

HEALTH INFRASTRUCTURE

# Addendum No.1 Review of Environmental Factors – Concord Hospital

Concord Forensic Mental Health Unit

24 July 2024

Version No.2



HI Planning Document Control

Version	Date	Author	Description	Reviewed by	Approved by
1	16 July 2024	Larissa Ozog	Draft report		
2	24 July 2024	Larissa Ozog	Final report		

Declaration

This Addendum Review of Environmental Factors (Addendum REF) has been prepared for NSW Health Infrastructure (HI) to assesses the potential environmental impacts which could arise from changes to the roof design of the new three storey forensic mental health facility at Concord Hospital which is located at 1H Hospital Road, Concord West and to seek the deletion of mitigation measure 22.3 in relation to the engagement of an EPA accredited site auditor.

A REF for the demolition of structures and the construction of a new three storey building to be used as a Forensic Mental Health facility including infrastructure works and associated landscaping was endorsed by HI on 11 March 2024. This Addendum 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* (TI SEPP).

This Addendum 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 3 of the Guidelines for Division 5.1 Assessments (June 2022), the EP&A Regulation and the *Commonwealth Environmental Protection and Biodiversity Conservation Act 1999* (EPBC ACT).

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

Declaration	
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Document Management, Tracking and Revision History

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Appendices

Appendix	Description	Author	Rev/Ref/Date
A	Architectural Plans by NBRS	NBRS	12 and 16 July 2024
B	Cover Letter	Bd Infrastructure	16 July 2024
C	Letter – Schedule of changes	NBRS	16 July 2024

## 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	<i>Biodiversity Conservation Act 2016</i>
BC Act 2017	<i>Biodiversity Conservation Act 2017</i>
BC Regulation	Biodiversity Conservation Regulation 2017
BAM	Biodiversity Assessment Method
CA	Certifying Authority
CE	Chief Executive
CM Act	<i>Coastal Management Act 2016</i>
CMP	Construction Management Plan
CWC	Connecting with Country
CRA	Conservation Risk Assessment
DPC	Department of Premier and Cabinet
DPHI	Department of Planning, Housing and Infrastructure
EIS	Environmental Impact Statement
EMP	Environmental Management Plan
EES	Environment, Energy and Science
EPA	Environment Protection Authority
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	Environmental Planning and Assessment Regulation 2021
EPBC Act (Cwth)	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
EPI	Environmental Planning Instrument
EPL	Environment Protection License
FM Act	<i>Fisheries Management Act 1994</i>
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

Abbreviation	Description
<b>NorBE</b>	Neutral or Beneficial Effect of Water Quality Assessment Guideline (2022)
<b>NPW Act</b>	<i>National Parks and Wildlife Act 1974</i>
<b>NPW Regulation</b>	National Parks and Wildlife Regulation 2009
<b>NPWS</b>	National Parks and Wildlife Service (part of EES)
<b>NT Act (Cth)</b>	<i>Commonwealth Native Title Act 1993</i>
<b>OEH</b>	(Former) Office of Environment and Heritage
<b>PCMP</b>	Preliminary Construction Management Plan
<b>Planning Systems SEPP</b>	State Environmental Planning Policy (Planning Systems) 2021
<b>POEO Act</b>	<i>Protection of the Environment Operations Act 1997</i>
<b>Proponent</b>	NSW Health Infrastructure
<b>REF</b>	Review of Environmental Factors
<b>RF Act</b>	<i>Rural Fires Act 1997</i>
<b>RFS</b>	Rural Fire Service
<b>Resilience and Hazards SEPP</b>	State Environmental Planning Policy (Resilience and Hazards) 2021
<b>SEPP</b>	State Environmental Planning Policy
<b>SIS</b>	Species Impact Statement
<b>TI SEPP</b>	State Environmental Planning Policy (Transport and Infrastructure) 2021
<b>WM Act</b>	<i>Water Management Act 2000</i>

## Executive Summary

A Review of Environmental Factors (REF) was approved for the demolition of an existing car park and transport services building (known as Building No.29) and construction of a new three storey Forensic Mental Health facility inclusive of site works and landscaping on 11 March 2024.

The design of the new building involves a main building with three wings or fingers extending out along the eastern side with two centralised courtyards breaking up the built form.

The approved design includes a standard pitched roof form for the main building with the three external wings designed to include flat concrete rooves with appropriate fencing around the perimeter of the roof. Along the eastern side a traditional raised brick parapet feature with gable ends which concealed the flat roof. The 3D montage at **Figure 1** below shows the approved flat concrete roof and associated parapet design.



**Figure 1: 3D montage showing the approved façade and roof treatment to the eastern wings of the Forensic Mental Health Facility.**

A concrete roof was originally included as future mechanical ventilation, plant and equipment may have to be accommodated at this level and would then be easily integrated. The large mass of concrete roof is expensive and has its disadvantages as it's a large area that will need to be maintained for the future. Through the detailed design stage of the project, it has been found that the concrete roof is not required and to save money and improve the appearance of the development a standard pitched roof is recommended.

To accommodate a pitched roof form for the extended wings a REF addendum has been prepared. The change reduces the overall height of the new section and improves the visual appearance when viewed from the side elevations and also creates a more consistent, complimentary and integrated roof form across the development.

The design change is considered to be a positive one and there are no other implications or adverse impacts arising from the proposed change. There is no additional overshadowing and there is no change to the approved ESD report and compliance with sustainability and DGN58 as the new roof will provide for improved insulation and will reduce the heat island effect.

The modification is considered to be minor and will improve the long-term sustainability, maintenance and cost effectiveness of the project. There is no change to the GFA, functioning and operation of the facility as approved. The change is also substantially the same as the approved development.

The modification results in a change to Mitigation measure 2 in the Decision Statement and the REF addendum is also seeking the deletion of Mitigation measure 22.3 as it is not required in this case.



# 1. Introduction

NSW Health Infrastructure (HI) propose to amend the development of the Concord Forensic Mental Health Unit (CFMHU) within the existing Concord Repatriation General Hospital at 1H Hospital Road, Concord West (the site) as part of its delivery of infrastructure solutions and services to support the healthcare needs of the NSW communities. The additional works to be undertaken as part of the proposal include the replacement of the approved flat concrete roof and replacement with a pitched roof form and the deletion of mitigation measure 22.3 which requires the engagement of an EPA Accredited Auditor throughout the construction (amended proposal).

This Addendum Review of Environmental Factors (REF) has been prepared by HI to determine any changes to the environmental impacts as identified within the REF. 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 Addendum REF is to describe the amended proposal, to document the likely altered impacts of the amended proposal on the environment and to detail any changes to the protective measures, identified in the REF, to be implemented to mitigate impacts.

The description of the additional proposed works and associated altered environmental impacts have been undertaken in the context of the *Guidelines for Division 5.1 Assessments (June 2022)*, the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation) and the Australian Government's *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

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

- Whether the amended proposed activity (the amended proposal) 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 Homes under Part 5 of the EP&A Act; and
- The potential for the amended proposed activity (the amended 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 Federal Minister for the Environment on whether assessment and approval is required under the EPBC Act.

The Addendum 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.

## Approved activity

The approved REF No.01/2024 for the CFMHU involved the following scope of works;

- Early works/enabling works for relocation of existing operational facilities (in-ground services);
- Demolition of existing at grade carpark;
- Demolition of Building 29 (single storey SLHD transport services building);
- Development of a new three-storey building with a maximum height of 14.7m and a GFA of approximately 4000 m<sup>2</sup> to house 18 medium secure and 24 low secure forensic mental health beds (total 42 patient beds);
- Creation of new access road into rear loading dock;
- Landscaping.

**Figure 1** below highlights the area where the new CFMHU will be located within the Concord Hospital site.



**Figure 1: Area where the new CFMHU will be located**

## 2. Site Analysis and Description

### 2.1 The Site and Locality

Table 1: Description of the site

Details	Proposal (endorsed REF)	Amended proposal (this REF)
Address	Hospital Road, Concord	No change
Legal Description	Lot 2 DP 1280788	No change to site area
Owners	HAC	No change to ownership
Heritage	Local Heritage Item	No change to heritage status

#### 2.1.1 Existing Development

The proposed activity is located within the extensive grounds of the Concord Repatriation General Hospital located along Hospital Road in Concord. The hospital operates as a general hospital and also is a 750-bed teaching hospital in conjunction with the University of Sydney with a comprehensive range of specialty and sub-specialty services.

#### 2.1.2 Site Considerations and Constraints

The original Section 10.7 Planning Certificate No.PC2023/1055 dated 9 May 2023 identified that the site is located within the SP2-Infrastructure zone and the C2 Environmental Conservation zone under the *Canada Bay Local Environmental Plan 2013*. Since the time of determination of the REF there have not been any changes to the planning controls in relation to the site and proposal.

There are no critical planning constraints apart from the site being designated as a Local Heritage Item. The proposed changes are minor and will not affect the aesthetic, architectural or historic significance of the site.



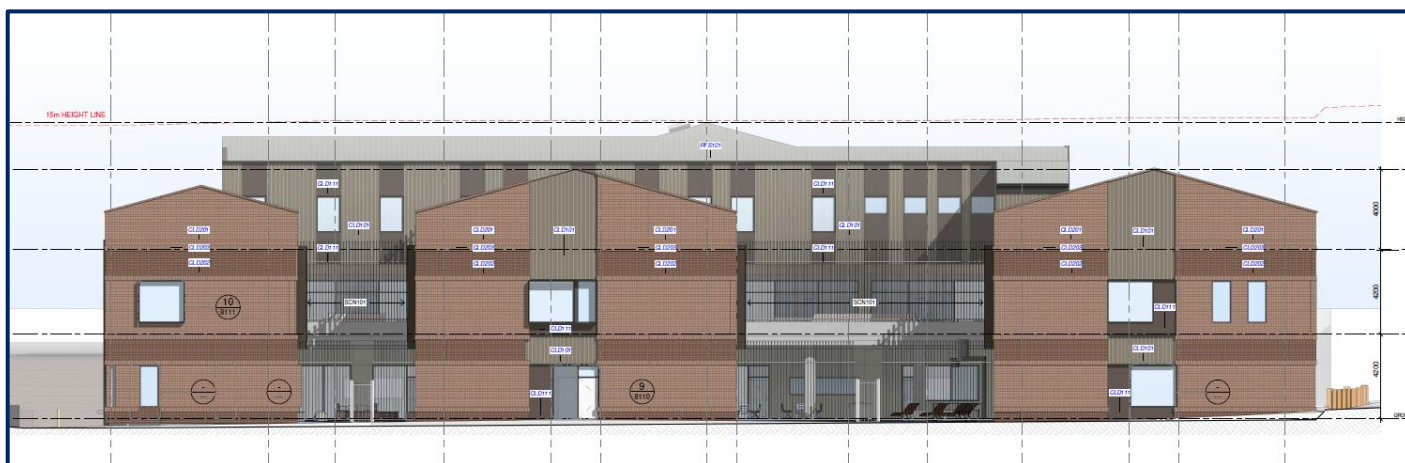
## 3. Proposed Amended Activity

### 3.1 Proposal Overview

The proposed amendment to the approved scheme includes the following design changes;

- Removal of the concrete roof and associated fencing and replacement with a pitched metal roof.
- The design change to the roof has reduced its height and the top of ridge heights are RL18.24 and RL19.1 respectively and the gable walls at the eastern ends have been reduced in height.
- The false parapet gable feature has been reduced in height and its proportions adjusted to align with the new pitched roof element.
- Alteration to the proposed cladding materials amending the metal façade product selection.
- Minor changes to openings with the door to the central wing replaced with a window and other minor window changes. The egress door along the eastern façade has been relocated to open out to the courtyard and two windows have been deleted.
- There is a small section of the roof which is to remain flat to allow for plant or mechanical equipment. This can be seen in the updated roof plan at **Figure 8** and the updated side elevation showing the retention of the flat roof section at **Figure 9**.
- Deletion of mitigation measure 22.3 in relation to the requirement to engage an Accredited auditor in respect to contamination.

**Figure 2** shows the eastern elevation of the approved scheme and **Figure 3** shows the eastern elevation of the modified proposal.



**Figure 4** below shows the side elevation of the approved scheme and **Figure 5** shows the side elevation of the modified proposal showing the new metal roof.



**Figure 4: Side elevation of the originally approved flat roof (courtesy: NBRS, 2023)**

The changes were proposed from the project user group from an operational perspective. Having an external door at the end of a corridor is not standard practice in the mental health setting and an emergency egress door exiting into the courtyard is preferred to align with the staged evacuation protocol (ie. Exiting into a secure courtyard, as opposed to exiting directly out of the security perimeter).

The changes to the window openings are a result of the required compliance changes to the Level 2 staff bathrooms. The DDA report required 2 ambulant toilets in this area in lieu of standard bathrooms. This resulted in a reshuffle of the spaces and a realignment of the external architectural treatment to suit (ie positioning of windows and openings).

The metal façade product selection has been amended with no major visual impact. The metal façade product selection alternative was an exercisable option that leads to a cost saving for the project. There is no aesthetic or performance differentiation.



**Figure 5: Side elevation of the proposed modification showing the new metal roof (courtesy: NBRS, 2024)**

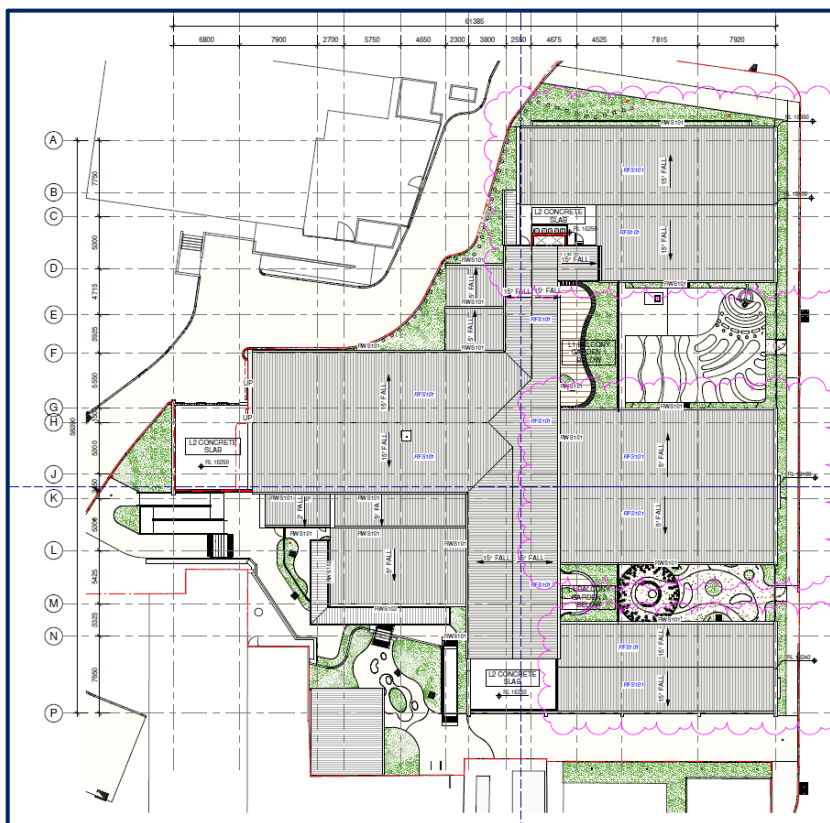


Figure 6: Updated Roof plan (courtesy: NBRs, 2024)



Figure 7: Side elevation showing the amended flat roof section which has been retained for future plant and services (courtesy: NBRs, 2024)

It is also requested as part of this Addendum to delete mitigation measure 22.3 and remove the requirement to engage an Accredited Site Auditor throughout the construction of the project. The original REF included a Detailed Site Investigation (DSI) prepared by EI Australia Consultants and dated 26 June 2023. The recommendations of the DSI included;

- Prior to demolition the preparation of a Hazardous Materials Survey (HMS) is required which will guide the demolition and site preparation to ensure no hazardous materials, if present are appropriately contained and/or removed.
- Additional intrusive investigations to close any data gaps.
- Prepare a Remediation Action Plan (RAP) if remediation is required and a Validation Report is to be prepared in conjunction with this process.



- A Waste Management Plan (WMP) and Site Analysis Quality Plan (SAQP) is also required if a RAP is to be prepared.

The DSI didn't find any contamination across the subject site however required further investigations (as recommended above) and if remediation is required the RAP will outline a detailed process for remediation including the requirement to validate the site. The contamination process across the site is detailed by the inclusion of mitigation measures 22.1 and 22.2 which will ensure the findings and recommendations of the DSI are implemented prior to demolition and through the construction process. Given there is a clear procedure to deal with any potential contamination through the DSI process, there is no need to involve a Site Auditor as per the requirements of Mitigation measure 22.3 as this is considered an onerous process and measures 22.1 and 22.2 adequately deal with contamination.

### 3.2 Construction and Operational Activities

The proposed design changes do not alter the functional and operational activities of the proposed facility. There are no changes proposed to the operating hours, number of staff or patients, layout of rooms, landscaped courtyard areas and their treatment, access or parking.

There are no changes to the building footprint and layout.

The changes are visual, and design and operationally focused. They aim to ensure a more cost-effective design response is provided without impacting on the functionality and amenity of the development. The changes will improve the visual appearance of the development.

## 4. Statutory Framework

### 4.1 Activity Description under TI SEPP

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 out the development, in accordance with the EPI, on land to which the provision applies. However, an environmental assessment of the development is required under Part 5 of the Act.

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

The site is zoned SP2 Infrastructure (Hospital) under the *Canada Bay Local Environmental Plan 2013*. The SP2 is a 'prescribed zone' under the TI SEPP.

Therefore, the proposal was considered 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 Section 5.1 of the EP&A Act because the development satisfied the definition of an activity in that it involves the demolition of a building or work, erection of a building and involves carrying out of work. The amended proposal does not alter this planning approval pathway.

Under provisions of the TI SEPP, the following activity is to be undertaken.

TI SEPP consultation is discussed within section 5 of this REF.

**Table 2: Description of proposed activities**

Division and Section within TI SEPP	Proposal (endorsed REF)	Amended proposal (this REF)
Division 10 – Section 2.61 – 'Development permitted without consent'.	The development activity comprises the demolition of Building 29 (SLHD transport services) carried out on the site of an existing health services facility and the erection of a new three-storey health facility.	The amendment does not change the activity as approved and still satisfies this clause.
(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).	14.7m in height and located further than 5m from the boundary,	The amended proposal reduces the height of the eastern wings by a further 1.3m so overall height will reach around 13.5m which maintains compliance with height and no change to the setback which complies with the minimum of 5m.

### 4.2 Environmental Protection and Biodiversity Conservation Act 1999

The provisions of the *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act) do not affect the proposal as it was not development that takes place on or affects 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.

The amended proposal does not trigger any additional aspects of the EPBC Act as there is no tree removal proposed or affectation to any areas of open space and the like.

### 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. HI 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 Subsection 1 of Section 5.5 of the EP&A Act).

Section 171 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. Section 6 of this REF specifically responds to the factors for consideration.

#### 4.4 Environmental Planning and Assessment Regulation 2021

The *Guidelines for Division 5.1 Assessments* (DPE June 2022) provides a list of environmental factors that must be taken into account for an environmental assessment of the activity under Part 5 of the EP&A Act. These factors were considered in Section 6.1 of the REF for the proposal and are considered (as relevant) for the amended proposal although no adverse or negative changes are envisaged.

In addition, Section 171A of the EP&A Regulation requires the consideration of the impact an activity in a defined catchment. This was considered in Section 6.2 of the REF. Where considered required to be re-assessed, or assessed, make reference to Table 4 of this Addendum REF.

#### 4.5 Other NSW Legislation

The REF amendment does not impact or affect any local, federal or state planning legislation as assessed under the original REF.

## 5. Consultation

The changes proposed are minor and material in nature and will not be visible from the public domain. They do not alter the functional and operational elements of the new facility and do not reduce or affect areas of open space, parking or impact on the approved building footprint.

The change is aesthetic in nature and reduces the overall bulk and scale of the development as the overall height of the false parapet feature is lower than approved. For these reasons there is no requirement or need for any further formal consultation given the small-scale nature of the works.

## 6. Environmental Impact Assessment

### 6.1 Environmental Planning and Assessment Regulation 2021 – Assessment Considerations

Section 171 (1) of the *Environmental Planning and Assessment Regulation (2021)* notes that when considering the likely impact of an activity of the environment, the determining authority must take into account the environmental factors specified in the environmental factors guidelines that apply to the activity.

The *Guidelines for Division 5.1 Assessments (June 2022)* apply to the activity. A comparison of the impacts of the proposal and the amended proposal against Section 3 of these Guidelines is provided below in Table 3.

**Table 3: Summary of Environmental Factors Reviewed in Relation to the Activity**

Relevant Consideration	Response/Assessment	Impact	Proposal	Amended proposal
(a) Any environmental impact on a community	No impact to the community from the small scale works	-ve		
		Nil	✓	✓
		+ve		
(b) Any transformation of a locality	There is no impact from the works to the broader locality.	-ve		
		Nil	✓	✓
		+ve		
(c) Any environmental impact on the ecosystem of the locality	There is no change to any ecological process or to existing biodiversity value across the site and its surrounds	-ve		
		Nil	✓	✓
		+ve		
(d) Any reduction of the aesthetic, recreational, scientific or other environmental quality or value of a locality	No change to the visual, recreational, scientific or environmental quality or value of the locality	-ve		
		Nil	✓	✓
		+ve		
(e) Any effect on a locality, place or building having aesthetic, anthropological, archaeological, architectural, cultural, historical, scientific, or social significance or other special value for present or future generations	No change or adverse Impact from the change	-ve		
		Nil	✓	✓
		+ve		
(f) Any impact on the habitat of protected animals (within the meaning of the <i>Biodiversity Conservation Act 2016</i> )	No impact on the habitat of any protected animals (within the meaning of the <i>Biodiversity Conservation Act 2016</i> ).	-ve		
		Nil	✓	✓
		+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	No change or impact to any species, animal or plant.	-ve	✓	✓
		Nil		
		+ve		
(h) Any long-term effects on the environment	No adverse impact to the environment	-ve		
		Nil	✓	✓
		+ve		
		-ve		

Relevant Consideration	Response/Assessment	Impact	Proposal	Amended proposal
(i) Any degradation of the quality of the environment	No change or adverse impact	Nil	✓	✓
		+ve		
		-ve		
(j) Any risk to the safety of the environment	No change is envisaged	Nil	✓	✓
		+ve		
		-ve		
(k) Any reduction in the range of beneficial uses of the environment	No change to the range of uses on offer and currently operational across the site	Nil	✓	✓
		+ve		
		-ve		
(l) Any pollution of the environment	No pollution generated by the change	Nil	✓	✓
		+ve		
		-ve		
(m) Any environmental problems associated with the disposal of waste	No additional waste generated by the amendment	Nil	✓	✓
		+ve		
		-ve		
(n) Any increased demands on resources (natural or otherwise) that are, or are likely to become, in short supply	No increase in demand for natural resources or the like	Nil	✓	✓
		+ve		
		-ve		
(o) Any cumulative environmental effect with other existing or likely future activities	No cumulative adverse environmental impact generated by the development	Nil	✓	✓
		+ve		
		-ve		
(p) Any impact on coastal processes and coastal hazards, including those under projected climate change conditions	No impact on coastal processes	Nil	✓	✓
		+ve		
		-ve		
(q) Any applicable local strategic planning statements, regional strategic plans or district strategic plans made under the Act, Division 3.1	No affect to any strategic or policy implications at a local, state or regional level.	Nil	✓	✓
		+ve		
		-ve		
(r) Any other relevant environmental factors	The change does not affect the ESD commitments originally agreed to as part of the REF.	Nil	✓	✓
		+ve		
		-ve		

## 6.2 Summary of Impacts

Any likely impacts relating to the amended proposal from those presented for the proposed activity (within the REF) have been considered and are discussed in **Table 4** below. All issues relating to the amended proposal are largely minor and will not cause significant impact as a result of the proposed activity. All mitigation measures relating to the project are provided in **Appendix C** as an updated Decision Statement is provided for ease of reference.

Table 4: Summary of Impacts relating to the activity (as amended)

Issue	Discussion
Local Heritage	<p>The proposed changes are minor and will improve the visual appearance of the wings as a pitched roof form is more in keeping and sympathetic to the pitched roof form of the main building. The change to the roof is seen as a more cohesive element and design change. It will not affect the historic importance of the hospital and its status as a Local Heritage Item.</p> <p>The modification will not affect the integrity of the local heritage item.</p>
Contamination	<p>The deletion of mitigation measure 22.3 will remove the requirement to engage a Site Auditor (in respect to site contamination) which is an unnecessary given that the findings and recommendations of the DSI adequately deal with contamination and any potential remediation by the need for additional investigations, preparation of a RAP and appropriate validation if remediation is required. The process outlined in the DSI is captured by mitigation measure 22.1 and 22.2 which are considered to address the issue and satisfy the provisions of the SEPP (Resilience and Hazards) 2021, hence there is no need to engage a Site Auditor.</p>
Design	<p>The proposed changes were reviewed by HI's Design Advisor who did not object to the modification and provided formal advice on 26 June 2024 in support of the design change.</p>
Traffic	<p>The proposal does not affect any traffic, access arrangements or parking spaces across the campus.</p>

## 7. Summary of Mitigation Measure

Additional or changes to the mitigation measures, presented in the REF for the proposal, in relation to the amended proposal are provided in **Table 5**. Underlined text identifies changes or an additional mitigation measures.

**Table 5: Altered mitigation measures**

No	Mitigation measures
2.1	Update the measure to include the new plans – see measure 2.1 updated below.
22.3	Delete this condition

### Amend mitigation measure 2.1 in the following manner;

- 2.1 The proposal must be carried out generally in accordance with the Review of Environmental Factors dated 2 February 2024 and prepared by Urbis on behalf of NSW Health Infrastructure (including accompanying Appendices A – X) and generally in accordance with the following plans/documentation as modified below and by any of the under-mentioned measures:

Drawing Title	Drawing Ref	Revision	Date	Prepared by
Site Layout	22071-A-REF-0200	4	30/11/2023	NBRS
Overall Site Plan	22071-A-REF-0250	3	14/11/2023	NBRS
Site Layout – Demolition Plan	22071-A-REF-0300	3	14/11/2023	NBRS
Overall Ground Floor Plan	22071-A-REF-1000	<u>3</u> 4	<u>14/11/2023</u> 12/07/2024	NBRS
Overall Level 1 Plan	22071-A-REF-1010	3	14/11/2023	NBRS
Overall Level 2 Plan	22071-A-REF-1020	<u>3</u> 5	<u>14/11/2023</u> 16/07/2024	NBRS
Overall Roof Plan	22071-A-REF-1030	<u>3</u> 4	<u>14/11/2023</u> 16/07/2024	NBRS
General Arrangement – Ground Level – Part 1	22071-A-REF-1100	<u>3</u> 4	<u>14/11/2023</u> 12/07/2024	NBRS
General Arrangement – Ground Level – Part 2	22071-A-REF-1101	<u>3</u> 4	<u>14/11/2023</u> 12/07/2024	NBRS
General Arrangement – Level 1 – Part 2	22071-A-REF-1111	3	14/11/2023	NBRS
General Arrangement – Level 1 – Part 1	22071-A-REF-1112	3	14/11/2023	NBRS
General Arrangement – Level 2 – Part 1	22071-A-REF-1120	<u>3</u> 4	<u>14/11/2023</u> 12/07/2024	NBRS
General Arrangement – Level 2 – Part 2	22071-A-REF-1121	<u>3</u> 5	<u>14/11/2023</u> 16/07/2024	NBRS
Building Elevation – Sheet 1	22071-A-REF-3000	<u>3</u> 4	<u>14/11/2023</u> 12/07/2024	NBRS
Building Elevation – Sheet 2	22071-A-REF-3001	<u>3</u> 5	<u>14/11/2023</u> 16/07/2024	NBRS
Building Sections – Sheet 1	22071-A-REF-4000	<u>3</u> 4	<u>14/11/2023</u> 12/07/2024	NBRS
Building Sections – Sheet 2	22071-A-REF-4001	<u>3</u> 5	<u>14/11/2023</u> 16/07/2024	NBRS
<b>Landscape</b>				

Cover Sheet	22071-NBRS-REF-DR-LA-001	1	23/1/2024	NBRS
General Arrangement Plan – Ground Level	22071-NBRS-REF-DR-LA-002	1	23/1/2024	NBRS
General Arrangement Plan – First Level	22071-NBRS-REF-DR-LA-003	1	23/1/2024	NBRS
Existing Tree Plan	22071-NBRS-REF-DR-LA-004	1	23/1/2024	NBRS
Detail Plan – Entry Forecourt	22071-NBRS-REF-DR-LA-005	1	23/1/2024	NBRS
Detail Plan – North Courtyard	22071-NBRS-REF-DR-LA-006	1	23/1/2024	NBRS
Detail Plan – South Courtyard	22071-NBRS-REF-DR-LA-007	1	23/1/2024	NBRS
Site Section 01	22071-NBRS-REF-DR-LA-008	1	23/1/2024	NBRS
Site Section 02	22071-NBRS-REF-DR-LA-009	1	23/1/2024	NBRS
Site Section 03	22071-NBRS-REF-DR-LA-010	1	23/1/2024	NBRS

**Delete Mitigation Measure 22.3 which reads as follows;**

~~Prior to the commencement of work, an NSW EPA-accredited Site Auditor must be engaged to provide advice throughout the duration of the works to ensure that any work required in relation to contamination is appropriately managed.~~

## 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 amended proposal, it is determined that:

- The extent and nature of modification will not have any significant adverse effects on the locality, community and the environment;
- The proposed changes will improve the visual appearance of the building without altering the functionality and operation of the proposed facility.
- The modification is minor and material in nature and will not generate any adverse impacts to the hospital, environment or immediately surrounding area.

## 8. Justification and Conclusion

The amended proposal at Concord Hospital is subject to assessment under Part 5 of the EP&A Act. A REF for proposal the demolition of existing structures and construction of a new Forensic Mental Health Facility was endorsed by HI on 14 March 2024. This Addendum REF which involves altering the flat roof to a pitched metal roof including minor changes to openings and the removal of mitigation measure 22.3 have examined and taken into account to the fullest extent possible all matters affecting, or likely to affect, the environment by reason of the amended proposed activity.

As discussed in detail in this report, the amended proposal 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 Addendum REF, the amended 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 considered all potential impacts (changed from those identified within the REF) and has minimal environmental impacts; and
- There will be no adverse amenity or environmental impacts generated by the change. The reduction in the height and the introduction of a pitched roof form are considered to be improvements to the overall design creating a more integrated and cohesive design and built form outcome.

The environmental impacts of the amended 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 of the EP&A Act. On this basis, it is recommended that HI determine the amended proposed activity in accordance with Part 5 of the EP&A Act and subject to the adoption and implementation of mitigation measures identified within this report.