

HEALTH INFRASTRUCTURE

Review of Environmental Factors

Nepean Hospital

Child and Adolescent Mental Health Services (CAMHS) Project

Prepared by _planning Pty Ltd

Version Number 7 NEW FINAL VERSION (CAMHS only)



HI Planning Document Control

Version	Date	Author	Description	Reviewed by	Approved by
12	June 2022		REF Template Revision		

Declaration

This Review of Environmental Factors (REF) has been prepared for NSW Health Infrastructure (HI) and assesses the potential environmental impacts which could arise from the proposed demolition, construction works, and operation in relation to the Nepean Hospital Child and Adolescent Mental Health Services (CAMHS) Project at Nepean Hospital, Derby Street, Kingswood.

This REF has been prepared in accordance with the relevant provisions of *the Environmental Planning and Assessment Act 1979* (EP&A Act), *the Environmental Planning and Assessment Regulation 2021* (EP&A Regulation) and *State Environmental Planning Policy (Transport and Infrastructure) 2021* (TISEPP).

This REF provides a true and fair review of the activity in relation to its likely impact on the environment. It addresses to the fullest extent possible all the factors listed in section 170 of the EP&A Regulation (that is, the Department of Planning and Environment's Guidelines for Division 5.1 assessments – June 2022), as well as the *Commonwealth Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act).

Based upon the information presented in this REF, it is concluded that, subject to adopting the recommended mitigation measures, it is unlikely there would be any significant environmental impacts associated with the activity. Consequently, an *Environmental Impact Statement* (EIS) is not required.

Declaration	
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Date:	6 June 2023

Document Management, Tracking and Revision History

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Appendices

Appendix	Description	Author	Rev/Ref/Date
A	Survey	Veris	Issue C – 13 May 2022
B	Section 10.7(2) and (5) Planning Certificate	Penrith City Council	Planning Certificate No. 22/01641 - 30 March 2022
C	ESD Report / Memo	Stantec	21 July 2022
D	Architectural Plans	STH	CAMHS / TAM Demolition Plan Issue C dated 5/8/22 NHR-STH-DRW-ARC-MHS-A10-002 NHR-STH-DRW-ARC-MHS-A20-001 NHR-STH-DRW-ARC-MHS-A20-002 NHR-STH-DRW-ARC-MHS-A21-001 NHR-STH-DRW-ARC-MHS-A22-001 NHR-STH-DRW-ARC-MHS-A27-001 NHR-STH-DRW-ARC-MHS-A30-001 NHR-STH-DRW-ARC-MHS-A40-001 NHR-STH-DRW-ARC-MHS-A50-001 NHR-STH-DRW-ARC-MHS-A50-002 NHR-STH-DRW-ARC-MHS-A50-003 NHR-STH-DRW-ARC-MHS-A51-001 NHR-STH-DRW-ARC-MHS-A51-002 All Issue B and all dated 7/7/22
	Existing and Demolition Plan	NBRS	NBRS-0210 Issue B – dated 24/5/2023
	Site Plan		NBRS-0300 Issue C – dated 24/5/2023
E	Transport Impact Assessment (June 2023)	ptc	25 March 2023 (Issue 6 – TAM Removed) as identified on the document control page
F	Arboricultural Development Assessment Report	Moore Trees	Final version – 23 May 2022 Addendum statement dated 29 November 2022
G	Landscape Plans	Taylor Brammer	Markup of Trees Level 1 Planting Plan (P4) dated 6/7/22 NHR-TBL-DRW-LAN-MHS-L10-001(P3) 28/6/22 NHR-TBL-DRW-LAN-MHS-L20-001(P3) 28/6/22 NHR-TBL-DRW-LAN-MHS-L20-002(P4) 6/7/22 NHR-TBL-DRW-LAN-MHS-L20-003(P4) 6/7/22 NHR-TBL-DRW-LAN-MHS-L20-004(P5) 6/7/22 NHR-TBL-DRW-LAN-MHS-L20-005(P4) 6/7/22 NHR-TBL-DRW-LAN-MHS-L20-006(P4) 6/7/22 NHR-TBL-DRW-LAN-MHS-L20-007(P4) 6/7/22 NHR-TBL-DRW-LAN-MHS-L30-001(P4) 6/7/22

Review of Environmental Factors:

Nepean Hospital Child and Adolescent Mental Health Services (CAMHS) Project

			NHR-TBL-DRW-LAN-MHS-L30-002(P4)	6/7/22
			NHR-TBL-DRW-LAN-MHS-L30-003(P4)	6/7/22
			NHR-TBL-DRW-LAN-MHS-L40-001(P3)	28/6/22
			NHR-TBL-DRW-LAN-MHS-L40-003(P3)	6/7/22
H	Hydraulic and Fire Services Memo	Arup	28 October 2022	
HH	Mechanical HVAC Services Memo			
HHH	Electrical and Communications Services Memo	JHA	19 April 2022	
I	Civil Engineering Documentation – CAMHS Civil Works	ACOR Consultants	7 April 2022	
	Civil and Structural Engineering Schematic Design Report		28 February 2022	
II	Civil Works Statement		26 May 2023	
	General Arrangement Siteworks and Grading		Drawing C3.01 Issue B – dated 26/5/2023	
	Sediment and Erosion Control Plan – Child and Adolscent Mental Health Details Sheets 1		Unnumbered drawing – Issue B – dated 26/5/2023	
J	Preliminary Construction Management Plan	Turner & Townsend (for HI)	12 December 2022 (v3.0)	
K	Detailed Site Investigation – CAMHS	JK Environments	Ref: E33780PLrpt2 - 24 June 2022	
	Detailed Site Investigation – accessway land		Ref: E35033PLrpt – 1 July 2022	
L	Notification letters	HI	21 February 2021	
	Response to notification	Penrith City Council	2 March 2021	
M	Noise Impact Assessment	EMM Indigeco	6 July 2022 (v2 Final)	
N	Geotechnical Investigation - CAMHS	JK Environments	Ref: 33780LTTrpt – 17 May 2021	
	Geotechnical Investigation – accessway land		Ref: 35033LTTrpt – 4 July 2022	
O	AHIMS Search Result	_planning / NSW Govt	23 November 2022	
P	Hazardous Building Materials Survey - CAMHS	JK Environments	Ref: E33780PLrpt-HAZ – 18 February 2021	
PP	Hazardous Building Materials Survey – accessway land		Ref: E35033PLrpt2-HAZ – 28 June 2022	
Q	BCA Statement - CAMHS	BM+G	Rev 3 – 20 June 2022	
R	Mitigation Measures	HI	2 June 2023	

Review of Environmental Factors:

Nepean Hospital Child and Adolescent Mental Health Services (CAMHS) Project

Abbreviations

Abbreviation	Description
AEC	Area of Environmental Concern
AHD	Australian Height Datum
AHIP	Aboriginal Heritage Impact Permit
AHIMs	Aboriginal Heritage Information Management System BC Regulation
AMG	Australian Map Grid
BC Act 2016	Biodiversity Conservation Act 2016
BC Act 2017	Biodiversity Conservation Act 2017
BC Regulation	Biodiversity Conservation Regulation 2017
BAM	Biodiversity Assessment Method
CA	Certifying Authority
CE	Chief Executive
CM Act	Coastal Management Act 2016
CMP	Construction Management Plan
CWC	Connecting with Country
CRA	Conservation Risk Assessment
DPC	Department of Premier and Cabinet
DPE	Department of Planning and Environment
EIS	Environmental Impact Statement
EMP	Environmental Management Plan
EES	Environment, Energy and Science
EPA	Environment Protection Authority
EP&A Act	Environmental Planning and Assessment Act 1979
EP&A Regulation	Environmental Planning and Assessment Regulation 2021
EPBC Act (Cwth)	Environment Protection and Biodiversity Conservation Act 1999
EPI	Environmental Planning Instrument
EPL	Environment Protection License
FM Act	Fisheries Management Act 1994
Ha	Hectares
HHIMS	Historic Heritage Information Management System
HI	Health Infrastructure
LEP	Local Environmental Plan
LGA	Local Government Area
MPS	Multipurpose Service
MNES	Matters of National Environmental Significance

Review of Environmental Factors:

Nepean Hospital Child and Adolescent Mental Health Services (CAMHS) Project

Abbreviation	Description
NPW Act	National Parks and Wildlife Act 1974
NPW Regulation	National Parks and Wildlife Regulation 2009
NPWS	National Parks and Wildlife Service (part of EES)
NT Act (Cth)	Commonwealth Native Title Act 1993
OEH	(Former) Office of Environment and Heritage
PCMP	Preliminary Construction Management Plan
Planning Systems SEPP	State Environmental Planning Policy (Planning Systems) 2021
POEO Act	Protection of the Environment Operations Act 1997
Proponent	NSW Health Infrastructure
REF	Review of Environmental Factors
RF Act	Rural Fires Act 1997
RFS	Rural Fire Service
Resilience and Hazards SEPP	State Environmental Planning Policy (Resilience and Hazards) 2021
SEPP	State Environmental Planning Policy
SIS	Species Impact Statement
TISEPP	State Environmental Planning Policy (Transport and Infrastructure) 2021
WM Act	Water Management Act 2000

Executive Summary

The Proposal

The scope of works involves the demolition of buildings known as Nepean 1, Nepean 2, and Sexual Health; minor earthworks; removal of 3 mature trees; required infrastructure works and utilities connections; construction and use of the two-storey Nepean Hospital Child and Adolescent Mental Health Services (CAMHS) building including its connection to the Acute Mental Health Unit building; use of the existing at-grade car parking area to the south and east of the buildings as a construction compound; and a new accessway connection to Derby Street. The works also necessitate the relocation of the existing Aboriginal Reconciliation Garden which sits between Nepean 1 and Nepean 2 but is not subject of this REF.

The scope of works is approximately \$18 million in value.

Need for the Proposal

The drivers for the CAMHS works relate to the following:

- HI is delivering the Statewide Mental Health Infrastructure Program (SWMHIP) as part of the NSW Government's commitment to mental health infrastructure reform. The SWMHIP is a NSW Government initiative designed to support the delivery of mental healthcare reform across the state.
- The new CAMHS facility is part of the SWMHIP which aims to address statewide gaps in inpatient services including mothers and their babies, children and adolescents, older persons and forensic patients. It will also provide facilities for patients to transition or receive care in the community.
- There are currently no specialist Child and Adolescent (Youth) Mental Health In-patient Services in Nepean Blue Mountains Local Health District (NBMLHD);
- The population of young people who may be admitted to the Unit, aged 12-17 years is projected to increase by 36% between 2016- 2036 from 28,868 to 40,394;
- There are high levels of socio-economic disadvantage in Lithgow Local Government area (LGA with 75% of the population living in the more disadvantaged suburbs than the Australian average; and
- In Penrith LGA, 42% of the population lived in more socio-economic disadvantage than the Australian average while 8% of the St Marys and North St. Marys (two suburbs in Penrith LGA) live in extreme disadvantage.

To that end, the CAMHS will provide for much needed mental health support and treatment not presently available. When the ten (10) bed CAMHS In-patient Unit is complete it will have the capacity to admit up to 260 young people per annum based on 100% occupancy and an average length of stay of fourteen days. An occupancy level of 90% will result in 234 admissions per annum and allows for reduced activity during holidays and at weekends.

Proposal Objectives

The CAMHS Unit is considered a key priority for the State-wide Mental Health Infrastructure Program, supporting the delivery of Mental Health care reform in NSW. The new CAMHS Unit will be integrated into the existing Nepean Hospital Campus and will be immediately adjacent to the existing Acute Mental Health Building.

Clinical pathways for Acute presentations to the CAMHS Unit extend to the new Emergency Department which is currently under construction. The location of the new CAMHS Unit must support parallel CAMHS and Emergency Department care. The new CAMHS Unit will be designed to the latest in contemporary models of care and will fully integrate in with the greater Nepean Hospital Campus and the other Local Health District Services.

Options Considered

It is clear that to do-nothing is not a suitable course of action. In planning for the CAMHS, its adjacency and connectivity to the existing Acute Mental Health Unit building is essential.

A number of site planning options were considered by the design team which developed two concept design options which considered the main entry and reception points, functional relationships, flows for public, consumers and staff through the building.

Concept design options considerations included:

- Ideal functional and space relationships.
- Horizontal flows and vertical travel.
- Existing site topography and availability of infrastructure.
- Existing built environment – Asset assessments and scoring criteria.
- Environmental planning constraints.

- Authority planning constraints.
- Existing trees and Arborist recommendations.
- Heritage requirements.
- Future expansion possibilities for the Hospital and other existing health services.
- Vehicular access both for hospital and public.
- Parking requirements for staff, services vehicles and public.
- Public and staff pedestrian access routes and pedestrian linkages.
- Adjacent facilities.
- Staging and continuity of business during construction.
- Project Budget.
- Service Statement.
- Service Delivery Plan.
- Schedule of accommodation developed to meet the Functional Design Brief requirements.

To arrive at a preferred solution, the team undertook a number of workshops with representatives from HI, EWG, NBMLHD, hospital clinical and mental health staff, carers, parents and children. During the planning stage, several consumer workshops were held to inform the design with consumer representation in key decision-making / governance meetings. The project is also regularly reviewed and discussed at the monthly Nepean Redevelopment Consumer Committee meeting.

The preferred option, the subject of this REF, is based on all bedrooms having proximity to the existing Triage and Assessment Centre within the adjacent Acute Mental Health Unit and visibility from the staff work zone over the bedrooms and the active recreational zones.

Site Details

Nepean Hospital is located at 35 Derby Street, Kingswood NSW 2747. The whole of the hospital is sited within Lot 4 DP 1238301. The subject development site is located in the south of the hospital campus addressing Derby Street – see **Figure 1** further over.

The site of the works presently accommodates a range of general administration buildings, namely Nepean 1; Nepean 2; the NBMLHD Executive building; Sexual Health; and the Court building, as well as fleet and executive at-grade car parking and a number of mature trees and landscaping. The landscaping includes the Reconciliation and Memorial Garden and commemorative plaques previously relocated from the site of the Acute Mental Health Unit building – see **Figure 2** further over.

Planning Approval Pathway

Section 4.1 of the EPA Act states that if an EPI provides that development may be carried out without the need for development consent, a person may carry the development out, in accordance with the EPI, on land to which the provision applies. However, the environmental assessment of the development is required under Part 5 of the Act.

State Environmental Planning Policy (Transport and Infrastructure) 2021 (TISEPP) aims to facilitate the effective delivery of infrastructure across the State. Chapter 2 Division 10 of TISEPP outlines the approval requirements for health service facilities. A “hospital” is defined as a health service facility under this division.

The site is zoned SP2 Infrastructure - Health Service Facilities zone under *Penrith Local Environmental Plan 2010* (LEP). The SP2 zone is a prescribed zone under the TISEPP.

The proposal involves the erection and/or alteration of, or addition to, a building that is a health services facility (namely the existing Acute Mental Health Unit building at Nepean Hospital) which is classified as development without consent as proposed activity is consistent with section 2.61(1)(a) of TISEPP. Demolition works to existing buildings within (and adjacent to) the footprint of the new CAMHS Building are subject to section 2.61(1)(c) of the TISEPP.

Selected tree removal, earthworks, and relocation of infrastructure and services is undertaken as ancillary to the works subject to section 2.3(3) of the TISEPP.

However, the project becomes an ‘activity’ for the purposes of Part 5 of the EPA Act and is subject to an environmental assessment (REF). The proposal is considered an ‘activity’ in accordance with section 5.1 of the EP&A Act because it involves the carrying out of a work, the demolition of a building or a work, and the use of land, that is not Exempt Development or prohibited under an environmental planning instrument.

Statutory Consultation

Whilst formal notification is not required under sections 2.10 to 2.15 of the TISEPP, consultation is triggered by section 2.62 in relation to the CAMHS Building.

Under section 2.62 notification is triggered to Council and occupiers of adjoining land for a period of 21 days.

Notification letters were issued to these parties on 21 February 2021. The notification period concluded on 14 March 2021. Note, the scope, design, and location of the CAMHS Building remains consistent with that provided in these 2021 notification letters.

Following notification, a response was received only from Penrith City Council (dated 2 March 2021)

Council's letter (on the CAMHS scope only) raises the following matters:

The proposal represents an increase in gross floor area and additional or expanded services within the hospital that may require a proportionate increase in onsite car parking.

There is already a numerical deficiency in onsite car parking resulting from recent state significant development approvals for the redevelopment of the Nepean Hospital campus. It will need to be demonstrated that the proposed development works will not further increase patronage and parking demands if there is no additional car parking proposed.

A review of the plans suggest reconfiguration of some car parking however there doesn't appear to be a specific increase in parking to cater for the increased gross floor area associated with the proposed development.

It is therefore requested that a traffic and parking assessment report be prepared and submitted to Council for review that addresses the traffic and parking demands of the existing / approved hospital campus with analysis to confirm what impacts the proposed works will have on parking availability. The report should ensure or demonstrate that further overflow parking is projected to occur in the local road network as a consequence of this development.

To address Council's request that a traffic and parking assessment report be prepared and submitted to Council, ptc's pre-existing assessment was updated to address Council's comments and was provided to Council's letter's signatory for information by email on 15 March 2023. Council was provided with a response timeframe of 7 calendar days. Council's Senior Traffic Engineer responded by email on 17 March 2023 advising that he/Council: had no objection with respect to the ptc report; that it generally concurred with the assessment; and advised of conditions and a clarification for inclusion in the mitigation measures.

No public submissions were received.

Environmental Impacts

The environmental impacts of the works are varied given the nature of the works, including demolition and minor civil engineering works, tree removal, and the construction of new buildings on the hospital campus. The most significant impacts identified to arise relate to demolition and construction noise and vibration, and other general demolition and construction impacts.

Construction noise is likely to impact a range of internal hospital uses within the retained buildings and operational hospital. Management and mitigation will be applied to limit likely impacts. Construction vibration will be localised to within the subject hospital buildings and management and mitigation will again need to be applied to reduce adverse impacts upon sensitive machinery, equipment, activities and patients within the hospital.

Impacts upon vegetation, biodiversity, heritage, Aboriginal cultural heritage, natural systems including stormwater, and traffic and parking have generally been identified as negligible, low, or neutral. Tree removal will be offset with an increase in native trees at the site at a rate of better than 2:1, with 17 trees replacing the 3 trees to be removed.

Justification and Conclusion

The proposed demolition and construction works for the new CAMHS Building at Nepean Hospital is subject to assessment under Part 5 of the EP&A Act. The REF has examined and taken into account to the fullest extent possible all matters affecting, or likely to affect, the environment by reason of the proposed activity.

As discussed in detail in this report, the proposed activity will not result in any significant or long-term impact. The potential impacts identified can be reasonably mitigated and where necessary managed through the adoption of suitable site practices and adherence to accepted industry standards.

As outlined in this REF, the proposed activity can be justified on the following grounds:

- It responds to an existing need within the community;
- It generally complies with, or is consistent with all relevant legislation, plans and policies;
- It has minimal environmental impacts; and
- Adequate mitigation measures have been proposed to address these impacts.

The environmental impacts of the proposal are not likely to be significant and therefore it is not necessary for an EIS to be prepared and approval to be sought for the proposal from the Minister for Planning under Part 5.1 of the EP&A Act. Further, the activity will not significantly affect threatened species, populations, ecological communities or their habitats, and therefore a Species Impact Statement (SIS) and/or Biodiversity Development Assessment Report (BDAR) is not required.

On this basis, it is recommended that HI approve the proposed activity in accordance with Part 5 of the EPA Act and subject to the adoption and implementation of matters outlined in this report.

1. Introduction

The scope of works involves the demolition of buildings known as Nepean 1, Nepean 2, and Sexual Health; minor earthworks; removal of 3 mature trees; required infrastructure works and utilities connections; construction and use of the two-storey Nepean Hospital Child and Adolescent Mental Health Services (CAMHS) building including its connection to the Acute Mental Health Unit building; use of the existing at-grade car parking area to the south and east of the buildings as a construction compound; and a new accessway with driveway connection to Derby Street. The works also necessitate the relocation of the existing Aboriginal Reconciliation Garden which sits between Nepean 1 and Nepean 2 but is not subject of this REF.

The scope of works is approximately \$18 million in value.

The proposal is located at Nepean Hospital - 35 Derby Street, Kingswood NSW 2747 (the site). The whole of the hospital is sited within Lot 4 DP 1238301. The subject development site is located in the south of the hospital campus addressing Derby Street – see **Figure 1** below.



Figure 1 – Location within Nepean Hospital – site of works outlined in red (skyviewaerial.com.au)

The site of the works presently accommodates a range of general administration buildings, namely Nepean 1; Nepean 2; the NBMLHD Executive building; Sexual Health; and Court building; as well as fleet and executive at-grade car parking and a number of mature trees and landscaping. The landscaping includes the Reconciliation and Memorial Garden and commemorative plaques previously moved from the site of the Acute Mental Health Unit building – see **Figure 2** over.

The activity forms part of HI's delivery of infrastructure solutions and services to support the healthcare needs of the NSW communities.

This Review of Environmental Factors (REF) has been prepared by _planning Pty Ltd on behalf of HI to determine the environmental impacts of the proposed demolition, construction works, and operation in relation to the Nepean Hospital Child and Adolescent Mental Health Services (CAMHS) Project at Nepean Hospital, Derby Street, Kingswood.

Review of Environmental Factors:

Nepean Hospital Child and Adolescent Mental Health Services (CAMHS) Project

For the purposes of these works, HI is the proponent and the determining authority under Part 5 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The purpose of this REF is to describe the proposal, to document the likely impacts of the proposal on the environment and to detail protective measures to be implemented to mitigate impacts.

The description of the proposed works and associated environmental impacts have been undertaken in the context of section 170 of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation), that is, the Department of Planning and Environment's Guidelines for Division 5.1 assessments – June 2022, as well as the Australian Government's *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).



Figure 2 – Existing buildings and uses within this part of the hospital (STH)

The assessment contained within the REF has been prepared having regard to:

- whether the proposed activity is likely to have a significant impact on the environment and therefore the necessity for an EIS to be prepared and approval to be sought from the Minister for Planning and Public Spaces under Part 5.1 of the EP&A Act;
- whether the proposed activity is likely to significantly affect threatened species, populations, ecological communities or their habitats, and therefore require a Species Impact Statement (SIS) and/or Biodiversity Development Assessment Report (BDAR); and
- the potential for the proposal to significantly impact *Matters of National Environmental Significance* (MNES) on Commonwealth land and the need to make a referral to the Australian Government Department of Environment and Energy for a decision by the Commonwealth Minister for the Environment on whether assessment and approval is required under the EPBC Act.

The REF helps to fulfil the requirements of section 5.5 of the EP&A Act, which requires that HI examine, and take into account to the fullest extent possible, all matters affecting, or likely to affect, the environment by reason of the proposed activity.

1.1 Proposal need and Alternatives

The drivers for the CAMHS works relate to the following:

- HI is delivering the Statewide Mental Health Infrastructure Program (SWMHIP) as part of the NSW Government's commitment to mental health infrastructure reform. The SWMHIP is a NSW Government initiative designed to support the delivery of mental healthcare reform across the state.
- The new CAMHS facility is part of the SWMHIP which aims to address statewide gaps in inpatient services including mothers and their babies, children and adolescents, older persons and forensic patients. It will also provide facilities for patients to transition or receive care in the community.
- There are currently no specialist Child and Adolescent (Youth) Mental Health In-patient Services in Nepean Blue Mountains Local Health District (NBMLHD);
- The population of young people who may be admitted to the Unit, aged 12-17 years is projected to increase by 36% between 2016- 2036 from 28,868 to 40,394;
- There are high levels of socio-economic disadvantage in Lithgow Local Government area (LGA with 75% of the population living in the more disadvantaged suburbs than the Australian average; and
- In Penrith LGA, 42% of the population lived in more socio-economic disadvantage than the Australian average while 8% of the St Marys and North St. Marys (two suburbs in Penrith LGA) live in extreme disadvantage.

To that end, the CAMHS will provide for much needed mental health support and treatment not presently available. When the ten bed CAMHS In-patient Unit is complete it will have the capacity to admit up to 260 young people per annum based on 100% occupancy and an average length of stay of fourteen days. An occupancy level of 90% will result in 234 admissions per annum and allows for reduced activity during holidays and at weekends.

It is clear that to do-nothing is not a suitable course of action in either circumstance.

In planning for the CAMHS, its adjacency and connectivity to the existing Acute Mental Health Unit building is essential. A number of site planning options were considered by the design team which developed two concept design options which considered the main entry and reception points, functional relationships, flows for public, consumers and staff through the building.

Concept design options considerations include:

- Ideal functional and space relationships.
- Horizontal flows and vertical travel.
- Existing site topography and availability of infrastructure.
- Existing built environment – Asset assessments and scoring criteria.
- Environmental planning constraints.
- Authority planning constraints.
- Existing trees and Arborist recommendations.
- Heritage requirements.
- Future expansion possibilities for the Hospital and other existing health services.
- Vehicular access both for hospital and public.
- Parking requirements for staff, services vehicles and public.
- Public and staff pedestrian access routes and pedestrian linkages.
- Adjacent facilities.
- Staging and continuity of business during construction.
- Project Budget.
- Service Statement.
- Service Delivery Plan.
- Schedule of accommodation developed to meet the Functional Design Brief requirements.

To arrive at a preferred solution, the team undertook a number of workshops with representatives from HI, EWG, NBMLHD, hospital clinical staff, and management and consumer representatives.

Review of Environmental Factors:

Nepean Hospital Child and Adolescent Mental Health Services (CAMHS) Project

The preferred option, the subject of this REF is based on all bedrooms having proximity to the existing Triage and Assessment Centre within the adjacent Acute Mental Health Unit and visibility from the staff work zone over the bedrooms and the active, recreational zones.

2. Site Analysis and Description

2.1 The Site and Locality

Nepean Hospital is located at 35 Derby Street, Kingswood NSW 2747. The whole of the hospital is sited within Lot 4 DP 1238301. The subject development site is located in the south of the hospital campus addressing Derby Street.

The Nepean Hospital Campus sits south-east of the Penrith CBD. The campus is generally bounded by the Great Western Highway and Barber Avenue to the north, Somerset Street to the east, Derby Street to the south and Parker Street to the west— see **Figures 3** and **4**. The Health Administration Corporation (HAC) owns the hospital site.

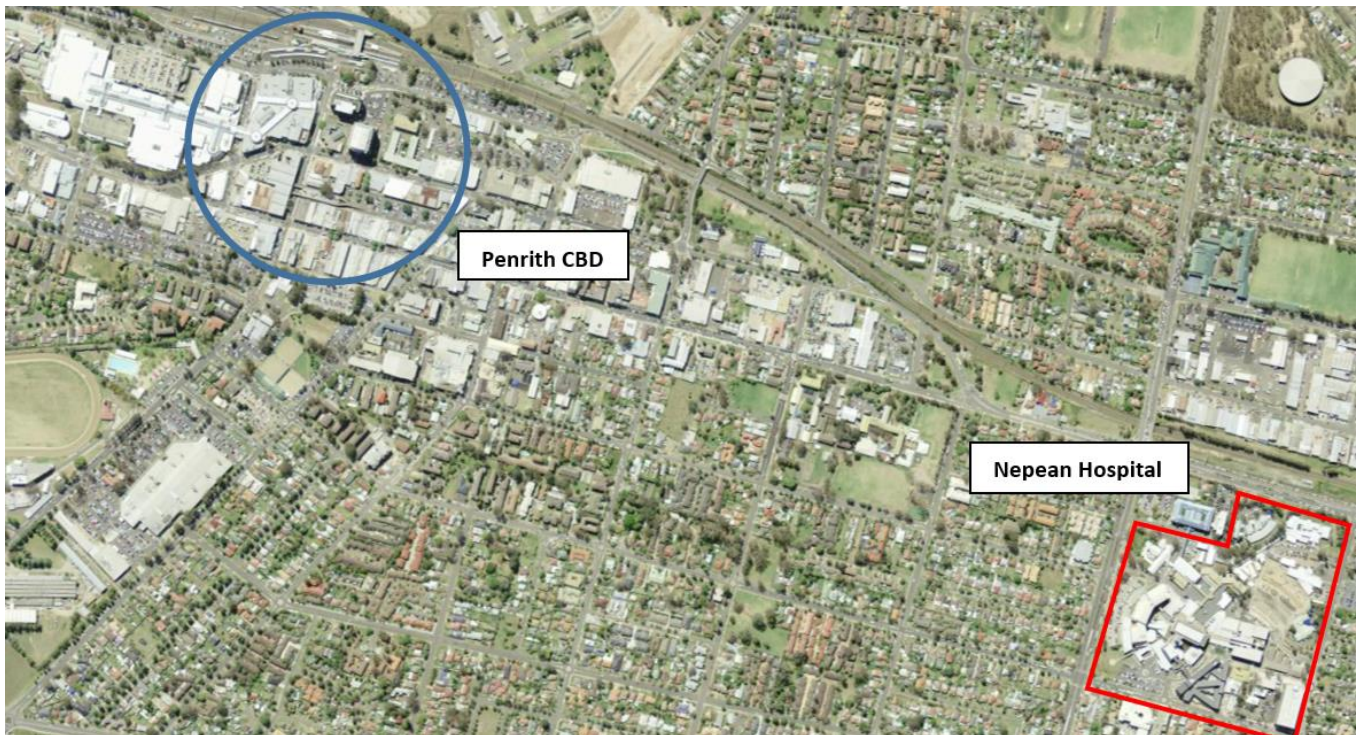


Figure 3 – Location Plan



Figure 4 – Campus map and recent aerial photograph of the campus

2.1.1 Existing Development

The site of the works presently accommodates a range of general administration buildings, namely Nepean 1; Nepean 2; the NBMLHD Executive building; Sexual Health; and Court building; as well as fleet and executive at-grade car parking and a number of mature trees and landscaping. The landscaping includes the Reconciliation and Memorial Garden and commemorative plaques previously relocated from the site of the Acute Mental Health Unit building. See also **Figures 1** and **2** earlier in this REF for the location of the works within the Nepean Hospital campus as well as the cluster of buildings existing within this location – see **Figure 2** as well as **Figures 5-12**.



Figure 5 – The site as seen from Derby Street, including a tree proposed for removal



Figure 6 – Nepean 1 – proposed for demolition



Figure 7 – Nepean 2 – proposed for demolition



Figure 8 - NBMLHD Executive building – proposed for retention



Figure 9 - Sexual Health (right) proposed for demolition and Court Building (left) proposed for retention



Figure 10 – Existing at-grade car park



Figure 11 – Mature trees at the site, including Trees 82 (rear) and 83 (foreground) proposed for removal



Figure 12 – Reconciliation and Memorial Garden and commemorative plaques – proposed for relocation separate to this REF

2.1.2 Other Site Elements

The site generally falls from north to south towards Derby Street. The levels at the site range from RL53.6 to RL51.76 along the northern boundary, falling from west to east. From this point they drop to about RL51 at the campus boundary with Derby Street – See the survey at **Appendix A**.

Aside from the buildings, at-grade car parking areas, and landscaping located within the development site, the otherwise highly-modified site accommodates some 51 mature (largely native) trees. It is understood that these are generally mature planted specimens. Note also that the most recent visit by the arborist in November 2022 has identified that some four (4) trees have been removed from the Derby Street frontage of the site, meaning 47 trees now sit within the development site.

2.1.3 Site Considerations and Constraints

Section 10.7 Planning Certificate No. 22/01641 dated 30 March 2022 identifies that the site is located within the SP2 Infrastructure – Health Services Facilities zone under *Penrith Local Environmental Plan 2010* and is provided at **Appendix B**.

Table 1: Section 10.7 Planning Certificate

Affectation	Yes	No
Critical habitat		✓
Conservation area		✓
Item of environmental heritage		✓
Affected by section 38 or 39 of the Coastal Management Act 2016 (CM Act)		✓
Proclaimed to be in a mine subsidence district		✓
Affected by a road widening or road realignment		✓
Affected by a planning agreement		✓
Affected by a policy that restricts development of land due to the likelihood of landslip		✓
Affected by bushfire, tidal inundation, subsidence, acid sulphate or any other risk		✓
Affected by any acquisition of land provision		✓
Biodiversity certified land or subject to any bio-banking agreement or property vegetation plan		✓
Significantly contaminated		✓
Subject to flood related development controls	✓	
Planning considerations under State Environmental Planning Policy (Precincts – Western Parkland City) 2021, Chapter 4 – Western Sydney Aerotropolis	✓ See discussion below	
Planning consideration in relation to remediation works under State Environmental Planning Policy (Biodiversity and Conservation) 2021, Chapter 9 – Hawkesbury-Nepean River	✓ See discussion below	

2.2 Surrounding Development

Neighbouring land uses around the Nepean Hospital campus opposite Somerset St (to the east) and Derby Street (to the south) include low to high-density residential use ranging from single dwelling houses to a 7-storey residential flat building facing the site, as well as commercial and health consulting rooms in former residential dwellings. Within the hospital the site is immediately surrounded by the existing Acute Mental Health Unit building to its west, the East Block and the Oral Health building to its north, and the 7-storey split-level multideck car park at the corner of Derby and Somerset Streets to the site's east – see **Figures 13-15**.



Figure 13 – Residences in Somerset Street to the south of the hospital



Figure 14 – Somerset Specialist Centre at the corner of Somerset and Derby Streets



Figure 15 – 48-56 Derby Street immediately opposite the site

3. Proposed Activity

3.1 Proposal Overview

Overview

The works subject of this REF involve:

- Demolition of the existing Nepean 1, Nepean 2, and Sexual Health buildings, and associated landscaping.
- Removal of 3 trees in the footprint of the proposed new buildings and works.
- Removal of existing fleet and other car parking spaces in the footprint of the new accessway and driveway connection from Derby Street.
- The construction and use of the 2-storey CAMHS Building attached to the existing Mental Health Building which includes ancillary and associated services and utilities augmentation and connections, earthworks associated with the construction, and new landscaping.

The scope of works is approximately \$18 million in value.

The works also separately necessitate the relocation of the existing Aboriginal Reconciliation Garden which sits between Nepean 1 and Nepean 2. The proposed site to relocate this garden is between South Block and East Block entrances adjacent to the War Memorial site. This proposed location will not be further impacted by planned works on the Nepean Hospital campus, so will be a final move. It will provide an Aboriginal-specific location on the south side of campus. The relocation can occur at any time as Exempt Development and is outside of the formal scope of this REF. Separate discussion with key hospital and Aboriginal stakeholders has occurred to agree to the relocation and design.

Proposal Objectives

The CAMHS Unit is considered a key priority for the State-wide Mental Health Infrastructure Program, supporting the delivery of Mental Health care reform in NSW. The new CAMHS Unit will be integrated into the existing Nepean Hospital Campus and will be closely located to the existing Acute Mental Health Building.

Clinical pathways for Acute presentations to the CAMHS Unit extend to the new Emergency Department which is currently under construction. The location of the new CAMHS Unit must support parallel CAMHS and Emergency Department care. The new CAMHS Unit will be designed to the latest in contemporary models of care and will fully integrate in with the greater Nepean Hospital Campus and the other Local Health District Services.

3.1.1 Design Approach

Placemaking and Design

Whilst the design of this project has pre-dated detailed compliance requirements under this REF process and has not specifically focussed upon the objectives of *Better Placed* (GANSW, May 2017) and the principles of placemaking, the project architects have nonetheless routinely considered and satisfied the objectives as part of their typical design process as set out below through an appropriately scaled, placed and activated development meeting these principles.

- Better fit: contextual, local and of its place
- Better performance: sustainable, adaptable and durable
- Better for community: inclusive, connected and diverse
- Better for people: safe, comfortable and liveable
- Better working: functional, efficient and fit for purpose
- Better value: creating and adding value
- Better look and feel: engaging, inviting and attractive

The tight site and its constraints as well as the operational requirements of the buildings leaves little scope for significant exploration of alternatives to widen application of the principles. The design does however seek to maximise opportunities for green canopy retention, provide for a sensitive grading of height and delivery of proportionate development in the context of the hospital and neighbouring buildings, and allows for continued access and visibility into the campus. ESD principles are employed as per HI guidelines as set out in detail below. The design seeks to add value to the physical appearance of the campus as viewed from the street and neighbouring properties by providing modern and contemporary accommodation for hospital-related uses.

Connecting with Country/ Engagement

Again, as above, the specific requirements for this REF process post-date the design process. Notwithstanding, ongoing development at Nepean Hospital campus maintains a high degree of engagement with local traditional land owners/Aboriginal Country. This has been particularly evident during the planning and design for the Stages 1 and 2 Redevelopment towers and the SSD process for those developments. The details of those engagements have been documented in those applications and accepted.

Engagement has been consistent with the GANSW draft Connecting with Country (CWC) framework in that regard, however noting the highly specialised functions and lack of direct public access to these subject buildings.

Sustainability

A range of sustainability initiatives have been employed within the buildings consistent with the requirements of HI's Design Guidance Note (DGN) No. 058 Environmentally Sustainable Development (DGN 58).

The CAHMS building could achieve an improved environmental performance of equivalent to 5-Star or minimum 60 points under the HI ESD Evaluation Tool from the minimum required equivalent of 4-Star or 45 points.

Additionally, during the Design Development phase predictive energy modelling was undertaken which, in addition to confirming that the proposed design response would meet the 10% improvement in energy efficiency required by DGN 058, it would achieve a further 2.3% improvement in its building envelope performance and a 8.6% in its engineering services when compared to a Reference Design.

Further, the EP&A Regulation lists four principles of ESD required to be considered in assessing a project:

- The Precautionary Principle
- Intergenerational equity
- Conservation of biological biodiversity and ecological integrity
- Improved valuation and pricing of environmental resources

The precautionary principle is utilised when uncertainty exists about potential environmental impacts. It provides that if there are threats of serious or irreversible environmental damage, lack of scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. The precautionary principle requires careful consideration and evaluation of potential environmental impacts in order to avoid, wherever practicable, serious or irreversible damage to the environment.

This REF has not identified any serious threat or irreversible damage to the environment and therefore the precautionary principle is not relevant in this case.

Intergenerational equity is concerned with ensuring the health, diversity and productivity of the environment can be maintained or enhanced for the benefit of future generations. The proposal satisfies this by providing a means to providing enhanced and much needed health services for generations to come.

The principle of biological diversity upholds that the conservation of biological diversity and ecological integrity should be a fundamental consideration for any development. The proposal will have no detrimental effect upon this, given the general lack of biodiversity values present on the site.

The principles of improved valuation and pricing of environmental resources requires consideration of all environmental resources that may be affected by a proposal, including air, water, land and living things. Mitigation measures are included in this REF for avoiding waste and ensuring where possible reuse, recycling and managing waste occurs, as relevant to this scope of works.

Overall, the ESD credentials of the development are exemplified by the current HI objective and mandatory requirement that all projects satisfy the equivalency of at least 45 Green Star rating points (which equates to 4-star 'best practice') plus a 10% increase on the requirements of Section J of the National Construction Code with respect to ESD. The project's ESD report is attached at **Appendix C**.

3.1.2 Proposed Activity

The details of the proposed activity are set out below. Descriptions of other aspects of the works follows further below.

Demolition

The demolition scope entails the removal of the Nepean 1, Nepean 2, and the Sexual Health buildings within the development site. **Figure 16** indicates the demolition scope, coupled with the tree removal scope, and the removal of the at-grade fleet parking area and its general street furniture. Tree removal details based on the Arboricultural Assessment are set out further below. Overall, a net loss of 42 staff parking spaces results (46 spaces removed and 4 new CAMHS spaces provided) with the 46 fleet car spaces from the site of these works separately transferred within the campus near West Block, where 46 staff spaces will be consequently displaced.

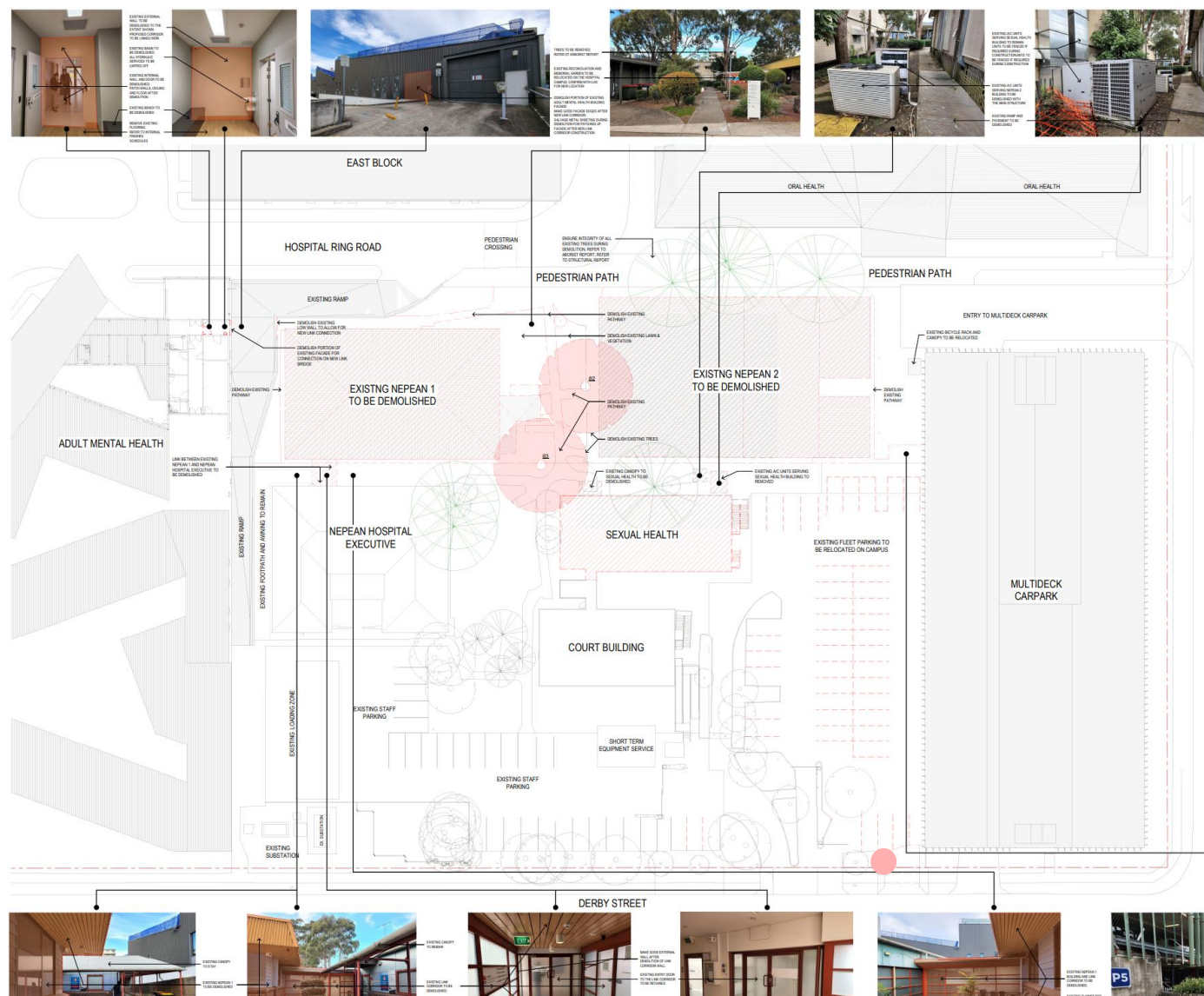


Figure 16 – Existing site and Demolition Plan (NBR5)

CAMHS

The CAMHS building includes the following:

Ground Level (Level 01)

- Main pedestrian entry and lobby;
- Stairs and lift to Level 02;
- Lounge and 2 x carer bedrooms and en-suite;

- Plant and utilities rooms; and
- Loading dock.

The balance of the ground floor level is substantively an undercroft area under the First Floor level which will remain undeveloped under this REF.

First Floor Level (Level 02)

- Reception and waiting area;
- Patient interview and meeting rooms;
- Equipment and general store rooms;
- Staff and administration office space, including meeting rooms, staff room and WCs;
- Treatment room, clinical workroom; and medical store;
- Two internally-accessed courtyards (one of about 142m² and the other about 600m²);
- Exercise room, multi-purpose room, media room, quiet room, sensory room, learning centre and laundry and kitchen;
- 10 x patient bedrooms with en-suites;
- Patient recreation and day therapy spaces, lounge area, and dining room area;
- Connection to / from the Acute Mental Health Unit building.

Overall, the proposal has a maximum building height of 13.55m from existing ground level at the eastern elevation. Generally, the building is otherwise approximately 10.30m to 11.02m in height, well below the REF pathway's maximum height control of 15m. As noted, four (4) parking spaces are provided to support CAMHS.

Figures 17 to 23 provide details of the proposed CAMHS location, floor plans, elevations, and bulk and scale.

The architectural plans are included at **Appendix D**.



Figure 17 – CAMHS site plan (NBRS)

Review of Environmental Factors: Nepean Hospital Child and Adolescent Mental Health Services (CAMHS) Project

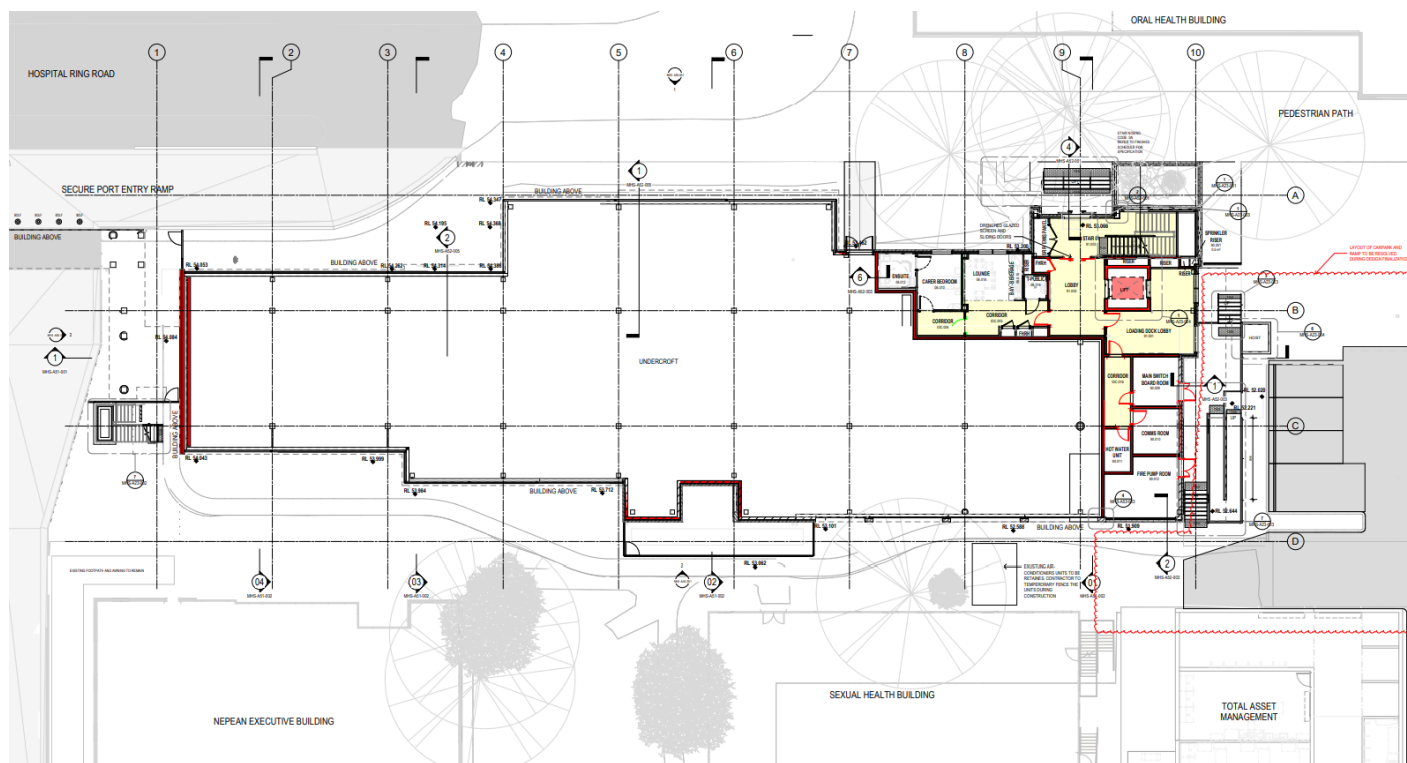


Figure 18 – CAMHS ground level (Level 01) floor plan (STH)

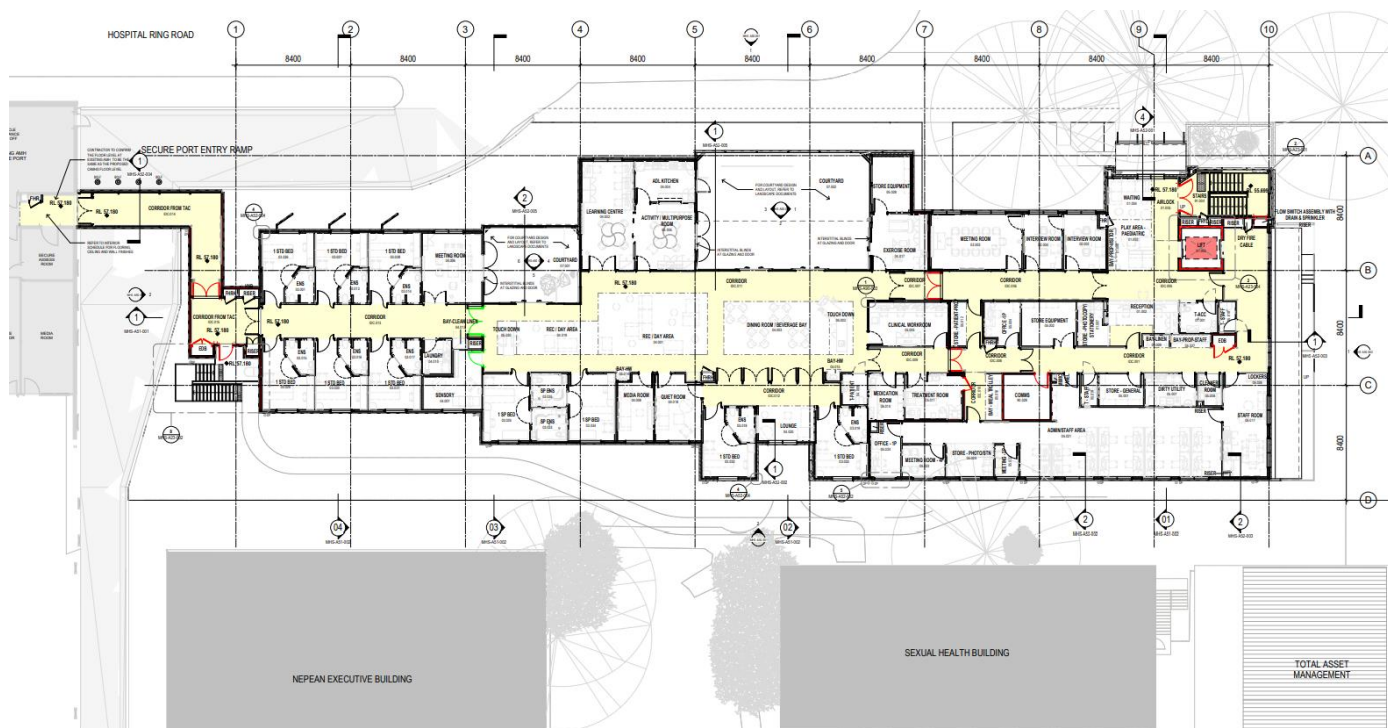
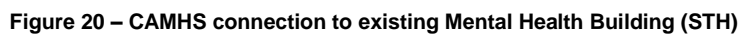


Figure 19 – CAMHS level 1 (Level 02) floor plan (STH)

Nepean Hospital Child and Adolescent Mental Health Services (CAMHS) Project



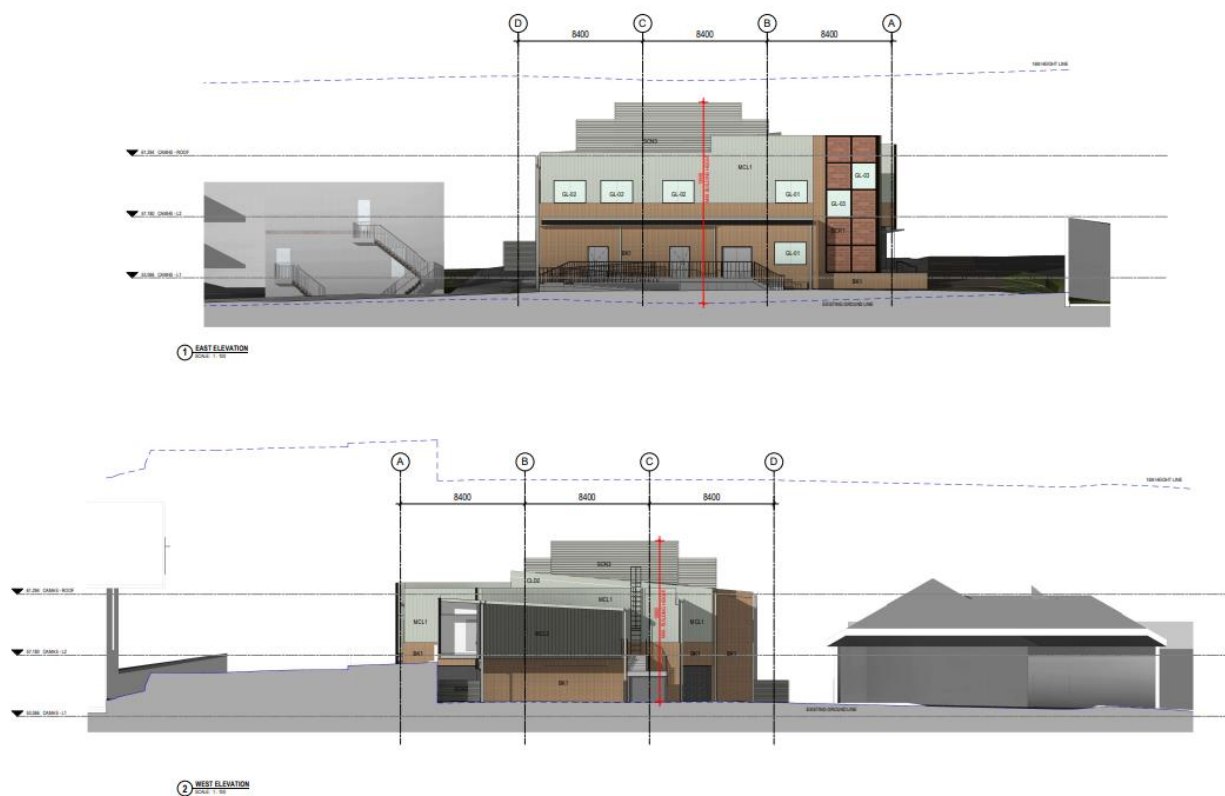


Figure 22 – CAMHS east and west elevations (STH)

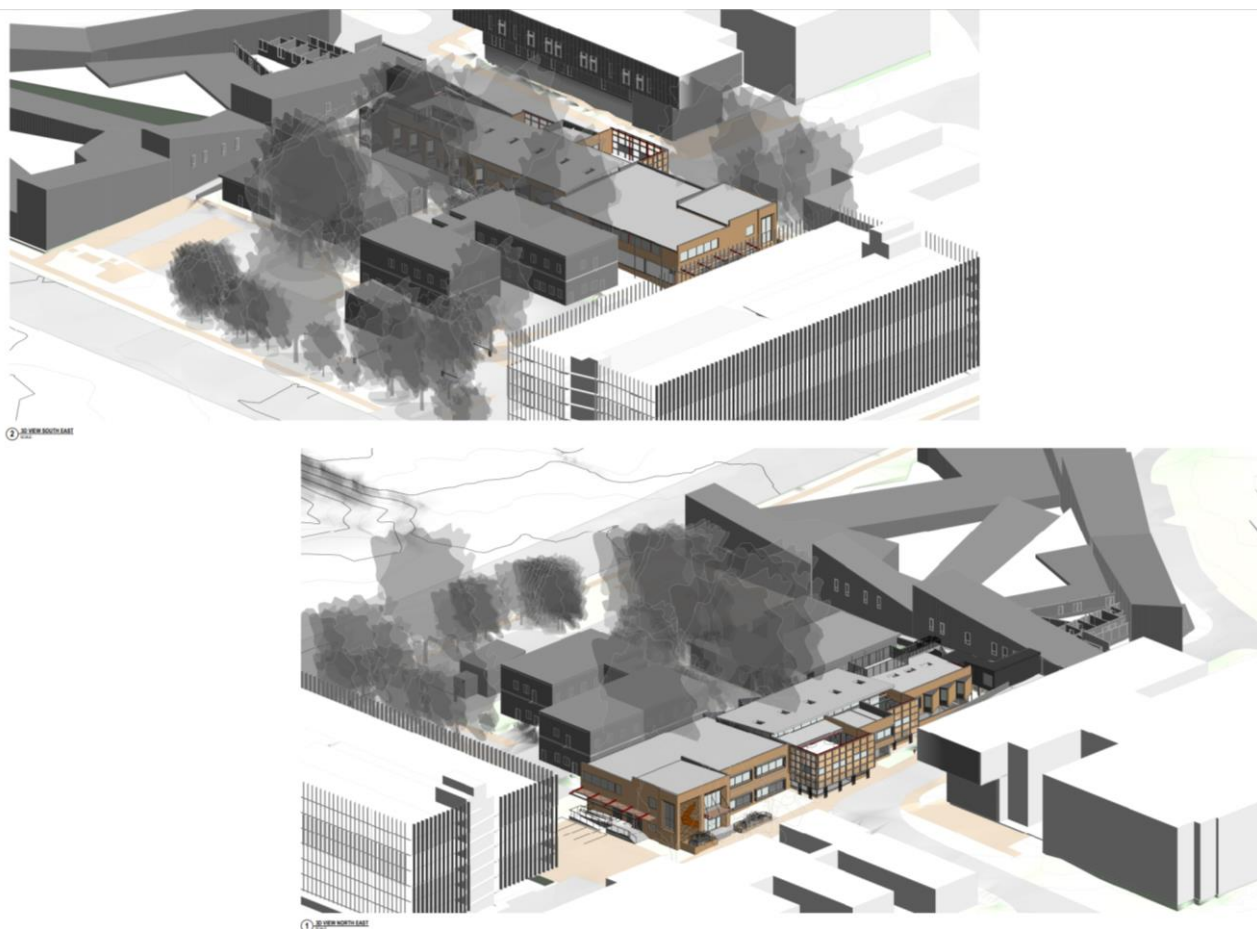


Figure 23 – CAMHS axonometric renders (STH)

Review of Environmental Factors:

Nepean Hospital Child and Adolescent Mental Health Services (CAMHS) Project

Roadworks and Parking

The project requires an additional accessway and driveway crossing off Derby Street to accommodate the new CAMHS parking and loading dock area.

As set out in the ptc Traffic Impact Assessment, access to the subject area of the campus is presently provided via two driveways, both accommodating two-way traffic flow. These access points are not proposed to be altered, however a new two-way driveway is to be constructed to the west of, and immediately adjacent to, the multi-storey car park to provide access to the CAMHS building's east.

The existing and proposed driveway layouts are shown below and over in **Figures 24** and **25**. The image at **Figure 26** is captured from Streetview to confirm that the driveways are located within an existing No Stopping control zone and therefore the proposal will have no impact on the provision of on-street parking spaces. It will require removal of one planted tree within the hospital land.

A loading dock will be provided in the eastern corner of the CAMHS building. The largest vehicle required to access the loading dock will be a Medium Rigid Vehicle. Access to the loading dock will be via the new access driveway on Derby Street, adjacent to the existing Somerset Street multi-storey car park.



Figure 24 – Existing driveway access points (ptc)

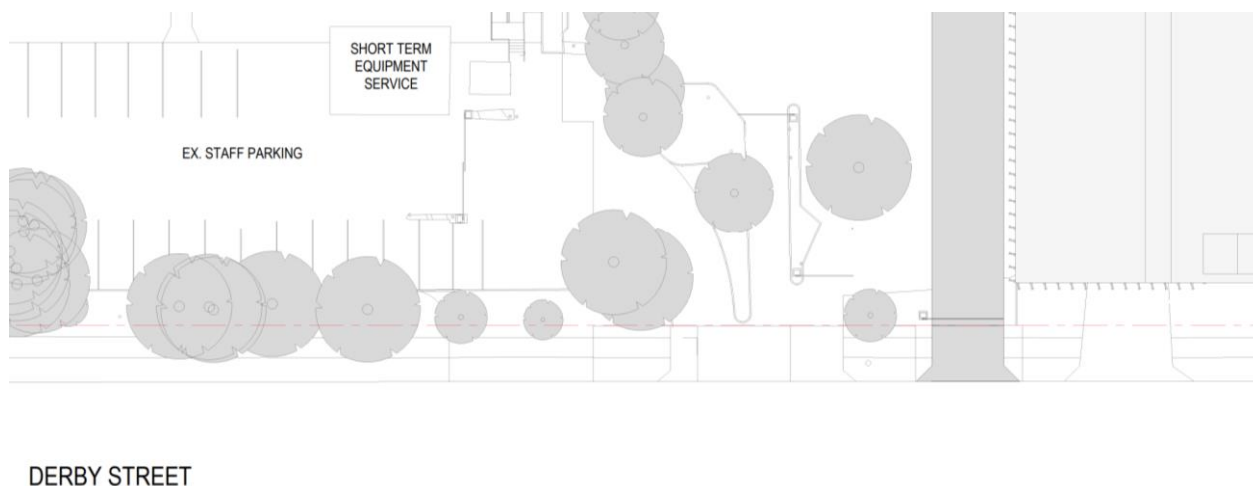


Figure 25 – Proposed driveway arrangements (NBRS)



Figure 26 – Existing site frontage parking arrangements (ptc via google streetview)

In terms of parking supply, as noted, 46 existing fleet spaces will be lost as a result of the works, however four (4) new / replacement spaces will be provided in relation to the parking requirements for CAMHS. The 46 fleet spaces will be transferred to near West Block, which in turn will displace 46 staff spaces. The net loss in parking supply is 42 spaces.

ptc has estimated the required parking supply arising from the works. CAMHS is likely to generate the need for 36 parking spaces for staff, visitors to in-patients, and other associated visits to the facility by medical or emergency officers. The demolition of Nepean 1, Nepean 2, and the Sexual Health building results in the decanting of some staff within the hospital campus but a relocation of a significant number out of the campus. Of some 256 staff presently working within these buildings, 125 will be relocated out of the campus. This has the effect of reducing parking demand by some 111 spaces based on ptc's calculations.

Accordingly, the 111 spaces presently required will be offset by a new demand for 36 spaces. The resultant change in parking demand is a reduction of 75 spaces.

The demand for parking is reduced by 75 spaces compared the change in supply of 42 spaces. The works therefore result in a net decrease in demand for parking on the campus by 33 spaces, which effectively serves to remove this number of vehicles from the streets around the hospital's perimeter.

See the Traffic Impact Assessment at **Appendix E**.

Tree Removal and Landscaping

Two mature trees are proposed to be removed (Trees 82 and 83) as a result of the CAMHS building. Both trees are Grey box (*Eucalyptus moluccana*) of 19m and 20m, respectively. Both have minor defects and some dead wood but are in good condition. Their life-expectancy is between 15-40 years, if unaffected by development. Given they sit within the footprint of the CAMHS building they will not be able to be retained.

The new Derby Street accessway works result in the loss of one (1) additional tree (Tree 133) being a planted Grey box (*Eucalyptus moluccana*) of 7m in height. An earlier tree removal and tree protection plan is shown at **Figure 27**, with this author further circling these three subject trees for clarity.

Relevantly, none of the trees affected by the works are Council street trees. All trees are wholly within the boundaries of the hospital campus and can be addressed through the REF process. See the survey at **Appendix A**. The project's Arboricultural Development Assessment Report is found at **Appendix F**.

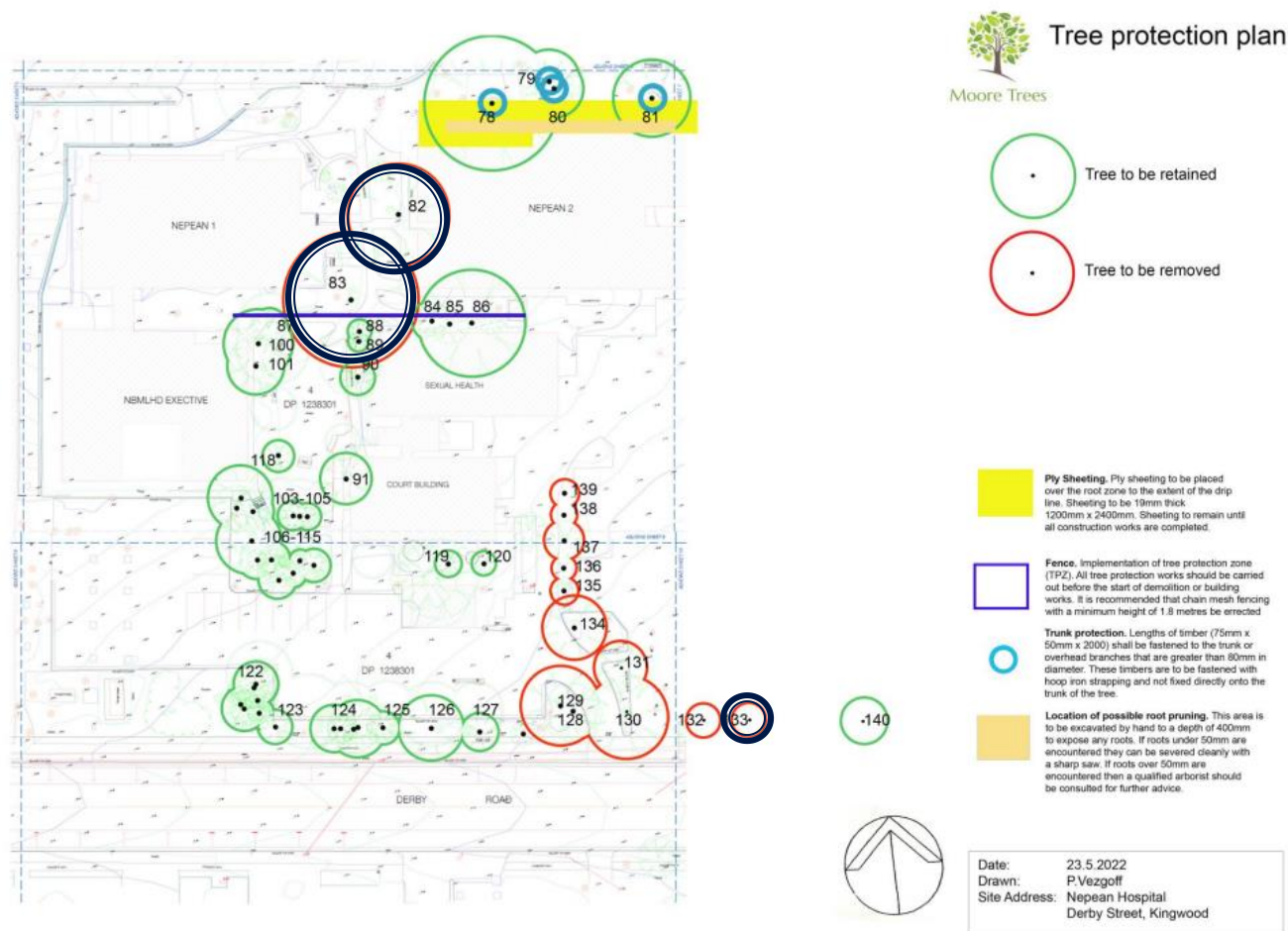


Figure 27 – Tree Protection Plan – black-circled trees are proposed for removal (Moore Trees)

The landscaping scope is principally focussed upon the perimeter and the courtyards of the CAMHS building with a mix of soft and hard landscaping. Most relevantly, 17 replacement canopy trees are proposed, resulting in better than a 1:1 ratio of replacement as per the HI guidelines for replacement of canopy trees and additional requirements for this project at 2:1. With three (3) tree removed and 17 replacement trees, the ratio is 5.6:1. See Landscape Plans by Taylor Brammer included at **Appendix G** as well as **Figure 28** below.

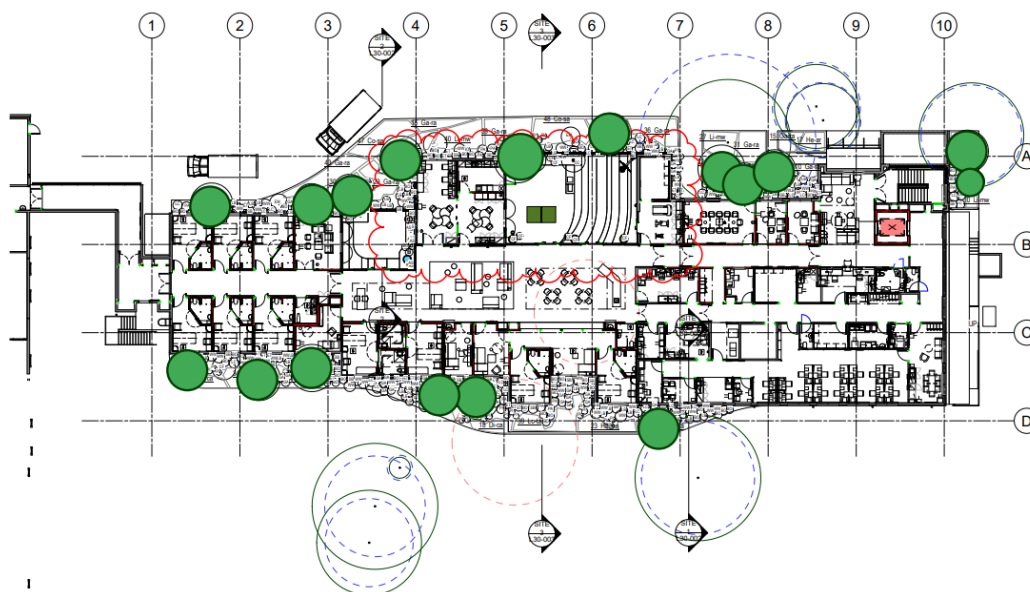


Figure 28 – Proposed replacement canopy tree planting (Taylor Brammer)

Utilities

Arup has provided separate services statements related to hydraulic and fire services, and to mechanical services for the building. Further, JHA has provided an electrical services statement for the building. These statements are located at **Appendices H-HHH**.

Arup indicates that the works for CAMHS will not necessitate any new connections with respect to domestic cold water supply or natural gas. The CAMHS building will connect into existing site sewer infrastructure, as such a new connection to Sydney Water authority sewer mains will not be required.

Rainwater harvesting will not be adopted for the building. All roof drainage collected will discharge into the civil stormwater network.

There is currently an existing hydrant booster assembly located on Derby Street. This booster is dedicated to the AMH building. The AMH hydrant system is complete with a single diesel hydrant pump located on level 1 and consists of a 150mm capped provision available for future extension as documented on the AMH hydraulic as built drawings (AB-HZ-512 REV:C). The hydrant water supply for the CAMHS building will be supplied by extending this capped provision. A new connection to Sydney Water authority mains for the hydrant supply will not be required.

Similar to the cold water supply to the CAMHS building, the fire hose reel supply will be provided from the existing supply to Nepean 1 & 2.

JHA advises with respect to electrical and communications services that the existing High Voltage (HV) infrastructure on-site does not form part of the proposed works, however an application to Endeavour Energy is necessary to inform Endeavour Energy of the increased load. JHA is to undertake this application on behalf of the client. There are currently no Low Voltage Authority works proposed under the project scope.

Electricity diversions works are required and proposed to maintain connections for the retained buildings within the development site. New electrical connections will also be required for the building.

In terms of Photovoltaic (PV) systems, JHA advises that it is currently proposed that the new CAMHS building be provided with a minimum 10kW capacity PV System to facilitate notional Green Star requirements.

Similarly, existing external telecommunications providers' infrastructure on-site does not form part of the proposed works, nor is it expected to be affected by the proposed works under this package. Internal hospital-related communications will however require diversion and reallocation due to the demolition works of existing buildings using the hospital's communications network.

Civil Engineering Works

ACOR Consultants has provided statements with respect to the civil engineering scopes for the CAMHS building and new accessway - see **Appendices I and II**.

The civil works associated with the CAMHS building and accessway includes:

- In-ground stormwater network including water quality treatment devices to service the new building and external areas.
- Site regrading and pavement works external to the building envelope, including proposed parking bays and access pathways at the eastern end of the building.
- Demolition of the existing building slabs and minor regrading below the building envelope to level the undercroft area and generally tie in with existing surrounding levels.
- In-ground stormwater network to service external areas, including provision for capacity to accept stormwater discharge from the CAMHS site area.
- Site regrading and pavement works external to the building envelope, including proposed driveway on the eastern side of the building, and altered access to the existing carpark to Derby Street.
- Minor earthworks below the existing natural surface to grade the new accessway.

3.2 Proposal Need, Options and Alternatives

3.2.1 Strategic Justification

The strategic justification for the CAMHS building is founded upon the hospital's clinical services plan and the State-wide Mental Health Infrastructure Program which has identified a critical need for additional care and support.

3.2.2 Alternatives and Options

Options Considered

It is clear that to do-nothing is not a suitable course of action. In planning for the CAMHS, its adjacency and connectivity to the existing Acute Mental Health Unit building is essential.

A number of site planning options were considered by the design team which developed two concept design options which considered the main entry and reception points, functional relationships, flows for public, consumers and staff through the building.

Concept design options considerations include:

- Ideal functional and space relationships.
- Horizontal flows and vertical travel.
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To arrive at a preferred solution, the team undertook a number of workshops with representatives from HI, EWG, NBMLHD, hospital clinical staff and management and consumer representatives.

The preferred option for the CAMHS building, the subject of this REF, is based on all bedrooms having proximity to the existing Triage and Assessment Centre within the adjacent Acute Mental Health Unit and visibility from the staff work zone over the bedrooms and the active, recreational zones.

3.3 Construction Activities

The works are long term (being about 12 months in duration). A preliminary Construction Management Plan has been prepared by Turner & Townsend which will be further embellished and built-upon by a final Construction Management Plan by the appointed contractor. The following information is derived from the preliminary Construction Management Plan, which is located at **Appendix J**.

Table 2: Project Timeframes and Construction Activities

Construction activity	Description
Commencement Date	Estimated June 2023 to April 2024.
Work Duration/Methodology	The duration of the works is approximately 10 months.
Work Hours and Duration/Construction	Standard working hours are proposed, namely Mon-Fri 7am to 6pm Sat 8am to 1pm No work Sundays or public holidays
Workforce/Employment	The proposed workforce is not yet understood, but would likely be in the order of 50 workers over the duration of the works.
Ancillary Facilities	Site sheds and amenities will be located between the two site in the general location of the current Sexual Health building and extending within the existing fleet parking aprons and hardstands. No parking is proposed on-site or on-campus for construction works are the typical policy of car sharing and public transport use continues to be promoted by HI.
Plant Equipment	The likely plant and equipment cited by the preliminary Construction Management Plan, includes: <ul style="list-style-type: none"> • powered mobile plant • excavators • cranes • personnel and/or materials hoists • air compressors • electric generators jack hammers • hydraulic jacks • oxy-acetylene (gas cutting/welding) • concrete saws and corers • scaffolding • ladders (limited use) • many types of handheld plant, including: angle grinders, power saws, hammers, • demolition saws, hydraulic jacks and pinch/lever bars.
Earthworks	Only minimal and shallow earthwork are required to accommodate the building and accessway – see the civil engineering documents at Appendices I and II .
Source and Quantity of Materials	This is yet to be determined, however given potential scarcity of imported materials, there is a likelihood of a significant proportion of locally sources building materials.
Traffic Management and Access	<p>The project will be constructed as a single contract will seek to minimise the impacts of traffic activity on Derby Street.</p> <p>Access to the will be provided via a single driveway on Derby Street, adjacent to the multi-storey car park. Access through to the CAMHS site will be maintained along a new roadway adjacent multi-storey car park.</p> <p>The peak traffic activity is likely to be associated with the removal of material during the demolition stage, and concrete pours associated with the footings and structures. Following these stages, smaller and less frequent vehicles are used for the fitout stage.</p> <p>The site is well served by the arterial road network, providing proximate access to the M4 motorway to the south of Kingswood. The following truck routes have been identified as provided the most direct routes while minimising the impact on residential areas/roads.</p> <p>The proposed driveway access will be designed to accommodate the left turn movement into the site and the right turn exit movement. There is no intention for vehicle to use the roads to the west of the campus.</p> <p>The movement of vehicles will be restricted to the hours of operation of the site and all standard requirements (covered loads etc.) will apply.</p>

3.4 Operational Activities

Use

The CAMHS use will be directly related to the provision of mental health services and care for children and adolescents, including its typical and ancillary activities and is new to the campus within this bespoke designed facility attached to the existing Mental Health Building.

Operation Hours

The CAMHS building will continue or maintain the hospital's existing hours. The CAMHS facility will operate 24 hours per day, 7 days per week.

Staff / Patients

The CAMHS Building is a 10-bed facility with a total of up to 44 new staff, with 29 day shift staff, 10 afternoon shift staff, and 5 night time staff.

Traffic and Parking

As noted above, in terms of parking supply, 46 existing fleet spaces will be transferred to West Block where in turn 46 staff spaces will be lost as a result of the works. However four (4) new / replacement spaces will be provided in relation to the parking requirements for CAMHS.

The net loss in parking supply is 42 spaces within the campus.

ptc has estimated the required parking supply arising from the works. CAMHS is likely to generate the need for 36 parking spaces for staff, visitors to in-patients, and other associated visits to the facility by medical or emergency officers. The demolition of Nepean 1, Nepean 2, and the Sexual Health building results in the decanting of some staff within the hospital campus but a relocation of a significant number out of the campus. Of some 256 staff presently working within these buildings, 125 will be relocated out of the campus. This has the effect of reducing parking demand by some 111 spaces based on ptc's calculations.

Accordingly, the 111 spaces presently required will be offset by new demand for 36 spaces. The resultant change in parking demand is a reduction of 75 spaces.

The demand for parking is reduced by 75 spaces compared the change in supply of 42 spaces. The works therefore result in a net decrease in demand for parking on the campus by 33 spaces, which effectively serves to remove this number of vehicles from the streets around the hospital's perimeter.

4. Statutory Framework

4.1 Planning Approval Pathway

Section 4.1 of the EP&A Act states that if an EPI provides that development may be carried out without the need for development consent, a person may carry the development out, in accordance with the EPI, on land to which the provision applies. However, the environmental assessment of the development is required under Part 5 of the Act.

State Environmental Planning Policy (Transport & Infrastructure) 2021 (TI SEPP) aims to facilitate the effective delivery of infrastructure across the State. Division 10 of TI SEPP outlines the approval requirements for health service facilities. A “hospital” is defined as a health service facility under this division.

The site is zoned SP2 Infrastructure - Health Service Facilities under the *Penrith Local Environmental Plan 2010*. The SP2 is a prescribed zone under the TI SEPP.

The proposal involves demolition works and the alteration of, or addition to, a building that is a health services facility (namely the existing Acute Mental Health Unit building at Nepean Hospital) through the development of the CAMHS building, along with ancillary works which is classified as development without consent as the proposed activity is consistent with sections 2.61(1)(a) and (c) of the TI SEPP.

Therefore, the project becomes an ‘activity’ for the purposes of Part 5 of the EP&A Act and is subject to an environmental assessment (REF). The proposal is considered an ‘activity’ in accordance with clause 5.1 of the EPA Act because it involves the carrying out of a work, the demolition of a building or a work, and the use of land, that is not Exempt Development or prohibited under an environmental planning instrument.

TISEPP consultation is discussed within section 5 of this REF.

Table 3: Description of proposed activities

Division and Section within TISEPP	Description of Works
Chapter 2, Division 10, Section 2.61(1)(c) Chapter 2, Part 2.1, Section 2.3(3)	Demolition works (Nepean 1, Nepean 2, and Sexual Health Building)
Chapter 2, Part 2.1, Section 2.3(3)	Tree removal, minor earthworks, services diversions and new connections, and access reconfiguration as ancillary works
Chapter 2, Division 10, Section 2.61(1)(a)	Construction and use of CAMHS building

4.2 Environmental Protection and Biodiversity Conservation Act 1999

The provisions of the EPBC Act do not affect the proposal as it is not development that takes place on or affect Commonwealth land or waters. Further, it is not development carried out by a Commonwealth agency, nor does the proposed development affect any matters of national significance. An assessment against the EPBC Act checklist is provided at Table 4.

Table 4: EPBC Checklist

Consideration	Yes/No
The activity will not have any significant impact on a declared World Heritage Property?	No
The activity will not have any significant impact on a National Heritage place?	No
The activity will not have any significant impact on a declared Ramsar wetland?	No
The activity will not have any significant impact on Commonwealth listed threatened species or endangered community?	No
The activity will not have any significant impact on listed migratory species?	No
The activity does not involve nuclear actions?	No

Consideration	Yes/No
The activity will not have any significant impact on Commonwealth marine areas?	No
The activity will not have any significant impact on Commonwealth land?	No
The activity does not relate to a water resource, a coal seam gas development or large coal mining development?	No

4.3 Environmental Planning and Assessment Act 1979

Duty to Consider Environmental Impact

Part 5 of the EP&A Act applies to activities that are permissible without consent and are generally carried out by a public authority. Activities under Part 5 of the EP&A Act are assessed and determined by a public authority, referred to as the determining authority. Health Infrastructure is a public authority and is the proponent and determining authority for the proposed works.

For the purpose of satisfying the objects of the EP&A Act relating to the protection and enhancement of the environment, a determining authority, in its consideration of an activity shall, notwithstanding any other provisions of the Act or the provisions of any other Act or of any instrument made under the EP&A Act or any other Act, examine and take into account to the fullest extent possible all matters affecting or likely to affect the environment by reason of that activity (refer to sub-section 1 of section 5.5 of the EP&A Act).

Section 170 of the EP&A Regulation defines the factors which must be considered when assessing the likely impact of an activity on the environment under Part 5 of the EP&A Act. This is set out in the Department of Planning and Environment's Guidelines for Division 5.1 assessments – June 2022, which provides reference to factors to be considered under section 171(2) of the EP&A Regulation. Section 6.1 of this REF specifically responds to the factors for consideration under sections 170 and 171(2).

Table 5 below demonstrates the effect of the proposed development activity on the matters listed for consideration in sub-section 3 of section 5.5 of the EP&A Act.

Table 5: Matters for consideration under Sub-Section, Section 5.5 of the EP&A Act

Matter for Consideration	Impacts of Activity
Sub-section 3: Without limiting subsection 1, a determining authority shall consider the effect of any activity on any wilderness area (within the meaning of the <i>Wilderness Act 1987</i>) in the locality in which the activity is intended to be carried on.	No effect, as there is no wilderness area (within the meaning of the <i>Wilderness Act 1987</i>) in the locality in which the activity is intended to be carried on.
Note: If a biobanking statement has been issued in respect of a development under Part 7A of the <i>Threatened Species Conservation Act 1995</i> , the determining authority is not required to consider the impact of the activity on biodiversity values.	

4.4 Environmental Planning and Assessment Regulation 2021

As above, Section 170 of the EP&A Regulation defines the factors which must be considered when assessing the likely impact of an activity on the environment under Part 5 of the EP&A Act. This is set out in the Department of Planning and Environment's Guidelines for Division 5.1 assessments – June 2022, which provides reference to factors to be considered under section 171(2) of the EP&A Regulation. These requirements are considered at section 6.1 of this REF.

4.5 Other NSW Legislation

The following table lists any additional legislation that is required to be considered if it is applicable to the proposed activity.

Table 6: Other Possible Legislative Requirements

Legislation	Comment	Relevant? Yes/No
State Legislation		
Rural Fires Act 1997	The site is not identified on the Bushfire Prone Land Map.	No
Biodiversity Conservation Act 2016	The development site does not contain any critical habitat, threatened species or ecological population or community.	No
Water Management Act 2000	The works are not within 40 metres of a watercourse.	No
Contaminated Land Management Act 1997	The site is not listed on the register of contaminated sites.	No
Heritage Act 1977	The site is not listed or mapped as a heritage item.	No
Roads Act 1993	Approval under section 138 of the Roads Act will apply to the new accessway into and out of the campus at Derby Street and which are in part within Council's road reservation. The works otherwise do not involve the pumping of water onto a public road, or involve the connection of a road to a classified road.	Yes
Other Acts as required	The <i>Protection of the Environment Operations Act 1997</i> will apply to carrying out of works and the administration of environmental protection. This extends to managing the impacts of the demolition noise, and air and water quality impacts. These are addressed through mitigation measures under this REF.	Yes
State Legislation Planning Policies		
State Environmental Planning Policy (Biodiversity and Conservation) 2021	Chapter 6 of the SEPP applies to the former Hawkesbury – Nepean SREP.	Yes – see commentary below.
State Environmental Planning Policy (Resilience and Hazards) 2021	Chapter 4 Remediation of land applies in relation to any contamination across the development site.	Yes – see commentary below.
State Environmental Planning Policy (Transport and Infrastructure) 2021	Infrastructure SEPP provisions now located within this SEPP.	Yes – see prior commentary and further below regarding the ability to use the REF / Development without consent pathway. The activity is not traffic generating development as the additional CAMHS beds are less than 100 or 200 beds, as per the relevant criteria.
State Environmental Planning Policy (Precincts – Western Parkland City) 2021	The site is within an State Significant Precinct that's located in the Western Parkland City, namely within the boundaries of the former Western Sydney Aerotropolis SEPP.	Yes, see commentary below.

Review of Environmental Factors:

Nepean Hospital Child and Adolescent Mental Health Services (CAMHS) Project

Legislation	Comment	Relevant? Yes/No
Penrith Local Environmental Plan 2010		
Zone	<p>The Nepean Hospital campus is zoned SP2 Infrastructure - Health Service Facilities zone under <i>Penrith Local Environmental Plan</i> (LEP) 2010. Health services facilities are permitted with consent within the SP2 zone.</p> <p>The objectives of the SP2 zone are:</p> <ul style="list-style-type: none">To provide for infrastructure and related uses.To prevent development that is not compatible with or that may detract from the provision of infrastructure. <p>The proposed CAMHS building is consistent with the SP2 zone objectives as it provides for new and enhanced health services and supports the ongoing operation of Nepean Hospital as envisaged by the zone and its objectives.</p>	Yes.
Height of Buildings	N/A	No
Floor Space Ratio	N/A	No.
Heritage	N/A	No.
Flood Planning	It is noted that despite the contents of the section 10.7(2) and (5) Planning Certificate with respect to flood planning controls, the whole of the campus is not mapped as being affected as such.	Yes, see commentary in Section 6 of this REF.

Transport and Infrastructure SEPP – Chapter 2 - Infrastructure

The delivery of the new CAMHS Building is to be undertaken subject to section 2.61(1)(a) and (c) and 2.61(2) of the TI SEPP as development without consent as set out below:

(1) Any of the following development may be carried out by or on behalf of a public authority without consent on any land if the development is carried out within the boundaries of an existing health services facility—

*(a) the **erection or alteration of, or addition to, a building that is a health services facility,***

(b) development for the purposes of restoring or replacing accommodation or administration facilities,

*(c) **demolition of buildings carried out for the purposes of a health services facility,***

(d) development for the purposes of patient transport facilities, including helipads and ambulance facilities,

(e) development for the purposes of car parks to service patients or staff of, or visitors to, the health services facility (or to service staff of, or visitors to, other premises within the boundaries of the facility).

*(2) This section does not permit the **erection of any building that exceeds 15 metres in height or is located closer than 5 metres to any property boundary (or an addition to a building resulting in the building exceeding that height or being closer than that distance to any property boundary).***

Consistent with section 2.61(1)(a) and (c) and 2.61(2) of the TISEPP, the works are being carried out by HI (a public authority) within the boundaries of an existing health services facility. The proposed CAMHS Building is less than 15m in height and sits more than 5m from any property boundary and therefore satisfies the provisions of section 2.61(2).

The overall ancillary works, including tree removal and services relocation and augmentation works, and earthworks related to the construction are addressed / permitted via section 2.3(3) of the TISEPP.

As noted in the table above, the activity is not a traffic generating development under Schedule 3 of this SEPP.

Resilience and Hazards SEPP – Chapter 4 – Remediation of Land

Pursuant to section 4.6 – Contamination and remediation to be considered in determining development application of (the former clause 7 of SEPP 55), a consent authority must consider whether the land subject of a development application is contaminated and, if the land is contaminated, be satisfied that the land is suitable in its contaminated state for the use proposed. If the land requires remediation to be made suitable for the proposed purpose, the consent authority must be further satisfied that the land will be so remediated before the land is used for that purpose.

Whilst this provision applies only to DAs, it remains a relevant consideration for the works as the object of this Chapter of this SEPP is to provide for a State-wide planning approach to the remediation of contaminated land, and in particular to promote the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment and where a remediation work is required that it meets certain standards and notification requirements.

To confirm that the site is suitable for the ongoing health services uses a Detailed Site Investigation has been undertaken by JK Environments (see **Appendix K**) for each of the CAMHS and the accessway components of the proposed works. Based on the investigations no remediation is required at the respective sites.

JK Environments are of the opinion based on the data collected and assessed for the DSIs, that the site is suitable for the proposed development from a contamination standpoint, without the need for remediation, subject to appropriate implementation of its recommendations. See further assessment / discussion in Section 6 of this REF.

Biodiversity & Conservation SEPP – Chapter 6 – Water Catchments (Hawkesbury – Nepean)

This Chapter as it relates to the Hawkesbury – Nepean Catchment applies to certain land in the Greater Metropolitan Region and includes Penrith LGA. The aim of this plan has been to protect the environment of the Hawkesbury-Nepean River system by ensuring that the impacts of future land uses are considered in a regional context.

This includes strategies for Total Catchment Management, Environmentally Sensitive Areas, Water Quality, Water Quantity, Cultural heritage, Flora and Fauna, Riverine Scenic Quality, Agriculture and Aquaculture and fishing, Rural residential development, Urban Development, Recreation and Tourism, and Metropolitan Strategy.

The relevant provisions of these strategies to this REF relate largely to water quality and quantity considerations at section 6.6 of the SEPP. These are addressed in Section 6 of this REF.

Precincts - Western Parkland City SEPP – Chapter 4 – Western Sydney Aerotropolis

This SEPP, amongst other things, aims to:

- (a) to facilitate development in the Western Sydney Aerotropolis in accordance with the objectives and principles of the Western Sydney Aerotropolis Plan,
- (b) to promote sustainable, orderly and transformational development in the Western Sydney Aerotropolis,
- (c) to ensure development is compatible with the long-term growth and development of the Western Sydney Airport (including in relation to the operation of the Airport 24 hours a day) and other critical transport infrastructure,

Council's planning certificate indicates this SEPP applies as the land may be subject to its planning controls set out over.

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Planning control	Affected?
(a) Subject to an ANEF or ANEC contour of 20 or greater	No
(b) Affected by the Lighting Intensity and Wind Shear Map	No
(c) Affected by the Obstacle Limitation Surface (OLS) Map	Yes
(d) Affected by the "public safety area" on the Public Safety Area Map	No
(e) Within the "3km zone" or the "13km zone" of the Wildlife Buffer Zone Map	Yes

With respect to the above, the hospital campus sits just inside the OLS Map's Outer Horizontal Surface line of 230.5m AHD. Given the development will be approximately 10m above the existing ground levels of RL 53 (that is to about RL 63, the development will be well below this RL 230.5 threshold for notification to Air Services Australia and Commonwealth. The development will not penetrate the prescribed airspace and the provisions of section 4.22 of the SEPP require no further action.

Further, the campus sits at the periphery of the mapped area in relation to the Wildlife Buffer Zone. The campus sits on the 13km Wildlife Buffer Zone line / boundary. Accordingly, the hospital is identified as sitting at the extremities of land surrounding the Airport where wildlife may present a risk to the operation of the Airport. The proposed development does not involve a land use that encourages or fosters wildlife and thereby risk to operations of the airport. No further action under section 4.19 of the SEPP is warranted.

5. Consultation

Whilst formal notification is not required under sections 2.10 to 2.15 of the TISEPP, consultation is triggered by section 2.62 in relation to the CAMHS Building.

Under section 2.62 notification is triggered to Council and occupiers of adjoining land for a period of 21 days – as per Table 7.

Notification letters were issued to these parties on 21 February 2021. The notification period concluded on 14 March 2021. Note, the scope, design, and location of the CAMHS Building remains consistent with that provided in these 2021 notification letters.

The works to provide for the new accessway to the development site was not deemed of significance with respect to notification to Council as it did not trigger any of the relevant provisions of section 2.10 and does not affect any on-street parking arrangement at the perimeter of the campus as it sits wholly within a No Parking zone as identified earlier in this REF.

Table 7: Stakeholders required to be notified

Stakeholder	Relevant Section
Penrith City Council	Section 2.62
Occupiers of adjoining land	Section 2.62

The extent of notification of occupiers of adjoining land included properties at:

- 30-40 Somerset Street, Kingswood (at the south-eastern extremity of the hospital campus); and
- 46-60 Derby Street, Kingswood (along the southern boundary of the hospital campus).

This generated some 200 notification letters, focused principally upon the residential flat buildings to the hospital's south which in part overlook the site of CAMHS.

Copies of the notification letters, as well as responses received, are provided at **Appendix L**.

An overview of the comments received are outlined and responded to in the table below. Note, no public submissions were received.

Table 8: Issues raised and responses

Issue raised	Date received	Response	Reference
Penrith City Council			
The proposal represents an increase in gross floor area and additional or expanded services within the hospital that may require a proportionate increase in onsite car parking.	2 March 2021	These matters are addressed in Section 6 of this REF and directly comment by comment in the ptc Transport Impact Assessment.	Section 6.2.1 and in Appendix E .
There is already a numerical deficiency in onsite car parking resulting from recent state significant development approvals for the redevelopment of the Nepean Hospital campus. It will need to be demonstrated that the proposed development works will not further increase patronage and parking demands if there is no additional car parking proposed.			
A review of the plans suggest reconfiguration of some car parking however there doesn't appear to be a specific increase in parking to cater for the increased gross floor area associated with the proposed development.			
It is therefore requested that a traffic and parking assessment report be prepared and submitted to Council for review that			

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Issue raised	Date received	Response	Reference
addresses the traffic and parking demands of the existing / approved hospital campus with analysis to confirm what impacts the proposed works will have on parking availability. The report should ensure or demonstrate that further overflow parking is projected to occur in the local road network as a consequence of this development.			

To address Council's request that a traffic and parking assessment report be prepared and submitted to Council, ptc's pre-existing assessment was updated to address Council's comments and was provided to Council's letter's signatory for information by email on 15 March 2023. This was version 5 of the ptc report which included the new accessway and driveway connection (and the now omitted TAM Building).

Council was provided with a response timeframe of 7 calendar days. Note, the referral of ptc's report to Council addresses the parking and traffic matters concerning both the CAMHS and the now omitted TAM components of the works. Whilst the TAM component is now omitted from this project, it does include the new accessway into the campus as per the current civil engineering design. Council accordingly was able to further consider this new accessway in providing its response.

Council's Senior Traffic Engineer responded by email on 17 March 2023 advising that he/Council: had no objection with respect to the ptc report; that it generally concurred with the assessment; and advised of conditions and a clarification for inclusion in the mitigation measures (see **Appendix R**). Council's full response is set out below.

I have reviewed the transport impact assessment prepared by ptc dated 28 February 2023 in regard to proposed CAMS and TAM Facilities at Nepean Hospital.

Based on the requirement under State Wide Mental Health Infrastructure Program, a net addition of 10 beds is required. As such, a new CAMHS unit is proposed in the south-eastern corner of the Nepean Hospital campus to supplement the existing facilities. With the redevelopment of the site for CAMHS, the existing TAM facility is to be relocated from the current compound adjacent to Barber Avenue to make way expansion of Stage 2.

The following comments are provided:

- No objection is raised in regard to the traffic impact of the proposed development on adjoining road network as the impact is considered minimal.*
- SSDA condition for Stage 1 requires provision of 2,009 spaces. Review of the submitted traffic impact assessment shows 2,015 parking spaces have been provided for Stage 1 development.*
- The parking demand for CAMHS and TAM has been estimated from the number of staff (256 staff) currently working in the buildings that will be demolished to make way for the construction of CAMHS and TAM development. Out of 256 staff, 125 staff will be relocated to the Health Hub and 131 staff will be based within the campus. The existing parking demand generated by the staff who are to be relocated has been estimated as 111 spaces, based on percentage driving and requiring a parking space (93%), and car occupancy of 1.05.*
- The estimated CAMHS parking demand is 36 spaces resulting in reduction in demand of 75 parking spaces.*
- The CAMHS and TAM developments will displace 26 existing staff parking spaces and 46 fleet parking spaces. Development proposes 7 spaces. Therefore, loss of parking spaces associated with the proposal is 65 spaces. Considering the demand for parking is reduced by 75 spaces, there will be net decrease in demand of 10 spaces. **Therefore, no concern is raised about provision of parking spaces associated with proposed CAMS and TAM Facilities at Nepean Hospital.***

Please note the following:

- A Construction Traffic Management Plan (CTMP) shall be submitted to Penrith City Council's Asset Management Department for endorsement. The CTMP shall be prepared by a suitably qualified consultant with appropriate training and certification from Transport for NSW. The CTMP shall include details of any required road closures, work zones, loading zones. Approval of the CTMP may require approval of the Local Traffic Committee. Please contact Council's Asset Management Department on 4732 7777 and refer to Council's website for a copy of the Temporary Road Reserve Occupancy Application Form.*

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- *Under Section 138 of the Roads Act 1993 all proposed works within a road reserve require Council approval including the payment of fees and bonds. These works include driveway construction, road reserve occupancy and road reserve opening/excavation.*
- *Page 15 of the traffic impact assessment report refers to the largest vehicle required to access the loading dock as medium rigid vehicle. But, swept path assessment shows that the loading dock can accommodate an SRV. This needs to be clarified.*

Further to the above, subject to the now revised ptc report (version 6 of 1 June 2023) further consultation with Council in this regard is not required as the scenario is generally maintained over that accepted by Council in its response of March 2023.

Non-statutory consultation

From a non-statutory consultation perspective, to arrive at a preferred solution, the team undertook a number of workshops with representatives from HI, EWG, NBMLHD, hospital clinical and mental health staff, carers, parents and children. During the planning stage, several consumer workshops were held to inform the design with consumer representation in key decision-making / governance meetings. The project is also regularly reviewed and discussed at the monthly Nepean Redevelopment Consumer Committee meeting.

6. Environmental Impact Assessment

6.1 Environmental Planning and Assessment Regulation 2021 – Assessment Considerations

The relevant assessment considerations under section 170 of the EP&A Regulation 2021 (though the application of the Department of Planning and Environment's Guidelines for Division 5.1 assessments – June 2022), which provides reference to factors to be considered under section 171(2) of the EP&A Regulation. These are provided below.

Table 9: Summary of Environmental Factors Reviewed in Relation to the Activity

Relevant Consideration	Response/Assessment		
a) Any environmental impact on a community	<p>The works will replace existing development and hard stand areas within disturbed areas of Nepean Hospital. The impacts upon the community will largely be in relation to the appearance of this part of the hospital when viewed from Derby Street and its residential developments to the south. The main changes will be a short-term loss of two canopy trees, and a changed built form at the location of Nepean 1 and Nepean 2 and the Sexual Health buildings, although not off any significant change in height.</p> <p>The construction related impacts will be largely focussed on noise and vibration during works at this edge of the hospital. During construction, a minor increase in trucks and construction operations may have a minor noise impact, however this will be minimal due to the scale of the works.</p>	-ve	Minor and short-term construction
		Nil	Minor ongoing visual impact.
		+ve	
(b) Any transformation of a locality	The works are not of a scale or type that would result in any transformation of the locality.	-ve	
		Nil	Minor visual changes to part of the locality only.
		+ve	
(c) Any environmental impact on the ecosystem of the locality	<p>The hospital is an existing disturbed environment in a suburban and built-up setting. The canopy trees impacted and proposed to be removed will be replaced by new canopy trees within the hospital campus at a rate of better than 2:1. 17 trees are proposed to replace the three (3) trees being removed. Trees are generally fragmented throughout the campus and the replanting options will seek to better cluster and focus canopy growth, particularly in the vicinity of the CAMHS building.</p> <p>The tree removal does not impact adversely upon any ecosystems that require further detailed consideration or assessment. See further discussion below on biodiversity-related considerations.</p>	-ve	
		Nil	Neutral to positive impacts over the longer term as trees mature.
		+ve	As above.
d) Any reduction of the aesthetic, recreational, scientific or other environmental quality or value of a locality.	<p>There will be no significant impact, change or reduction of the aesthetic, recreational, scientific or other environmental quality or value of a locality. The only impact is a localised aesthetic impact and this primarily relates to the replacement of at-grade parking and three modest and functional buildings with a new architect-designed hospital building along with the removal of three (3) canopy trees within the hospital. Existing areas of tree canopy will be retained and augmented with 17 new canopy trees.</p>	-ve	
		Nil	Neutral visual impacts overall
		+ve	
e) Any effect on locality, place or building having aesthetic, anthropological, archaeological, architectural, cultural, historical, scientific, or social significance or other special value for present or future generations.	<p>The Nepean Hospital is a disturbed environment having been subject to decades of change and development. There is no current place or building having aesthetic, anthropological, archaeological, architectural, cultural, historical, scientific, or social significance or other special value for present or future generations that is impacted by the works. The works have the positive impact of replacing building stock with a bespoke architecturally-designed hospital building catering for an immediate need in the provision of high quality health care and its associated services.</p>	-ve	
		Nil	
		+ve	Positive longer-term health care impacts without any

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Relevant Consideration	Response/Assessment		
	An unexpected finds protocol will be in place for any anthropological, archaeological, cultural, historical matters of significance.		direct impact under this provision.
(f) Any impact on the habitat of protected fauna (within the meaning of the National Parks and Wildlife Act 1974)	No impact upon habitat of protected fauna (within the meaning of the National Parks and Wildlife Act 1974) arises.	-ve	
		Nil	No impact arises.
		+ve	
(g) Any endangering of any species of animal, plant or other form of life, whether living on land, in water or in the air	The works will not endanger of any species of animal, plant or other form of life, whether living on land, in water or in the air. Mitigation measures are included to protect trees and also to ensure any tree hollows that may not have been visible from the ground to further protect any arboreal fauna.	-ve	
		Nil	
		+ve	No impact arises.
(h) Any long term impacts on the environment	The loss of three (3) canopy trees will be noticeable at the site from Derby Street, however over the longer term, the replacement and increase in canopy trees within the campus has the potential to positive longer term impacts for arboreal animals and the aesthetic presentation of the campus.	-ve	
		Nil	
		+ve	Replacement and increased tree canopy
(i) Any degradation of the quality of the environment	The existing natural environment in the hospital campus and surrounds is generally degraded, disturbed and suburban in form. The works will not further degrade this existing quality. Indeed, the improved built form, functionality and capacity of the hospital as well as the replacement tree canopy plantings has the potential over the longer-term to enhance the quality of the immediate environment.	-ve	
		Nil	Neutral to positive impacts over the longer term as trees mature.
		+ve	As above.
j) Any risk of safety of the environment	There will be no change to the existing safety of the environment during works and the operational phase of the development.	-ve	
		Nil	Neutral
		+ve	
(k) Any reduction in the range of beneficial uses of the environment	There will be no reduction in the range of beneficial uses of the environment during works and the operational phase of the development.	-ve	
		Nil	Neutral
		+ve	
(l) Any pollution of the environment	The pollution of the environment will only occur in a minor and short-term way during works. This is able to be suitably managed or mitigated with standard and bespoke measures for the short overall duration of the works in an area already subject to high degrees of planned change and overall transformation.	-ve	Short-term traffic and noise
		Nil	
		+ve	
(m) Any environmental problems associated with the disposal of waste	There will be no problems associated with the disposal of waste associated with any of the demolition works, construction works, and the ongoing operation of the buildings. The waste associated with the works is routine and standard, including the handling of HAZMAT and any contaminated soils and materials. Standard waste management systems are anticipated.	-ve	
		Nil	Neutral
		+ve	

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Relevant Consideration	Response/Assessment		
n) Any increased demanded on resources (natural or otherwise) that are, or are likely to become, in short supply	There will be no addition demand placed upon natural or other resources that may come into short supply.	-ve	
		Nil	
		+ve	No impact.
(o) Any cumulative environmental effects with other existing or likely future activities.	<p>The locality is a highly active development area. Recent works to Parker Street / The Northern Road have been completed by TfNSW and will not be affected by the works. Other works to The Northern Road to the south of the hospital and towards the M4 Motorway are significantly advanced and also at completion.</p> <p>The recent redevelopment of a new private hospital / clinic (Nepean Health Hub) by Cornerstone at the corner of Parker Street and Barber Avenue is now operational.</p> <p>A review of the Department's Major Project's webpage reveals no current development's near Nepean Hospital.</p> <p>A review of the Sydney and Regional Planning Panels register and Penrith City Council DA tracker for any recent DAs of note in Kingswood and near the hospital has however garnered the following:</p> <ul style="list-style-type: none"> • DA20/0810 – 34-36 Somerset Street, Kingswood (approved 29 October 2021) for the construction of a five (5) storey Private Health Facility Containing a 90 Bed Mental Health Hospital and Associated Health Services with Three (3) Levels of Basement and Lower Ground Parking for 92 Cars and a Roof Terrace • DA20/0767 – 28-32 Somerset Street, Kingswood (approved 24 September 2021) for the demolition of Dwelling, Construction of a Seven (7) Storey Accommodation Hotel with Rooftop Bar and Restaurant, 3 Levels of Basement Parking for 63 Vehicles, Ground Floor Reception, Lounge and Dining, and Associated Site Works with Consolidation of Three Lots • DA19/0801 – 39-43 Orth Street, Kingswood (approved 20 April 2020) for the Demolition of Existing Structures and Construction of a 5 Storey Private Hospital with 2 Levels of Basement and Parking for 65 Cars. <p>These developments are all generally to the east of the hospital noting these works will focus construction activity to the south and the likely overlap of impacts will be moderately dispersed.</p> <p>The commencement of the Stage 2 Redevelopment is now soon to commence. The location of those works to the north and west of the campus is generally isolated from these subject works and little direct overlap is likely.</p>	-ve	
		Nil	Neutral
		+ve	
(p) Any impact on coastal processes and coastal hazards, including those under projected climate change conditions.	The site is not located in the coastal zone or near the coast.	-ve	
		Nil	No Impacts
		+ve	
q) Applicable local strategic planning statements, regional strategic plans or district strategic plans made under the Act, Division 3.1	See below.	-ve	
		Nil	
		+ve	The works reinforce strategic planning objectives.

The factors to be considered also require consideration at section 171(2)(r) of other relevant environmental factors. No other relevant environmental factors are considered relevant under this REF.

Penrith Local Strategic Planning Statement

Penrith City Council's Local Strategic Planning Statement (LSPS) - Planning for a Brighter Future, sets out the 20-year vision for land use in Penrith Local Government Area (LGA). The LSPS recognises the special characteristics which

contribute to Penrith's local identity and how growth and change will be managed in the future. The LSPS came into force in March 2020 following endorsement by the Greater Sydney Commission and adoption by Council.

Overall, the LSPS provides a land use vision for Penrith LGA over the next 20 years taking into consideration the economic, social and environmental needs of the community. It aligns with and responds to the key priorities and directions set in the Greater Sydney Commission's (GSC) Greater Sydney Region Plan – A Metropolis of Three Cities and Western City District Plan. In doing so, it includes 21 planning priorities and 10 themes which reflect the shared community values to be maintained and enhanced. These are:

- Planning Priority 1 - Align development, growth and infrastructure
- Planning Priority 2 – Work in partnership to unlock our opportunities
- Planning Priority 3 – Provide new homes to meet the diverse needs of our growing community
- Planning Priority 4 – Improve the affordability of housing
- Planning Priority 5 – Facilitate sustainable housing
- Planning Priority 6 – Ensure our social infrastructure meets the changing needs of our communities
- Planning Priority 7 – Enrich our places
- Planning Priority 8 – Recognise and celebrate our heritage
- Planning Priority 9 – Support the North South Rail Link and emerging structure plan
- Planning Priority 10 – Provide a safe, connected and efficient local network supported by frequent public transport options
- Planning Priority 11 – Support the planning of the Western Sydney Aerotropolis
- Planning Priority 12 – Enhance and grow Penrith's economic triangle
- Planning Priority 13 – Reinforce The Quarter as a specialised health, education, research and technology precinct
- Planning Priority 14 – Grow our tourism, arts and cultural industries
- Planning Priority 15 – Boost our night-time economy
- Planning Priority 16 – Protect and enhance our high value environment lands
- Planning Priority 17 – Define and protect the values and opportunities within the Metropolitan Rural Area
- Planning Priority 18 – Connect our green and blue grid
- Planning Priority 19 – Create an energy, water and waste efficient city
- Planning Priority 20 – Manage flood risk
- Planning Priority 21 – Cool our city

The most vivid examples of the project meeting the Planning Priorities of the LSPS are Planning Priorities 1, 2, 6, 12, and 13. Accordingly, the development and ongoing enhanced operation of Nepean Hospital plays a significant contribution to Penrith LGA's strategic planning outcomes.

Of note with respect to The Quarter, the LSPS states:

The Quarter is Penrith's Health and Education precinct. It is a collaboration of the leading health and education providers spanning 300ha between Penrith and St Marys. Already a major employment hub with over 6,000 jobs, the number of jobs in The Quarter is expected to double by 2026 to more than 12,000. To achieve this goal, The Quarter must look at ways to facilitate industry clustering and agglomeration in health and education. Creating this economic hub will help generate new jobs in Penrith and better serve the needs of our community. The benefits will result in the precinct having its own industry specialisations different to other places that will drive additional economic opportunities.

The Quarter is anchored by the Nepean Hospital which is currently undergoing a \$1bn renovation, and a significant education presence through TAFE NSW and Western Sydney University, as well as a significant private hospital presence which is also expanding. In recent years, these anchoring institutions have united with other health and education providers like Sydney University's Nepean Clinical School to work together on projects that can foster an ecosystem of innovation within the precinct; centred on research and development.

Council has recently united with these stakeholders to collaborate and actively attract new forms of investment in order to create more high value jobs, while providing high-quality health care and education services for our community, and the Western Sydney region.

Western City District Plan

For the purposes of the District Plans, Penrith LGA and Nepean Hospital sits within the Western City District.

The proposal is consistent with the following Planning Priorities in the Western City District Plan:

- Planning for a city supported by infrastructure
- Providing services and social infrastructure to meet people's changing needs
- Fostering healthy, creative, culturally rich and socially connected communities.

The Nepean Hospital campus is located within the Greater Penrith Collaboration Area, which is identified "as a Collaboration Area, Greater Penrith's growth will be supported by a whole-of-government approach to align the activities and investments of government and key stakeholders in the area."

The Collaboration Area aims to:

- develop an integrated land use and transport vision
- revitalise and grow the Penrith CBD
- develop a major tourist, cultural, recreational and entertainment hub
- protect and expand the health and education precinct
- address flooding issues
- implement Greater Sydney Green Grid projects and promote ecologically sustainable development
- improve housing diversity and provide affordable housing
- diversify the night-time economy
- implement healthy city initiatives and improve social infrastructure.

The Plan identifies that collaboration for health and education precincts "will lead to the development of plans that increase the attractiveness and productivity of each centre, coordinate and leverage urban renewal opportunities to deliver greater liveability outcomes, promote advanced technology and knowledge sectors on industrial and urban services land and align infrastructure delivery with urban renewal." The proposal will result in the further expansion of the existing campus and improve the health services facilities within the Health and Education Precinct. This will contribute to the productivity of the Precinct and deliver greater liveability outcomes through the increased provision of health services.

6.2 Identification of Issues

6.2.1 Traffic, Access and Parking

Questions to consider	Yes	No
Will the works affect traffic or access on any local or regional roads?		X
Will the works disrupt access to private properties?		X
Are there likely to be any difficulties associated with site access?		X
Are the works located in an area that may be highly sensitive to movement of vehicles or machinery to and from the work site (i.e. schools, quiet streets)?		X
Will full or partial road closures be required?		X
Will the proposal result in a loss of onsite car parking?	X However the net loss in parking is positively offset by a greater loss in demand for spaces	
Is there onsite parking for construction workers?		X

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A Traffic Impact Assessment has been prepared which also includes preliminary Construction Traffic Management commentary – see **Appendix E**.

In terms of parking supply, as noted, 46 existing fleet spaces will be lost as a result of the works, however 4 new / replacement spaces will be provided in relation to the parking requirements for CAMHS. The 46 fleet spaces transferred to near West Block will in turn displace 46 staff spaces. The net loss in parking supply is 42 spaces.

ptc has estimated the required parking supply arising from the works. CAMHS is likely to generate the need for 36 parking spaces for staff, visitors to in-patients, and other associated visits to the facility by medical or emergency officers. The demolition of Nepean 1, Nepean 2, and Sexual Health building results in the decanting of some staff within the hospital campus but a relocation of a significant number out of the campus. Of some 256 staff presently working within these buildings, 125 will be relocated out of the campus. This has the effect of reducing parking demand by some 111 spaces based on ptc's calculations.

Accordingly, the 111 spaces presently required will be offset by new demand for 36 spaces. The resultant change in parking demand is a reduction of 75 spaces.

The demand for parking is reduced by 75 spaces compared the change in supply of 42 spaces. The works therefore result in a net decrease in demand for parking on the campus by 33 spaces, which effectively serves to remove this number of vehicles from the streets around the hospital's perimeter.

With respect to **Council's commentary in its submission**, see responses below.

The proposal represents an increase in gross floor area and additional or expanded services within the hospital that may require a proportionate increase in onsite car parking.

ptc advises that the floor area is not a reliable reference with regard to hospital parking demand, with the staff population, number of beds and the provided health services resulting in a more accurate basis. In this regard, the staff population will decrease as a result of this proposal according to the current services plan for the hospital, thereby parking demand will reduce accordingly. Refer to section 5 of the TIA where ptc presents both the parking demand and provision outcomes to conclude a net reduction in demand.

There is already a numerical deficiency in onsite car parking resulting from recent state significant development approvals for the redevelopment of the Nepean Hospital campus. It will need to be demonstrated that the proposed development works will not further increase patronage and parking demands if there is no additional car parking proposed.

Section 5 of the ptc report presents the parking assessment that underpins this application, which is presented in the context of the overall campus parking supply. In specific regard for the CAMHS project, the clinical services plan proposes a reduction in staff through the removal of the existing buildings within the site, which reduces the parking demand more than the impacts on the parking provision, resulting in a net positive parking provision to demand ratio (i.e. a reduction in the use of on-street parking).

A review of the plans suggest reconfiguration of some car parking however there doesn't appear to be a specific increase in parking to cater for the increased gross floor area associated with the proposed development.

The works themselves provide for 4 spaces for the CAMHS building. The demand generated by CAMHS is 36 spaces. The difference is however offset by the retention of other parking spaces on campus, but a reduced demand for parking spaces due to loss of staff within the campus. The parking demand of this staff is now accommodated within their new accommodation and its on-site parking.

ptc further states, as above, the project does involve some parking reconfiguration including the relocation of the fleet parking to the West Block car park, however the parking demand reduces by more than the reduction in parking (refer Section 5 of the TIA). The parking demand associated with the proposed staffing with CAMHS is presented as this provides a more accurate assessment than the gross floor area.

It is therefore requested that a traffic and parking assessment report be prepared and submitted to Council for review that addresses the traffic and parking demands of the existing / approved hospital campus with analysis to confirm what

impacts the proposed works will have on parking availability. The report should ensure or demonstrate that further overflow parking is projected to occur in the local road network as a consequence of this development.

The submission made by Council in 2021 has been subsequently replaced by campus-wide commentary (and assessment) made in relation to the Stage 2 tower's SSD application. This included detailed commentary on campus-wide parking matters as well as on-street parking concerns and the loss of parking on Barber Avenue. These comments and assessments have to the greater part dealt more comprehensively with Council's concerns and the campus-wide car parking issues.

Notwithstanding, ptc states its report has been prepared with reference to the overall campus parking study that established the parking demand and travel mode characteristics of the hospital. By applying the results of that study to the existing buildings to be removed from the subject site, and the proposed uses, it is demonstrated that the project in combination with the reduction in staff demand will improve the parking supply situation (Section 5 of the TIA).

The traffic assessment component has confirmed that the project will involve an overall decrease in the traffic activity associated with the campus, but particularly on Derby Street through the removal of the fleet car park from the site (Section 4 of the TIA).

As noted in the consultation section of this REF, to address Council's request that a traffic and parking assessment report be prepared and submitted to Council, ptc's pre-existing assessment was updated to address Council's comments and was provided to Council's letter's signatory for information by email on 15 March 2023. Council's Senior Traffic Engineer responded by email on 17 March 2023 raising no objection and no concern with respect to the parking scenario at the campus arising from this project.

Additionally, in relation to the overall campus-wide supply of parking and the required 2,009 spaces at the commencement of the Stage 1 Redevelopment under the Stage 1 Redevelopment SSD consent, it is noted and relevant to consider the ongoing fluidity of parking supply at the campus.

In June 2022 a campus parking inventory was undertaken by ptc and CBRE which recorded a total parking provision of 1,836 spaces, which excluded parking associated with Stage 1, as the contractor's compound was still in place in lieu of parking. The total spaces associated with Stage 1 were added and resulted in a total provision of 2,015 spaces following the completion of Stage 1. This satisfied a Stage 1 SSD condition requiring the provision of 2,009 spaces. At the time of writing, this provision remains within the campus as no other parking has been displaced pending the commencement of Stage 2 (which has a minor impact on parking) and the CAMHS project. Subject to budgets and other commitments, the supply of car parking will be able to revert to the 2,000 spaces mark through reconfiguration and re-commissioning of previous spaces lost to phases of redevelopment.

The CAMHS project will be constructed as a single contract therefore the construction activity will occur concurrently to minimise the impacts of traffic activity on Derby Street.

Access to both sites will be provided via a single driveway on Derby Street, adjacent to the multi-storey car park. Access through to the CAMHS site will be provided adjacent to the multi-storey car park. The peak traffic activity is likely to be associated with the removal of material during the demolition stage, and concrete pours associated with the footings and structures. Following these phases of works, smaller and less frequent vehicles are used for the fitout stage.

The site is well served by the arterial road network, providing proximate access to the M4 motorway to the south of Kingswood. The following truck routes have been identified as provided the most direct routes while minimising the impact on residential areas/roads.

The proposed driveway access will be designed to accommodate the left turn movement into the site and the right turn exit movement. There is no intention for vehicle to use the roads to the west of the campus.

The movement of vehicles will be restricted to the hours of operation of the site and all standard requirements (covered loads etc.) will apply.

No on-site construction worker parking is proposed, however given the public transport options around the site it is anticipated workers will be able to travel to the site without high levels of car dependency.

6.2.2 Noise and Vibration

Questions to consider	Yes	No
Are there residential properties or other sensitive land uses or areas that may be affected by noise from the proposal during construction? (i.e. schools, nursing homes, residential areas or native fauna populations)?	X Residential	
Will any receivers be affected by noise for greater than three weeks?	X	
Are there sensitive land uses or areas that may be affected by noise from the proposal during operation?	X	
Will the works be undertaken outside of standard working hours? Monday – Friday: 7am to 6pm Saturday: 8am to 1pm Sunday and public holidays: no work		X
Will the works result in vibration being experienced by any surrounding properties or infrastructure?		X

A Noise and Vibration Impact Assessment has been undertaken by EMM in consideration of the concurrent works at the site and of the impacts upon sensitive receivers both within the hospital and at the hospital's perimeter. Where impacts are identified, mitigation measures are recommended to apply. This assessment is located at **Appendix M**.

Sensitive Receivers

Sensitive receivers of noise outside of the hospital have been identified as a range of residential, mixed use, and health care-related uses to the south and east of the development site, generally within the immediate vicinity of the site and/or overlooking the site. A range of uses internal to the hospital, including those within East Block, Oral Health, the retained Nepean Executive building, and the Adult Mental Health building are all also identified as sensitive receivers.

Construction Noise

Based on background noise levels applied for the Stage 1 Redevelopment of the hospital, that is, before construction noise impacts commenced to introduce bias to the recording of conservative background noise levels, and with the assumption of a range of demolition plant and machinery that would be expected based on the scope of works and their sound power levels, EMM has been able to predict the likely noise impacts on the various sensitive receivers.

Across both scopes of works at the site, EMM has concluded as follows with respect to demolition noise.

Noise predictions indicate that construction noise levels during demolition works:

- may exceed the 'noise affected' Noise Management Levels (NMLs) at all residential assessment locations. The 'highly noise affected' level is not expected to be exceeded during the demolition phase; and
- some minor exceedances (up to 5dB) of surrounding hospital / healthcare uses may also be experienced.

It is noted that the demolition works are expected to be short in duration given:

- the absence of significant structures on the project site; and
- new structures will not accommodate sublevel floors (eg no major excavation).

On-campus assessment locations which may experience levels exceeding associated NMLs include Oral Health,

Sexual Health and Court Building (noting Sexual Health is now proposed for demolition). Possible mitigation measures are discussed in Section 5.4. Noise mitigation measures and strategies should be formulated as part of the detailed construction noise and vibration management plan.

Across both scopes of works at the site, EMM has concluded as follows with respect to construction noise.

Noise predictions indicate that construction noise levels during construction works:

- may exceed the 'noise affected' NMLs at all residential assessment locations. The 'highly noise affected' level is not expected to be exceeded during the construction stage; and
- the NMLs for surrounding hospital / healthcare uses would likely be met.

On-campus assessment locations which may experience levels exceeding associated NMLs include the Sexual Health and Court Building (note these are now proposed for demolition). Possible mitigation measures are discussed in Section 5.4. Noise mitigation measures and strategies should be formulated as part of the detailed construction noise and vibration management plan.

Mitigation measures which may be employed to further minimise noise impacts from the construction of the project are discussed in this section. These can include physical measures, such as acoustic screens or shrouds, or noise management measures such as scheduling, alternative plant, community consultation and the like.

Operational Noise

The operational noise likely to be generated by CAMHS will be from vehicle deliveries via the internal driveway; and mechanical plant operation.

The noise levels generated by these factors have been considered and predicted by EMM.

Based on the source noise levels presented in Section 6.2.2 of the assessment by EMM into the likely mechanical plant for CAHMS, the predicted noise levels indicate that additional acoustic treatment would be required to mechanical plant to meet noise emission objectives. Noise predictions indicate that the primary source of exceedance is associated with rooftop fans, given that condensers will be largely screened from noise affected receiver locations. Additional acoustic treatment to the rooftop fans could include internally lined discharge duct or an acoustic attenuator.

EMM concludes as follows:

Noise associated with demolition and construction may result in some exceedance of project NML for residential assessment locations surrounding the site. Predicted noise levels do not exceed the 'highly noise affected' management level.

Construction noise predictions indicate some exceedances of the project construction NMLs at commercial and healthcare uses within and external to the Nepean Hospital campus. Construction noise mitigation and management strategies have been included in this report for consideration.

A detailed construction noise and vibration management plan is to be prepared as part of the main works contract to ensure that all feasible and reasonable treatments and management measures are considered to minimise construction noise and vibration from the project. This review would be undertaken once a detailed methodology for the works is established.

An assessment of noise from operational noise sources, such as the workshops and mechanical plant has been undertaken. Recommendations and noise management limits have been provided to ensure that noise from the operation of the workshops meet the PNTLs with the façade open and closed.

A detailed assessment of mechanical plant is to be undertaken during the detailed design to confirm compliance with NPfI noise limits.

EMM's recommendations have been included in the proposed mitigation measures for this project.

6.2.3 Air Quality and Energy

Questions to consider	Yes	No
Could the works result in dust generation?	X	
Could the works generate odours (during construction or operation)	X Construction	
Will the works involve the use of fuel-driven heavy machinery or equipment?	X	

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Are the works located in an area or adjacent to land uses (e.g. schools, nursing homes) that may be highly sensitive to dust, odours, or emissions?

X

Dust and air quality management is included in the preliminary construction management plan. Standard mitigation measures are likely to be suitable to the level of air quality management required in the context of these works.

6.2.4 Soils and Geology

Questions to consider	Yes	No
Will the works require land disturbance?	X	
Are the works within a landslip area?		X
Are the works within an area of high erosion potential?		X
Could the works disturb any natural cliff features, rock outcrops or rock shelves?		X
Will the works result in permanent changes to surface slope or topography?		X
Are there acid sulphate soils within or immediately adjacent to the boundaries of the work area? And could the works result in the disturbance of acid sulphate soils?		X
Are the works within an area affected by salinity?	X	
Is there potential for the works to encounter any contaminated material?	X	

To manage run-off from stormwater during works, separate Erosion and Sediment Control Plans for each of the CAMHS and accessway sites has been prepared and provided by ACOR Consultants at **Appendices I and II** as part of its civil works package of drawings. The measures proposed are consistent with Erosion and sediment control - Managing Urban Stormwater: Soils and Construction (Landcom, 2004) (the Blue Book).

With respect to contamination and any need for remediation works, please see commentary below within Section 6.2.13 of this REF.

Geotechnical Assessments are also provided at **Appendix N**.

With reference to the 1:100,000 Map of Salinity Potential in Western Sydney prepared by the Department of Natural Resource, the site is located in an area where there is a moderate potential for soil and groundwater salinity to occur. Salinity can affect the longevity and appearance of structures as well as causing adverse horticultural and hydrogeological effects.

Penrith City Council's DCP includes a section on managing salinity impacts – see Section 4.5 of Chapter C4 – Land Management. Should the site be identified as being subject to a potential risk of salinity (refer to the map Salinity Potential in Western Sydney 2002) a detailed salinity analysis will be required to avoid or mitigate the impacts of development on salinity processes to prevent any degradation in soils, groundwater or vegetation; damage to buildings and infrastructure; and ensure development will not significantly increase the salt load in existing watercourses.

In any case the scope of earthworks are shallow and unlikely to cause impacts of development upon the groundwater system at or near the hospital campus.

As a mitigation measure, further advice is required to determine the risk of impact upon degradation in soils, groundwater or vegetation; damage to buildings and infrastructure; and ensure development will not significantly increase the salt load in existing watercourses. This should be acquired prior to the commencement of works.

6.2.5 Hydrology, Flooding and Water Quality

Questions to consider	Yes	No
Are the works located near a natural watercourse?		X
Are the works located within a floodplain?		X
Will the works intercept groundwater?		X

Questions to consider	Yes	No
Will a licence under the <i>Water Act 1912</i> or the <i>Water Management Act 2000</i> be required?		X

ACOR Consultants have provided advice around the existing hydrology and flooding of the site and the proposed works. This is contained within reporting within **Appendix I** of this REF. A summary is set out below.

Existing stormwater and flooding characteristics of the site

ACOR Consultants advise that there is existing in-ground drainage infrastructure at the southern, downstream, end of the site along the boundary with Derby Street. Surface water from the existing carparking currently sheet flows across the site and is collected into these pits. There is a 300mm diameter outlet pipe from the existing pit in the south-eastern corner of the site. Based on available survey data it is assumed this pipe continues along the Derby Street frontage, past the multideck carpark and discharges into an existing Council kerb inlet pit on the corner of Derby and Somerset Streets. The existing demountable buildings to the north and west of the carpark, namely the Court building and Sexual Health building have gutters and downpipes which collect and convey roof water runoff and discharge directly onto the existing surface and into landscaping areas. This then overland flows as above to be collected into the surface inlet pits in the south. Part of the Court building roof runoff is also directed to an above ground rainwater tank. Rainwater re-use reticulation is unknown.

In terms of flooding, the site falls within the College, Orth and Werrington Creeks catchment and flooding of this area is the subject of the 'College, Orth and Werrington Creeks Catchment Overland Flow Flood Study' prepared by Catchment Simulation Solutions dated June 2017.

The CAMHS site is generally unaffected by flooding impacts, however the south-eastern corner of the accessway site has been identified as flood affected for all storm events from the 50% AEP to the 1% AEP. Flood depths are only shown to be up to 300mm deep for all storms. However, outside the site boundary along Derby Street is not shown to be flood affected for any storm event up to and including the 1% AEP, see Figure 1 of the ACOR Consultants Civil and Structural Engineering Schematic Design report at **Appendix I**. This flooding may be due to an anomaly in the model.

Proposed works

Based on Copuncil's DCP, the intent for the development is to utilise the existing fleet carpark drainage network where possible and ultimately discharge to the existing pipe running adjacent to the multideck carpark on Derby Street. The assumed outlet pipe will need to be confirmed prior to detail design to confirm the size and condition of the existing system to ensure it has capacity for the stormwater runoff from the proposed building and accessway works.

The new building is proposed to be drained by a conventional roof drainage system connecting to a new inground pit and pipe network. The roof and in-ground pipe system will be sized to cater for the 5% AEP, ensuring there is available overland flow paths for the larger storm events up to and including the 1% AEP to freely discharge to Derby Street.

Note, the site is not identified as requiring on-site detention on Council's OSD maps. In terms of Water Sensitive Urban Design elements, no water quality treatment devices are required. Majority of the site area which is currently asphalt carparking will remain as with the proposed design, so no change in the rainfall runoff quality will occur.

Stormwater quantity

It is not expected that any flood controls will be placed on the development at the accessway site as the flooding shown on the flood maps is localised to the south-eastern corner of the site only, and the adjacent Derby Street is not identified as flood affected. As such, the flooding shown may be an anomaly in the modelling. Minor regrading at the boundary to ensure the driveways are free draining to Derby Street should alleviate existing flooding, if any. Overland flow paths will be designed to convey flows from all storms above a 5% AEP event up to and including the 1% AEP storm event.

Stormwater quality

The Penrith DCP 2014 Part C3.2 outlines the water quality requirements for proposed developments. For new commercial and industrial developments with a site area of less than 2,500m² or where there is an increase in impervious site area of less than 250m² no stormwater quality or water quantity flow devices are required. Accordingly, based on ACOR Consultant's calculation no flow devices have been provided in this instance.

6.2.6 Visual Amenity

Questions to consider	Yes	No
Are the works visible from residential properties, or other land uses that may be sensitive to visual impacts?	X	
Will the works be visible from the public domain?	X	
Are the works located in areas of high scenic value?		X
Will the works involve night work requiring lighting?		X

The proposed works are likely to be visible from parts of Derby Street to the south of the hospital only, and to that end from a narrow viewshed from residences opposite the hospital on Debry Street. The built form and bulk and scale of development is generally likely to be consistent with the existing cluster of single and two-storey functional (and demountable) buildings currently at the site. The improvement however in existing visual impacts to the future visual impacts arises from the architecturally-designed CAMHS building. The CAMHS building will be further setback into the hospital and away from Derby Street. Being a 2-storey building nestled to the immediate west of the multi-storey carpark building at the corner with Somerset Street, it will moderate bulk and scale by stepping down and away from the intersection.

6.2.7 Aboriginal Heritage

Questions to consider	Yes	No
Will the activity disturb the ground surface or any culturally modified trees?		X
Are there any known items of Aboriginal heritage located in the works area or in the vicinity of the works area (e.g. previous studies or reports from related projects)?		X
Are there any other sources of information that indicate Aboriginal objects are likely to be present in the area (e.g. previous studies or reports from related projects)?		X
Will the works occur in the location of one or more of these landscape features and is on land not previously disturbed?		X
<ul style="list-style-type: none"> • Within 200m of waters. • Located within a sand dune system. • Located on a ridge top, ridge line or headland. • Located within 200m below, or above a cliff face. • Within 20m of, or in a cave, rock shelter or a cave mouth 		
If Aboriginal objects or landscape features are present, can impacts be avoided?		N/A
If the above steps indicate that there remains a risk of harm or disturbance, has a desktop assessment and visual inspection been undertaken?		X
Is the activity likely to affect wild resources or access to these resources, which are used or valued by the Aboriginal community?		X
Is the activity likely to affect the cultural value or significance of the site?		X

The standard unexpected finds protocol is likely to be suitable as a mitigation measure in this context. In confirming that no Aboriginal cultural heritage is likely to be impacted, see a recent AHIMS search at **Appendix O**.

Note, during the Stage 2 Redevelopment SSD process, reporting on Aboriginal cultural heritage resulted in the following commentary and mitigation measures.

Following the site inspection, and due to the disturbed nature of the site, Comber concluded that the site does not contain Aboriginal archaeological potential and that it is unlikely that Aboriginal objects would be disturbed by the proposal. Accordingly, there are no constraints to the proposed Nepean Hospital Stage 2 Redevelopment in respect of Aboriginal archaeology. Recommendations are nonetheless made with respect to an unexpected finds protocol during works and induction and procedures related to addressing any finds.

6.2.8 Non-Aboriginal Heritage

Questions to consider	Yes	No
Are there any heritage items listed on the following registers within or in the vicinity of the work area? NSW heritage database (includes section 170 and local items) Commonwealth EPBC heritage list?		X
Will works occur in areas that may have archaeological remains?		X
Is the demolition of any heritage occurring?		X

Again, with reference to the most recent heritage assessment at the campus, consistent with mapping under Penrith LEP 2010, the hospital campus is not a listed item on any statutory or non-statutory heritage register. A number of local heritage items are however located near or in the general locality of the hospital. No heritage conservation areas are located within this general area.

The proposed works are unlikely to have an impact on any items of built heritage significance of the hospital itself. The majority of buildings are relatively recent developments, the earliest having been erected sometime in the 1980s. Major developments in this area of the campus occurred in the 1990s. In considering the pattern of development in the hospital buildings over time, it is clear that these buildings are representative of the reactive nature of hospital growth in response to the growing community.

The works are also remote from any nearby heritage items being some many hundreds of metres from the closest items in any direction.

Archaeological potential at the site has previously been assessed as Nil to Low on the basis of the highly disturbed and urbanised nature of the site and progressive loss of soil integrity across the campus from periods of intensive works.

The standard unexpected finds protocol is likely to be suitable as a mitigation measure in this context.

6.2.9 Ecology

Questions to consider	Yes	No
Could the works affect any <i>Environmental Protection and Biodiversity Conservation Act 1999 (Cth)</i> listed threatened species, ecological community or migratory species?		X
Is it likely that the activity will have a significant impact in accordance with the <i>Biodiversity Conservation Act (2016)</i> ? In order to determine if there is a significant impact, the REF report must address the relevant requirements of Section 7.2 of the BC Act: <ul style="list-style-type: none"> Section 7.2 (a) – Test for significant impact in accordance with section 7.3 of the BC Act. Section 7.2 (c) – it is carried out in a declared area of outstanding biodiversity value. 		X
Could the works affect a National Park or reserve administered by EES?		X
Is there any important vegetation or habitat (i.e. Biodiversity and Conservation SEPP) within or adjacent to the work area?		X
Could the works impact on any aquatic flora or habitat (i.e. seagrasses, mangroves)?		X
Are there any noxious or environmental weeds present within the work area?		X
Will clearing of native vegetation be required?		X

The removal of three (3) mature native trees would not be classed as the clearing of native vegetation given the selective and specific nature of the tree removal.

The Biodiversity Conservation Act is not triggered in this part of the site as no part of this quadrant of the campus is mapped by the various NSW mapping portals (or Council's LEP) as containing biodiversity values. Unlike the areas around the Stage 2 Redevelopment footprint to the north which includes a range of remnant or representative tree species, it is understood that these subject three trees are planted. No clear reference is made in the reporting to these

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in prior biodiversity reporting being remnant vegetation. The age and size of the trees suggests prior planting. This is certainly the case for Tree 133, and potentially the case for Trees 82 and 83.

In the event Trees 82 and 83 are remnant, they have the potential to be highly fragmented PCT 849 - Cumberland shale plains woodland, as located elsewhere on the campus and which generally comprises other isolated patches of remnant eucalypts, including *Eucalyptus moluccana* (Grey Box), such as these. However, like other patches of isolated trees in the campus they are highly fragmented from the surrounding area and comprise only canopy trees. The landscape is highly urbanised with few remnant or planted species consistent with this Threatened Ecological Community (TEC). Based on previous ecological assessments in Nepean Hospital, the current condition of the TEC within parts of the campus is low due to few of the ground and mid-storey species consistent with the TEC with the patches generally consisting of a few remnant isolated trees.

Tree 133 is a more recent (and younger) planted specimen adjacent to the road reserve likely to have been planted as part of the development of the adjacent Somerset Street multi-storey car park in the past 10-15 years only. It has previously been identified by Moore Trees as having low significance.

Given the potential that the trees are planted native vegetation no biodiversity offsetting is triggered. The removal of three isolated specimens is not likely to trigger any Serious and Irreversible Impacts (SAIL) in relation to the possible and highly fragmented PCT 849 - Cumberland shale plains woodland within the wider campus and the adjacent areas of Kingswood.

The Aboricultural Assessment by Moore Trees (see **Appendix F**) has not indicated whether any hollows are found within any of the trees to be removed.

In any case, Moore Trees includes a series of recommendations setting out the tree removal methodology as well as a tree protection plan. Further, a replacement planting ratio requirement of 2:1 is satisfied with 17 new canopy trees to replace these three trees.

Based on this, the activity will not significantly affect threatened species, populations, ecological communities or their habitats, and a SIS and/or BDAR is not required.

6.2.10 Bushfire

Questions to consider	Yes	No
Are the works located on bushfire prone land?		X
Do the works include bushfire hazard reduction work?		X
Is the work consistent with a bush fire risk management plan within the meaning of the <i>Rural Fires Act 1997</i> (RF Act) that applies to the area or locality in which the activity is proposed to be carried out?		N/A

No further mitigation measures are considered applicable or relevant in the context.

6.2.11 Land Uses and Services

Questions to consider	Yes	No
Will the works result in a loss of, or permanent disruption of an existing land use?		X
Will the works involve the installation of structures or services that may be perceived as objectionable or nuisance?		X
Will the works impact on, or be in the vicinity of other services?		X

No further mitigation measures are considered applicable or relevant in the context.

6.2.12 Waste Generation

Questions to consider	Yes	No
Will the works result in the generation of non-hazardous waste?	X	
Will the works result in the generation of hazardous waste?	X	
Will the works result in the generation of wastewater requiring off-site disposal?		X

The range of waste likely to be generated is a mix of hazardous and non-hazardous building material and hardstand asphaltic waste. As set out in the preliminary Construction Management Plan, all waste materials will be treated in accordance with the Penrith City Council and EPA requirements. Excavated soil is to be classified prior to disposal and/or reuse. Identification of suspected or contaminated soil will cease work. Suspected contaminated spoil will be tested to provide classification for disposal – see discussion on the results of the Detailed Site Investigations in the section that follows.

The project scope includes for some demolition activity. Rubbish will be removed using both liftable construction bins and wheelie type bins. The waste in these bins will be loaded into the larger ‘skip’ bins located in the building delivery/laydown area within the site compound.

The Contractor will be required to recycle and reuse where possible. The Contractor will be required to arrange for the sorting and recycling of waste materials and packaging to ensure maximum recycling is achieved. The disposal subcontractor will recycle material where possible and record waste volumes. A receipt summarising status of recycled and waste quantities will be issued to the contractor on a monthly basis. Target for recycling of waste by the disposal subcontractor to be agreed upfront (as percentage of the total waste generated). All other/general waste will be removed from site as required.

Anticipated construction waste streams are demolition waste (rubble, concrete, and solid waste); mixed spoil; excavated natural material; green waste; metal waste; office waste; and asbestoscontaining materials. Recycling will be sorted and stockpiled on site in the following categories: concrete; steel/metals; bricks. Waste streams will be classified, and their recovery or disposal tracked.

A Hazardous Materials Assessment has been prepared. See discussion on this in the section that follows.

6.2.13 Hazardous Materials and Contamination

Questions to consider	Yes	No
Is there potential for the works to encounter any contaminated material?	X	
Will the works involve the disturbance or removal of asbestos?	X	
Is the work site located on land that is known to be or is potentially contaminated?	X	
Will the works require a Hazardous Materials Assessment?	X	
Is a Remediation Action Plan required?		X
Is the work category 2 works under Resilience and Hazards SEPP?		N/A

HAZMAT

JK Environments has prepared a Hazardous Building Materials Survey for each of the sites subject of the works (being the CAMHS site and the new accessway) and their current accommodation – see **Appendices P and PP**. The CAMHS-related assessment has only considered Nepean 1 and Nepean 2 (having pre-dated the decision to now also demolish the Sexual Health building). Conservatively, and given the likely similar ages of the buildings, the same general conclusion may be drawn with respect to these building for this assessment.

Those buildings do not contain any lead in paint or lead in accumulated dust. Asbestos containing materials were identified within the interior and the exterior of the existing building and structures at the site at the time of the inspection by JK Environments. Only bonded asbestos containing materials were encountered at the site.

Fluorescent light fittings potentially housing PCB containing capacitors were identified to the external areas of Nepean 1 building. The fittings were visually inspected at the time of the inspection. Materials containing SMF were identified in the form of foil wrapped insulation, foil backed insulation, acoustic ceiling tiles, vinyl tiles and vinyl sheeting at the site. All materials were in good condition at the time of the inspection.

An unexpected finds protocol is to be applied as a mitigation measures as well as the need to prepare a Hazardous Building Materials Survey for these buildings prior to the commencement of demolition works. A range of recommendations (imposed as mitigation measures) are included in the JK Environments assessment / report.

The accessway site is not subject to any asbestos materials, lead in paint, PCB containing electrical equipment, or SMF materials, principally as the site is an at-grade car park devoid of buildings.

Contamination

JK Environments has also prepared separate Detailed Site Investigations (DSI) for each site to determine the level of potential contamination as well as any need for remediation works at the sites – **see Appendix K**.

In relation to the CAMHS site, the DSI included sampling from seven borehole locations and groundwater sampling from three groundwater wells installed for the investigation. No elevations of the contaminants of potential concern (CoPC) above the human-health or ecological based SAC were encountered in the soil samples analysed. Elevations of heavy metals in groundwater were identified above the ecological SAC, however these were considered to be consistent with regional/background groundwater conditions. Soil and groundwater contamination triggering a need for remediation was not identified.

Bonded asbestos containing material (ACM) was previously identified (during the PSI) on the ground surface within the sub-floor of the existing Nepean 2 building in the eastern area of the site. The asbestos-related risks in the context of the current land use were assessed to be low due to the most likely form of the asbestos being ACM (i.e. non-friable) and access to the exposed area currently being restricted (sub-floor). Notwithstanding, any remaining ACM fragments will need to be removed prior to the commencement of construction so that potential risks are adequately mitigated.

Based on the Tier 1 risk assessment, contamination related risks in the context of the current land use and the proposed development were assessed to be low. JK Environments is of the opinion that the site can be made suitable for the proposed development subject to appropriate implementation of the following recommendations:

- The buildings/structures are to be appropriately demolished and clearance certificates are to be provided following removal of any hazardous building materials. All demolition and clearances should occur prior to removal of the hardstand in order to reduce the potential for cross contamination with the underlying soils;
- Following completion of the demolition works, undertake an 'emu pick' of the site for fragments of fibre cement/ACM at the surface of the site. The pick should be conducted by a suitably licensed asbestos contractor. On completion of the pick, a clearance certificate should be issued by a competent person or SafeWork NSW Licensed Asbestos Assessor to ensure the area is free of visible asbestos; and
- Development and implementation of an unexpected finds protocol during the proposed development works.

JK Environments is of the opinion that there is currently no requirement to report the contamination to the NSW EPA under the NSW EPA Guidelines on the Duty to Report Contamination under Section 60 of the CLM Act 1997 (2015). This is to be further evaluated as the project proceeds.

Similarly, in relation to the accessway site, the DSI included a review of historical information for the site and sampling of the soil from seven borehole locations and groundwater from three monitoring wells. The site has historically been vacant or used for grazing/agricultural purposes, prior to its development as an open-air car park as part of the wider hospital campus from sometime between 1986 and 1991 to the present day.

The CoPC for the soil samples analysed were reported at concentrations below the SAC, or at levels below the laboratory detection limits. Risks from contamination (i.e. exposure via a complete SPR linkage) were not identified.

Elevations of heavy metals in groundwater were identified above the ecological SAC, however these were considered to be consistent with regional/background groundwater conditions. Overall, risks associated with groundwater contamination were assessed to be low.

Review of Environmental Factors:

Nepean Hospital Child and Adolescent Mental Health Services (CAMHS) Project

Based on the findings of the DSI, JK Environments is of the opinion that the site is suitable for the proposed development. There is considered to be a relatively low potential for contamination-related unexpected finds to occur at the site during the proposed development works, however it is recommended that an unexpected finds protocol be developed and implemented during the construction phase of the development.

6.2.14 Community Impact/ Social Impact

Questions to consider	Yes	No
Is the activity likely to affect community services or infrastructure?		X
Does the activity affect sites of importance to local or the broader community for their recreational or other values or access to these sites?		X
Is the activity likely to affect economic factors, including employment numbers or industry value?		X
Is the activity likely to have an impact on the safety of the community?		X
Will the activity affect the visual or scenic landscape? This should include consideration of any permanent or temporary signage.	X	
Is the activity likely to cause noise, pollution, visual impact, loss of privacy, glare or overshadowing to members of the community, particularly adjoining landowners?	X	

The CAMHS building has a direct and tangible positive impact in the provision of new and needed (mental) health services that have been identified in the Clinical Services Plan.

As set out in the earlier sections of this REF concerning the objectives and justification, the CAMHS Unit is considered a key priority for the State-wide Mental Health Infrastructure Program, supporting the delivery of Mental Health care reform in NSW. The new CAMHS Unit will be integrated into the existing Nepean Hospital Campus and will be immediately adjacent to the existing Acute Mental Health Building.

Clinical pathways for Acute presentations to the CAMHS Unit extend to the new Emergency Department which is currently under construction. The location of the new CAMHS Unit must support parallel CAMHS and Emergency Department care. The new CAMHS Unit will be designed to the latest in contemporary models of care and will fully integrate in with the greater Nepean Hospital Campus and the other Local Health District Services.

As noted, The drivers for the CAMHS works relate to the following:

- There are currently no specialist Child and Adolescent (Youth) Mental Health In-patient Services in Nepean Blue Mountains Local Health District (NBMLHD);
- The population of young people who may be admitted to the Unit, aged 12-17 years is projected to increase by 36% between 2016- 2036 from 28,868 to 40,394;
- There are high levels of socio-economic disadvantage in Lithgow Local Government area (LGA with 75% of the population living in the more disadvantaged suburbs than the Australian average; and
- In Penrith LGA, 42% of the population lived in more socio-economic disadvantage than the Australian average while 8% of the St Marys and North St. Marys (two suburbs in Penrith LGA) live in extreme disadvantage.

To that end, the CAMHS will provide for much needed mental health support and treatment not presently available. When the ten (10) bed CAMHS In-patient Unit is complete it will have the capacity to admit up to 260 young people per annum based on 100% occupancy and an average length of stay of fourteen days.

Overall, the delivery of the new CAMHS building will be an immediate community asset.

6.2.15 Cumulative Impact

Questions to consider	Yes	No
Has there been any other development approved within 500m of the site?	X	
Will there be significant impacts (for example, including but not limited to, construction traffic impacts) from other development approved or currently under construction within 500m of the site?		X

The locality is a highly active development area. Recent works to Parker Street / The Northern Road have been completed by TfNSW and will not be affected by the works. Other works to The Northern Road to the south of the hospital and towards the M4 Motorway are significantly advanced and also at completion.

The recent redevelopment of a new private hospital / clinic (Nepean Health Hub) by Cornerstone at the corner of Parker Street and Barber Avenue is now operational.

A review of the Department's Major Project's webpage reveals no current development's near Nepean Hospital. Note the Stage 2 Nepean Hospital Redevelopment is soon to commence however this is remote from the CAMHS site and suitably able to be segregated from a construction management standpoint.

A review of the Sydney and Regional Planning Panels register and Penrith City Council DA tracker for any recent DAs of note in Kingswood and near the hospital has however garnered the following:

- DA20/0810 – 34-36 Somerset Street, Kingswood (approved 29 October 2021)
 - Construction of a Five (5) Storey Private Health Facility Containing a 90 Bed Mental Health Hospital and Associated Health Services with Three (3) Levels of Basement and Lower Ground Parking for 92 Cars and a Roof Terrace
- DA20/0767 – 28-32 Somerset Street, Kingswood (approved 24 September 2021)
 - Demolition of Dwelling, Construction of a Seven (7) Storey Accommodation Hotel with Rooftop Bar and Restaurant, 3 Levels of Basement Parking for 63 Vehicles, Ground Floor Reception, Lounge and Dining, and Associated Site Works with Consolidation of Three Lots
- DA19/0801 – 39-43 Orth Street, Kingswood (approved 20 April 2020)
 - Demolition of Existing Structures and Construction of a 5 Storey Private Hospital with 2 Levels of Basement and Parking for 65 Cars

These development are now all well progressed and/or at completion. They generally sit to the east of the hospital and have a direct access from the Great Western Highway via Somerset Street. It is unlikely that there would be any significant level of overlap of traffic related to this project and these. Given their level of completion and modest scope of this REF's works the likely volume of construction traffic will be diminishing rather than increasing in this regard.

BCA / Accessibility Assessment

In addition to the above assessment, BM+G has also completed separate BCA and Accessibility assessment of the proposed building – see **Appendix Q**. BM+G concludes that it is satisfied that the new works can satisfy the requirements of the BCA 2019 and the Access to Premises Standards 2010 if the works are designed and constructed in accordance with the requirements of this BCA Report and the subsequent Fire Engineering Assessment undertaken by Fire Safety Engineer and Performance Solution prepared by the appointed Access Consultant in relation to the building.

7. Summary of Mitigation Measure

Mitigation measures are to be implemented for the proposal to reduce impacts on the environment. The mitigation measures are provided at **Appendix R**.

7.1 Summary of Impacts

Based on the identification of potential issues, and an assessment of the nature and extent of the impacts of the proposed development, it is determined that:

- The extent and nature of potential impacts are moderate during construction (however able to be managed with appropriate mitigation measures) and low during operation and will not have significant adverse effects on the locality, community and the environment;
- Potential impacts can be appropriately mitigated or managed to ensure that there is minimal effect on the locality, community; and
- Given the above, it is determined that an EIS is not required for the proposed development activity.

8. Justification and Conclusion

The proposed demolition, construction works, and operation in relation to the Nepean Hospital Child and Adolescent Mental Health Services (CAMHS) Project at Nepean Hospital, Derby Street, Kingswood is subject to assessment under Part 5 of the EP&A Act. The REF has examined and taken into account to the fullest extent possible all matters affecting, or likely to affect, the environment by reason of the proposed activity.

As discussed in detail in this report, the proposed works will not result in any significant or long-term impact. The potential impacts identified can be reasonably mitigated and where necessary managed through the adoption of suitable site practices and adherence to accepted industry standards.

As outlined in this REF, the proposed activity can be justified on the following grounds:

- It responds to an existing need within the community;
- It generally complies with, or is consistent with all relevant legislation, plans and policies;
- It has minimal environmental impacts; and
- Adequate mitigation measures have been proposed to address these impacts.

The environmental impacts of the proposal are not likely to be significant and therefore it is not necessary for an EIS to be prepared and approval to be sought for the proposal from the Minister for Planning under Part 5.1 of the EP&A Act. Further, the activity will not significantly affect threatened species, populations, ecological communities or their habitats, and therefore a SIS and/or BDAR is not required.

On this basis, it is recommended that HI approve the proposed activity in accordance with Part 5 of the EP&A Act and subject to the adoption and implementation of matters outlined in this report.