

GALES-KINGSCLIFF PTY LTD

ACN 093540080

GALES HOLDINGS PTY LTD

ACN 000872275

20 Ginahgulla Rd Bellevue Hill NSW 2023

8 November 2019

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

Submitted via Online Planning Portal: <https://www.planningportal.nsw.gov.au/major-projects>

Submission from Gales-Kingscliff Pty Ltd and Gales Holdings Pty Ltd on Tweed Valley Hospital Stage 2

Gales-Kingscliff Pty Ltd (**'Gales'**) own the land immediately adjoining the hospital site, being lot 3 DP 828290 to the West and lots 26C and 26D DP 10715 to the North, as shown on **'Blue Location Plan 2018'** (Attachment 1).

Gales is currently preparing a Masterplan and Planning Proposal over its entire 214ha landholdings. The latest LFA Masterplan is shown on **'20190814 – Kingscliff Illustrative Masterplan'** (Attachment 2).

We wish to raise the following four issues:

1. Proposed 'minor increase in flood level in the wetland during minor storms'

- We note that the following reports state, inter alia, that there will be a 'minor increase in flood level in the wetlands during minor storms':
 - *Stormwater Management Plan, Tweed Valley Hospital, Prepared for Stage 2 State Significant Development Application, Issue E dated 19 September 2019, Robert Bird Group.*
 - *Tweed Valley Hospital Hydrology Assessment, dated 15 August 2019, SMEC.*
- The Hospital site is part of the Chinderah Drain catchment. Venant Solutions is currently modelling the catchment as part of Gales masterplan for its entire holdings. Preliminary results from the modelling indicate that the critical storm duration is 36 hours for most of the catchment including the wetland. It appears that the EIS Stormwater Management Plan assessment of peak flow is based on critical duration at the outlet of the proposed retarding basins and has not taken into consideration the critical duration in the receiving environment.
- The 'wetland' referred to in both reports is on land owned by Gales, and flows onto other land owned by Gales extending approximately 1.5km to the north and west.
- Gales initial hydrology advice from Venant Solutions is that existing stormwater flow volumes and rates and proposed development do not leave capacity for increased flow volumes and rates onto Gales lands and that increased flow volumes and rates may have adverse consequence. The EIS has not assessed the longer storm durations that are critical in the wetland and Chinderah Drain and hence the impact of the development has not been properly assessed.
- Gales **does not consent to an increase in flow rate or volume** onto its land until outcomes that are acceptable to all parties including Gales, Tweed Shire Council, NSW Health Infrastructure, and NSW Department of Planning are determined.

2. Integration of Hospital with Parklands adjoining the western edge of the Hospital Site

Gales are planning a recreational park on Lot 3 DP828298, which immediately adjoins the western edge of adjoining the Hospital lot. The parklands will provide a high quality outlook for the Hospital and opportunities for recreational use by staff, visitors and patients of the Hospital as well as active transport connections.

Attachment 2 – Kingscliff Illustrative Masterplan, illustrates the location of the regional parklands ('Sugar Mill Park') proposed by Gales immediately adjacent to the western boundary of the Hospital site.

There are 2 matters that Gales would like to be considered in relation to the Parklands:

2.1 Shared car parking for visitors to Sugar Mill Park

It is requested that Hospital parking facilities be made available, if capacity exists, so that unused spaces can be available for people visiting Sugar Mill Park (see point 2.2 below). If spare parking is not available during business hours, parking could still be available on weekends. Gales consider that it would be in the interests of the community to share car parking where feasible to reduce the amount of hard stand car parking in the area thereby allowing for more land to be allocated to open space. Gales would be happy to further discuss how such arrangements could work.

2.2 Connecting path to Sugar Mill Park proposed by Gales

Gales requests consideration and investigation in relation to connecting the path and bike track surrounding the Hospital development, as shown on the plans contained in:

- *Tweed Valley Hospital NSW, SSD2 Landscape Report, 23 September 2019, Turf Design Studio; and*
- *Landscape Architectural Drawings, Landscape Package, Turf Design Studios*

to Sugar Mill Park via a link on the west side of the Hospital site conceptually shown in red on the plan below:



Landscape Architectural Drawings, Landscape Package, Turf Design Studios page 4

Red mark indicates connection between Hospital and Sugar Mill Park

- A preliminary concept for the Sugar Mill Park is shown on the following plans, extracted from the draft Paterson Design Studio Conceptual Open Space plans, which is currently being finalised:



Above – image from draft Paterson Design Studio Conceptual Open Space plans

Red mark indicates connection between Hospital and Sugar Mill Park

- A connecting path will provide the following benefits:
 - Increased overall connectivity in Kingscliff, in particularly enabling access between the Hospital and Sugar Mill Park and the urban area to the west (Cudgen), north (Kingscliff towards Chinderah) and east (Kingscliff beach area);
 - Enabling an extensive pedestrian / bicycle loop track from the Hospital grounds through Sugar Mill Park and onto the new Turnock Street extension and along Turnock Street; and
 - Provide access to recreational opportunities for the staff, visitors and patients of the Hospital.

3. Tweed Coast Road / Cudgen Road upgrade to allow U-turn from the north

We request that intersection design allows traffic coming to the intersection from the north be allowed to do U turn at the intersection. Gales Kingscliff Masterplan Traffic Impact Assessment by Bitzios (2019) notes that in relation to this intersection:

'The provision of parkland or site access on Tweed Coast Road, between Cudgen Road and the Turnock Street Extension, will necessitate the need for a U-Turn to be provided for the northern approach to the intersection. In this regard, it is noted that an opposing U-Turn is permitted on the southern approach.'

4. Accommodation on the Hospital site

We understand that there are plans to provide accommodation (living quarters) for students, staff and workers on the Hospital site. We request details of the impacts of the Hospital in relation to the expected population that the Hospital will generate and who may live onsite and close-by, so that this can be factored into specialist reports relating to Gales Planning Proposal, for example Social Infrastructure and Essential Services.

We look forward to your consideration and discussion of these matters.

Yours sincerely,

Stephen Segal
Director
Gales-Kingscliff
0414 322455
sdsegal@gmail.com

Submitted by:
Lisa Peled
Director
Gales-Kingscliff
peledlisa@gmail.com