscliff residents have worked with council to established restricted height limits. This massive Hospital contradicts these height limit restrictions in the Tweed LEP.

IP Address: - 121.218.178.162
Submission: Online Submission from Beverley Love (comments)
https://majorprojects.accelo.com/?action=view_activity&id=300462

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: Richard Roberts
Email: rroberts@fastmail.com.au

Address:
P O Box 2

Fingal Head, NSW
2487

Content:
I would like to register my strong support for the concept proposal and EIS on Stage 1 Works for the Tweed Valley Hospital SSD18_9575.

I have not made any political donations, reportable or otherwise, in the last two years.

Reasons for support
I live in the Tweed Shire where I have retired to following extensive involvement during a 40 year professional career in siting and delivery of a diverse array of Infrastructure projects including major hospitals. These professional roles have seen me serve in organisations such as Queensland Treasury, Thiess Contractors and REST Industry Super where I was Director Infrastructure Investments before my retirement. Drawing on my experience, I have undertaken considerable personal research on the Tweed Valley Hospital Project and the site at Kingscliff and have attended numerous presentations about the project, including as a Member of the Community Reference Panel established to gain local input into the project formulation process. I have concluded that the Kingscliff site represents an excellent site for this major community health facility in the Tweed Valley for reasons that include:
1. The Kingscliff/Cudgen site is a physically very attractive site for a new first class hospital situated as it will be on a North facing slope with extensive views and allowing for excellent light penetration. The fact that it is a sloping site (rather than a flat one) will allow for the employment of more interesting architectural features and more functional design features e.g. separation of areas at different levels on the site. Importantly too, there is absolutely no doubt that this site is flood free in a shire where flooding is a major problem. Also, very importantly, the site is significant is size and so allows not only for the future expansion of the hospital in a planned way but also the preservation on the site of substantial green wooded areas to enhance the "healing" feel of the site.

2. The Kingscliff/Cudgen site will allow for the most timely delivery of the new Tweed Hospital. This is an extremely important issue as the Tweed Valley region is in urgent need of upgraded hospital facilities as is evidenced from commentary of local community members and amongst the health professionals that service the region. All services required for the hospital are currently immediately available at the border of the site - road, water, sewage, power, telecommunications etc - meaning that there will be no delays in having these services delivered to the site compared with other greenfield sites. This is not the case for the Kings Forest site where all services will have to be delivered resulting in extended delivery times for the hospital and substantial additional costs

3. A new Tweed Hospital at the Kingscliff/Cudgen site should definitely be deliverable at a lower cost to the community and the taxpayer than the other two shortlisted sites. The Kings Forest site will

require substantial expenditure on delivering services to the site and in raising the height of the site with fill to above the flood level. The existing Tweed Hospital site represents a substantially more costly site to deliver the new hospital on even if adjacent land is acquired.To double the size of a hospital on top of the existing over-stretched facility that is on a space- constrained site only one quarter the size of what is needed is clearly not feasible. The extra costs and time delays would be extraordinary and a poor quality hospital outcome almost certain. From my experience of delivering major projects on both greenfield and brownfield sites, the cost of delivery on a brownfield site is 25% greater than delivery on a greenfield site (so circa an extra $130m would be required for this hospital on the basis the publicly available hospital capital cost is for the greenfield Kingscliff site) and the time required is 30% greater for a brownfield delivery as opposed to a greenfield site). Given the current tax burden on the community and the urgent need for enhanced hospital facilities in the Tweed, the Kingscliff/Cudgen site is the highest preferable site.

4. I have read the site selection report and visited the three shortlisted sites. Based on this my strong view is that the site selection process was conducted in a professional and evidence based way and was transparent.

5. The projected future demographic growth of the Tweed shire clearly points to the need to locate the new Hospital south of the Tweed River. As well as being south of the Tweed River, the Kingscliff/Cudgen site allows for excellent access for all residents of Tweed Shire given its close location a short distance from the M1. This is not the case with the existing Tweed Hospital site located as it is in the extreme North of the Shire and in a hard-to-access area. The Kingscliff/Cudgen site is therefore the most equitable site in terms of access for the majority of Tweed residents.

6. The location of the new Hospital adjacent to the TAFE represents an exciting opportunity for the Tweed Region to expand knowledge based industries in the region, which industries are vital to employing our young people in the future. The hubbing of institutions close together is a proven formula globally to spawning new research and innovative startups. In a Shire where 70% of people who are Shire residents and in the workforce travel out of the Shire every day to a workplace this surely is a very vital consideration as to where we locate our large new and first rate hospital i.e. where it is most likely to see a growth in local jobs !

7. Whilst it is unfortunate that agricultural land will be lost as part of the development of the new hospital, I believe that the community need for a quality hospital site is a higher order need than continuation of the current relatively low value agricultural activity. My research indicates that 25% of the Cudgen plateau land is not being used for agricultural purposes. Whilst I am not an expert in this area, this would indicate to me that there are substantial other factors at work that are impacting on the problems of the Cudgen Plateau as a future farming area. The excising of a veritable sliver of this area for the new Hospital is therefore highly unlikely to negatively impact on the future of farming on the Cudgen Plateau.

8. The siting of the new Hospital on the Kingscliff/Cudgen site allows for minimal environmental degradation. The EIS has found no substantive grounds that would preclude this site as the new hospital site and based on the EIS and my extensive previous experience in EIS studies and site selections I would agree with that assessment. In fact i believe that the site and the location of the hospital on it will allow for the environmental enhancement of the site and the opening up of the significant wooded areas for wide community use but within a controlled way so that the environment of the site is not deleteriously affected.

9. I certainly believe that more consideration needs to be given as to how better integrate the new Hospital into the existing infrastructure in the area. Basically a hospital in this Cudgen Rd location offers the opportunity to upgrade community accessibility across the Kingscliff to Cudgen axis. Currently public infrastructure including several schools, a TAFE college, a library and public pool are very poorly serviced by safe and attractive walking / bike paths. I strongly urge this issue be addressed as it is vital that the new Hospital be a good neighbour.

IP Address: cpe-101-183-87-155.qb03.qld.asp.telstra.net - 101.183.87.155
Submission: Online Submission from Richard Roberts (support)
https://majorprojects.accelo.com/?action=view_activity&id=300472

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: Leonard Hall
Email: [redacted]

Address:
[redacted]

Kingscliff, NSW
2487

Content:
Refer attached PDF submission

IP Address: - [redacted]
Submission: Online Submission from Leonard Hall (object)
https://majorprojects.accelo.com/?action=view_activity&id=300521

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

13 December 2018

Submission in response to the Environmental Impact Statement for the New Tweed Valley Hospital (Concept Proposal and Stage 1 Works) (EIS)

The primary purpose of public exhibition of the proposed EIS is to allow the public the opportunity to provide feedback such that the Planning Minister and Department of Planning and Environment may better understand and appraise the application informed and with due regard to the concerns of the affected community.

It is important that community concerns together with current regional and local town planning (that have already been established after genuine consultation between all levels of government and the community over a number of years) are given proper consideration and weighting and not ignored in what is clearly an imprudent rush to have the new Tweed Valley Hospital pushed through on this particular site.

The land proposed for development as the new Tweed Valley Hospital (771 Cudgen Road, Cudgen) (the Site) is primarily zoned RU1 Primary Production. Hospitals are a prohibited use in RU1 zone under the Tweed Local Environmental Plan (LEP) 2014. The proposed SEPP seeks to amend the Tweed Local Environmental Plan (LEP) 2014 by rezoning the land from RU1 Primary Production to SP2 Infrastructure so as to permit the Department of Planning and Environment to consider the SSD application for a hospital on the Site.

Section 117(2) of the Environmental Planning and Assessment Act 1979

Local Planning Direction No. 5.3 “Farmland of State and Regional Significance on the NSW Far North Coast” applies when a relevant planning authority prepares a planning proposal for land mapped as state significant farmland. 771 Cudgen Road, Cudgen is mapped as “State Significant Farmland”.

The objectives of Local Planning Direction No. 5.3 are:

a) to ensure the best agricultural land will be available for current and future generations to grow food and fibre,
b) to provide more certainty on the status of the best agricultural land, thereby assisting councils with their local strategic settlement planning, and
c) to reduce land use conflict between agricultural use and non-agricultural use of farmland as caused by urban encroachment into farming areas.

The Direction states that a planning authority must not rezone land identified as “State Significant Farmland” for urban or residential use.

The Direction goes on to set out that a planning proposal may be inconsistent with the terms of this direction only if council can satisfy the Secretary of the Department of Planning and Environment (or an officer of the Department nominated by the secretary) that the planning proposal is consistent with:

(A) The North Coast Regional Plan 2036, or
(B) Section 4 of the report titled Northern Rivers Farmland Protection Project – Final Recommendations, February 2005, held by the department of Planning and Environment.

I submit to the Planning Minister and Department of Planning and Environment that the proposed EIS and SEPP rezoning amendment should be refused for the following reasons:

(A) The rezoning of the Site is inconsistent with the stated objectives of Local Planning Direction No. 5.3; and

(B) North Coast Regional Plan 2036 published by the NSW Government Department of Planning and Environment and endorsed by Minister Anthony Roberts

The rezoning of the Site contravenes the intent and objective of Direction 11 "Protect and enhance productive agriculture lands" in that:

(i) the North Coast Regional Plan reflects the community and stakeholder aspirations to protect productive farmland from rezoning. The most important farmland was identified and mapped to support long term agricultural production. 771 Cudgen Road, Cudgen (the Site) was identified and mapped as "State Significant Farmland";

(ii) the Site (until the recent compulsory acquisition by the NSW Government) supported sustainable agricultural production and could continue to support sustainable agriculture;

(iii) The Site adjoins or is within 300m of other agricultural activities and is likely to cause conflict and/or impact on those activities. Appendix J of the New Tweed Valley Hospital EIS identifies areas of land use conflict, however the investigations carried out and recommendations made do not demonstrate a proper understanding of the local environment, or that any real due diligence had been carried out, especially with regard to the red soil dust (and soil/chemical residues) which are a problem in the area and permeate every building on the Cudgen Plateau. A hospital is an important and critical health care facility and it would be negligent of the Planning Minister to consent to the SEPP in circumstances where a proper dust, chemical and associated health risk assessment has not been carried out.

(C) Report titled Northern Rivers Farmland Protection Project Final Recommendations Feb 2005

The rezoning of the Site contravenes the recommended planning principles and there are other "Feasible" alternative sites available.

The report titled Northern Rivers Farmland Protection Project Final Recommendations February 2005 (NRFPP) identifies agricultural land as a finite resource and seeks to protect it from development pressures and areas with the most potential are not lost to urban use.

Policy mapping was undertaken to establish three (3) farmland categories: state significant, regionally significant, and significant non-contiguous. The distinction between state and regionally significant farmland was established to recognise the diversity within the regions 'important' farmland. "State Significant" farmland is the identification of farmland of very high quality and unique agricultural soils/lands whereas "Regionally Significant" are also important to agriculture but are more extensive and less productive generally.

Of particular significance and relevance to this submission is that 771 Cudgen Road, Cudgen (the Site) was identified and mapped as "State Significant Farmland";

Section 4 of the NRFPP sets out recommended objectives to guide decision making on development in farmland areas. One of those objectives is to recognise and conserve the best agricultural land in the region for current and future rural use.

Section 4 of the NRFPP also recommends planning principals to implement farmland protection objectives (the Planning Principals). Those Planning Principals include that:

1. "State Significant" farmland should not be considered for urban (including housing, retailing and other uses normally located in towns) or rural residential rezoning; and
2. Public infrastructure is permitted on land mapped as state or regionally significant **only where no feasible alternative is available**. Council or state agencies proposing public infrastructure on such land should select alternative sites where possible.

The definition of "Feasible" in the Collins English Dictionary is something that can be done or put into effect, made, or achieved; possible.

I submit to the Planning Minister and Department of Planning and Environment that there are other feasible site alternatives to the "State Significant Farmland" proposed. For example, the NSW Government Tweed Valley Hospital Development Site Selection Report July 2018 (the Site Selection Report) identified and shortlisted three (3) such sites:

1. Chinderah Site (F2-1);
2. Kings Forest Site; and
3. Tweed Coast Road Site (G4-1)

Notably the Site Selection Report acknowledges the Kings Forest Site has landowner and significant community support; the potential capital cost is similar; however there are some State and Commonwealth approvals that may impact the current delivery timeframe for the hospital.

Section 5.2.4 of the Environmental Impact Statement New Tweed Valley Hospital (Concept Proposal and Stage 1 Works) (the EIS) states that the shortlisted alternatives sites were discounted as not feasible for differing reasons; including but not necessarily limited to:

a) the risk of the hospital being delayed through complex multi-level approvals; or
b) becoming an isolated development for an extended period due to approvals and/or the uncertainty of the housing market; or
c) the additional costs involved would significantly impact on the budget available to build clinical space and the resulting impact on clinical services would be unacceptable.

I submit to the Planning Minister and Department of Planning and Environment that none of the reasons given for discounting the shortlisted alternative sites are valid reasons. All the shortlisted alternative sites are feasible, ie can be done or put into effect, made, or achieved, are possible; and the proposed Site is simply NSW Health Infrastructures preferred site:

a) It is incongruous for NSW Health Infrastructure to suggest that the requirement to comply and follow the NSW governments own proper process makes a site infeasible and is not a valid reason. The statement that "the risk of the hospital being delayed through complex multi-level approvals" would prima facie be a reference to the Kings Forest site and the assessment of ecological considerations. The assessment suggests that increase in traffic volumes when compared to the approved residential subdivision <u>may (it has not been determined)</u> present a *Serious and Irreversible Impact* under the NSW Biodiversity Conservation Act.

   The Kings Forest site already has zoning approval. There are 24,000 new koala trees planned to be planted in the area and substantial funds committed to local koala conservation by the owner of the site to ensure the koala population is maintained.

If the Minister of Planning forms the opinion that an additional review of the Koala Plan of Management, or other ecological considerations, are required in the circumstances the time to carry proper process would be minimal and never a justification declaring the site infeasible.

Further, Health Infrastructure admit in their Site Selection Report that it has not been determined whether or not increase in traffic volumes will present a *Serious and Irreversible Impact* under the NSW Biodiversity Conservation Act. Health Infrastructure have not done a proper ecological impact analysis and therefore cannot assert that the site is not feasible because of the alleged additional time needed to obtain approvals for something that may not even be required.

Further, the Koala Plan of Management for the Kings Forest site has already been published. NSW Biodiversity Conservation Act sets out that if the Minister for Planning is of the opinion that proposed State significant development or State significant infrastructure that is the subject of an application to which this Division applies is likely to have serious and irreversible impacts on biodiversity values, the Minister:

(a) is required to take those impacts into consideration, and

(b) is required to determine whether there are any additional and appropriate measures that will minimise those impacts if consent or approval is to be granted.

If the Minister of Planning forms the opinion that an additional review of the Koala Plan of Management or other ecological considerations are required, the time to carry the supplementary review would be minimal in the circumstances and should never be a justification for declaring the site infeasible.

b) The “isolated development” comment in Section 5.2.4 of the EIS would prima facie be a reference to the Kings Forest site. A short period of isolation (if any at all) whilst a residential development evolves around a hospital site is not a valid reason to suggest a Site is not feasible. In fact, this situation is likely to result in a more considered and balanced precinct and therefore provides weight to the argument that the site is feasible

c) Only one (the Chinderah site) of the three (3) shortlisted sites identified in the Site Selection Report have been assessed to be a more expensive proposition than the currently proposed Site; the other two (2) sites (the Kings Forest site and the Tweed Coast Road site) were assessed as “affordable and broadly similar [in capital cost] to the proposed Site”. Additional capital cost is therefore not a valid reason to suggest that either the Kings Forest site or the Tweed Coast Road site not feasible. All three (3) sites are possible and therefore feasible. It is worth noting that the assessment criteria used in the Site Selection Report appears to have placed a nil value or weighting on the retention and protection of State Significant Farmland.

In conclusion, I again submit to the Planning Minister and Department of Planning and Environment that public infrastructure is not and should not be permitted on the Site as there are feasible site alternatives available. In order to comply with the Planning Principals, the state agency proposing the public infrastructure, in this case Health Infrastructure, should and is required to select an alternative site in these circumstances.

Len Hall
Kingscliff Resident

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation:

Agreed to false or misleading information statements: yes

Name: Leonard Hall
Email: [redacted]

Address:
[redacted]

Kingscliff, NSW
2487

Content:
Refer to attached PDF Submission

IP Address: - [redacted]
Submission: Online Submission from Leonard Hall (comments)
https://majorprojects.accelo.com/?action=view_activity&id=300470

Submission for Job: #9659
https://majorprojects.accelo.com/?action=view_job&id=9659

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

13 December 2018

Submission in response to the Proposed State Environmental Planning Policy (SEPP) amending the Tweed Local Environmental Plan 2014

The primary purpose of public exhibition of the proposed SEPP is to allow the public the opportunity to provide feedback such that the Planning Minister and Department of Planning and Environment may better understand and appraise the application informed and with due regard to the concerns of the affected community.
It is important that community concerns together with current regional and local town planning (that have already been established after genuine consultation between all levels of government and the community over a number of years) are given proper consideration and weighting and not ignored in what is clearly an imprudent rush to have the new Tweed Valley Hospital pushed through on this particular site.
The land proposed for development as the new Tweed Valley Hospital (771 Cudgen Road, Cudgen) (the Site) is primarily zoned RU1 Primary Production. Hospitals are a prohibited use in RU1 zone under the Tweed Local Environmental Plan (LEP) 2014. The proposed SEPP seeks to amend the Tweed Local Environmental Plan (LEP) 2014 by rezoning the land from RU1 Primary Production to SP2 Infrastructure so as to permit the Department of Planning and Environment to consider the SSD application for a hospital on the Site.

Section 117(2) of the Environmental Planning and Assessment Act 1979

Local Planning Direction No. 5.3 "Farmland of State and Regional Significance on the NSW Far North Coast" applies when a relevant planning authority prepares a planning proposal for land mapped as state significant farmland. 771 Cudgen Road, Cudgen is mapped as "State Significant Farmland".
The objectives of Local Planning Direction No. 5.3 are:
a) to ensure the best agricultural land will be available for current and future generations to grow food and fibre, b) to provide more certainty on the status of the best agricultural land, thereby assisting councils with their local strategic settlement planning, and c) to reduce land use conflict between agricultural use and non-agricultural use of farmland as caused by urban encroachment into farming areas.
The Direction states that a planning authority must not rezone land identified as "State Significant Farmland" for urban or residential use.
The Direction goes on to set out that a planning proposal may be inconsistent with the terms of this direction only if council can satisfy the Secretary of the Department of Planning and Environment (or an officer of the Department nominated by the secretary) that the planning proposal is consistent with:
(A) The North Coast Regional Plan 2036, or (B) Section 4 of the report titled Northern Rivers Farmland Protection Project – Final Recommendations, February 2005, held by the department of Planning and Environment.

I submit to the Planning Minister and Department of Planning and Environment that the proposed SEPP rezoning amendment should be refused for the following reasons:

(A) The rezoning of the Site is inconsistent with the stated objectives of Local Planning Direction No. 5.3; and

(B) North Coast Regional Plan 2036 published by the NSW Government Department of Planning and Environment and endorsed by Minister Anthony Roberts

The rezoning of the Site contravenes the intent and objective of Direction 11 "Protect and enhance productive agriculture lands" in that:
(i) the North Coast Regional Plan reflects the community and stakeholder aspirations to protect productive farmland from rezoning. The most important farmland was identified and mapped to support long term agricultural production. 771 Cudgen Road, Cudgen (the Site) was identified and mapped as "State Significant Farmland";
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(iii) The Site adjoins or is within 300m of other agricultural activities and is likely to cause conflict and/or impact on those activities. Appendix J of the New Tweed Valley Hospital EIS identifies areas of land use conflict, however the investigations carried out and recommendations made do not demonstrate a proper understanding of the local environment, or that any real due diligence had been carried out, especially with regard to the red soil dust (and soil/chemical residues) which are a problem in the area and permeate every building on the Cudgen Plateau. A hospital is an important and critical health care facility and it would be negligent of the Planning Minister to consent to the SEPP in circumstances where a proper dust, chemical and associated health risk assessment has not been carried out.

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1. "State Significant" farmland should not be considered for urban (including housing, retailing and other uses normally located in towns) or rural residential rezoning; and
2. Public infrastructure is permitted on land mapped as state or regionally significant only **where no feasible alternative is available**. Council or state agencies proposing public infrastructure on such land should select alternative sites where possible.
The definition of "Feasible" in the Collins English Dictionary is something that can be done or put into effect, made, or achieved; possible.
I submit to the Planning Minister and Department of Planning and Environment that there are other feasible site alternatives to the "State Significant Farmland" proposed. For example, the NSW Government Tweed Valley Hospital Development Site Selection Report July 2018 (the Site Selection Report) identified and shortlisted three (3) such sites:
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2. Kings Forest Site; and
3. Tweed Coast Road Site (G4-1)
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a) the risk of the hospital being delayed through complex multi-level approvals; or
b) becoming an isolated development for an extended period due to approvals and/or the uncertainty of the housing market; or
c) the additional costs involved would significantly impact on the budget available to build clinical space and the resulting impact on clinical services would be unacceptable.
I submit to the Planning Minister and Department of Planning and Environment that none of the reasons given for discounting the shortlisted alternative sites are valid reasons. All the shortlisted alternative sites are feasible, ie can be done or put into effect, made, or achieved, are possible; and the proposed Site is simply NSW Health Infrastructures preferred site:
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The Kings Forest site already has zoning approval. There are 24,000 new koala trees planned to be planted in the area and substantial funds committed to local koala conservation by the owner of the site to ensure the koala population is maintained.

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(a) is required to take those impacts into consideration, and
(b) is required to determine whether there are any additional and appropriate measures that will minimise those impacts if consent or approval is to be granted.

If the Minister of Planning forms the opinion that an additional review of the Koala Plan of Management or other ecological considerations are required, the time to carry the supplementary review would be minimal in the circumstances and should never be a justification for declaring the site infeasible.

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In conclusion, I again submit to the Planning Minister and Department of Planning and Environment that public infrastructure is not and should not be permitted on the Site as there are feasible site alternatives available. In order to comply with the Planning Principals, the state agency proposing the public infrastructure, in this case Health Infrastructure, should and is required to select an alternative site in these circumstances.

Len Hall
Kingscliff Resident

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:
The chosen hospital location on Cudgen Road, opposite the TAFE is a beautiful location for the new Tweed area hospital. The site, on the edge of the town means that traffic to and from the hospital will not be going through the town area. Access for emergency vehicles will be straight forward.
Located in the a more central region of the Tweed area, it is more accessible to the population living in the developments south of Tweed, yet within a reasonable distance from the Tweed Heads population.
The view from the chosen location would provide a calming and peaceful environment for the patients, hence helping with the patients' healing process.
The views and state of the art proposed hospital would also provide a positive environment for the workers at the hospital and as such attract quality medical staff to work here.
The site is large enough to effectively accommodate the proposed hospital, parking and other associated facilities.
Going ahead with development on this site means Kingscliff and area will have a much needed new hospital much sooner.
The current site was chosen by an impartial selection process and that process should be adhered to.

IP Address: [redacted]
Submission: Online Submission from [redacted] (support)
https://majorprojects.accelo.com/?action=view_activity&id=300523

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:
The hospital for the Tweed area should not be relocated to Cudgen but rather the existing hospital should be renovated as per the original and approved of several years ago which would have been completed by now if work had commenced.

The Cudgen site should stay as designed State Significant Farm to ensure food security and in keeping with the existing shire plans.

It is not morally right that the government can change this.

How can work commence on the site when not all necessary approvals are not in place that would apply to all other developments?

IP Address: [redacted]
Submission: Online Submission from [redacted] (object)
https://majorprojects.accelo.com/?action=view_activity&id=300537

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 771 Cudgen Road, Cudgen, protected State Significant Farmland, as the selected site for the new Tweed Valley Hospital for the following reasons.

1. No accommodation within 1 km or walking distance of selected site.
Often, short-term accommodation is required before or after a hospital stay, or for patients' family and friends. The current Tweed Hospital has at least nine motels within walking distance, with many offering disability rooms/ suites available. As per a Government website, accommodation within a short walking distance from hospital is often needed. Listed below are nine motels within walking distance of the current hospital.
1. Cooks Endeavour Motor Inn. 389 meters from current hospital. Rates from $129-$140
2. Tweed Heads Vegas Motel: 418 meters from current hospital. Rates from $140
3. Blue Pelican Motel: 421 meters from current hospital. Rates from $115 - $180
4. Comfort Inn Tweed Heads: 432 meters from current hospital. Rates from $130
5. Tweed Central Motel: 475 meters from current hospital. Rates from $79 - $150
6. Tweed Harbour Motor Inn: 484 meters from current hospital. Rates from $104 - $200
7. Tweed Ultima Apartments: 840 meters from current hospital. Rates from $175 - $450
8. Bombora Resort: 879 meters from current hospital. Rates from $85 - $450
9. Mantra Twin Towns: 973 meters from current hospital. Rates from $159 - $299

There are no motels within walking distance of the selected site of Cudgen. The nearest accomodation are in the beachside community of Kingscliff with substantially higher prices and often completely booked out during weekends and holiday seasons. You will force people to commute to/from the Tweed area, adding more congestion to the busy roads.

2. Forcing the elderly of the Tweed Heads, Banora Point, Terranora, Cobaki-Piggabeen areas to negotiate the 100-110 km/per hour, six lane M1 highway, then negotiate a winding country road along farmland on the edge of a small surfing/ holiday location, to attend hospital. Many people, including the elderly and disabled, have moved to the Tweed Heads area to be close to the current Tweed Heads hospital. Moving the hospital to the proposed site on State Significant Farmland will force the frail/ elderly folks to either drive on this highway or give up their independence and rely on other means to get to the hospital.

Also, thousands of people are able to drive their mobility scooters or walk with mobility aids to the current hospital. They will no longer be able to do this if the hospital is moved from Tweed Heads to Cudgen. As a nurse, having worked in Home Support for many years, we are always encouraging these vulnerable people to retain as much independence as possible, for as long as they can. Please

do not take this from them.

Should there be an accident or flooding on the M1 between Barneys Point and the Kingscliff M1 exit, all these people will then be forced to drive 35 km and approximately 40 minutes via Tumbulgum to the hospital.

Also, it appears the traffic survey was completed in May which is not a busy period for the holiday/ tourist area of Kingscliff. This area swells during the summer months and holidays.

3. Removing protected State Significant Farmland.
The rich red soil on Cudgen Plateau produces an abundance of Australian grown produce on drought-free State Significant Farmland, where other areas suffer during droughts, Cudgen does not.

4. Proposed nine stories height of new hospital.
The current height of building in this area is restricted to three stories and you are proposing to build a nine story building envelope, causing many people to lose their current views.

5. Parking fees.
You are forcing the frail/elderly/sick to pay for parking fees, as there is no free parking within walking distance of the farmsite. This is an extra expense for people.

6. Wildlife.
The newly placed fencing around the proposed hospital site does not allow the wildlife to freely flow across the land as they have always done. The week after the fence was placed in front of the trees lining the site, an animal was killed on the road. Unfortunately, the animal was unidentifiable the next morning, due to the amount of vehicles running over the remains. Also, the proposed rock blasting for ten months will cause disruption to the wildlife of the area.

7. Safety.
There is a huge new police station within a few hundred meters of the current site of the Tweed Heads Hospital and a small older often unmanned police station in Kingscliff. Having worked at a large hospital I am fully aware of the need for policing close by.

8. Cycling.
With the current Tweed Heads Hospital, staff are able to commute to their work via bicycle. Should the hospital be moved away for the area, it will force these people to find other ways to get to get to their work. Most hospital employees will not be able to commute to Cudgen on a bicycle.

My family moved to this beautiful beachside village feel in the 1990's to escape the rat race of the big city.

I am fully supportive of the need for a new/updated hospital in the Tweed region, however I am OPPOSED for the hospital to be built on State Significant Farmland. I support the original plan of rebuilding the current Tweed Hospital in its current location, in Tweed Heads.

IP Address: - [redacted]
Submission: Online Submission from [redacted] (object)
https://majorprojects.accelo.com/?action=view_activity&id=300552

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:

Agreed to false or misleading information statements: yes

Name: [redacted]
Email: [redacted]

Address:
[redacted]

Content:
I strongly object to 771 Cudgen Road, Cudgen, protected State Significant Farmland, as the selected site for the new Tweed Valley Hospital for the following reasons.

1. No accommodation within 1 km or walking distance of selected site.
Often, short-term accommodation is required before or after a hospital stay, or for patients' family and friends. The current Tweed Hospital has at least nine motels within walking distance, with many offering disability rooms/ suites available. As per a Government website, accommodation within a short walking distance from hospital is often needed. Listed below are nine motels within walking distance of the current hospital.
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5. Tweed Central Motel: 475 meters from current hospital. Rates from $79 - $150
6. Tweed Harbour Motor Inn: 484 meters from current hospital. Rates from $104 - $200
7. Tweed Ultima Apartments: 840 meters from current hospital. Rates from $175 - $450
8. Bombora Resort: 879 meters from current hospital. Rates from $85 - $450
9. Mantra Twin Towns: 973 meters from current hospital. Rates from $159 - $299

There are no motels within walking distance of the selected site of Cudgen. The nearest accomodation are in the beachside community of Kingscliff with substantially higher prices and often completely booked out during weekends and holiday seasons. You will force people to commute to/from the Tweed area, adding more congestion to the busy roads.

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Also, thousands of people are able to drive their mobility scooters or walk with mobility aids to the current hospital. They will no longer be able to do this if the hospital is moved from Tweed Heads to Cudgen. As a nurse, having worked in Home Support for many years, we are always encouraging these vulnerable people to retain as much independence as possible, for as long as they can. Please do not take this from them.

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IP Address: - [redacted]
Submission: Online Submission from [redacted] (comments)
https://majorprojects.accelo.com/?action=view_activity&id=300557

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: DENNIS FREEMAN
Organisation: [redacted]
Email: [redacted]

Address:
[redacted]

tWEED HEADS, NSW
2485

Content:
I was born, as a third generation, on the Tweed in1931. Over the last 43 years I have lived, worked, 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 its many elderly residents who have chosen to purchase their last independent -living residences there.
3. State Significant Farmland should be solely used to produce a regular supply of farm products for consumption for present and future generations.
4. This proposal will destroy the current way of life of the Kingscliff and Cudgen coastal Villages and their tourism focus.
5. The new hospital will be well above the coastal villages 3 storey height limit destroying the community's hard- fought campaign for that control.
6. In the City Hub of Tweed Heads the height limit is significantly closer to the required number of storeys for a new Regional hospital.
7. This proposal will isolate 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.

Objection to EIS - Application Number 9575 New Tweed Valley Hospital

My Submission Dennis Arthur Freeman

IP Address: [redacted]
Submission: Online Submission from DENNIS FREEMAN of INDIVIDUAL (object)
https://majorprojects.accelo.com/?action=view_activity&id=300578

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: Helen Wilson
Email: helenwilson@westnet.com.au

Address:
2 Seaside Drive

Kingscliff, NSW
2487

Content:
I am strongly objecting to the SSD application (SSD 18_9575) and/or the proposed SEPP amendment.

I moved to this area 14 years ago as my brother moved to a sweet potato farm here on the Cudgen plateau. I came here on holidays and fell in love with it. It was exactly the red volcanic rich soils so close to beautiful beaches that was the attraction. Offering a healthy, back to nature lifestyle, with easy access to fresh produce while living in a small communal village. What more could I want? It is the very perfect and highly unusual scenario envied by many. Go anywhere and anybody who knows Kingscliff will say how lucky I am to live here. That it has beautiful farmland and a relaxed village feel. And don't I know it. I now feel very sad and threatened that the very thing that is the essence of Kingscliff is being taken away if the Hospital is put in in the proposed location.

We really need to protect this national asset. How can rules of protection be put in place only to ignored. How can a Hospital go ahead in a terribly wrong location against the wishes of so many in the community. How can one group just totally stuff the future environment of what Kingscliff will become because of their own agendas? Has it really been thought through to the negative impact it will have? We need to stay true to why Kingscliff appeals to so many and build on what is so rare and special and take advantage of that and not destroy it. Please.
Which brings me to my next point. Tourism.

I love this place so much I have started my own business being a local tour guide, "Private Tours of Tweed". Yep. I like to show people our beautiful volcanic rich soils. I drove an American couple through the Cudgen plateau a few months back and they requested me to stop for them to take a photo of nothing else but the rich volcanic red soil so they could send it back to their father to show him how amazing it is. America has millions of acres of farmland, but they could see how special this was. Please don't start the chipping away at what little rich soil we have left, we have to protect it.

Can you not see the trend that is happening, people are wanting a `farm to plate' concept. People want to relate to food grown and sourced locally. People are appreciating that it is special to buy straight from farmers markets. We don't want to give up our precious farmland and have to have to import four food from overseas. We want to know where it comes from, and not have all the plastic packaging. And that is how we can appeal to people on tourism level. We need to claim our identity of being "Farmland and Sea" and build on what we have. We need to be showcasing it. Not covering it in concrete.

Please I think it is great to have a hospital nearby, but surely, surely there is a better location.

I am not understanding why it could not be included in the development at Kings Forest, where they say they already have hospital approval. I just think there has to be somewhere that will work. Cudgen farmland, right in Kingscliff where we will struggle with traffic and lose our relaxed lifestyle to have a multi-level building taking away our food producing country is not the answer.
Please have a conscience for our future. Please listen to your community and don't bully us. I truely believe people aren't grasping the negative impact this will have and it truely saddens me.
This is a real turning point and it would be devastating to have everything that we are about taken away from us by a small group with the money muscle instead of letting it continue to grow even more so into its uniqueness. Please find another site.

IP Address: 106-69-192-122.dyn.iinet.net.au - 106.69.192.122
Submission: Online Submission from Helen Wilson (object)
https://majorprojects.accelo.com/?action=view_activity&id=300587

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:

Agreed to false or misleading information statements: yes

Name: Helen Wilson
Email: helenwilson@westnet.com.au

Address:
2 Seaside Drive

Kingscliff, NSW
2487

Content:
I am strongly objecting to The proposed State Environmental Planning Policy for the Tweed Valley hospital to be built on the site in Kingscliff beside the TAFE. I am pleading to have the hospital in another location that will not ignore years of community consultation and planning (around Kingscliff as a tourist destination) We do not want this in this location and I feel it will set a precedent for the eventual demise of the Cudgen plateau agricultural sector. This land and is currently zoned RU1 and is State Significant Farmland It needs to be protected as a national asset, a valuable industry for the Tweed Shire and as food security for future generations. I am a local tour guide, â€oePrivate Tours of Tweedâ€ and I want my industry protected as the â€˜rich volcanic soils beside the seaâ€™ is one of the main assets I can showcase to my tourists.

If the Hospital goes ahead where planned It is likely to trigger future supplementary rezonings adjacent to the Hospital in accordance with the Minister for Planning & Environmentâ€™s announcement of plans for an extended â€oeRegional Health Services Precinctâ€ adjoining the Hospital site. This is undermining the remaining prime agricultural landâ€™s that is already at-risk. The viability threshold of 500ha. only needs losses of another 30ha to lose its special protection altogether.
It will also facilitate automatic rezoning of adjoining land to support facilities associated with the Tweed Regional Hospital and this will lead to the total destruction of the relaxed seaside village with the â€˜Food to Plate conceptâ€™ which so many of our restaurants and tourist businesses are trying to claim and sell to the world. We are unique please protect what us locals are trying to embrace and grow.
Current height limit restrictions in the Tweed LEP which were established through extensive community consultation are being ignored and this will open the door for many ancillary health services, associated commerce and residential demand to do the same. Opening the flood gates in a nut shell.
Please do not allow this proposal to go ahead. It is wrong on so many levels. Find another site.

IP Address: - 106.69.192.122
Submission: Online Submission from Helen Wilson (comments)
https://majorprojects.accelo.com/?action=view_activity&id=300603

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]
Organisation: [redacted]
Email: [redacted]

Address:
[redacted]

[redacted]
[redacted]

Content:
i wish to lodge my strongest objection to the proposed EIS.
This EIS seeks to overturn numerous government long term strategic plans with very little community consultation and even breaching the Dept of planning's own policies.
There is so many problems this EIS raises & to list a few:
Loss of state signficant farm land, road upgrades that will be required & then paid for by the local community, negative impacts on surrounding towns who have not been advised of the full impacts.
Lack of accessibility for the elderly who live in Tweed Heads. I could go on and on but I will let others provide more detail.
I urge the DP&E no refuse both the SEPP and the EIS for the community.

IP Address: [redacted]
Submission: Online Submission from [redacted] object)
https://majorprojects.accelo.com/?action=view_activity&id=300591

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]
Organisation: [redacted]
Email: [redacted]

Address:
[redacted]

[redacted]

Content:
I strongly object to the re-zoning of State Significant Farmland, when there are other more suitable sites to locate a new Hospital.
See the attached file which lists my concerns.

IP Address: - [redacted]
Submission: Online Submission from [redacted] (comments)
https://majorprojects.accelo.com/?action=view_activity&id=300576

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 live in a retirement village in Kingscliff and I am writing to voice my objection to the proposed rezoning of the Lot 771 Cudgen Road, which is currently zoned State Significant Farmland.

I am astounded that the NSW State Government would even consider re-zoning State Significant Farmland (SFF), given we are still in a state of drought. That farm contains fertile red volcanic soil and it has been classified SSF for a reason. It should be saved from being concreted. There is more than enough land in the Tweed District that is far more suitable for a hospital and I am aware that there were originally plans to leave the Tweed Hospital in its current position. This would be a better decision, given many of my elderly friends live over near the Tweed Hospital and are very concerned how they are going to be able to get to Kingscliff if they need.

There has been no discussions involving the community about choosing this valuable farm for a hospital until after it was announced and this arrogant action has caused a great deal of anger in the Cudgen/Kingscliff and Tweed communities. This is perfectly understandable!

As a retired nurse I am very well aware the negative impact that this mega hospital will have on my village of Kingscliff. The roads in places are narrow and windy & I envisage traffic chaos and parking problems.

I respectfully request that the SEPP application be refused as I am very much opposed to the rezoning of this beautiful farm and as a life long National Party voter, I will no longer be voting for the LNP.

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Agreed to false or misleading information statements: yes

Name: Trevor McCosker
Email: trevormccosker5@bigpond.com

Address:
6

Casuarina, NSW
2487

Content:
My question is
Why the Cudgen Plateau ?
Why not Remain at the existing Tweed Heads site?
Why not Kings Forrest?
Regardless of what I read or hear at meetings, the actual reasons and motivations behind the site choice remains unclear.
My questions are not answered with universal convictions.
A modern hospital is an integral part of any community - undeniable!!!
Broadly supported !!!!
Accessible to all , with direct approaches of road and transport for all.
Does Kingscliff Beach really fit these requirements???
For that is what this coastal hamlet is - Kingscliff Beach.
In a "Land girt by sea" , beach culture is part of our natural heritage . It is a culture enshrined in Australian literature, art, films , sports and events. It is documented into our history.
Australian loves the beach.
This town has been ravaged by natural phenomenon, sandmining and financial exploitations but always retained it' s
unique appeal.
People comment on it all the time. Visitors from all over the country and globe. People who shun the glittering attractions of ultra commercialism.
This quality must surely be our (we who live here and have chosen to come and live here) legacy for future generations.
A major development such as this dramatically imposing structure will createi demands that will bring the existing Kingscliff to an abrupt end.
The soul would depart from the life that is now Kingscliff
I object to the development of the hospital on the Cudgen Plateau

IP Address: cpe-58-168-1-212.nb06.nsw.asp.telstra.net - 58.168.1.212
Submission: Online Submission from Trevor McCosker (object)
https://majorprojects.accelo.com/?action=view_activity&id=300593

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:
We need a new hospital but not on farm land. There are many other sites that would be much better then this site. Everyone is so worried about flooding. If it is flooding no one in the outer villages can't get to a hospital anyway so I'm not to sure why this is a major deal.

IP Address: [redacted]
Submission: Online Submission from [redacted] (object)
https://majorprojects.accelo.com/?action=view_activity&id=300595

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]

Content:
As a former Kingscliff resident with family ties to this area, I object in the strongest terms to the absurd choice of prime, drought free farmland at Kingscliff as the site of the new Tweed Valley Hospital. Or perhaps I should write Tweed/Byron hospital, as it seems a name change has occurred during the submissions process. Has this happened because it is easier to justify a hospital being 15 kms south of Tweed Heads where the majority of the elderly population live by saying it is going to serve Byron residents too?
By choosing this site the Health department has ignored years of prior planning by the local council that Tweed Heads is to be the regional city. It is already zoned for mulli storeys, so a nine storey tower block with associated buildings and multi level carparks will fit very easily into the Tweed Shire Council site, which has already been offered by the Mayor.
All of the necessary infrastructure is already in place, so Minister Roberts can fire the consultant he has already appointed to encourage medicos to relocate to Kingscliff. Public transport is adequate and it is flat ground suitable for the elderly mobility scooters which now are used in very high numbers in the area.
If a letter box survey form were to be dropped in every Tweed Shire residents box, with a return paid envelope to ensure a better response rate, the OVERWHEMING MAJORITY of people would vote to expand Tweed Heads hospital on its current site, and also to upgrade and improve Murwillumbah Hospital at the same time.
Experts have said that building on a brownfield site costs 20% more than a greenfield site. Perhaps so, but when costs of blasting and piling works are added on to the build cost at Kingscliff, because there is BASALT underneath the entire surface there, the costs would be about the same.By the way, a separate EIS is necessary because the blasting required is wihin one kilometre of homes, so you'd better get your experts working on that one too!!!
This whole site selection process has been a PR disaster from the start, as telling blatant lies and obfuscating the facts is never a good way to get the people who live here on board. They are disgusted with our politicians and will let them know this at the next election.
The fact that the original firm of Sydney consultants, Charter, Keck and Cramer, have refused to endorse this choice of site is surely ringing alarm bells somewhere. They must have noted the unsuitability in their report, so having Peter Lawless finish their report demonstrates just how inefficient and plain dishonest this whole process has been.
Any first year graduate traffic engineer could forecast the dire consequences for Cudgen Road once another set of lights is added, just 200 metres from the intersection with lights and the same distance from the small Turnock Road roundabout. Absolute gridlock, which will be fun for the emergency vehicles trying to get to the hospital as quickly as they can. Put a tractor or two in the mix and we have a disaster!
There are no positives for this choice of site, only negatives. The southern side of the hospital facing

Cudgen Road will be subject to spray drift from the farm across the road, as there is no 300 metre buffer zone left there, so all opening windows, balconies and air conditioners will have to be placed on the northern side. These will make for great healing views.with whirring air conditioners an all the balconies!!
The thriving tourism industry in Kingsliff will be wiped out, along with all the endangered species on the northern boundary. Nine storey tower blocks coming in to Kingsliff will certainly set the scene for a relaxing holiday ahead!!! NOT!!
It is time that the people responsible for this flawed decision make themselves known, instead of hiding behind secrecy and privacy walls. We know Minister Brad Hazzard and Mr Geoff provest are backing this site 100%. The community would like to know why!
[redacted]

IP Address: [redacted]
Submission: Online Submission from [redacted] (object)
https://majorprojects.accelo.com/?action=view_activity&id=300599

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:
Although I now live in Brisbane, Kingscliff is my home town and most of my family still lives there. It is an area of great natural beauty with a 3 storey height limit which enhances the ambience ot the town.
For the NSW Government to even consider wiping out the peaceful lifestyle of this village, plus Cudgen, plus the livelihoods of the surounding farmers businesses absolutely beggars belief.
The lack of provision for adequate car parking is nionsensical. 700 paid car parks will never be enough, and the entire town of Kingscliff and Cudgen will become gridlocked with traffic congestion. The three close amenities of the swimming pool, library and TAFE will have their carparks permanently taken over by hospital parking, thus rendering them unavailable to every resident except by walking. This situation is totally unacceptable, and unless many hundreds more free carparks are available on the site these three facilities will become useless.
Kingscliff is a small town with not much crime, luckliy because our small police station is mostly closed. The huge new police station was built just last year in Tweed Heads, very convenienly close to the current hospital. What will happen when the nurses need urgent assistance and the closest police are 15 minutes drive away? No police are available in Kingscliff at night to manage the many drunk or violent patients who attend the emergency department.
Just these two issues alone make the choice of site at Kingscliff totally illogical and unfeasible.
The Health Dept needs to go back to the drawing board and start the whole process again, this time with proper community consultation, and automatically excluding precious state significant farmland from the selection process.
The lies told by the consultants about community consultation undertaken shoud be taken to ICAC, and hopefully someone will do so soon.There was NO CONSULTATION AT ALL until residents reacted with outrage to the prosed site.

IP Address: - [redacted]
Submission: Online Submission from [redacted] (comments)
https://majorprojects.accelo.com/?action=view_activity&id=300567

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: Cassandra Evans
Organisation: The Local Espresso (Owner)
Email: cassandra@a1marketingservices.com.au

Address:
718 Casuarina Way

Casuarina, NSW
2487

Content:
I am making an objection to the hospital being located on State Significant Farmland at Cudgen. I have lived in the area for 10 years and believe the current proposed site is wrong and should be either kept at Tweed Heads or moved to Kingsforest where the impact on the community can be better managed and we don't lose any farming land. With a country that has seen devastating drought conditions, it is a poor decision to build over prime agricultural land this can never be undone and will have a significant impact in the immediate future as well as a long-term negative impact on our children. We should not be making a decision based on what is currently being grown, rather what we could potentially grow. See attached additional information on why I am objecting.

IP Address: 255.194.190.203.sta.dodo.net.au - 203.190.194.255
Submission: Online Submission from Cassandra Evans of The Local Espresso (object)
https://majorprojects.accelo.com/?action=view_activity&id=300638

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

Response to EIS

I am a long term resident of Kingscliff and soon to be business owner in Kingscliff and I object to this EIS because:

- Up until March 2017, the North Coast Reginal Plan (NCRP) and NSW Health future plans were focused on the rejuvenation and expansion of the hospital precinct at the existing Tweed Heads site. As a result of this many people over the age of 60 have moved to Tweed Heads and Banora Point to be closer to the hospital. By relocating the hospital to Kingscliff these people will no longer be able to easily access the hospital.
- There are over 8000 residents over the age of 65 in Tweed Heads/Banora Point many of whom have purchased homes to be close to ageing health services, and may have limited transport options.
- The Regional Health Precinct supported all our-of-hospital services be clustered around a new much enlarged hospital, acting as the main economic driver for the city of Tweed Heads.
- High rise high density residential development would take advantage of the hospital and public transport within close proximity. Local Environmental Plans and Development Control Plans were developed by the Tweed Council to support the NCRP.
- Despite these endorsed plans the NSW Government announced a drastic reversal with apart from some out-of-hospital services possibly remaining on the current site all services would relocate to Kingscliff without any community consultation contrary to the claims made in the EIS.
- The removal of health related services, exodus of hundreds of jobs from Tweed Heads will remove the key economic driver. The impact on surrounding retail and other industries is expected to be significant. Community and economic impact studies have not been conducted.
- For Kingscliff and Cudgen, the social, community, economic and environmental impacts of the completed works have not been conducted and declared to the public.
- As a resident of Kingscliff with children growing up in the area, I believe that we are entitled to be given access to the full implications of the long term dramatic changes to our lifestyle before an irreversible commitment is made.
- The current land is zoned as RU1 and has been classified as State Significant Farmland (SSF) for more than 10 years after years of consultation and research. This parcel of unique red soil with exceptional quality and growing properties must be protected as SSF for not just my generation but my son's and many generations to come.
- The EIS has failed to mention lack of community consultation prior to the site selection, the two petitions well over 8000 signatures that were submitted to both the Upper and Lower Houses of NSW Parliament, as well as the 46000 followers of the "Relocate" Facebook page. This demonstrates how strongly the community oppose the current site.
- The location of this hospital will diminish Kingscliff and Cudgen residents' quality of life with intense urbanization, increased traffic congestion, parking demands, 24 hour helipad and emergency vehicles and lighting across the site. Hospital traffic and strict parking limits that come with major hospitals will consume Kingscliff and Cudgen and hinder access to current infrastructure.
- The project team has also falsely asserted that the chosen site was the best when in fact it was the cheapest site not the best site

- The independent choosing of the site is questionable given the ex-liberal members that are landowners living close to the location. Once this site is changed from SSF it won't be long before this case is used as a precedent to change the zoning of the rest of Cudgen
- It will destroy existing business's such as Mate and Matts who are opposite the proposed site. This will force the closure of many farming family business's. In an era of increased food security why would it be the best option to get rid of SSF when there is thousands of acres of non farming land within 50km of this site.
- Compulsory acquisition could have been exercised to select a more appropriate site in the Tweed Valley off SSF.
- A probable maximum flood event of Q10,000 or one in 10,000 years is well over and not in line with other health sites including the Gold Coast University Hospital (GCUH) and Robina which has been set at Q500 or one in 500 year flood event.
- The chosen site needs to be situated so that it can it be transformed into a significant health and knowledge precinct in line with the GCUH without impacting on the Locality Plans endorsed by the Kingscliff and Cudgen communities.
- There are so many reasons to relocate this hospital to one of the other very viable alternatives that are better locations out of the town and most importantly not on SSF.

There is so much land available within 50km of the chosen site it beggars belief that this was the site chosen given it is on SSF and so close to residential properties. The community will be impacted by the size of this structure for generations to come. Our job should be to protect SSF for future generations and for food security not to destroy it when there are numerous other viable alternatives.

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation:

Agreed to false or misleading information statements: yes

Name: Cassandra Evans
Organisation: The Local Espresso (Owner)
Email: cassandra@a1marketingservices.com.au

Address:
718 Casuarina Way

Casuarina, NSW
2487

Content:
I am making an objection to the hospital being located on State Significant Farmland at Cudgen. I have lived in the area for 10 years and believe the current proposed site is wrong and should be either kept at Tweed Heads or moved to Kingsforest where the impact on the community can be better managed and we don't lose any farming land. With a country that has seen devastating drought conditions, it is a poor decision to build over prime agricultural land this can never be undone and will have a significant impact in the immediate future as well as a long-term negative impact on our children. We should not be making a decision based on what is currently being grown, rather what we could potentially grow. See attached additional information on why I am objecting.

IP Address: - 203.190.194.255
Submission: Online Submission from Cassandra Evans of The Local Espresso (comments)
https://majorprojects.accelo.com/?action=view_activity&id=300640

Submission for Job: #9659
https://majorprojects.accelo.com/?action=view_job&id=9659

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

Response to SEPP

I am a long term resident of Kingscliff and soon to be business owner in Kingscliff and I object to this SEPP because:

- The current land is zoned as RU1 and has been classified as State Significant Farmland (SSF) for more than 10 years after years of consultation and research. This parcel of unique red soil with exceptional quality and growing properties must be protected as SSF for not just my generation but my daughters and many generations to come.
- This parcel of SSF is one of only two SSF drought free pockets of land in NSW. Figures from the NSW Department of Primary Industries (DPI) confirm that every part of the state except for our 1% here on the Cudgen Pateau, is in drought and the NSW Government has only recently announced more than $1billion in drought relief measures. This demonstrates how special and valuable this SSF is for food security not just our local area but across the State and Country.
- The Cudgen Plateau supports up to 20 farms, growing primarily sweet potatoes for eastern seaboard city populations with a typical return in the order of 55 – 65 tonnes a hectare, grossing more than $100,000/ha in a good market. These farms provide agriculture based careers and employment for locals who want to work and specialise in this sector which is important for our local economy.
- Kingscliff is part of the Tweed Shire and has for the last number of years been promoted by Destination NSW and Destination Tweed as a natural food bowl encouraging visitors and increasing tourism based on our agricultural offering. By building a hospital in the middle of prime agricultural land you loose the ability to promote Kingscliff in this way as the increased population and density in population will not marry up with how the Tweed Valley is being promoted. This will affect tourism and local business's based on tourism.
- Strategies within the Kingscliff Locality Plan and Development Control Plan promote and support agriculture including new diversifying and 'value add' industries.
- The extended Regional Health Services Precinct Plan puts at risk the remaining farmland for eventual rezoning to support the hospital site which will inevitable put the viability threshold of 500ha and the potential loss of the Plateau's special protection as SSF.
- Myself and family strongly believe that our community supports and wants to retain the 11 metre and 13.6 metre building heights keeping its low key coastal settlement atmosphere, proximity to the beaches, expansive coastal foreshore, agricultural and farming back drop. Current hospital planning contradicts the current height limit restrictions supported through extensive consultation.
- The Kingscliff Locality Plan also supports the town retaining architectural and design guidelines built around coastal character.
- The tourism industry here also brings in over $446 million a year and employs thousands of locals with Kingscliff loved for being a tourist haven with an amazing coastline and fresh produce available from local farmland.
- One of the main reasons we moved to Kingsclliff was because of the proximity of food producing farmland so our children can see where our food comes from as well as appreciating seasonality of produce
- The transfer to Kingscliff of the upgraded Tweed Hospital and associated private health infrastructure and support services will achieve the opposite to the community vision expressed during consultation creating a City of Kingscliff/Cudgen once intended for Tweed Heads.
- This development renders years of community consultation and planning redundant through the massive social and economic footprint of the hospital.
- The whole of the Tweed Shire wants and deserves a new hospital and I believe that it needs to be in a better location to cater for all our needs into the future. Up until March 2017, the State Government

Regional Plan and NSW health future plans were focused on the rejuvenation and expansion of the hospital precinct at the existing Tweed Heads site.

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:
Please see attachments for my reasons to support the hospital at the new location that is flood free.

IP Address: [redacted]
Submission: Online Submission from [redacted] (support)
https://majorprojects.accelo.com/?action=view_activity&id=300642

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

[redacted]

Attention:
Deputy Secretary – Planning Services
Department of Planning & Environment
GPO Box 39, SYDNEY NSW 2001

12th December 2018

Dear Deputy Secretary – Planning Services

Re: SSD 18_9575- Tweed Valley Hospital

I am writing in strong SUPPORT of the proposed State Environmental Policy - Tweed Valley Hospital SSD18_9575. I have NOT made any political donations, reportable or otherwise, I the previous two years. I do not wish for my details to be identified when submissions are made public following close of the public exhibition period.

Proposed Amendments – Rezoning of the Land

- I support wholeheartedly the rezoning of part of 771 Cudgen Road, Cudgen from RU1 Primary Production and R1 General Residential to SP2 (Health Services Facility).

Proposed Amendments – Height of Buildings

- I support wholeheartedly the removal of the Height of Building Controls limiting the maximum height of buildings for that part of 771 Cudgen Road, Cudgen, proposed to be developed as health service facilities.

Proposed Amendments – Minimum Lot Size

- I support wholeheartedly the removal of minimum lot size controls for that part of 771 Cudgen Road, Cudgen proposed to be developed as health service facilities.

Proposed Amendments – Floor Space Ratio

- I support wholeheartedly the removal of the Floor Space ratio Controls for that part of 771 Cudgen road, Cudgen proposed to be developed as a health services facility.

I support the proposed amendments to height of buildings, minimum lot size and floor space ration with the full understanding that these proposed amendments relate only to the site at 771 Cudgen Road, Cudgen for the purpose of a Health Services Facility (Tweed Valley Hospital) and that the final height building controls, minimum lot size controls and floor space ration will be determined on merit during the assessment of any development applications for the site. I support this rezoning with the understanding this is relevant only to the site acquired for the purpose of building the new Tweed Valley Hospital.

I am a local nurse and I have been nursing for 15 years. I cannot wait to have a hospital so close to the majority of the Tweed/Byron population. This is the only site that is large enough, not in a floodplain, above the probably Maximum flood, close to existing services and centrally located for the majority of Tweed residents. With only the loss of one farm, 99.9% of the regions farmland remains and we will get a new, modern hospital in the best location. The relocate fanatics are exaggerating. They ignore facts like MPF flood levels and other 99.9% of farms in the Tweed that can continue as normal. They say that one hospital will mean everything gets rezoned and ends farming forever. KF will take years before the new 1.5 metres of of artificial sand can settle before a building slab can be poured. We need a new hospital now and this is the best location and the best outcome for the Tweed/Byron people.

Yours sincerely

[redacted]

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]

Content:
I wish to object to the Tweed Heads Hospital being built on State Significant Farm Land site in Cudgen.
The current Tweed Hospital should be rebuilt.

IP Address: - [redacted]
Submission: Online Submission from [redacted] (object)
https://majorprojects.accelo.com/?action=view_activity&id=300888

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:
I object to the Tweed Valley Hospital being built on protected State Significant Farmland in Cudgen.
The Tweed Hospital needs to be rebuilt in Tweed Heads.

IP Address: - [redacted]
Submission: Online Submission from [redacted] (comments)
https://majorprojects.accelo.com/?action=view_activity&id=300892

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: PAULINE MCDONALD
Email: pauline.mcd@bigpond.com

Address:
70 Welsby Street,

New Farm, QLD
4005

Content:
I object to the new hospital being built on prime red soil farm land. As a frequent visitor to my local family, I love the semi rural amenity of the area. There are very few places where you can buy fresh farm produce so close to a tourist hub.
The height of the building will spoil the village atmosphere and there will soon follow many high rises to accommodate hospital staff. Surely we have enough of this .
Kingscliff will become just another concrete jungle like the Gold Coast.
I am sure there are other more suitable sites on which to build a hospital.

IP Address: cpe-121-222-137-125.bpw3-r-031.woo.qld.bigpond.net.au - 121.222.137.125
Submission: Online Submission from PAULINE MCDONALD (object)
https://majorprojects.accelo.com/?action=view_activity&id=300652

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:

Agreed to false or misleading information statements: yes

Name: PAULINE MCDONALD
Email: pauline.mcd@bigpond.com

Address:
70 Welsby Street

New Farm, QLD
4005

Content:
I strongly object to the new hospital being build without proper consultation with the locals. I visit family in Kingscliff regularly and am concerned this will change the amenity of the area forever. The infrastructure for a hospital is huge and town planning guidelines that have been put in place for a reason will be just tossed aside. The height of the building being one. Kingscliff is one of few remaining coastal villages that tourists love to visit because of the unique farm land and laid back lifestyle. There are other places where the hospital can be built and I think more thought should go into finding another site.

IP Address: - 121.222.137.125
Submission: Online Submission from PAULINE MCDONALD (comments)
https://majorprojects.accelo.com/?action=view_activity&id=300661

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]
Organisation: [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 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. In addition to this, to build a hospital on prime farmland when a large percentage of the state is in drought & when other sites are available, is absurd! It is also a real concern that if this hospital goes ahead on the proposed site, how this then sets a precedent over other future projects on the cudgen plateau.

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. I see first hand that this is a source of stress and unease for these people who are currently accessing the Hospital at Tweed Heads and have done so for years. It makes much more sense to put the funding towards redeveloping the current Tweed Hospital site that people have chosen to live near so they are in close proximity to hospital services, then move it over the Tweed river which is prone to flooding which then cuts off half the population who use the hospital.

Surely the 8000+ people signing a petition against the proposed hospital site, along with objections from our local shire council is evidence enough that there has been unsatisfactory community consultation on the proposed hospital site.

IP Address: [redacted]
Submission: Online Submission from [redacted] (object)
https://majorprojects.accelo.com/?action=view_activity&id=300659

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]
Organisation: [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 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. In addition to this, to build a hospital on prime farmland when a large percentage of the state is in drought & when other sites are available, is absurd! It is also a real concern that if this hospital goes ahead on the proposed site, how this then sets a precedent over other future projects on the cudgen plateau.

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. I see first hand that this is a source of stress and unease for these people who are currently accessing the Hospital at Tweed Heads and have done so for years. It makes much more sense to put the funding towards redeveloping the current Tweed Hospital site that people have chosen to live near so they are in close proximity to hospital services, then move it over the Tweed river which is prone to flooding which then cuts off half the population who use the hospital.

Surely the 8000+ people signing a petition against the proposed hospital site, along with objections from our local shire council is evidence enough that there has been unsatisfactory community consultation on the proposed hospital site.

IP Address: [redacted]
Submission: Online Submission from [redacted] (object)
https://majorprojects.accelo.com/?action=view_activity&id=300752

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 moved to Kingscliff as a 13-year-old in 2003 with my family. My dad had just quit his big corporate job in Melbourne in search of a better life style and more family time. I attended Kingscliff High school and graduated in 2008. Since graduation I have devoted the majority of the last decade to travelling and working overseas and domestic but Kingscliff has always been my home at heart.

My partner (of seven years) and I have just moved back to Kingscliff to `Start life' buy a home, start a business, raise a family. The proposed hospital location will destroy everything that is great about this area and the reason my family moved here years ago. It is for this lifestyle the we have decided to come back and call Kingscliff home again.

With the proposed hospital location, there will be thousands of staff members wanting to live close to work. Driving the already unattainable house prices up even further, which is a very daunting prospect for a fist home buyer.

There will also be a large number of people requiring regular medical treatment, which are statistically the elderly wanting to live close to the hospital. Which will not help the ageing population and the stigma that is already associated with the Kingscliff area of, `where old people go to die'.

Object to this proposal for these reasons:

 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.
 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 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.

 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.
 There was no community consultation prior to the site choice. This is contrary to claims made in the EIS.
 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.
 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.
 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.
 Funding for the project has not covered the transport and utility infrastructure. This will get pushed onto local councils and other authorities.

IP Address: [redacted]
Submission: Online Submission from [redacted] (object)
https://majorprojects.accelo.com/?action=view_activity&id=300675

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]

Content:
I moved to Kingscliff as a 13-year-old in 2003 with my family. My dad had just quit his big corporate job in Melbourne in search of a better life style and more family time. I attended Kingscliff High school and graduated in 2008. Since graduation I have devoted the majority of the last decade to travelling and working overseas and domestic but Kingscliff has always been my home at heart.

My partner (of seven years) and I have just moved back to Kingscliff to â€˜Start lifeâ€™ buy a home, start a business, raise a family. The proposed hospital location will destroy everything that is great about this area and the reason my family moved here years ago. It is for this lifestyle the we have decided to come back and call Kingscliff home again.

With the proposed hospital location, there will be thousands of staff members wanting to live close to work. Driving the already unattainable house prices up even further, which is a very daunting prospect for a fist home buyer.

There will also be a large number of people requiring regular medical treatment, which are statistically the elderly wanting to live close to the hospital. Which will not help the ageing population and the stigma that is already associated with the Kingscliff area of, â€˜where old people go to dieâ€™.

Object to this proposal for these reasons:

1. The 2017 North Coast Regional Plan protects the land for the proposed Tweed Valley Hospital.
2. The area has been made State Significant Farmland because of its beautiful fertile red soil which is drought free.
3. Kingscliff residents have worked with council to established restricted height limits. This massive Hospital contradicts these height limit restrictions in the Tweed LEP.
4. The Minister for Planning and Environment announced plans for an extended â€oeRegional Health Services Precinctâ€ adjoining the Hospital site, thus undermining the remaining prime agricultural landâ€™s already at-risk viability threshold of 500ha.
5. Leading to automatic rezoning of adjoining land to support facilities associated with Tweed Regional Hospital.
6. 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.

IP Address: - [redacted]
Submission: Online Submission from [redacted] (comments)
https://majorprojects.accelo.com/?action=view_activity&id=300682

Submission for Job: #9659
https://majorprojects.accelo.com/?action=view_job&id=9659

Site: #0
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