

Our Reference: J6397

8 November 2019

The Director Urban Assessments
Department of Planning, Industry & Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Aditi Coomar

**MOD 2 State Significant Development SSD 9575
Lot 11 DP 1246853; No. 771 Cudgen Road, CUDGEN**

We refer to the abovementioned application and advise we act on behalf of IRBS Pty Ltd, being the landowner of 741 Cudgen Road, Cudgen, which immediately adjoins the subject site.

IRBS welcomes the continued advancement of the Tweed Valley Hospital site (TVH site) and commends the diversification of land uses and opportunities to foster a health and knowledge precinct, anchored by the subject site and closely located NSW TAFE site. We encourage NSW Government, and specifically the NSW Department of Planning, Industry and Environment (DPIE) as the primary steward of the planning framework and consent authority for major infrastructure projects to continue to provide strong leadership in the delivery of this asset and planning investigations to ensure the delivery of a best practice innovation precinct.

As DPIE are aware, health and social assistance is a key industry within the Tweed Shire, both currently and projected, placing significant emphasis on the planning and delivery of the TVH site and its connected employment, residential and social precincts. As per the submitted Social and Economic Impact Assessment, economic clustering of health-related activities is of key importance, particularly the delivery of non-government land uses to supplement and support the government-led initiative included within the Stage 2 application. We encourage the significance of the TVH development to be leveraged as the catalyst of residential and employment growth in accordance with the North Coast Regional Plan 2036 and encourage DPIEs Tweed Regional City Action Plan to directly promote the delivery of a best practice innovation district, supercharged by complimentary private investment, focused on the health and education anchors.

In relation to the subject application, we encourage further investigations and assessment in light of the profound role of the TVH within the community and its need to integrate within a wider coastal and rural context. By way of example, we note that the subject proposal:

- should involve stronger public transport integration
- should have additional regard to the holistic traffic and transport considerations, including the Tweed Coast Road/Cudgen Road intersection and the confluence of broader existing growth projections with the seismic shift in travel patterns created through a primary employment and trip generator.
- should include an urban form that steps down to the site's edges and seamlessly integrates into the wider context,
- should include stronger and/or additional east-west pedestrian opportunities that enable the site to function as an 'open' campus rather than a closed site.

Specific to traffic and transport, we encourage DPIE to ensure a strategic-led transport assessment, which considers the broader Kingscliff and Tweed Coast context. In this regard, it is not the role of the proponent to explore the traffic network at-large, however it is of state significance that the intersection of the Tweed Coast Road and Cudgen Road, as well as the efficiencies of Cudgen Road be thoroughly analysed and fit for purpose. This matter is magnified in light of significant state-led approvals being contingent to effective infrastructure, particularly the TVH and Kings Forest urban growth area to the south.

Further, the subject application involves a 10 storey multi-deck car park along its western edge. This infrastructure, whilst needed to deliver an efficient servicing of the site, is vastly out of context of the site in its current form. Whilst screening, green walls and the like can be explored to soften the visual impact along this key entry statement threshold (and are requested should no modification to the form be pursued) we encourage the exploration of more appropriate solutions that consider the wider locale, cross-utilisation and enable suitable integration into the wider fabric.

Finally, we reaffirm previous statements that IRBS and Planit are happy to work with NSW Health Infrastructure and DPIE to ensure masterplanning is holistic to the ecosystem of land uses and supporting provisions needed to deliver an innovation district and embodies a valued sense of place. Consideration of integrating 741 Cudgen Road by way of complimentary private and civic land uses will enable a strategic response to the significant opportunity for the subregion created through the TVH proposal. Pursuing broader masterplanning at this stage of the process enables a genuine health and education-led innovation district to prosper and future proofs infrastructure in the locality from expensive retrofitting as the regional city's strong projected growth is delivered.

Should you have any questions or queries in relation to the content of this submission, please do not hesitate to contact Josh Townsend of Planit Consulting during normal business hours.

Kind regards,



Josh Townsend
Planit Consulting