Environmental Impact Statement

Extension to Wentworthville Northside West Clinic

SSD-17899480

23-27 Lytton Street, Wentworthville
Lot 1 DP787784

Prepared by Willowtree Planning Pty Ltd on behalf of Ramsay Health Care

January 2022

A national town planning consultancy
www.willowtreeplanning.com.au

Document Control Table			
Document Reference:	WTJ21-001		
Contact	Stephanie Wu – Senior Town Planner		
Version and Date	Prepared by	Checked by	Approved by
Version No. 1 – 01/07/2021	Stephanie Wu Senior Town Planner	Andrew Cowan Director	Andrew Cowan Director
Version No. 2 – 4/11/2021	Stephanie Wu Senior Town Planner	Andrew Cowan Director	Andrew Cowan Director
Version No. 3 – 21/12/21	Stephanie Wu Senior Town Planner	Andrew Cowan Director	Andrew Cowan Director
Version No. 4 – 18/01/22	Stephanie Wu Senior Town Planner	Andrew Cowan Director	Andrew Cowan Director

SECTION 4.12 CERTIFICATE

Declaration Form	**Submission of Environmental Impact Statement (EIS)** prepared under the *Environmental Planning and Assessment Act 1979* – Part 4, Division 4.3, Section 4.12
EIS Prepared By	
Name	Stephanie Wu
Qualifications	Bachelor of City Planning (Honours), University of New South Wales
Address	Suite 4, Level 7 100 Walker Street North Sydney, NSW 2060
In Respect Of	Proposed Extension of Wentworthville Northside West Clinic
Development Application	
Proponent Name	Ramsay Health Care
Address	Level 3, Building A, 5 Talavera Road, Macquarie Park NSW 2113
Land to be Developed	23-27 Lytton Street, Wentworthville (Lot 1 DP787784)
EIS	An Environmental Impact Statement (EIS) is enclosed.
Certificate	I certify that I have prepared the contents of this EIS to the best of my knowledge: ▪ it is in accordance with Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*, ▪ contains all available information that is relevant to the environmental assessment of the development, activity or infrastructure to which the statement relates, and ▪ that the information contained in the statement is neither false nor misleading.
Signature	
Name	Stephanie Wu
Qualification	BCP (Hons.), UNSW
Date	21 January 2022
Signature	
Name	Andrew Cowan
Qualification	BURP, UNE MPD, UTS
Date	21 January 2022

TABLE OF CONTENTS

APPENDICES

Appendix	Document	Prepared by
1	Secretary's Environmental Assessment Requirements	NSW Department of Planning, Industry and Environment
2	Quantity Surveyor's Report	Linesight
3	Architectural Plans	Team 2 Architects
4	Architectural Design Statement	Team 2 Architects
5	Visual Impact Assessment	Hatch RobertsDay
6	Landscape Plans and Landscape Strategy	Arcadia
7	ESD Report	JHA
8	Noise and Vibration Impact Assessment	JHA
9	Traffic and Accessibility Impact Assessment	Traffix
10	Stormwater Management Report and Plans	Stellen Consulting
11	Driveway Statement and Plan	Stellen Consulting
12	Flood Impact Study and Flood Statement	ACOR
13	Non-Aboriginal (Historical) Heritage Impact Assessment	Artefact
14	Aboriginal Cultural Heritage Impact Assessment and Addendum Letter	Artefact
15	Economic Impact Assessment	Macroplan
16	Arboricultural Development Impact Assessment Report and Tree Location Plan	Birds Tree Consultancy
17	Biodiversity Development Assessment Report	Eco Logical
18	Preliminary Site Investigation	JK Environments
19	Detailed Site Investigation	JK Environments
20	Geotechnical Investigation	JK Geotechnical
21	Building Services Interface Report	DSA Consulting
22	Preliminary Construction Management Plan	Erilyan
23	SEPP 33 Statement	MRA Consulting
24	Accessibility Review Report	Abe Consulting
25	BCA Assessment Report	Blackett Maguire + Goldsmith
26	Community Consultation Outcomes Report	Australian Public Affairs
27	Waste Management Plan	MRA Consulting
28	GANSW Advice	GANSW
29	Survey Plan	LTS Lockley
30	Clause 4.6 Variation Request	Willowtree Planning
31	CDCP2021 Compliance Table	Willowtree Planning
32	Preliminary Salinity Assessment	JK Environments
33	Remediation Action Plan	JK Environments
34	Social Infrastructure Needs Assessment	Macroplan
35	Section 10.7(2) and (5) Certificate	Cumberland City Council

FIGURES

TABLES

GLOSSARY OF KEY TERMS

TERM	MEANING
A Metropolis of Three Cities	*A Metropolis of Three Cities – The Greater Sydney Region Plan*
AU$	Australian Dollars
Council	Cumberland City Council
CIV	Capital Investment Value
DPIE	Department of Planning, Industry and Environment
EIS	Environmental Impact Statement
EP&A Act	*Environmental Planning and Assessment Act 1979* (as amended)
EP&A Regulation	*Environmental Planning and Assessment Regulation 2000*
EPI	Environmental Planning Instrument
GSC	Greater Sydney Commission
LEP	Local Environmental Plan
LGA	Local Government Area
OEH	NSW Office of Environment and Heritage
RMS	Roads and Maritime Services
SEARs	Secretary's Environmental Assessment Requirements issued 13 May 2021
SEPP	State Environmental Planning Policy
Sqm or m^2	Square metres
SREP	Sydney Regional Environmental Plan
SSD	State significant development (SSD 17899480)
SSDA	State significant development Application
The Site / Study Area / Subject Site	23-27 Lytton Street, Wentworthville (Lot 1 DP 787784)
TfNSW	Transport for NSW
Willowtree Planning	Willowtree Planning Pty Ltd

EXECUTIVE SUMMARY

This Environmental Impact Statement (EIS) has been prepared by Willowtree Planning to accompany State Significant Development (SSD) **17899480** for the proposed extension of Wentworthville Northside West Clinic at 23-27 Lytton Street, Wentworthville (Lot 1 DP787784). The EIS has been prepared on behalf Ramsay Health Care (the Applicant) in accordance with the Secretary's Environmental Assessment Requirements (SEARs) dated 13 May 2021.

The Site currently comprises the 'Stage 1' Wentworthville Northside West Clinic which is operated by Ramsay Health Care. The proposal includes the demolition of the existing west wing building and southern carpark, erection of a four-storey extension (being the 'Stage 2' building) to the existing Clinic, as well as alterations and additions to the existing 'Stage 1' building on Site. The proposed four-storey extension will be located south and west of the existing building above the existing at-grade carpark. The proposed extension would result in an additional Gross Floor Area (GFA) of 4,498m² with an addition of 46 carparking spaces.

The proposal satisfies the definition of State Significant Development pursuant to Clause 14 of Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP) as the Capital Investment Value (CIV) exceeds $30 million.

The primary Environmental Planning Instrument for the Site is the *Cumberland Local Environmental Plan 2021* (CLEP2021). Pursuant to CLEP2021, the Site is located within the R4 High Density Residential zone and development for a 'health services facility' is prohibited. Notwithstanding, permissibility of the proposal is established under *State Environmental Planning Policy (Infrastructure) 2007* (SEPP Infrastructure) which permits development for the purpose of a health services facility in a prescribed zone. Given that R4 High Density Residential zone is identified as a prescribed zone, the proposal is permissible with consent under SEPP Infrastructure.

The proposal exhibits variations to the Height of buildings and Floor space ratio (FSR) development standards that are allowable for the Site under Clauses 4.3 and 4.4 of CLEP2021. The maximum permissible building height for the Site pursuant to CLEP2021 is 15m. The height of the proposed extension is 16.3m-19.6m. Additionally, the maximum permissible FSR for the Site pursuant to CLEP2021 is 1:1 and the proposal exhibits an FSR of 1.09:1. It is noted that the Site layout and design respond to the Site's constraints and aim to protect and enhance constrained areas where possible. A Clause 4.6 Variation Request for the proposed height and FSR variations has been prepared and is provided at **Appendix 30** to support the proposed variations.

The Proponent has designed the proposed extension of Wentworthville Northside West Clinic to meet the significant demand for health services facilities that exist in Wentworthville and the wider Cumberland LGA. The proposed extension will exhibit a high-quality design and will provide additional operational capacity for the health care facility to provide for mental health services and in-patient residential services in response to the emerging demand for specialist clinical care in the community.

Consultation

Comprehensive consultation has been carried out as part of this State Significant Development Application (SSDA). Consultation letters were sent to each of the State and Local Authorities that were outlined in the SEARs and feedback was received via written correspondence or meetings/workshops held. Further to this, virtual community sessions and a phone conference were held with local residents, to inform and discuss the proposed development.

The key findings and discussions from the scheduled consultation sessions are discussed in further detail in **Section 5.1.2** of this EIS and **Appendix 26**.

Assessment and Conclusion

The proposed extension of Wentworthville Northside West Clinic has been designed to meet the significant demand for specialist health services in the Cumberland LGA and to deliver a state-of-the-art health services facility for staff and visitors.

The likely impacts of the proposal have been examined in depth and demonstrates that the potential environmental impacts of the proposed development can be suitably mitigated and/or managed. The proposed building envelopes have been holistically planned to achieve compatibility with the residential properties and the Lytton Street Park to the west.

The proposal is considered appropriate for the location and should be supported by the Minister for the following reasons:

- It has been prepared with regard to the relevant planning legislation and all components of the proposal are permissible with consent;
- The proposal has been prepared with regard to the relevant State and Regional Planning Policies and Strategies, and demonstrates consistency and compliance with the objectives of the identified strategic documents;
- It has been prepared having regard to Council's planning policies and generally complies with the aims and objectives of the planning controls for the Site including CLEP2021 and *Cumberland Development Control Plan 2021* (CDCP2021);
- The proposal is suitable for the Site as evidenced by the site analysis and various site investigations;
- The proposal does not appear to have any unacceptable, long term, off-site impacts on adjoining or surrounding properties or the public domain, in terms of traffic, social and environmental impacts; and
- Community consultation has been completed in accordance with the Department of Planning, Industry and Environment (DPIE) Consultation Guidelines.

In summary, the subject SSD Application is considered supportable from a technical viewpoint and satisfies relevant Government policies. It provides significant benefits to a wide range of stakeholders and is in the general public interest. Further, the proposed development has addressed the individual matters listed in the SEARs and are supported and justified through accompanying technical studies.

As such, the development warrants the support of the Minister and it is therefore recommended that approval be granted to the subject SSD Application for the extension to the Wentworthville Northside West Clinic.

PART A PRELIMINARY

1.1 INTRODUCTION

This EIS has been prepared by Willowtree Planning on behalf of Ramsay Health Care (the Proponent), and is submitted to the Department of Planning, Industry and Environment (DPIE) in support of the proposed development on the land portion described as 23-27 Lytton Street, Wentworthville (Lot 1 DP 787784) ('the Site'), for the purpose of the extension of the Wentworthville Northside West Clinic.

This SSD Application seeks Development Consent for the erection of a four-storey extension (being the 'Stage 2' building) to the existing Wentworthville Northside West Clinic, as well as alterations and additions to the existing 'Stage 1' building on Site.

Specifically, the proposal entails the following:

- Demolition of the existing two-storey west wing building and carpark in the southern portion;
- Construction of a four-storey extension of the existing Wentworthville Northside West Clinic including two levels of patient area and two levels of parking on the western boundary and three storeys of patient area and one level of at grade carparking along the southern boundary, comprising:
  - Addition of 95 inpatient rooms and nine consulting suites across Levels 1 to 3
  - Provision of 18 carparking spaces on Lower Ground Level and 28 carparking spaces on Ground Level
- Alterations and additions to existing Stage 1 building comprising:
  - A new lobby, gym, loading bay, ancillary office and associated amenities on Lower Ground Level
  - A new lobby, art room and amenities on Ground Level
- Construction of a landscaped open space in the south western portion of the Site
- Tree removal in the southern and western portions of the Site

As discussed throughout this EIS, the proposed development seeks to establish an architecturally innovative design that would benefit the immediate community and the wider locale. The proposed development would also provide employment opportunities both during construction and throughout the ongoing operation of the Wentworthville Northside West Clinic.

The EIS describes the Site and Proposed development, provides relevant information, responds to SEARs; and assesses the Proposed development in terms of the relevant matters set out in relevant legislation, Environmental Planning Instruments (EPIs) and associated planning policies.

The structure of this EIS is as follows:

- **PART A** Preliminary
- **PART B** Site Analysis
- **PART C** Proposed Development
- **PART D** Legislative and Policy Framework
- **PART E** Consultation
- **PART F** Environmental Risk Assessment
- **PART G** Management and Mitigation Measures
- **PART H** Project Development Justification
- **PART I** Conclusion

1.2 PROJECT TEAM

The Project Team involved in the preparation of this SSDA include:

- Ramsay Health Care (Proponent)
- Erilyan (Project Management and Construction Management)
- Willowtree Planning (Town Planning)
- Team 2 Architects (Architect)
- Hatch RobertsDay (Urban Design Visual Analysis)
- Linesight (Quantity Surveyor)
- LTS Lockley (Survey)
- Arcadia (Landscape Architect)
- Birds Tree Consultancy (Arborist)
- JHA (Acoustic and ESD)
- Traffix (Traffic)
- Artefact (Aboriginal Heritage and Heritage)
- Eco Logical (Biodiversity)
- ACOR Consultants (Flooding)
- Stellen Consulting (Civil Engineering and Stormwater)
- Macroplan (Social and Economic Impact)
- JK Geotechnics & Environment (Contamination, Geotechnical and Groundwater)
- DSA Consulting (Infrastructure Delivery)
- MRA Consulting (Waste and Hazard and Risk)
- Abe Consulting (Accessibility)
- Blackett Maguire + Goldsmith (Building Certification)
- Australian Public Affairs (Community Consultation)

1.3 THE PROPONENT

The Proponent is Ramsay Health Care. Erilyan are the Project Manager and contact for the proposed development. See **Table 1** for contact details.

Table 1 Proponent Contact Details	
Contact Name	Mike Ryan
Company Details	Erilyan
Contact Number	02 8188 0700 or 0477 477 944

Ramsay Health Care have extensive experience in health care services and is Australia's largest health care provider. Ramsay Health Care operates 72 private hospitals and day surgery units in Australia including mental health facilities as well as the operation of four public facilities. Ramsay Health Care admits more than one million patients annually and employs more than 31,000 people in Australia. In addition, Ramsay Health Care focuses on teaching and research, and places an emphasis on both undergraduate and postgraduate training of the future medical and nursing workforce.

1.4 CAPITAL INVESTMENT VALUE

The CIV of the Proposed development in accordance with the CIV definition under the EP&A Regulation is estimated to be $32,480,465 excluding GST) as shown in **Appendix 2**, containing QS costings with respect to the proposed development.

1.5 EXISTING ZONING PROVISIONS

The Site is currently zoned R4 High Density Residential under the provisions of CLEP2021.

1.6 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

A request for Secretary's Environmental Assessment Requirements (SEARs) was submitted on 26 April 2021 (Reference No. **SSD-17899480**). The SEARs were subsequently issued by NSW DPIE on 13 May 2021 and the matters raised are addressed in this EIS, including supporting consultant reports and plans.

For reference, the full SEARs, as issued, is attached at **Appendix 1** of this submission. An overview of how the SEARs have been satisfied by this EIS is outlined in **Table 2** below. This EIS is also consistent with the minimum requirements for Environmental Impact Statements, as set out in Clauses 6 and 7 of Schedule 2 of the EP&A Regulation.

Table 2 How SEARs have been satisfied	
Secretary's Environmental Assessment Requirements	**How Addressed**
General Requirements	
The Environmental Impact Statement (EIS) must be prepared in accordance with and meet the minimum requirements of clauses 6 and 7 of Schedule 2 the Environmental Planning and Assessment Regulation 2000 (the Regulation).	This EIS has been prepared in accordance with Clauses 6 & 7 of Schedule 2 of the EP&A Regulation. The structure of this EIS addresses all legislative requirements set out in the EP&A Regulation.
Notwithstanding the key issues specified below, the EIS must include an environmental risk assessment to identify the potential environmental impacts associated with the development.	An environmental risk assessment has been prepared and is provided in **Part G** of this EIS.
In addition, the EIS must include: • an executive summary. • a complete description of the development, including: o the need for the development. o justification for the development. o suitability of the site. o alternatives considered. o likely interactions between the development and existing, approved and proposed operations in the vicinity of the site. o a description of any proposed building works. o a description of existing and proposed operations, including: ▪ details of how the hospital would continue to operate during construction activities, including proposed site management and mitigation measures to ensure the safety of users. o site survey plan, showing existing levels, location and height of existing and adjacent structures / buildings and site boundaries. o a detailed constraints map identifying the key environmental and other land use constraints that have informed the final design of the development. o plans, elevations and sections of the proposed development. o cladding, window and floor details, including external materials. o a site plan showing all infrastructure and facilities (including any infrastructure that would be required for the development, but the subject of a separate approvals process). o plans and details of any advertising/business identification signs to be installed, including size, location and finishes.	 The executive summary is provided on page vii. Refer to **Part B** and **Part C** of this EIS. Refer to **Part F** of this EIS. Refer to Survey Plan at **Appendix 29**. Refer to Architectural Plans at **Appendix 3**. The location of the proposed infrastructure works is provided in the Preliminary Construction Management Plan (**Appendix 22**) and **Section 6.21.4** of the EIS. No signage is proposed as part of the development.

○ a description of any proposed construction or operational staging including relevant timing and dependencies. ○ details of construction and decommissioning including timing. ○ an estimate of the retained and new jobs that would be created during the construction and operational phases of the development along with details of the methodology to determine the figures provided. • a detailed assessment of the key issues identified below, and any other significant issues identified in the risk assessment, including: ○ a description of the existing environment, using sufficient baseline data and methodology to establish baseline conditions. ○ an assessment of the potential impacts of all stages of the development on all potentially impacted environments, sensitive receivers, stakeholders and future developments. The assessment must consider any relevant legislation, policies and guidelines. ○ consideration of the cumulative impacts due to other related development proposed or underway on the site, including development progressed under other assessment pathways and all other developments in the vicinity (completed, underway or proposed). ○ identification of all proposed monitoring or required changes to existing monitoring programs. ○ measures to avoid, minimise and if necessary, offset predicted impacts, including detailed contingency plans for managing any significant risks to the environment and triggers for each action. ○ details of alternative measures considered. • a consolidated summary of all the proposed environmental management and monitoring measures, identifying all commitments included in the EIS. • the reasons why the development should be approved and a detailed evaluation of the merits of the development, including consequences of not carrying out the development.	Refer to Preliminary Construction Management Plan (**Appendix 22**) and **Section 6.21** of this EIS. Refer to **Section 3.2** of this EIS. Refer to **Part D**, **F, G** and **H** of this EIS. Refer to **Section 3.4** and **Part H** of this EIS.
Key Issues	
1. Statutory Context, Strategic Context and Policies Address the statutory provisions contained in all relevant legislated and draft environmental planning instruments, including but not limited to: ▪ State Environmental Planning Policy (State and Regional Development) 2011. ▪ State Environmental Planning Policy (Infrastructure) 2007. ▪ State Environmental Planning Policy No 64 – Advertising and Signage. ▪ State Environmental Planning Policy No 55 – Remediation of Land. ▪ Draft State Environmental Planning Policy (Remediation of Land). ▪ Draft State Environmental Planning Policy (Environment).	All relevant legislations and planning strategies are addressed in **Part D** of this EIS. Permissibility of the proposed development and compliance with the development standards are addressed in **Sections 4.1.8** and **4.1.11**. A Clause 4.6 Variation has been prepared to address the height and floor space ratio (FSR) variations and is provided at **Appendix 30**.

▪ Holroyd Local Environmental Plan 2013. ▪ Draft Cumberland Local Environmental Plan. Having regard to the relevant environmental planning instruments: ▪ address the permissibility of the development, including the nature and extent of any prohibitions. ▪ identify compliance with the development standards applying to the site and provide justification for any contravention of the development standards. ▪ adequately demonstrate and document how each of the provisions in the listed instruments are addressed, including reference to necessary technical documents. Address the relevant planning provisions, goals and strategic planning objectives in all relevant planning policies including but not limited to the following: ▪ NSW State Priorities. ▪ State Infrastructure Strategy 2018 – 2038 Building the Momentum. ▪ Future Transport Strategy 2056. ▪ Crime Prevention through Environmental Design (CPTED) Principles. ▪ Better Placed: An integrated design policy for the built environment of New South Wales (Government Architect NSW (GANSW), 2017). ▪ Healthy Urban Development Checklist (NSW Health, 2009). ▪ Draft Greener Places Design Guide (GANSW). ▪ Draft A City Supported by Infrastructure: Place-based Infrastructure Compact Pilot (GSC, 2019). ▪ Greater Parramatta and the Olympic Peninsula (GPOP) Vision (GSC 2016). ▪ The Greater Sydney Region Plan - A Metropolis of Three Cities. ▪ Central City District Plan. ▪ Cumberland 2030 Local Strategic Planning Statement.	A DCP Compliance Table has been prepared to address the relevant provisions of CDCP2021 and is provided at **Appendix 31**.
2. Built Form and Urban Design ▪ Address: o the height, density, bulk and scale, setbacks and interface of the o development in relation to the surrounding development, topography, streetscape and any public open spaces. o design quality and built form, with specific consideration of the overall site layout, streetscape, open spaces, façade, rooftop, massing, setbacks, building articulation, materials and colour palette. o how Crime Prevention through Environmental Design (CPTED) principles are to be integrated into development. o how good environmental amenity would be provided, including access to natural daylight and ventilation, acoustic separation, access to landscape and outdoor spaces and future flexibility.	The built form and urban design of the development are addressed in **Section 6.2** of this EIS. A Site and Context Analysis Plan is provided within the Architectural Plans at **Appendix 3**. A Visual Impact Assessment has been prepared by Hatch RobertsDay and is provided at **Appendix 5**.

○ how services, including but not limited to waste management, loading zones, and mechanical plant are integrated into the design of the development. ▪ Provide: ○ a detailed site and context analysis to justify the proposed site planning and design approach including massing options and preferred strategy for future development. ○ a visual impact assessment that identifies any potential impacts on the surrounding built environment and landscape including views to and from the site and any adjoining heritage items.	
3. Trees and Landscaping ▪ Provide: ○ where relevant, an arboricultural impact assessment prepared by a Level 5 (Australian Qualifications Framework) Arborist, which details the number, location and condition of trees to be removed and retained, includes detailed justification for each tree to be removed and details the existing canopy coverage on-site. ○ a detailed site-wide landscape strategy, that: • details the proposed site planting, including location, number and species of plantings, heights of trees at maturity and proposed canopy coverage. • provides evidence that opportunities to retain significant trees have been explored and/or informs the plan. • demonstrates how the proposed development would: – contribute to long term landscape setting in respect of the site and the streetscape. – mitigate the urban heat island effect and ensure appropriate comfort levels on-site. – contribute to objectives to increase urban tree canopy cover. ○ a detailed landscape plan prepared by a suitably qualified person.	An Arboricultural Impact Assessment has been prepared by Birds Tree Consultancy and is provided at **Appendix 16**. A set of Landscape Plans has been prepared by Arcadia and is provided at **Appendix 6**. The proposed tree removal and landscape design are further discussed in **Section 6.3** of this EIS.
4. Environmental Amenity ▪ Assess amenity impacts on the surrounding locality, including solar access, visual privacy, visual amenity, overshadowing, wind impacts and acoustic impacts. A high level of environmental amenity for any surrounding residential land uses must be demonstrated. ▪ Provide: ○ shadow diagrams. ○ a view analysis, where relevant, of the site from key vantage points and streetscape locations and public domain including photomontages or perspectives showing the proposed and likely future development.	The environmental amenity impacts associated with proposed development are discussed in **Section 6.4** of this EIS. Shadow Diagrams have been prepared by Team 2 Architects and are provided in **Appendix 3**. A view analysis is provided within the Visual Impact Assessment prepared by Hatch RobertsDay and is provided at **Appendix 5**.

○ an analysis of proposed lighting that identifies lighting on-site that will impact surrounding sensitive receivers and includes mitigation management measures to manage any impacts.	The proposed lighting strategy is stipulated in the Building Services Interface Report prepared by DSA Consulting at **Appendix 21**.
5. Transport and Accessibility Provide a transport and accessibility impact assessment, which includes, but is not limited to the following: ▪ analysis of the existing transport network including: ○ road hierarchy. ○ pedestrian, cycle and public transport infrastructure. ○ details of current daily and peak hour vehicle movements based on traffic surveys and / or existing traffic studies relevant to the locality. ○ existing performance levels of nearby intersections utilising appropriate traffic modelling methods (such as SIDRA network modelling). ▪ details of the proposed development, including: ○ a map of the proposed access which identifies public roads, bus routes, footpaths and cycleways. ○ pedestrian site access and vehicular access arrangements, including for service and emergency vehicles and loading/unloading, including swept path analysis demonstrating the largest design vehicle entering and leaving the site and moving in each direction through intersections along the proposed transport routes. ○ car and motorcycle parking, bicycle parking and end-of-trip facilities. ○ pedestrian, public transport or road infrastructure improvements or safety measures.	The Transport and Accessibility Impact Assessment is addressed in **Section 6.5** of this EIS and is provided at **Appendix 9**.
▪ analysis of the impacts due to the operation of the proposed development, including: ○ proposed modal split for all users of the development including vehicle, pedestrian, bicycle riders, public transport and other sustainable travel modes. ○ estimated total daily and peak hour vehicular trip generation. ○ a clear explanation and justification of the: • assumed growth rate applied. • volume and distribution of proposed trips to be generated. • type and frequency of design vehicles accessing the site. ○ details of performance of nearby intersections with the additional traffic generated by the development both at the commencement of operation and in a 10-year time period (using SIDRA network modelling). ○ cumulative traffic impacts from any surrounding approved development(s). ○ adequacy of pedestrian, bicycle and public transport infrastructure and operations to accommodate the development.	

○ adequacy of car and motorcycle parking and bicycle parking provisions when assessed against the relevant car / bicycle parking codes and standards. ○ adequacy of the existing / proposed pedestrian infrastructure to enable convenient and safe access to and from the site for all users. ▪ measures to ameliorate any adverse traffic and transport impacts due to the development based on the above analysis, including: ○ travel demand management programs to increase sustainable transport (such as a Green Travel Plan). ○ arrangements for the Travel Coordinator roles. ○ governance arrangements or relationships with state and local government transport providers to update roads safety. ○ infrastructure improvements or protection measures, including details of timing and method of delivery. ▪ analysis of the impacts of the traffic generated during construction of the proposed development, including: ○ construction vehicle routes, types and volumes. ○ construction program (duration and milestones). ○ on-site car parking and access arrangements for construction, emergency and construction worker vehicles. ○ cumulative impacts associated with other construction activities in the locality (if any). ○ road safety at identified intersections near the site due to conflicts between construction vehicles and existing traffic in the locality.	
6. Ecologically Sustainable Development (ESD) ▪ Identify: ○ how ESD principles (as defined in clause 7(4) of Schedule 2 of the Regulation) would be incorporated in the design and ongoing operation phases of the development. ○ proposed measures to minimise consumption of resources, water (including water sensitive urban design) and energy. ○ how the future development would be designed to consider and reflect national best practice sustainable building principles to improve environmental performance and reduce ecological impact. This should be based on a materiality assessment and include waste reduction design measures, future proofing, use of sustainable and low-carbon materials, energy and water efficient design (including water sensitive urban design) and technology and use of renewable energy. ▪ Provide: ○ an assessment against an accredited ESD rating system or an equivalent program of ESD performance. This should include a minimum rating scheme target level.	An ESD Report has been prepared by JHA and is provided at **Appendix 7**. The incorporation of ESD principles is further discussed in **Section 6.6** of this EIS.

○ a statement regarding how the design of the development is responsive to the NARCliM projected impacts of climate change. ○ an Integrated Water Management Plan detailing any proposed alternative water supplies, proposed end uses of potable and non-potable water, and water sensitive urban design.	
7. Heritage ▪ Identify any archaeological potential or archaeological significance on and adjacent to the site and the impacts the development may have on this significance. ▪ Provide a statement of significance and an assessment of the impact on the heritage significance of the heritage items on and adjacent to the site in accordance with the guidelines in the NSW Heritage Manual (Heritage Office and DUAP, 1996) and Assessing Heritage Significance (OEH, 2015).	The heritage significance of the Site is addressed in **Section 6.7** of the EIS. A Non-Aboriginal (Historical) Heritage Assessment Report has been prepared by Artefact and is provided at **Appendix 13**.
8. Aboriginal Cultural Heritage ▪ Provide an Aboriginal Cultural Heritage Assessment Report (ACHAR) that: ○ identifies and describes the Aboriginal cultural heritage values that exist across the site. ○ includes surface surveys and test excavations where necessary. ○ has been prepared in accordance with the Guide to investigating, ○ assessing and reporting on Aboriginal Cultural Heritage in NSW (OEH, 2011) and Code of Practice for Archaeological Investigations of Aboriginal Objects in NSW (OEH, 2010). ○ incorporates consultation with Aboriginal people in accordance with Aboriginal Cultural Heritage Consultation Requirements for Proponents (Department of Environment, Climate Change and Water, 2010). ○ documents the significance of cultural heritage values of Aboriginal people who have a cultural association with the land. ○ identifies, assesses and documents all impacts on the Aboriginal cultural heritage values. ○ demonstrates attempts to avoid any impact upon cultural heritage values and identify any conservation outcomes. Where impacts are unavoidable, the ACHAR and EIS must outline measures proposed to mitigate impacts. ○ demonstrates attempts to interpret the Aboriginal cultural heritage significance identified into the development. Any Aboriginal objects recorded as part of the Aboriginal Cultural Heritage Assessment Report must be documented and notified to the Aboriginal Heritage Information Management System (AHIMS) within Heritage NSW of the Department of Premier and Cabinet.	An Aboriginal Cultural Heritage Assessment Report (ACHAR) (**Appendix 14**) has been prepared by Artefact and is further discussed in **Section 6.8**.

9. Social Impacts The EIS must include an assessment of the social and economic impacts of the development, including consideration of any increase in demand for community infrastructure, services and need/demand.	An Economic Impact Assessment (**Appendix 15**) has been prepared by Macroplan and is discussed in **Section 6.9**.
10. Noise and Vibration ▪ Provide a noise and vibration impact assessment that: o includes a quantitative assessment of the main noise and vibration generating sources during demolition, site preparation, bulk excavation and construction. o details the proposed construction hours and provide details of, and justification for, instances where it is expected that works would be carried out outside standard construction hours. o includes a quantitative assessment of the main sources of operational noise, including consideration of mechanical services (e.g. air conditioning plant) o outlines measures to minimise and mitigate the potential noise impacts on nearby sensitive receivers. o o considers sources of external noise intrusion in proximity to the site (including, road rail and aviation operations) and identifies building performance requirements for the proposed development to achieve appropriate internal amenity standards. o demonstrates that the assessment has been prepared in accordance with polices and guidelines relevant to the context of the site and the nature of the proposed development.	A Noise and Vibration Impact Assessment (**Appendix 8**) has been prepared by JHA and is discussed in **Section 6.10**.
11. Biodiversity ▪ Provide a Biodiversity Development Assessment Report (BDAR), that assesses the biodiversity impacts of the proposed development in accordance with the requirements of the Biodiversity Conservation Act 2016, Biodiversity Conservation Regulation 2017 and Biodiversity Assessment Method, except where a BDAR waiver has been issued in relation to the development or the development is located on biodiversity certified land. ▪ Where a BDAR is not required, because a BDAR waiver has been issued, in relation to the development, provide: o a copy of the BDAR waiver and demonstrate that the proposed development is consistent with that covered in BDAR waiver. o an assessment of flora and fauna impacts where significant vegetation or flora and fauna values would be affected by the proposed development. o Note: Further guidance is provided in the Biodiversity and Conservation Division Standard	A Biodiversity Development Assessment Report (**Appendix 17**) has been prepared by Eco Logical and is discussed in **Section 6.11**.

Environmental Assessment Requirements attached to the SEARs.	
12. Contributions ▪ Identify: o any Section 7.11/7.12 Contribution Plans, Voluntary Planning Agreements or Special Infrastructure Contribution Plans that affect land to which the application relates or the proposed development type. o any contributions applicable to the proposed development under the identified plans and/or agreements. Justification is to be provided where it is considered that the proposed development is exempt from making a contribution. o any actions required by a Voluntary Planning Agreement or draft Voluntary Planning Agreement affecting the site or amendments required to a Voluntary Planning Agreement affected by the proposed development.	The development contributions applicable are identified in **Sections 4.1.15** and **6.12**.
13. Staging: ▪ Assess impacts of staging where it is proposed and detail how construction works, and operations would be managed to ensure public safety and amenity on and surrounding the site.	The proposed staging of the construction is addressed in **Sections 6.13** and **6.21.3**.
14. Utilities ▪ In consultation with relevant service providers: o assess the impacts of the development on existing utility infrastructure and service provider assets surrounding the site. o identify any infrastructure upgrades required off-site to facilitate the development and any arrangements to ensure that the upgrades will be implemented on time and be maintained. o provide an infrastructure delivery and staging management plan, including a description of how infrastructure requirements would be co-ordinated, funded and delivered to facilitate the development. o Note: Further guidance is provided in Endeavour Energy's comments attached to the SEARs.	A Building Services Interface Report (**Appendix 21**) has been prepared by DSA Consulting and is addressed in **Section 6.14**.
15. Stormwater Drainage ▪ Provide: o a preliminary stormwater management plan for the development that: • is prepared by a suitably qualified person in consultation with Council, Sydney Water and any other relevant drainage authority. • details the proposed drainage design for the site including on-site detention facilities, water quality measures and the nominated • discharge point. • demonstrates compliance with Council, Sydney Water or other drainage authority requirements.	A Stormwater Management Report and Plans (**Appendix 10**) have been prepared by Stellen Consulting and are addressed in **Section 6.15**.

○ stormwater plans detailing the proposed methods of drainage without impacting on the downstream properties. ▪ Where drainage infrastructure works are required that would be handed over to Council, provide full hydraulic details and detailed plans and specifications of proposed works that have been prepared in consultation with Council and comply with Council's relevant standards.	
16. Flooding ▪ Identify any flood risk on-site in consultation with Council and having regard to the most recent flood studies for the development area and the potential effects of climate change, sea level rise and an increase in rainfall intensity. ▪ Assess the impacts of the development, including any changes to flood risk onsite or off-site, and detail design solutions to mitigate flood risk where required.	A Flood Impact Study (**Appendix 12**) has been prepared by ACOR Consultants and is addressed in **Section 6.16**.
17. Soil and Water ▪ Provide: ○ an assessment of potential impacts on surface and groundwater (quality and quantity), hydrology, soil, related infrastructure and watercourse(s) where relevant. ○ details of measures and procedures to minimise and manage the generation and off-site transmission of sediment, dust and fine particles. ○ o an assessment of salinity and acid sulphate soil impacts, including a Salinity Management Plan and/or Acid Sulphate Soils Management Plan, where relevant.	A Geotechnical Investigation (**Appendix 20**), Preliminary Site Investigation (**Appendix 18**) and Detailed Site Investigation (**Appendix 19**) have been prepared by JK Geotechnics and JK Environments and are discussed in **Section 6.17**.
18. Waste ▪ Identify, quantify and classify the likely waste streams to be generated during construction and operation. ▪ Provide the measures to be implemented to manage, reuse, recycle and safely dispose of this waste. ▪ Identify appropriate servicing arrangements (including but not limited to, waste management, loading zones, mechanical plant) for the site. ▪ Provide a hazardous materials survey of existing aboveground buildings that are proposed to be demolished or altered.	A Waste Management Plan has been prepared by MRA Consulting and is discussed in **Section 6.18**.
19. Contamination ▪ Assess and quantify any soil and groundwater contamination and demonstrate that the site is suitable for the proposed use in accordance with SEPP 55. This must include the following prepared by certified consultants recognised by the NSW Environment Protection Authority: ○ Preliminary Site Investigation (PSI). ○ Detailed Site Investigation (DSI) where recommended in the PSI.	A Preliminary Site Investigation and Detailed Site Investigation have been prepared by JK Environments and are discussed in **Section 6.19**.

○ Remediation Action Plan (RAP) where remediation is required. This must specify the proposed remediation strategy. ○ Preliminary Long-term Environmental Management Plan (LEMP) where containment is proposed on-site.	
20. Hazards and Risk ▪ Provide: ○ a preliminary risk screening completed in accordance with State Environmental Planning Policy No. 33 – Hazardous and Offensive Development and Applying SEPP 33 regarding all dangerous goods and hazardous materials associated with the development. ○ a Preliminary Hazard Analysis, if required where the development includes handling or storage of dangerous or hazardous materials must be prepared in accordance with Hazardous Industry Planning Advisory Paper No. 6, 'Hazard Analysis' and Multi-Level Risk Assessment.	A SEPP 33 Statement (**Appendix 23**) has been prepared by MRA Consulting and is discussed in **Section 6.20**.

As demonstrated by **Table 2** above, the issued SEARs have been adequately addressed throughout this EIS and its supporting appendices.

PART B SITE ANALYSIS

2.1 SITE LOCATION AND CHARACTERISTICS

The Subject Site is identified as 23-27 Lytton Street, Wentworthville, being legally described as Lot 1 DP787784.

The Site is 6,655m² and irregular in shape. The Site presently contains the existing Wentworthville Northside West Clinic which is operated by Ramsay Health Care. The Clinic adjoins low density residential development to the north, east and south of the Site and Lytton Street Park and Finlayson Creek to the west. The Site benefits from a large single site frontage of approximately 107m to Lytton Street and as such ingress/egress from the Site is via Lytton Street.

The Site is located in close proximity to the existing residential properties zoned R4 High Density Residential to the north and R2 Low Density Residential to the east and south. Additionally, the Site adjoins RE1 Public Recreational zoned land, Lytton Street Park and the Finlaysons Creek to the west.

The Site is situated approximately 2.7km from Parramatta and 23km from Sydney CBD. The Site affords road linkages to Cumberland Highway, Great Western Highway, M4 Western Motorway and Old Windsor Road. The Site is also highly accessible via public transport including bus services on Jordan Street and Veron Street, as well as the Wentworthville Station, which is located approximately 433m north west to the Site.

The Site and surrounding context are best illustrated in **Figures 1-5** below.

Figure 1 Aerial Map of Site (Nearmap 2021)

Figure 2 Cadastral Map of Site (SIX Maps 2021)

Figure 3 Street view from Lytton Street (Google 2020)

Figure 4 Street view - Lytton Street frontage (Google 2020)

Figure 5 Street view from Jordan Street/Lytton Street intersection (Google 2020)

2.2 LAND OWNERSHIP

The land to which is the subject of this SSDA is under ownership of Health Care Corporation Pty Limited.

2.3 SITE CONTEXT

The Site is located in Wentworthville, which forms part of the Cumberland Local Government Area (LGA).

As noted above, the surrounding context exhibits a number of residential and recreation uses, mainly characterised by low density residential housing and Lytton Street Park. It is noted that the Site comprises an existing health care facility known as the Wentworthville Northside West Clinic and has been integrated harmoniously within its context.

Key land uses in the vicinity of the Site include:

- North – R4 High Density Residential zoned land comprising existing low density residential dwellings;

- South – RE1 Public Recreation zoned land and R2 Low Density Residential zoned land comprising existing low density residential development;
- East – R2 Low Density Residential zoned land;
- West – RE1 Public Recreation zoned land comprising Lytton Street Park and Finlaysons Creek.

The surrounding Site context is illustrated in **Figure 6** below.

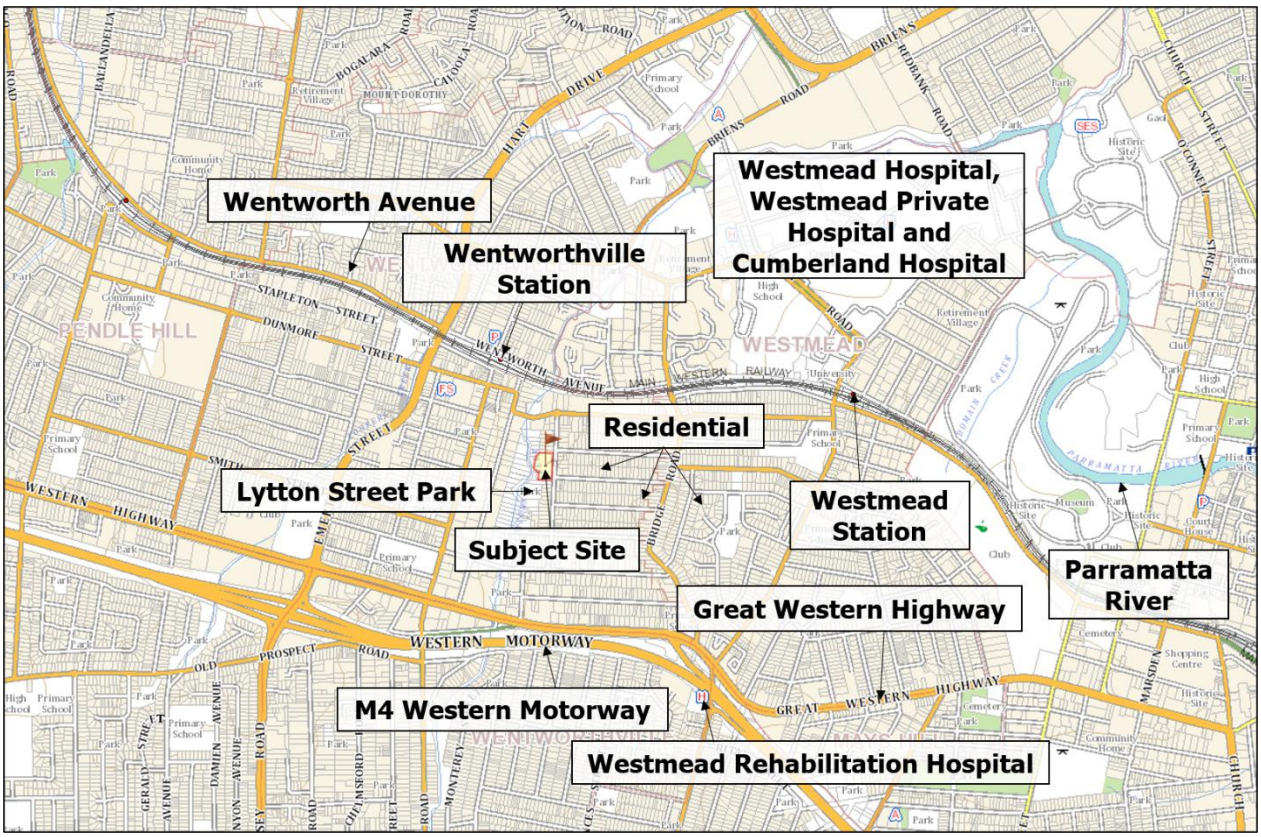

Figure 6 Site Context Map (SIX Maps 2021)

2.4 STRATEGIC CONTEXT

The Site is strategically located in the Central River City under the *Central City District Plan* and is identified as a Principal Local Centre under the *Cumberland 2030: Our Local Strategic Planning Statement* (LSPS) published by Cumberland City Council. The proposal is considered to be consistent with the Planning Priorities under the *Central City District Plan*, particularly in relation to "*Planning for a city supported by infrastructure*" as the Proposed development will provide specialised health care services in response to the emerging needs of the community.

In addition, the LSPS identifies that a total of around 2,500 additional dwellings are planned for Wentworthville. The proposed state-of-the-art health care facility will thus contribute to the provision of health infrastructure and create job opportunities in the Cumberland LGA, further facilitating the concept of a 30-minute city.

As demonstrated throughout the EIS, the proposed development is entirely consistent with the objectives of CLEP2021, SEPP Infrastructure, *The Greater Sydney Region Plan – A Metropolis of Three Cities*, the *Central City District Plan* and the LSPS. The Proposed development is therefore considered to be orderly development and aligns with both the strategic vision for the region and the desired socio-economic and employment outcomes envisaged for the locality and the wider Cumberland LGA.

2.5 DEVELOPMENT HISTORY

The relevant development consents which relate to the Site are summarised in **Table 3** below.

Table 3 Development History		
Application Number	**Description of Proposal**	**Date of Determination**
DA2014/195/1	Development Application for expansion of existing hospital facility to accommodate Adolescent Eating Disorder Unit	Approved on 25 August 2014
M2014/195/2	Section 4.55(2) Modification for alterations to an existing hospital facility	Approved on 2 November 2015
PP-2020-2448	Planning Proposal to rezone the land from R2 Low Density Residential to R4 High Density Residential, increase the maximum building height from 9m to 15m and increase the floor space ratio from 0.5:1 to 1:1	Approved and published on 25 May 2017
CDC2017/5235/1	Complying Development Certificate for dwelling alterations/additions	Issued to Council on 8 August 2017

2.6 SITE SUITABILITY

The Proposed development provides for the extension of the Wentworthville Northside West Clinic situated in a locality which has been identified to present opportunities for growth and development in jobs and housing under the LSPS. The Site comprises an existing health services facility which has been operated by Ramsay Health Care to offer high standards mental health care services and inpatient residential care in proximity to Wentworthville local centre. The proposal would provide additional capacity for the operation of the Clinic and continue to respond to the emerging demand for health care services in the locality.

In addition, the Site exhibits minimal constraints and which topography is suitable for the intended use. As demonstrated in the Detailed Site Investigation (**Appendix 19**), soils at the Site were generally non-saline to slightly saline to a depth of approximately 2m and the majority of the pH results from surficial soils were within the optimum range for plant growth. It is considered that no salinity management plan is required for the proposed development. Further details of the soils condition are discussed in **Sections 6.17** and **6.19**.

Notwithstanding the above, the Site is deemed highly suited to accommodate the intended use, for the purpose of a health services facility, due to the following factors:

- SEPP Infrastructure allows for the proposed development within the R4 High Density Residential zone;
- Access to regional and state road network which facilitates connectivity to the surrounding strategic and local centres and the wider region;
- Compatibility with surrounding development, as well as strategic and local context is evident;
- The height and scale would not negatively impact on existing or future adjacent development due to overshadowing;
- The Site is currently underutilised and the development represents a substantial investment in the locality which could promote investment opportunities and the provision of health care services in the Cumberland LGA;
- The Site represents orderly and sequential development having regard to the proximity to the existing and planned residential development in Wentworthville and the Westmead Health and Education Precinct;
- The Site can be serviced immediately and at no cost to Government;
- The proposed built form has been designed to mitigate any impacts on surrounding residential properties through siting, conscious positioning of the building, high quality landscaping and a conducive architectural and urban design outcome; and,
- Implementation of suitable mitigation measures where required.

Furthermore, the suitability of the Site is reinforced in **Part D** of the EIS with regard to the proposed development's overall consistency with applicable regional and local strategies; and, in **Part F** of this EIS, via a comprehensive Environmental Assessment, which includes an analysis of the potential impacts as a result of the proposed development. Accordingly, the Environmental Assessment prescribes recommendations and mitigation measures of the proposed development. As mentioned above, the suitability of the Site regarding the proposed development is attributed to its ready ability to provide employment, excellence access arrangements to the regional road network, suitable contextual setting and minimal impact on the environment it would impose.

PART C PROPOSED DEVELOPMENT

3.1 OBJECTIVES OF THE PROPOSAL

The subject Proposed development seeks Development Consent for the extension of the Wentworthville Northside West Clinic. The following aims and objectives have been identified as forming the basis of the proposed development of the subject land to accommodate the proposed health services facility:

- Facilitate the four-storey extension of the existing Clinic to meet the significant demand that exists in the Greater Sydney Region;
- Design the Site to create a high-quality hospital for both staff and patients;
- Respond to the current and projected growth of Greater Sydney Region through the provision of hospital beds and consulting suites;
- Ensure minimal environmental impact; and
- Ensure development is compatible with surrounding development.

The Site and proposed design are considered to meet the objectives of the project.

3.2 DESCRIPTION OF PROPOSAL

The proposal includes the erection of a four-storey extension (being the 'Stage 2' building) to the existing Wentworthville Northside West Clinic, as well as alterations and additions to the existing 'Stage 1' building on Site. The proposed four-storey extension will be located south and west of the existing building above the existing at-grade carpark. The proposed extension would result in an additional Gross Floor Area (GFA) of 4,498m² with an addition of 46 carparking spaces. Specifically, the proposal entails the following:

- Demolition of the existing two-storey west wing building and carpark in the southern portion;
- Construction of a four-storey extension of the existing Wentworthville Northside West Clinic including two levels of patient area and two levels of parking on the western boundary and three storeys of patient area and one level of at grade carparking along the southern boundary, comprising:
  - Addition of 95 inpatient rooms and nine consulting suites across Levels 1 to 3
  - Provision of 18 carparking spaces on Lower Ground Level and 28 carparking spaces on Ground Level
- Alterations and additions to existing Stage 1 building comprising:
  - A new lobby, gym, loading bay, ancillary office and associated amenities on Lower Ground Level
  - A new lobby, art room and amenities on Ground Level
- Construction of a landscaped open space in the south western portion of the Site
- Tree removal in the southern and western portions of the Site

A total of 30 trees within the Site are required to be removed to facilitate the construction of the proposed expansion. The proposal has been designed to optimise the retention of existing trees and vegetation on Site, which will be maintained through the implementation of the management measures designed a qualified arborist. An Arboricultural Impact Assessment has been prepared and is further discussed in **Section 6.3**.

The development particulars are listed in **Table 4** below.

Table 4 Development Particulars

Project Element	Development Particular
Site Area	6,655m²
Gross Floor Area (GFA)	▪ Existing GFA (Stage 1): 2,786m²

Table 4 Development Particulars	
Project Element	**Development Particular**
	▪ Proposed GFA (Stage 2): 4,498m^2 ▪ **Total GFA: 7,284m²**
Car Parking	▪ Stage 1: 31 spaces (including 2 accessible spaces) ▪ Stage 2: o Lower ground: 18 spaces (including 2 accessible spaces) o Ground: 28 spaces ▪ **Total car parking spaces: 77 car parking spaces**
Inpatient Units / Beds	▪ Stage 1: 30 units ▪ Stage 2: o Level 1: 41 units (including 3 accessible units) o Level 2: 29 units (including 2 accessible units) o Level 3: 25 units (including 3 accessible units) ▪ **Total: 125 inpatient units**
Consulting Suites	▪ Stage 1: 9 consulting suites ▪ Stage 2: 9 consulting suites on Level 1 ▪ **Total: 18 consulting suites**
Building Height	16.3m-19.6m
Floor Space Ratio	1.09:1
Primary Land Use	Health Services Facility comprising: ▪ consulting suites; ▪ in-patient units; and ▪ ward rooms.
Site Access	▪ The proposed development will retain the existing access arrangements for the Site, which comprises the following: o Southern carpark accessed via the 6m wide two-way driveway; o Northern carparks accessed via the 6m wide entry driveway; and o Egress from the northern carparks via the 6m wide exit driveway. ▪ The proposed access is further discussed in **Section 6.5** of this EIS and a detailed assessment has been provided in the Transport Impact Assessment prepared by Traffix and attached at **Appendix 9**. ▪ Pedestrian access will be available from Lytton Street and the Lytton Street Park. An Accessibility Review Report has been prepared by Abe Consulting and is attached at **Appendix 24**.
Infrastructure and Services	▪ Services to the Site can be successfully augmented where necessary, including potable water, electricity, gas, wastewater and telecommunications.
Operational and Construction Jobs	▪ Construction jobs are anticipated to be in order of approximately 60 and approximately 23 new full-time jobs at operational stage.
Hours of Operation	▪ Ward: 24/7 operations ▪ Day surgery: 7.00am to 7.00pm

A summary of key components and numerical particulars of the Proposed development is provided in **Table 5** below.

Table 5 Numerical Particulars	
Location	**Component**
Lower Ground Level	▪ Existing Stage 1 building:

Table 5 Numerical Particulars	
Location	**Component**
	○ New lobby, loading bay, gym, ancillary office and associated amenities ▪ Western carpark: ○ 18 carparking spaces
Ground Level	▪ Existing Stage 1 building: ○ Internal alterations and additions to create new group rooms, expanded ECT recovery room, staff room, art room, lounge room, café, office, interview room, breakout room and toilet upgrades ○ Existing undercroft carpark comprising 31 carparking spaces ▪ Proposed Stage 2 building: ○ Undercroft carparking area with 13 carparking spaces, plant room and services ○ New substation ○ Landscaped open space ▪ Western carpark: ○ 15 carparking spaces
Level 1	▪ Proposed Stage 2 building: ▪ 41 inpatient units ▪ 9 consulting suites ▪ Internal central open courtyard ▪ Associated amenities including lounge rooms, dining area, terrace, kitchenette and utility rooms
Level 2	▪ Proposed Stage 2 building: ▪ 29 inpatient units including 2 accessible units ▪ Associated amenities including lounge rooms, servery, dining area and utility rooms ▪ External courtyard with an area of 73m^2 in the western portion
Level 3	▪ Proposed Stage 2 building: ▪ 25 inpatient units including 3 accessible units ▪ Outdoor courtyard with an area of 118m^2 ▪ Associated amenities including lounge rooms and utility rooms

The visualisation of the extension of the Wentworthville Northside West Clinic is detailed in **Figures 7-9**.

Figure 7 Visualisation - Lytton Street View (Team 2 Architects 2021)

Figure 8 View from Lytton Street Park showing undercover courtyard (Hatch RobertsDay 2021)

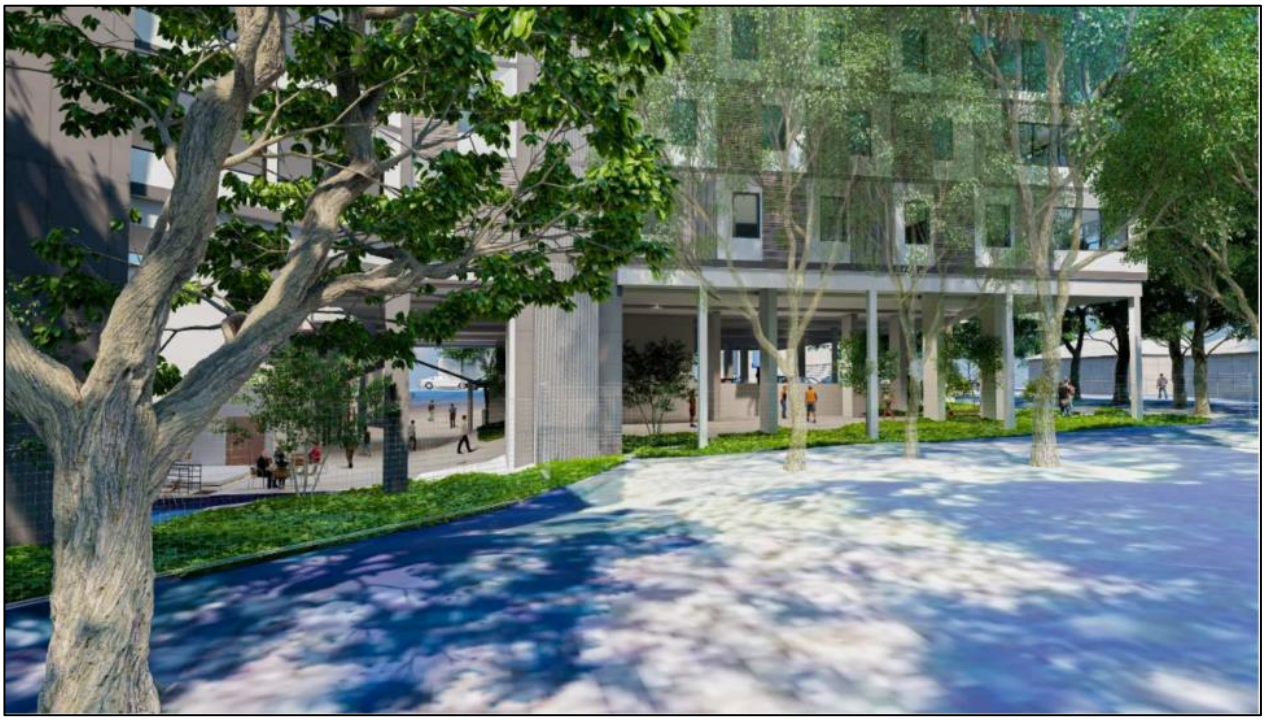

Figure 9 View from Lytton Street Park showing undercover courtyard and stepped facade at south west corner (Hatch RobertsDay 2021)

3.2.1 Building Envelope

The proposed development presents a four-storey extension to the Wentworthville Northside West Clinic with undercroft carparking and a landscaped open space. The façade treatment is a café composition of rhythmic reveals set out of phase between floors, and interspersed with textured panels between glazing bays. The elevations are ordered and anchored by an overriding horizontal grid which simultaneously provides an order the elevations, and references the existing Stage 1 extension. **Figure 10** below illustrates the relationship of the Stage 2 building with Stage 1 and Lytton Street.

Figure 10 View from north east showing relationship with Stage 1 and Lytton Street (Team 2 Architects 2021)

Further details of the proposed building envelope are illustrated in the Architectural Plans at **Appendix 3**.

3.2.2 Site Infrastructure

The Site infrastructure and services required to support the proposed extension of Wentworthville Northside West Clinic will be delivered in conjunction with the civil works and built form development. Suitable mechanical, electrical and hydraulic services will be provided for the development. Further details of the infrastructure provision are provided in the Building Services Interface Report at **Appendix 21** prepared by DSA Consulting. Details of the proposed earthworks and excavation are provided in **Section 6.17** and the Geotechnical Investigation at **Appendix 20**.

3.2.3 Vehicular Access and car parking

The proposal will retain the existing access arrangements for the Site from Lytton Street. A total of 77 car parking spaces will be accessed via the existing driveways on Site. Specifically, the access arrangements are as follows:

- 13 spaces in the southern carpark accessed via the 6m wide two-way driveway;
- 64 spaces in the northern carparks accessed via the 6m wide entry driveway; and
- Egress from the 64 spaces in the northern carparks via the 6m wide exit driveway.

The access arrangements are consistent with the minimum requirements of AS2890.1 (2004) and will continue to operate satisfactorily.

Additionally, the proposed provision of 77 car parking spaces is adequate to accommodate the parking demand of the proposal. The car parking areas have also been designed to be in accordance with the requirements of AS2890.1 (2004) and AS2890.6 (2009). Further details of the proposed access and parking arrangements are discussed in **Section 6.5** of the EIS.

3.2.4 Landscaping

A set of Landscape Plans has been prepared by Arcadia to illustrate the proposed landscaping design for the proposed development. As demonstrated in the Landscape Plans, the proposal will retain the existing trees and landscaping for the Stage 1 building and incorporate additional new landscaping for the Stage 2 building. Specifically, the proposed landscaping involves a complimentary mix of native species encompassing trees, planting beds, shrubs and accent planting. A landscaped open space will be created in the south western portion of the Site, including a basketball court, timber seating and feature planting, which will enhance the visual interest and amenity of the Site. Further details of the proposed landscaping are provided at **Appendix 6** and **Section 6.3.2**.

3.3 PROJECT NEED

The proposed development is essential in ensuring that the attributing characteristics of the Subject Site are utilised by providing a beneficial health care facility to the immediate area, as well as being accessible to the wider locality. Furthermore, the proposed expansion of the Wentworthville Northside West Clinic would enhance the operational capacity of the Clinic to provide high standards specialised health care services.

The proposal will facilitate the effective delivery of health infrastructure by providing excellent mental health care services and inpatient residential care which respond to the changing needs of the community, including mental and psychiatric illnesses and needs for rehabilitation services. Its location in proximity to the Wentworthville local centre would also enhance the accessibility for patients, visitors and workers to various health care facilities. Additionally, the proposal would also facilitate the co-location of health and social infrastructure which would deliver substantial public benefits and support the growth of Wentworthville as a local centre.

As identified in the LSPS, a total of around 2,500 additional dwellings and jobs growth are planned for Wentworthville. The proposed extension of the Clinic will contribute to the provision of social and health infrastructure in the locality which will address the capacity of the existing health services facility and cater to the future demand of the growing population. In addition, the proposal will create job opportunities in close proximity to homes and the Wentworthville local centre, further facilitating the delivery of a 30-minute city in the Cumberland LGA.

Furthermore, the proposal would build on the health services and infrastructure currently provided by the Clinic to facilitate the orderly and economic use and development of the Site without resulting in any unacceptable economic, environmental or social impacts.

Overall, the proposed development would be consistent and commensurate with Commonwealth, State, Regional and Local planning controls and objectives; the environmental characteristics of the Site; the surrounding context; and the principles of Ecologically Sustainable Development (ESD).

3.4 CONSIDERATION OF ALTERNATIVES

The purpose of the Proposed development is to increase the operational capacity of the existing Wentworthville Northside West Clinic and provide a well-resolved health services facility in the R4 High Density Residential zone. The proposal will also generate employment opportunities in close proximity to homes and the Wentworthville local centre, which will promote the 30-minute city concept as identified in the LSPS. As addressed in **Section 3.3**, the extension of the Clinic is proposed in order to meet the needs of the growing population for social and health infrastructure. The proposed hospital will provide inpatient units and mental health care services to service the wider Cumberland LGA.

The proposed development seeks to ensure it:

- Is compatible with surrounding development and the local context;
- Would provide increased operational efficiencies for the provision of health care services;
- Would result in minimal impact on the environment; and
- Would allow for the implementation of suitable mitigation measures, where required.

In determining the most appropriate outcomes for the Site, several options were considered, and subsequently dismissed, in arriving at the current Proposed development. These included:

(a) The "Do Nothing" Option

This option did not meet commercial timing or objectives for the Site and was therefore dismissed. If the proposed development was not to proceed, the Site would remain the existing capacity which would be insufficient to support the increasing demand for mental health services and the facilitate the operational requirement needed for the existing Clinic.

The "do nothing" option would mean that this Site, ideally located within close proximity to the Wentworthville local centre, would remain underdeveloped for the foreseeable future. This is a poor outcome for both investment and employment outcomes for the Site; NSW; and the region.

(b) Development on an Alternative Site

Due consideration was also given to developing alternative sites for this proposal. The analysis undertaken showed that the proposed Site offered superior outcomes for the intended development. It also was preferred to other alternative sites in terms of community and public benefit to the State and the Region, as it allowed for new services, infrastructure and roads to be built and delivered ahead of schedule, at no cost to Government. Some of the positive attributes of the Site were:

- It is located within the R4 High Density Residential zone where health services facilities are permissible with consent under SEPP Infrastructure;
- Proximity to the regional road network and existing services;
- Adequate separation from the surrounding residential properties and the Lytton Street Park;
- Few environmental constraints and therefore able to deliver employment and commercial outcomes;
- Immediate access to the regional road network giving the Site increased economic benefits;
- Low exposure to possible heritage affectations or impact on possible archaeological sites. Any impacts were assessed to be manageable through suitable mitigation measures.
- Excellent siting and context, thereby allowing a high-quality, environmentally sensitive finished product, with appropriate visual amenity, given its surrounding context.

(c) Different Site Configuration

Many site configurations were also tested before arriving at the final design. The Site is located on Lytton Street on the eastern side of Lytton Street Park overlooking Finlaysons Creek. The proposed development has been designed to accommodate extension of existing facility to the existing southern carpark which is both unsightly and an underused area of the Site.

Evolution of the approved Planning Proposal to the current design

Specifically, the original scheme approved under the Planning Proposal (PP-2020-2448) in 2017 relates to a stand-alone rehabilitation unit, which was unconnected with the existing mental health facility with a two-level basement carpark. In the intervening period between the approval of the Planning Proposal and the current design, the demand for mental health has risen considerably (and has escalated again during the COVID pandemic). Further, the flood studies undertaken have suggested that an underground carpark is not practical from a flooding or cost perspective.

In order to accommodate the increasing demand for mental health care services, the proposal has been designed to expand and upgrade the existing facility through the construction of a four-storey extension cojoined with the RL of first level of the Stage 1 development. This approach will provide operational connectivity across the Site, which was unable to be facilitated in the previous scheme. It is noted that the various alignments with the existing Stage 1 development were tested as part of the design process. **Figure 11** below illustrates the draft design of the eastern elevation dated 15 July 2020, indicating the preliminary design of the Stage 2 development at a different RL which encountered issues relating to levels and connections.

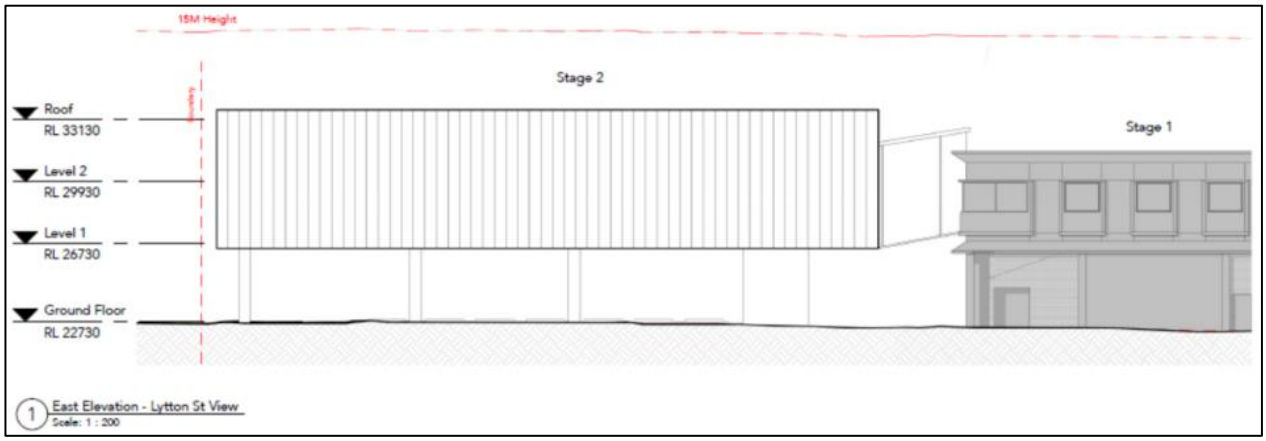

Figure 11 Draft eastern elevation dated 15 July 2020 (Team 2 Architects 2020)

Figure 12 below illustrates the comparison between the approved Planning Proposal scheme and the current proposed scheme.

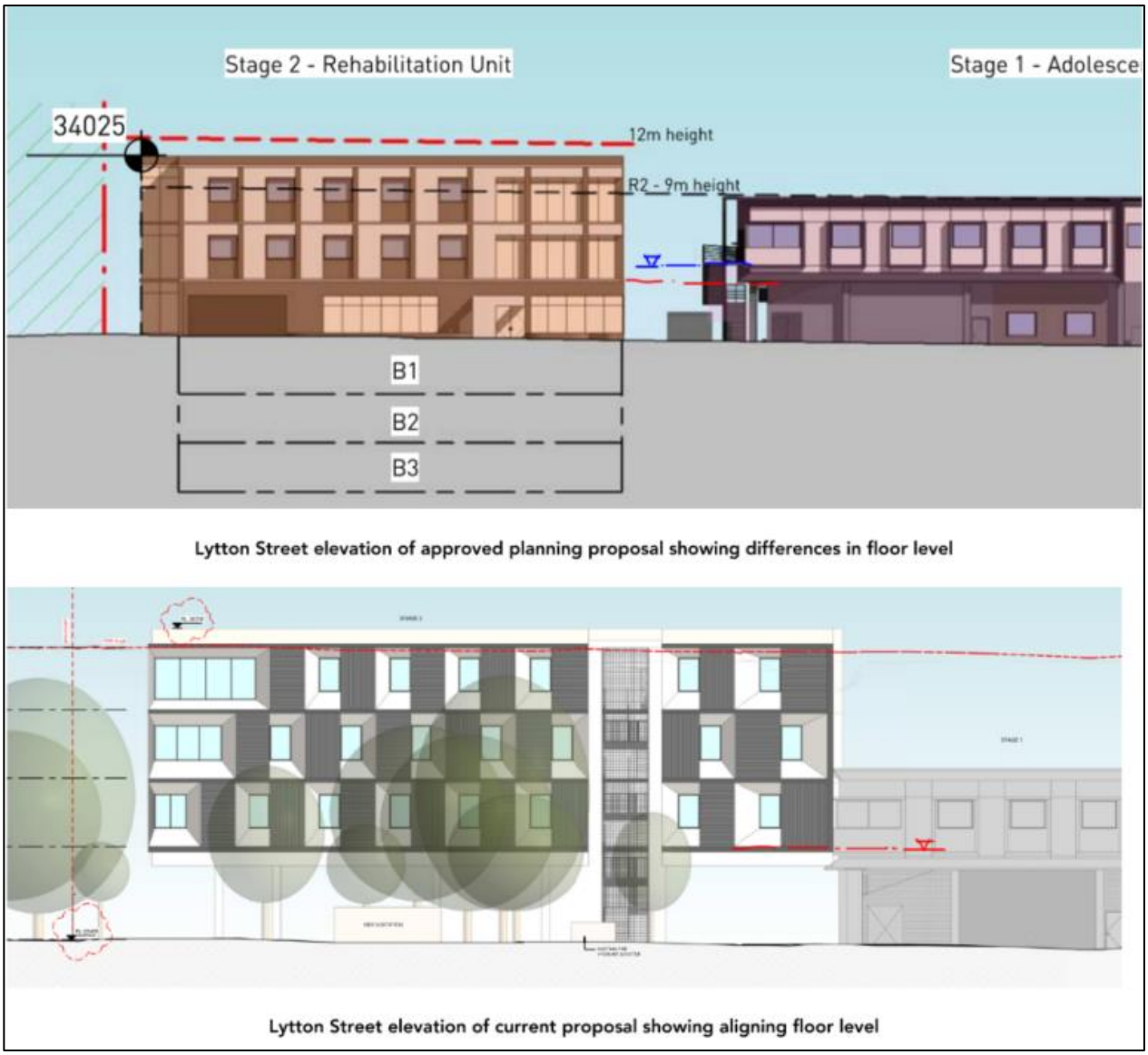

Figure 12 Comparison between approved Planning Proposal scheme and current proposed scheme (Team 2 Architects 2021)

In addition, throughout the design development process which commenced in 2018, a series of plan configuration options were formulated and reviewed against best practice patient care, and practical operational requirements.

The current design was arrived upon as it optimised patient and staff safety, as well as providing efficient staffing outcomes and comfortable surroundings, with good natural light and connection to the outside.

The final design also has the advantages of improved connectivity to both the existing Stage 1 ward, and the existing Level 1 consulting suites; and the doughnut circulation passage provides further efficiencies in staffing, as well as improved ward flexibility and better patient and staff safety by having a choice of horizontal egress pathways. **Figures 13-16** illustrate an insight into the design development process:

Figure 13 Plan dated 24 February 2019 (Team 2 Architects 2019)

Figure 14 Plan dated 5 December 2019 (Team 2 Architects 2019)

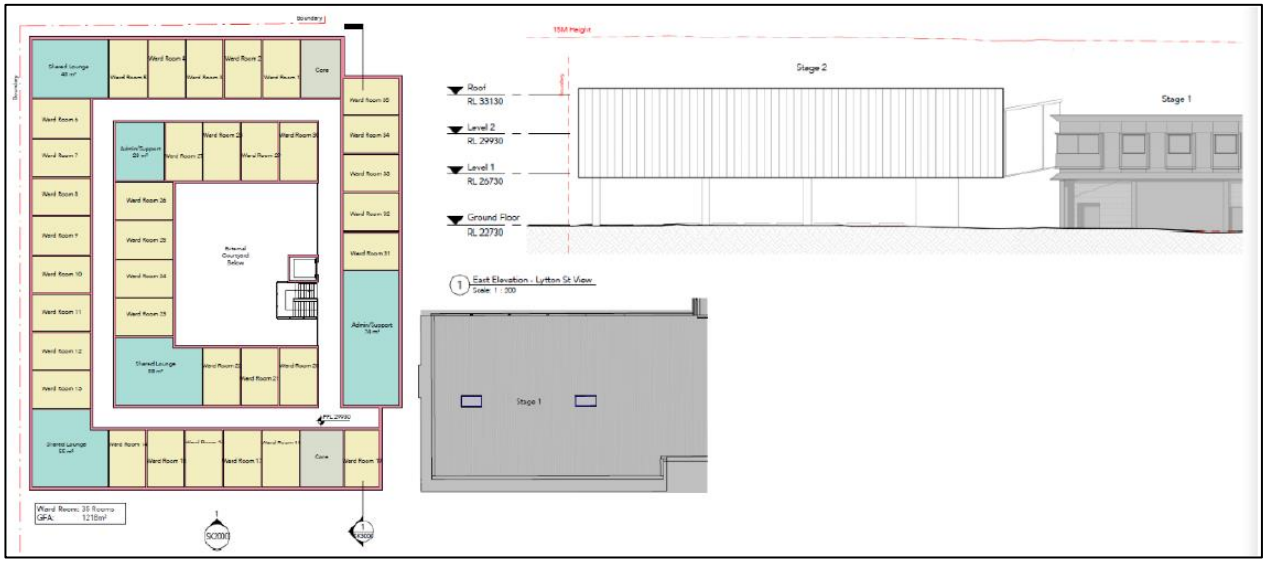

Figure 15 Plan dated 5 July 2020 illustrating ongoing issues with levels and car parking (Team 2 Architects 2020)

Figure 16 Final design dated 27 November 2021 (Team 2 Architects 2021)

The outcome of the design development is a series of pavilion type structures which are perforated by courtyards and balconies to provide safe internal and external spaces to serve the patients, and comply with the provisions of the Australasian Health Facility Guidelines (AHFG).

Figure 17 Sectional perspective through main courtyard (Team 2 Architects 2021)

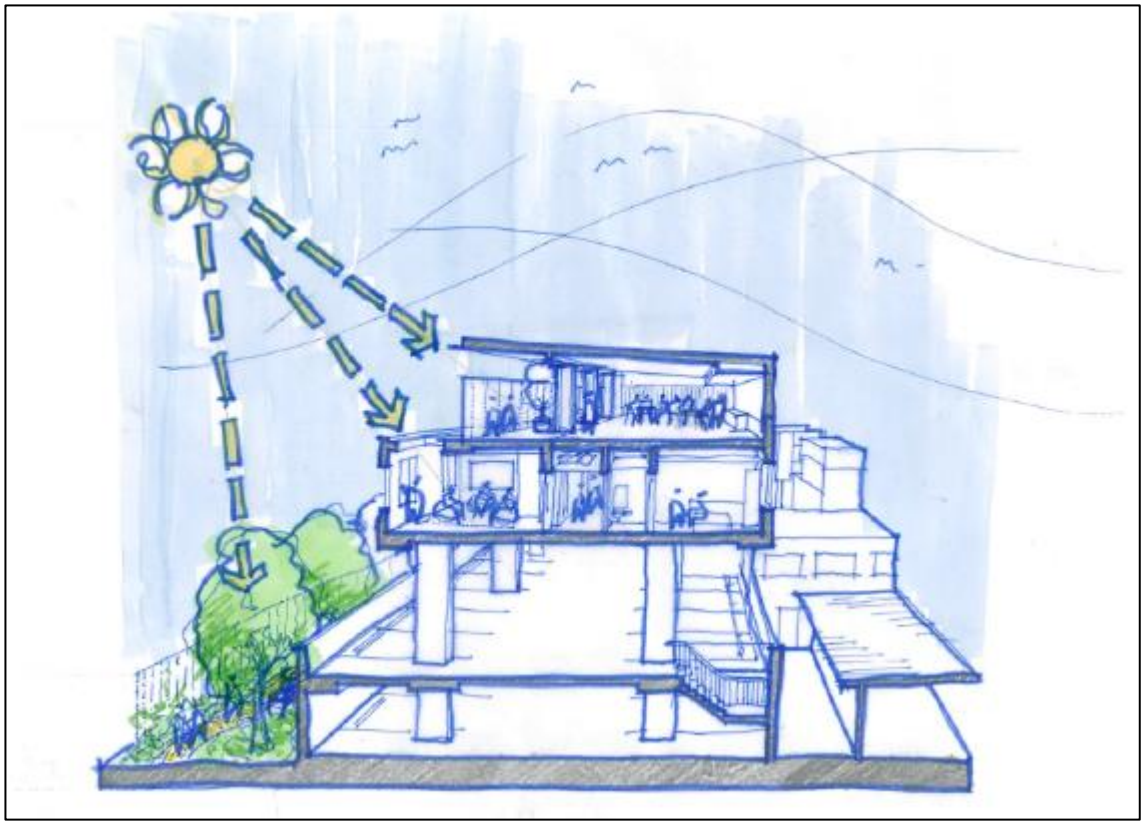

Figure 18 Sectional perspective through dining room (Team 2 Architects 2021)

Changes in building height between SEARs request and SSDA submission

Between the SEARs request submission and the final SSDA submission, there has been significant design development as would be reasonably expected as part of the process.

In order to meet the requirements of a highly serviced building of this nature, it was determined necessary to increase the floor to floor levels from 3,200mm to 3,500mm. Additionally, a further tolerance was added to allow for roof falls, flashing zones etc. The culmination of these measures is that the building will project through the building height plane by approximately 0.95m at the south east corner of the Site. The visual bulk is managed through recessing the roof zone which will be read as a recessive element in relation to the main elevation. **Figures 19-20** present a comparison between the proposal submitted for the SEARs Request and for the subject SSDA.

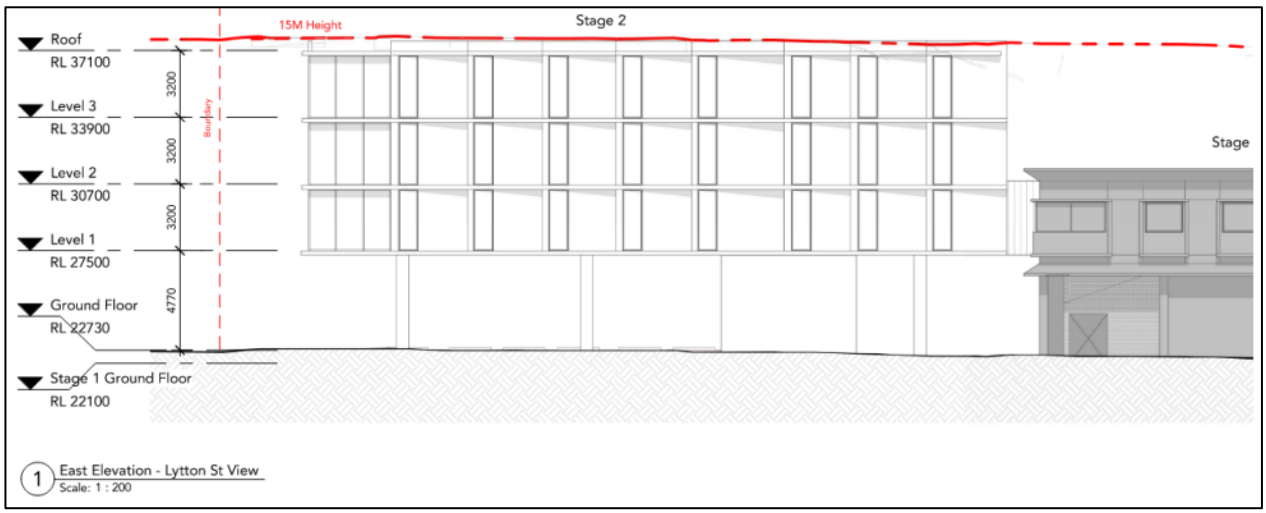

Figure 19 Proposal as submitted for SEARs Request - April 2021 (Team 2 Architects 2021)

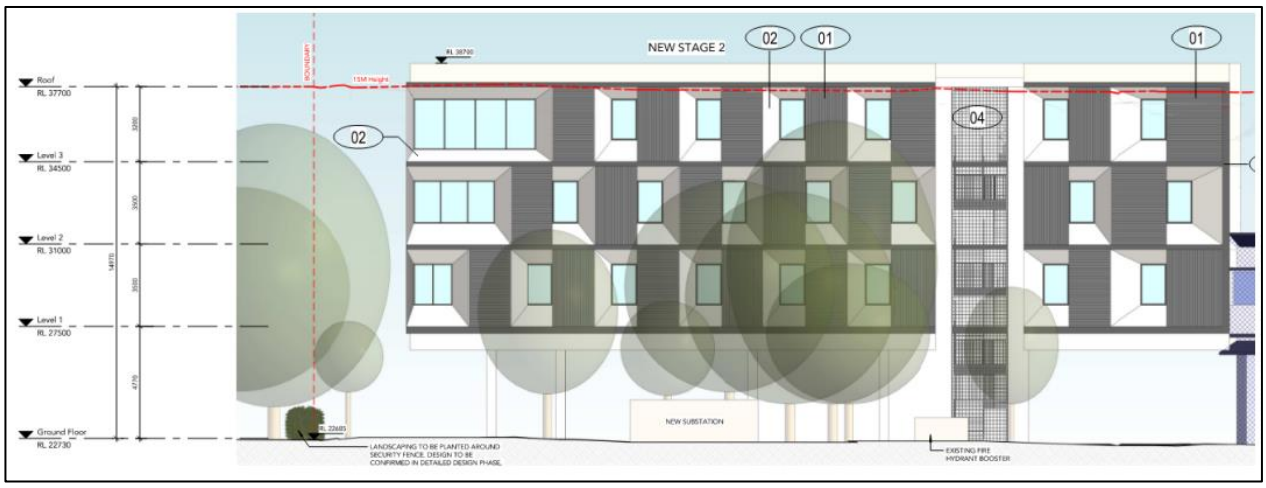

Figure 20 Proposal submitted for SSDA - January 2022 (Team 2 Architects 2022)

The current configuration was chosen for the following reasons:

- The extension to the south would facilitate a better use of this portion of the Site compared to the current use as a car park;
- The demolition of the existing two-storey west wing would facilitate the construction of a new purpose-designed wards and overnight accommodation integrated to the existing Stage 1 building;
- It facilitates upgrades to the existing Stage 1 building including internal modifications;
- It increases the operational capacity of the Clinic without extensive earthworks or excavation, which mitigates potential impacts on the existing drainage pattern and soil stability of the Site and the adjacent open space;
- It creates the opportunity to acknowledge and pay respects to the Dharug People, through the incorporation of public art, both at a tactile level in the landscaped paths and planting, and in the building where each of the three staircases offer the possibility of a major installation by local artists on a canvas nearly 3m wide by between 15-20m high;
- It improves the visual appearance of the Lytton Street frontage;

- It is strategically positioned to locate the maximum height exceedance in the rear portion of the Site facing Lytton Street Park, for which it is visually screened by the front portion of the building;
- Visually it would be compatible with the surrounding environment and would create a sensible transition to the surrounding residential properties;
- It makes a positive built form contribution to the streetscape; and
- It provides public domain upgrades that will be developed at no cost to Government.

The proposed development was thus able to be justified on the basis that, it is compatible with the locality in which it is proposed, whilst having an obvious positive economic, environmental and social impact on its surrounding region. The proposed development has obvious demand, supports the vision for the Wentworthville locality and is of public interest.

The proposed development is consistent with the regional strategic plans.

PART D LEGISLATIVE AND POLICY FRAMEWORK

Controls and Policies

The following current and draft Commonwealth, State, Regional and Local planning controls and policies have been considered in the preparation of this SSDA:

Statutory Planning Considerations

- *Environment Protection and Biodiversity Conservation Act 1999*
- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning and Assessment Regulation 2000*
- *Protection of Environment Operations Act 1997*
- *Biodiversity Conservation Act 2016*
- *Water Management Act 2000*
- *Rural Fires Act 1997*
- *State Environmental Planning Policy (State and Regional Development) 2011*
- *State Environmental Planning Policy (Infrastructure) 2007*
- *State Environmental Planning Policy No 33 – Hazardous and Offensive Development*
- *State Environmental Planning Policy No 55 – Remediation of Land*
- *Draft State Environmental Planning Policy (Remediation of Land)*
- *Draft State Environmental Planning Policy (Environment)*
- *Cumberland Local Environment Plan 2021*
- *Cumberland Local Infrastructure Contributions Plan 2020*

Non-Statutory Planning Considerations

- *The Greater Sydney Region Plan – A Metropolis of Three Cities*
- *Central City District Plan*
- *Greater Parramatta and the Olympic Peninsula (GPOP) Vision*
- *Draft A City Supported by Infrastructure: Place-based Infrastructure Compact Pilot*
- *Cumberland 2030: Local Strategic Planning Statement*
- *State Infrastructure Strategy 2018-2038*
- *Future Transport 2056*
- *Crime Prevention through Environmental Design*
- *Better Placed: An integrated design policy for the built environment of New South Wales*
- *Heathy Built Environment Checklist*
- *Draft Greener Places Design Guide*
- *Cumberland Development Control Plan 2021*

This proposed development has therefore been carefully assessed against the requirements and objectives of the above statutory and strategic planning documents. A detailed analysis is set out in the following sections.

4.1 STATUTORY PLANNING CONSIDERATIONS

4.1.1 Environment Protection and Biodiversity Conservation Act 1999

The *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) is the Australian Government's central piece of environmental legislation. It provides a legal framework to protect and manage, nationally and internationally important flora, fauna, ecological communities and heritage places, defined in the EPBC Act as matters of National Environmental Significance.

Under the EPBC Act, a person must not, without an approval under the Act, take an action that has or will have, or is likely to have, a significant impact on a matter of National Environmental Significance. These matters are listed as:

- The world heritage values of a declared World Heritage property
- The ecological character of a declared Ramsar wetland
- A threatened species or endangered community listed under the Act
- A migratory species listed under the Act
- The environment in a Commonwealth marine area or on Commonwealth land

A Biodiversity Development Assessment Report (BDAR) prepared by Eco Logical and is provided at **Appendix 17**. As demonstrated in the BDAR, two Matters of National Environmental Significance (MNES) were identified having potential to be adversely affected by the proposed development. *Pteropus poliocephalus* (Grey-headed Flying-fox) is listed as Vulnerable under the EPBC Act and it is considered that this species is likely to use some of the development Site for foraging. *Eucalyptus nicholii* is also a MNES and will be impacted by the proposed works. Application of the Commonwealth Significant Impact Criteria was undertaken for the Grey-headed Flying-fox and *Eucalyptus nicholii* and the assessments concluded that the project is unlikely to have a significant impact on these species.

As such, no referral to the Commonwealth Department of Environment is required.

4.1.2 Environmental Planning and Assessment Act 1979

The EP&A Act is the overarching governing statute for all development in NSW and Section 4.36(2) provides that:

> *A State environmental planning policy may declare any development, or any class or description of development, to be State significant development.*

The proposed development is identified as State Significant Development under *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP).

Pursuant to Section 4.12(8), *a development application for State significant development or designated development is to be accompanied by an environmental impact statement prepared by or on behalf of the applicant in the form prescribed by the regulations*. Accordingly, this application meets the requirements of the EIS.

4.1.3 Environmental Planning and Assessment Regulation 2000

The *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation) prescribes requirements for Environmental Impact Statements in Schedule 2.

Pursuant to Schedule 2, Part 3 identifies the requirements of an EIS. It is considered this application meets the relevant requirements and adequately assesses the subject SSD.

Section 4(1) of the EP&A Regulation states that any development described in Part 1 of Schedule 3 would be declared to be Designated Development for the purposes of the Act. The Proposed development being for a proposed health services facility, does not trigger the Designated Development thresholds under Part 1 of Schedule 3 of the EP&A Regulation.

4.1.4 Protection of Environment Operations Act 1997

Schedule 1 of the *Protection of the Environment Operations Act 1997* (POEO Act) contains a core list of activities that require a licence before they may be undertaken or carried out. The definition of an 'activity' for the purposes of the POEO Act is:

> *an industrial, agricultural or commercial activity or an activity of any other nature whatever (including the keeping of a substance or an animal).*

The proposal will not involve any activity that would require the issue of an Environmental Protection Licence.

4.1.5 Biodiversity Conservation Act 2016

The *Biodiversity Conservation Act 2016* (BC Act) is the key piece of legislation in NSW relating to the protection and management of biodiversity and threatened species. The purpose of the BC Act is to maintain a healthy, productive and resilient environment for the greatest well-being of the community, now and into the future, consistent with the principles of ecologically sustainable development. The BC Act is supported by several regulations, including the *Biodiversity Conservation Regulation 2017* (BC Regulation).

Part 7 of the BC Act sets out requirements for biodiversity assessments and approvals under the Planning Act (meaning the EP&A Act).

Pursuant to Section 7.2(1), *development or an activity is likely to significantly affect threatened species if:*

(a) it is likely to significantly affect threatened species or ecological communities, or their habitats, according to the test in section 7.3, or
(b) the development exceeds the biodiversity offsets scheme threshold if the biodiversity offsets scheme applies to the impacts of the development on biodiversity values, or
(c) it is carried out in a declared area of outstanding biodiversity value.

Pursuant to Section 7.9 of the BC Act, an SSD *is to be accompanied by a biodiversity development assessment report unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values*.

Under Clause 7.1 of the BC Regulation, where the future development involves clearing of native vegetation of 1 ha or more; or the clearing of native vegetation of land with outstanding biodiversity values, the development will exceed the biodiversity offset scheme and will require the preparation of a Biodiversity Development Assessment Report (BDAR).

Upon review of the Biodiversity Values Map (**Figure 21**), the Site is not identified to contain any biodiversity values.

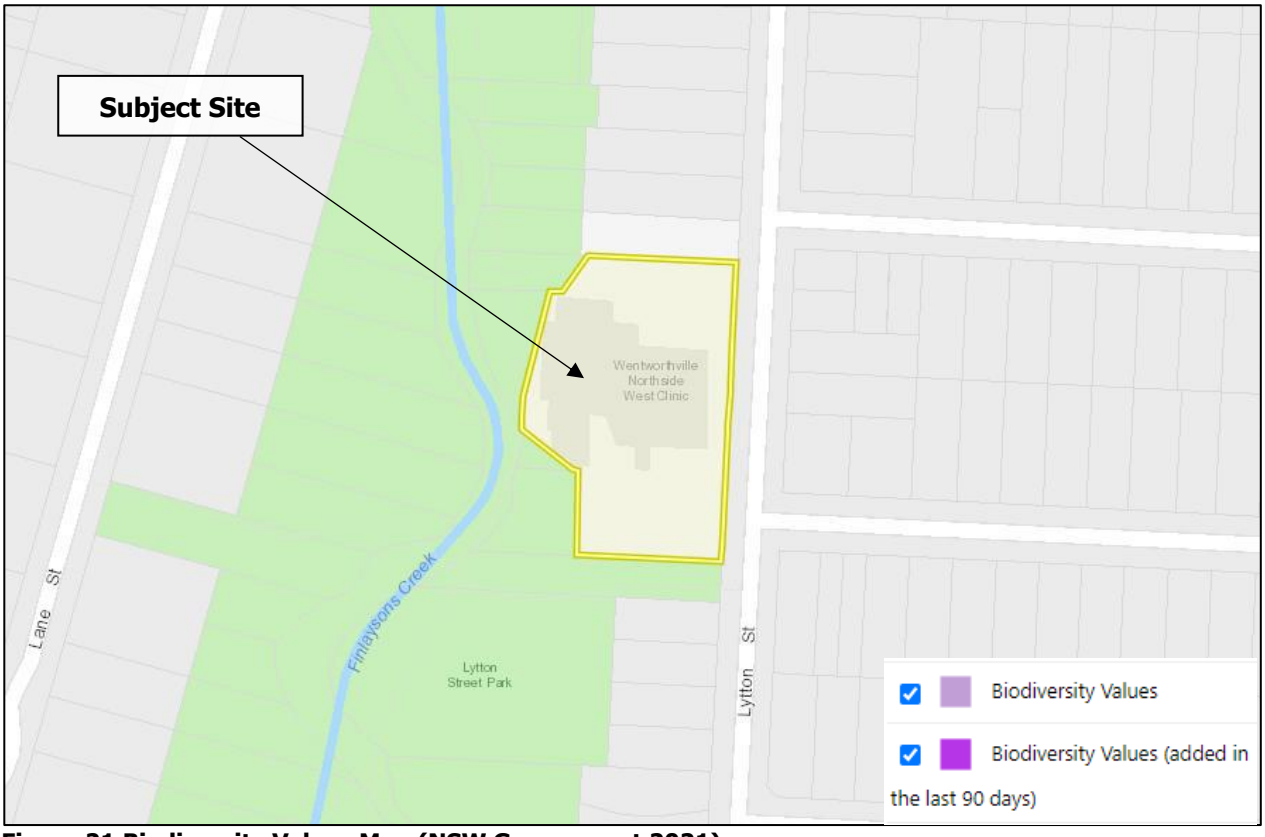

Figure 21 Biodiversity Values Map (NSW Government 2021)

The BC Act requires the submission of a BDAR. The BDAR has been prepared by Eco Logical and is attached at **Appendix 17**. Additionally, the assessment undertaken by the BDAR has been summarised at **Section 6.11** of this EIS.

4.1.6 Water Management Act 2000

The Site does not comprise a watercourse within its boundary. The closest watercourse to the Site is Finlayson Creek to the west of the Site. The creek is located approximately 5m from the Site at its closest point.

Pursuant to Section 91(2) of the *Water Management Act 2000* (WM Act), *a controlled activity approval confers a right on its holder to carry out a specified controlled activity at a specified location in, on or under waterfront land.*

For the purposes of the WM Act, *waterfront land* includes land 40m inland of the highest bank of a river (inclusive of any tributary of a watercourse). A *controlled activity* means:

(a) the erection of a building or the carrying out of a work (within the meaning of the Environmental Planning and Assessment Act 1979), or
(b) the removal of material (whether or not extractive material) or vegetation from land, whether by way of excavation or otherwise, or
(c) the deposition of material (whether or not extractive material) on land, whether by way of landfill operations or otherwise, or
(d) the carrying out of any other activity that affects the quantity or flow of water in a water source.

As demonstrated in the BDAR (**Appendix 17**), the proposed development does not involve works on waterfront land. Hence a Controlled Activity Approval under Section 91 of the WM Act is not required.

4.1.7 State Environmental Planning Policy (State and Regional Development) 2011

Proposed developments involving activities that are listed in Schedule 1 of the SRD SEPP are identified as being SSD. Schedule 1, Clause 14 of the SRD SEPP includes provisions for developments comprising hospitals, medical centres and health research facilities to be undertaken as SSD.

Clause 14 of Schedule 1 states:

> *14 Hospitals, medical centres and health research facilities*
>
> *Development that has a capital investment value of more than $30 million for any of the following purposes:*
>
> *(a) hospitals,*
> *(b) medical centres,*
> *(c) health, medical or related research facilities (which may also be associated with the facilities or research activities of a NSW local health district board, a University or an independent medical research institute).*

In accordance with Schedule 1 Clause 14(a), given that the CIV of the project is in excess of $30 million, the proposed development for the purpose of a hospital constitutes SSD.

4.1.8 State Environmental Planning Policy (Infrastructure) 2007

SEPP Infrastructure applies to the Subject Site and the proposed development.

Part 3 Division 10 Clause 57(1) of SEPP Infrastructure states that "*development for the purpose of health services facilities may be carried out by any person with consent on land in a prescribed zone*". Pursuant to

the *Standard Instrument – Principal Local Environmental Plan*, a 'health services facility' is defined as follows:

> ***health services facility*** *means a building or place used to provide medical or other services relating to the maintenance or improvement of the health, or the restoration to health, of persons or the prevention of disease in or treatment of injury to persons, and includes any of the following:*
> *(a) a medical centre,*
> *(b) community health service facilities,*
> *(c) health consulting rooms,*
> *(d) patient transport facilities, including helipads and ambulance facilities,*
> *(e)* ***hospital****.*

A 'hospital' means:

> *a building or place used for the purpose of providing professional health care services (such as preventative or convalescent care, diagnosis, medical or surgical treatment, psychiatric care or care for people with disabilities, or counselling services provided by health care professionals) to people admitted as in-patients (whether or not out-patients are also cared for or treated there), and includes ancillary facilities for (or that consist of) any of the following:*
> *(a) day surgery, day procedures or health consulting rooms,*
> *(b) accommodation for nurses or other health care workers,*
> *(c) accommodation for persons receiving health care or for their visitors,*
> *(d) shops, kiosks, restaurants or cafes or take away food and drink premises,*
> *(e) patient transport facilities, including helipads, ambulance facilities and car parking,*
> *(f) educational purposes or any other health-related use,*
> *(g) research purposes (whether or not carried out by hospital staff or health care workers or for commercial purposes),*
> *(h) chapels,*
> *(i) hospices,*
> *(j) mortuaries.*

The proposed development is consistent with the above definition. Given that the Site is located within the R4 High Density Residential zone which is a prescribed zone pursuant to Clause 56, the proposed development for the purpose of an extension to an existing health services facility is thereby permissible with consent.

SEPP Infrastructure also provides for certain proposals, known as Traffic Generating Development, to be referred to Transport for NSW (TfNSW) for concurrence.

The referral thresholds for 'hospitals' development are as follows:

- *200 or more beds (site with access to a road (generally))*
- *100 or more beds site with access to classified road or to road that connects to classified road (if access within 90m of connection, measured along alignment of connecting road)*

The proposed development seeks consent for 91 rooms which would result in a total of 125 rooms in the health services facility. As such, referral to TfNSW is not required pursuant to SEPP Infrastructure.

4.1.9 State Environmental Planning Policy No 33 – Hazardous and Offensive Development

A SEPP 33 Statement has been prepared by MRA Consulting to provide an advisory statement addressing the *State Environmental Planning Policy No 33 – Hazardous and Offensive Development* (SEPP 33) for the proposed development.

It is noted that the proposed development would not include the handling or storage or any dangerous or hazardous materials (e.g. pressurised oxygen, medical chemicals/compounds, radioactive materials or fuels) as no medical procedures are proposed to take place at the Site. Furthermore, an existing diesel generator

situated at the Site is proposed to be removed (and not replaced elsewhere) as part of the preparation works of Stage 2, hence there would be no diesel fuel storage on the Site.

Reflecting on the above criteria and the proposed development use, a preliminary risk screen and hazardous materials assessment in accordance with SEPP 33 is deemed unnecessary for the purpose of the SSD.

Further details of the SEPP 33 Statement are provided at **Appendix 23**.

4.1.10 State Environmental Planning Policy No 55 – Remediation of Land

Under the provisions of *State Environmental Planning Policy No 55 – Remediation of Land* (SEPP 55), where a development application is made concerning land that is contaminated, the consent authority must not grant consent unless:

(a) It has considered whether the land is contaminated, and
(b) If the land is contaminated, it is satisfied that the land is suitable in it contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and
(c) If the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.

A Detailed Site Investigation has been prepared by JK Environments and is provided at **Appendix 19**. Based on the findings of the assessment, asbestos has been encountered in the fill and on the ground surface at the Site and is considered to represent a risk to human receptors. It is considered that the Site can be made suitable for the proposed development via implementation of the Remediation Action Plan and Asbestos Management Plan. Further details of the Detailed Site Investigation are discussed in **Section 6.19**.

4.1.11 Cumberland Local Environmental Plan 2021

CLEP2021 is the primary Environmental Planning Instrument (EPI) applicable to the Site. The relevant provisions are summarised below and in **Table 6**.

Zoning and Permissibility

The Site is located within the R4 High Density Residential zone pursuant to CLEP2021 which is illustrated in **Figure 22** below.

The objectives of the R4 zone are:

- *To provide for the housing needs of the community within a high density residential environment.*
- *To provide a variety of housing types within a high density residential environment.*
- *To enable other land uses that provide facilities or services to meet the day to day needs of residents.*
- *To ensure that non-residential land uses are located in a setting that minimises impacts on the amenity of a high density residential environment.*
- *To encourage residential development that maintains the amenity of the surrounding area.*

The Site has been established for a health services facility which provides health care services to meet the day to day needs of residents. The proposed extension of the Wentworthville Northside West Clinic would increase the operational capacity of the existing health care facility and would continue to provide health services facilities for not only the local community but the wider Cumberland LGA. As such, it is considered that the proposed development is consistent with the objectives of the zone.

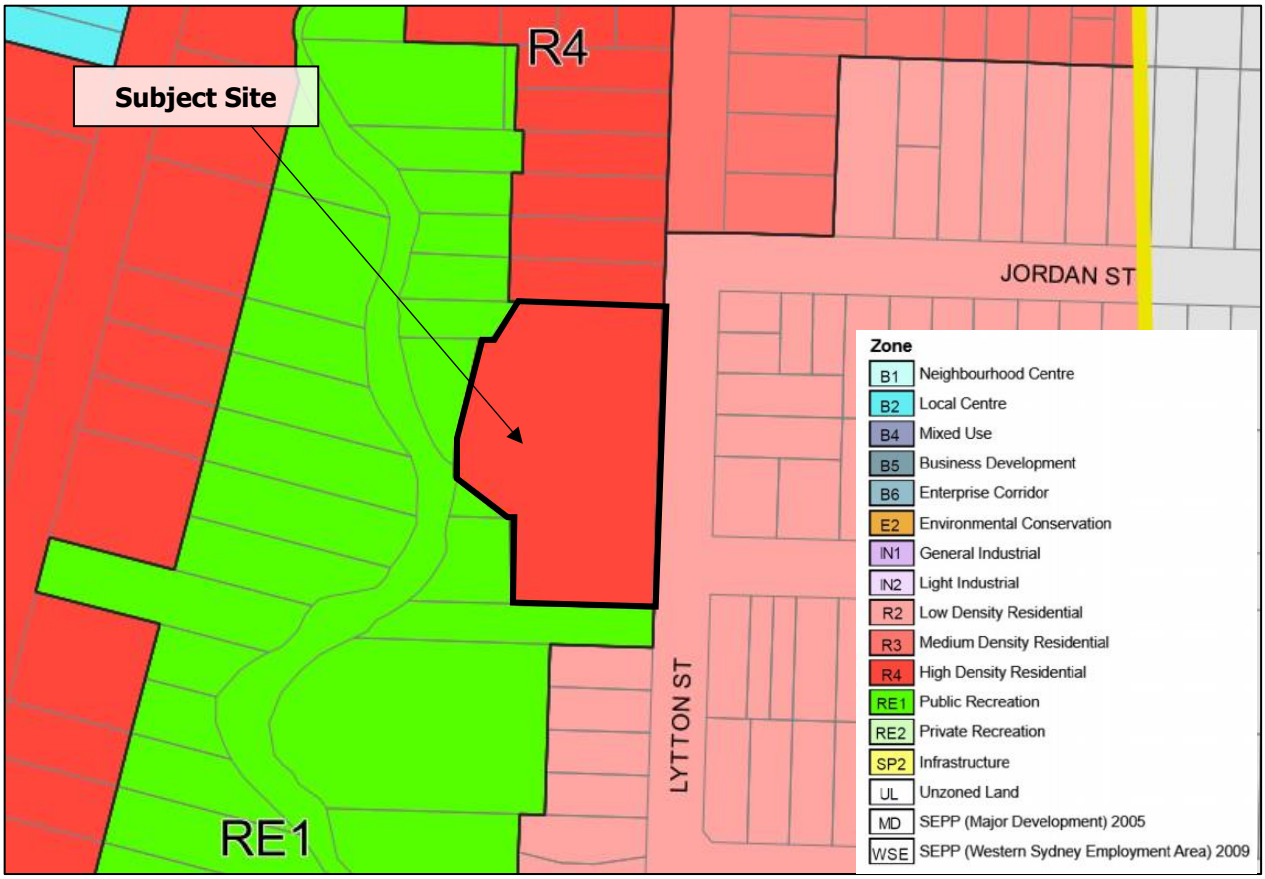

Figure 22 Land Zoning Map (NSW Legislation 2021)

Within the R4 zone the following land uses are permitted *without* consent:

Home occupations

Within the R4 zone the following land uses are permitted *with* consent:

Attached dwellings; Bed and breakfast accommodation; Boarding houses; Building identification signs; Business identification signs; Centre-based child care facilities; Community facilities; Home industries; Hostels; Kiosks; Multi dwelling housing; Neighbourhood shops; Oyster aquaculture; Places of public worship; Residential flat buildings; Respite day care centres; Roads; Seniors housing; Shop top housing; Water recycling facilities; ***Any other development not specified in item 2 or 4***

Within the R4 zone the following land uses are prohibited:

Agriculture; Air transport facilities; Airstrips; Amusement centres; Animal boarding or training establishments; Boat building and repair facilities; Boat sheds; Camping grounds; Car parks; Caravan parks; Cemeteries; Charter and tourism boating facilities; Commercial premises; Correctional centres; Crematoria; Depots; Dwelling houses; Eco-tourist facilities; Electricity generating works; Entertainment facilities; Environmental facilities; Exhibition villages; Extractive industries; Farm buildings; Forestry; Freight transport facilities; Function centres; Heavy industrial storage establishments; Helipads; Highway service centres; Home occupations (sex services); Industrial retail outlets; Industrial training facilities; Industries; Information and education facilities; Marinas; Mooring pens; Moorings; Mortuaries; Open cut mining; Passenger transport facilities; Pond-based aquaculture; Port facilities; Recreation facilities (major); Registered clubs; Research stations; Residential accommodation; Restricted premises; Rural industries; Service stations; Sewerage systems; Sex services premises; Signage; Storage premises; Tank-based aquaculture; Tourist and visitor accommodation; Transport depots; Truck depots; Vehicle body repair workshops;

Vehicle repair stations; Veterinary hospitals; Warehouse or distribution centres; Waste or resource management facilities; Water recreation structures; Water supply systems; Wharf or boating facilities; Wholesale supplies

Pursuant to CLEP2021, the development of a 'health services facility' is permitted with consent as an innominate use within the R4 zone. Notwithstanding, as demonstrated in **Section 4.1.8**, given that the Site is located within the R4 zone as a prescribed zone, permissibility of the proposed development for the purpose of a health services facility is established under SEPP Infrastructure. Accordingly, the proposal is permissible with consent pursuant to SEPP Infrastructure being for a health services facility on land zoned R4 High Density Residential.

The relevant CLEP2021 provisions have been set out in **Table 6** below.

Table 6 CLEP2021 Development Standards

Clause	Comment
Clause 4.1 – Minimum lot size	The Site is subject to a minimum lot size of 450m² pursuant to the CLEP2021. The proposed development does not seek to subdivide the Site.
Clause 4.3 – Height of buildings	The Site is subject to a maximum building height of 15m pursuant to CLEP2021 (**Figure 23**). The proposal exhibits a building height of 16.3m-19.6m. It is noted that the proposal involves a height exceedance ranging from 1.3m to 4.6m, which is equivalent to a maximum building height variation of 8.6% to 30.7%. Notwithstanding, the proposed extension has been strategically designed to locate the maximum height exceedance in the rear portion of the building facing Lytton Street Park, for which it is visually screened by the built form in the front portion of the building. This design approach has been adopted to preserve the scale and character of Lytton Street in consideration of the surrounding residential properties. Additionally, the proposal has also been designed to prevent direct overlooking into the neighbouring properties through articulation of the building elevations and the incorporation of high quality landscaping. The proposed building height is consistent with the objectives of Clause 4.3. Particularly, the proposal is not anticipated to impact on the visual privacy of the neighbouring residential properties given that adequate separation has been provided from the existing residential dwellings to the south. The proposed extension has also been designed to preserve solar access for the surrounding residential properties. Further, the proposed extension has been designed to respect the topography and natural landform of the Site. It is noted that the proposal does not include any underground structure or basement level, which will only involve minor extent of earthworks or excavation required for the construction and therefore minimise the potential risks of the disrupting the drainage patterns and soil stability of the Site. The proposal will also present an appropriate scale and intensity with respect to the proposed building height. While the proposal involves a variation to the floor space ratio (FSR) control (refer to section below), the proposal has been designed to respond to the demand for health care services in the locality and is considered to be of appropriate scale and density in its location. Additionally, the proposal has been articulated to be conducive to the surrounding residential dwellings and sympathetic to the surrounding built form. Therefore, the proposal is not anticipated to result in any adverse visual or amenity impacts.

	Given the variation to the building height limit under Clause 4.3, a Clause 4.6 Variation Request has been prepared as part of the EIS and is provided at **Appendix 30**.
Clause 4.4 – Floor space ratio	The Site is subject to a 1:1 maximum FSR pursuant to CLEP2021 (**Figure 24**). The proposal exhibits a total GFA of 7,284m^2 which results in a FSR of 1.09:1 and exhibits a 9% variation to the FSR control under Clause 4.4. The proposed FSR is consistent with the objectives of Clause 4.4. Specifically, the proposed extension of a health services facility will support the viability of Wentworthville as a local centre by providing health care infrastructure in the locality and provide employment opportunities in the vicinity of the Wentworthville local centre. The proposed development will also complement the emerging residential population by increasing the operational capacity of the existing Wentworthville Northside West Clinic. The proposed expansion is compatible with the existing and desired future character of the Wentworthville locality as a principal local centre and is also sympathetic to the established residential character in the locality. The proposal will not result in any adverse amenity impacts on the Wentworthville residential area and has been designed to facilitate vehicle and pedestrian access for the development. Adequate carparking will also be provided for the proposal. Given the variation to the FSR control under Clause 4.4, a Clause 4.6 Variation Request has been prepared as part of the EIS and is provided at **Appendix 30**.
Clause 4.6 – Exceptions to development standards	As demonstrated above, the proposal involves variations to the development standards under Clause 4.3 Height of buildings and Clause 4.4 Floor space ratio of CLEP2021. A Clause 4.6 Variation has been prepared to accompany the future EIS and is provided at **Appendix 30**.
Clause 5.1 – Relevant acquisition authority	The Site is not identified as land reserved for acquisition pursuant to CLEP2021.
Clause 5.10 – Heritage	The Site is not identified as a heritage item nor is it located within a heritage conservation area (**Figure 25**). The closest heritage item is 42 Lane Street, Wentworthville which is local heritage item I277 and is known as Federation cottage. This item is located approximately 71m away at its closest point. Notwithstanding, a Non-Aboriginal (Historical) Heritage Impact Assessment (**Appendix 13**) has been prepared by Artefact and is addressed in **Section 6.7**.
Clause 6.2 – Earthworks	The proposed earthworks will facilitate the suitability of the Site for health services facility development. The proposed earthworks design takes into consideration the existing topography, ensuring the proposal will not have a detrimental impact on the environmental functions and processes, neighbouring uses, cultural or heritage items or features of the surrounding land. The proposed development involves minimal earthworks and excavation. As demonstrated in the Geotechnical Investigation, the lower level of the proposed ward building will be a maximum of about 1.7m above the existing ground surface. Where the lowest floor slab is

	designed as a fully suspended floor slab no particular subgrade preparation would be required, but good practice would include stripping of any vegetation and root affected soils. Minimal excavation is anticipated for the proposed development as it will be at or above the existing surface levels. Local excavations may be required for lift pits and service trenches. However it is not anticipated that these will exceed 1.5m in depth. As demonstrated in the Flood Impact Study prepared by ACOR Consultants (**Appendix 12**), the proposed development does not result in any flood levels increase external to the Site. The flood hazard ratings within the area are within Low category, which justifies the suitability of the proposed development. As addressed in the ACHAR and Non-Aboriginal (Historical) Heritage Impact Assessment prepared by Artefact (**Appendix 13**), there is unlikely to be any archaeological material contained on the Site and hence the Site is deemed to have low heritage significance.
Clause 6.3 – Essential services	Adequate arrangements for the augmentation of essential services will made to facilitate the proposed development.
Clause 6.4 – Flood planning	A Flood Impact Study has been prepared by ACOR Consultants to investigate flood behaviour throughout the overland flooding catchment impacting the Site. Findings of the Flood Impact Study are further discussed in **Section 6.16**.
Clause 6.8 – Salinity	The Site is identified as an area of moderate salinity potential pursuant to CLEP2021 (**Figure 26**). As demonstrated in the Detailed Site Investigation (**Appendix 19**) prepared by JK Environments, soils at the Site were generally non-saline to slightly saline to a depth of approximately 2m and the majority of the pH results from surficial soils were within the optimum range for plant growth. Due to the nature of the proposed development, it is considered that no salinity management plan will be required. Further details of the salinity assessment are discussed in **Section 6.19.1**.

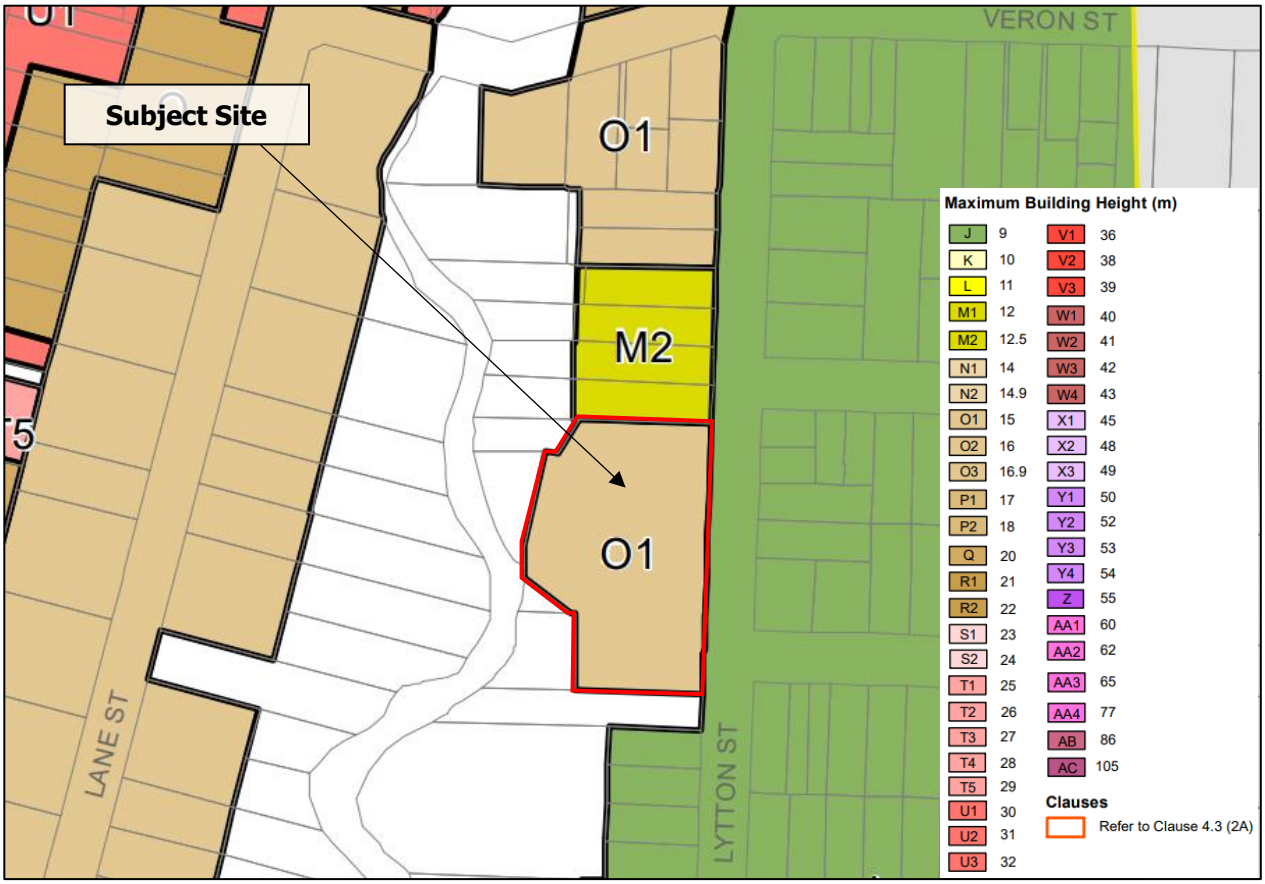

Figure 23 Height of Buildings Map (NSW Legislation 2021)

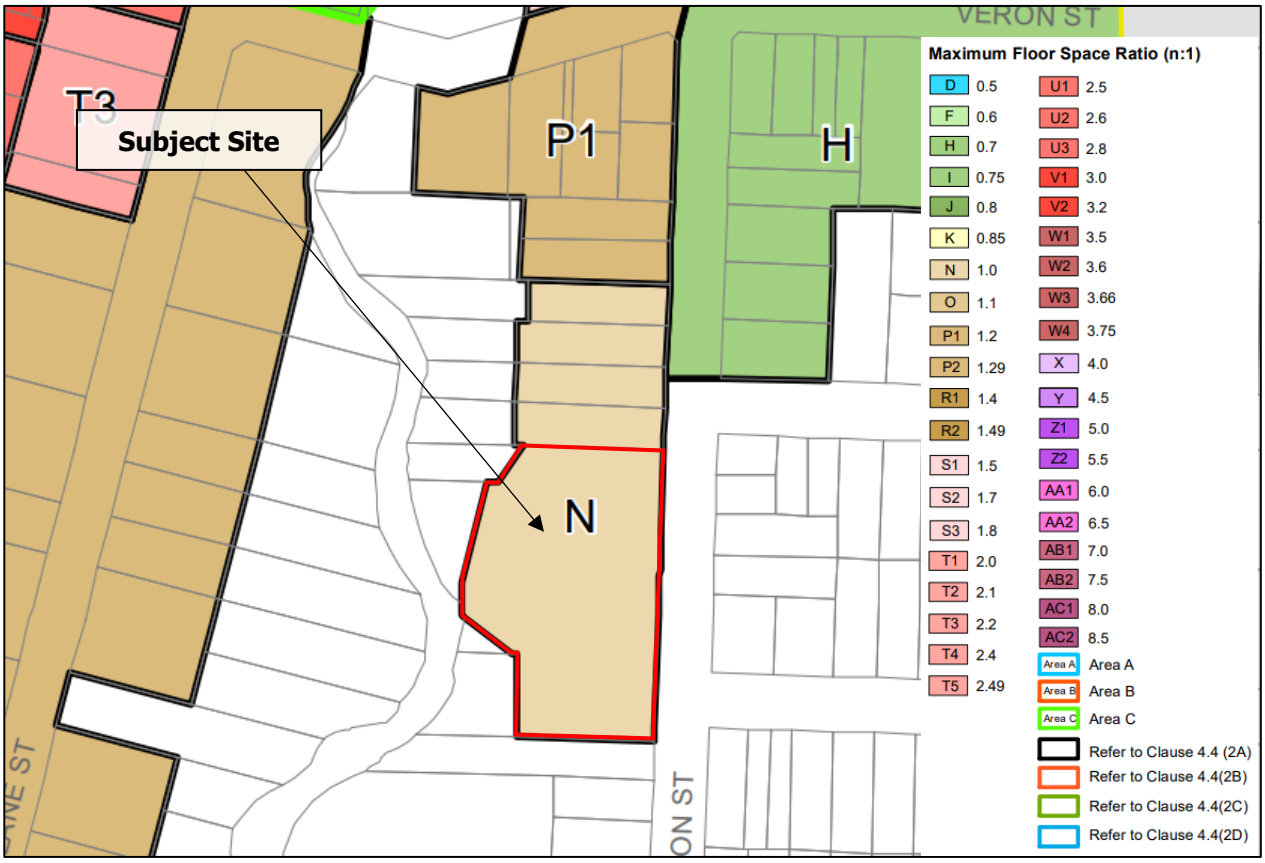

Figure 24 Floor Space Ratio Map (NSW Legislation 2021)

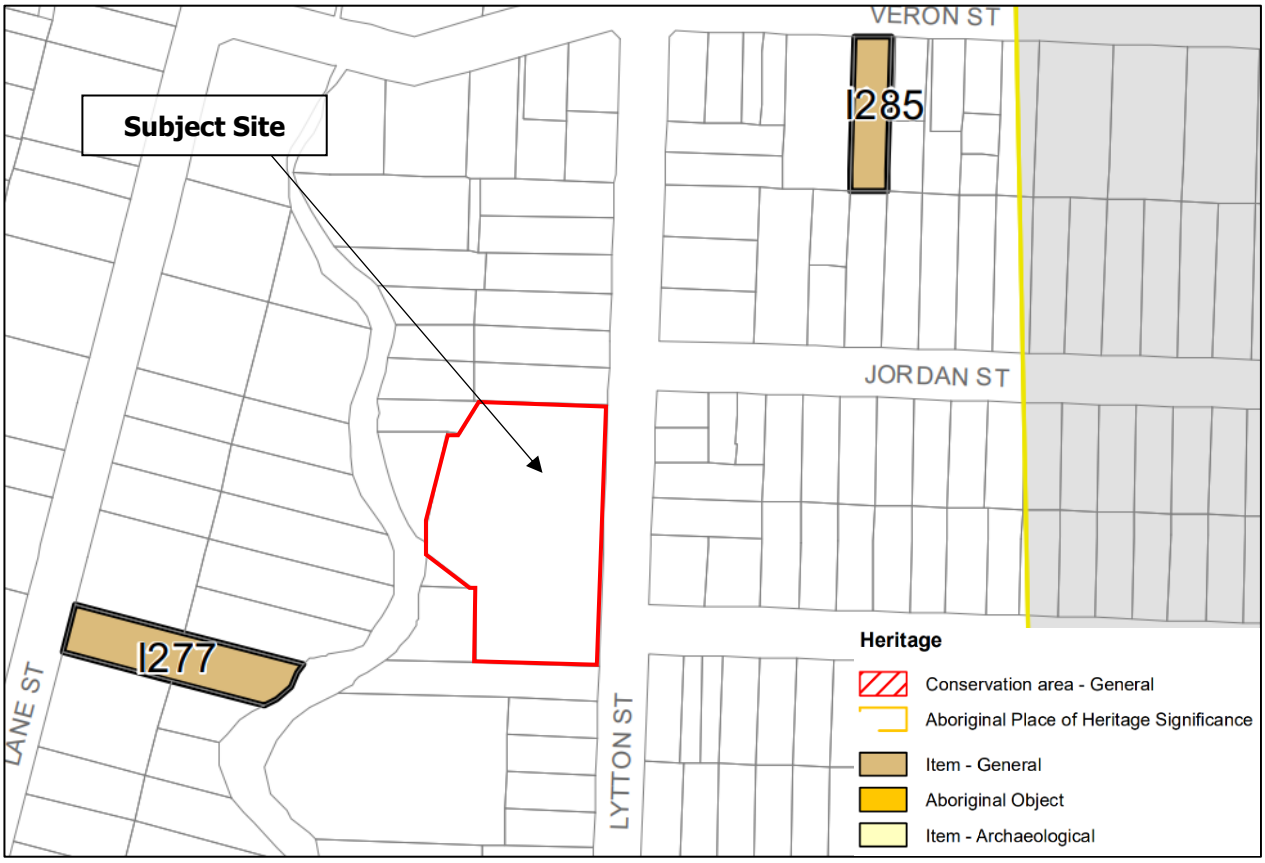

Figure 25 Heritage Map (NSW Legislation 2021)

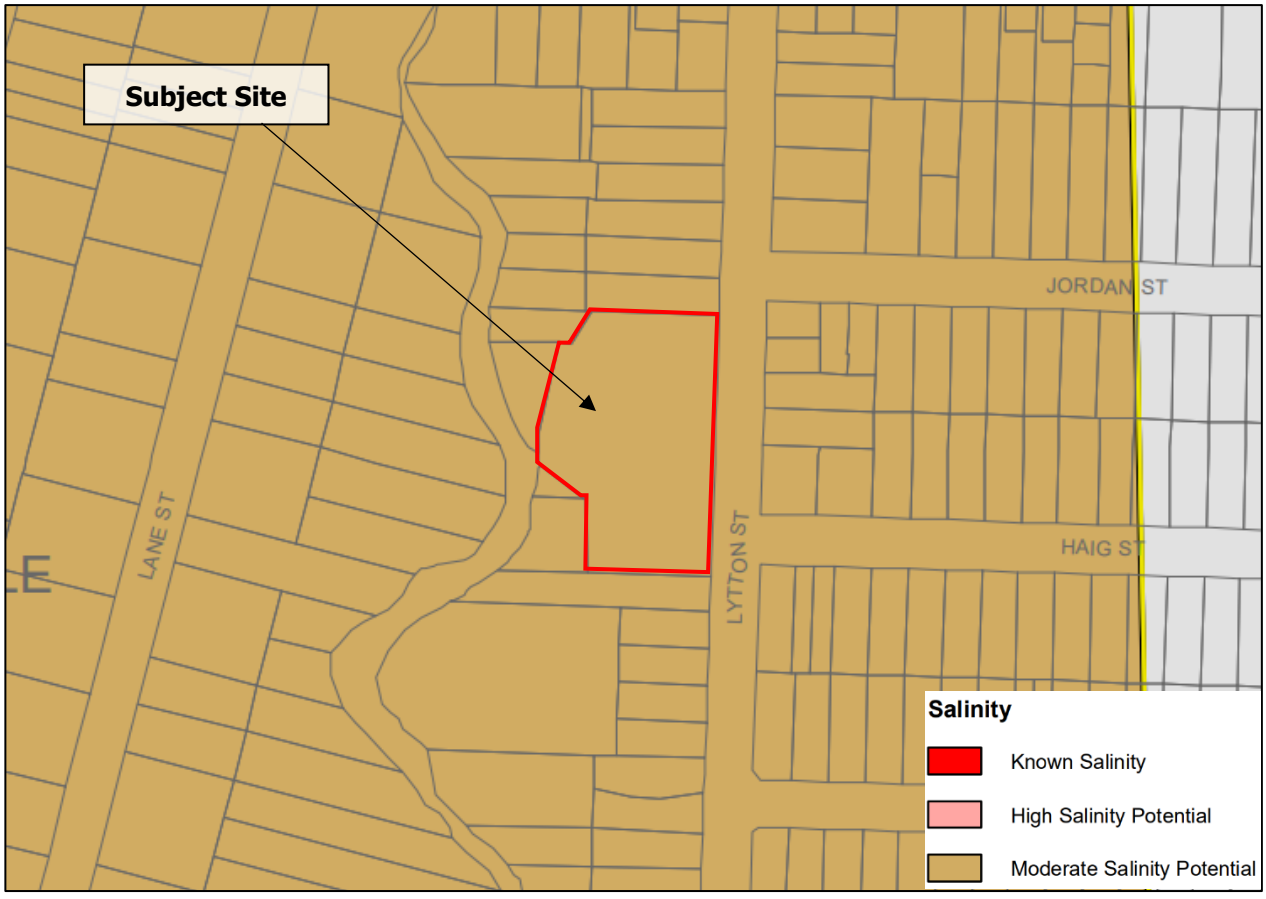

Figure 26 Salinity Map (NSW Legislation 2021)

4.1.12 Draft State Environmental Planning Policy (Remediation of Land)

The Explanation of Intended Effect (EIE) for *Draft State Environmental Planning Policy (Remediation of Land)* (Draft Remediation of Land SEPP) was released by NSW DPIE in January 2018. The proposed development is consistent with the objectives of the Draft Remediation of Land SEPP as the development has been designed to reduce the potential risk of harm to human health by implementing a site-specific Remediation Action Plan and an Asbestos Management Plan. A site validation report will also be prepared on completion of remediation activities to demonstrate the Site is suitable for the proposed development.

Further details of the contamination assessment are provided in **Section 6.19** of the EIS.

4.1.13 Draft State Environmental Planning Policy (Environment)

The EIE for *Draft State Environmental Planning Policy (Environment)* (Draft Environment SEPP) was released by NSW DPIE in October 2017. The Site is identified to be located within the Sydney Harbour Catchment under the current *Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005* (the Harbour REP). The proposed development is consistent with the Draft Environment SEPP and the current Harbour REP as it will not result in any adverse impacts on the foreshores and waterways of the Sydney Harbour and has been designed to address ecological sustainability, scenic quality, built form and design of the foreshores and waterways.

4.1.14 Contributions

The Site is subject to the *Cumberland Local Infrastructure Contributions Plan 2020*. As the Proposal constitutes non-residential development, it will be subject to the Section 7.12 levy stipulated as follows:

Table 7 Section 7.12 Contributions	
Construction cost	**Rate**
$100,001 - $200,000	0.05%
$200,001 plus	1%

4.2 NON-STATUTORY PLANNING CONSDIERATIONS

4.2.1 NSW State Priorities

Eighteen (18) state priorities are being actioned by the NSW Government to *make this state of ours even better.* The priorities have been categorised under the following headings:

- Strong budget and economy
- Building infrastructure
- Protecting the vulnerable
- Better services
- Safer communities

The proposed extension of the Wentworthville Northside West Clinic on the Site would achieve a number of priorities, as outlined below.

Encouraging Business Investment

The Government seeks to attract and grow business, create jobs and enhance prosperity.

The proposed development seeks to expand the existing mental health facility on Site which would contribute to the provision of health services facilities and increase the supply of health care services in the Cumberland LGA and the Greater Parramatta and the Olympic Peninsula (GPOP) area. Through the expansion of the health services facility, the proposed development would create business investment opportunities whilst supporting the Westmead Health and Education Precinct in GPOP by delivering complementary social infrastructure and health services in Wentworthville. Ultimately, the proposed

development would provide vital health facilities that would stimulate employment growth and encourage business investment opportunities in the Wentworthville locality.

Improving Road Travel Reliability

As part of improving the overall efficiency and reliability of the state's transport network, the Government has prioritised encouraging commuters to use public transport and to undertake off-peak travel more often. Combined with building extra road capacity, this would enable business and the community to move around the city with greater ease, reducing travel times, boosting productivity and reducing business costs.

The Site is highly accessible by public transport with the Wentworthville train station and bus services in close proximity to the Site, providing connection to the surrounding suburbs and the wider region. Further, the Site affords linkages with the established local and regional road network, including Great Western Highway, Cumberland Highway, Bridge Road and Veron Street, providing connection to the surrounding area and the greater region. The proposed development capitalises on the proximity to public transport infrastructure in the vicinity, and thus will promote the use of public transport to travel to and from the health services facility. Further, as demonstrated in the Transport Impact Assessment (**Appendix 9**), both the Lytton Street and Veron Street intersection and Lytton Street and Fullagar Road intersection would continue to experience a Level of Service of 'A' and would continue to operate good with acceptable delays and no external improvements required to support the proposed development.

Better Services

The Government aims to reduce the rate of suicide deaths in NSW by 20% by 2023. The proposed development will provide high standard specialist clinical care encompassing mood disorders, eating disorders, acute mental health disorders, drug and alcohol detoxification and rehabilitation. The proposed extension will increase the operational capacity of the mental health facility which will provide the much-needed specialist care services in the Cumberland LGA and the Greater Sydney.

By supporting infrastructure provision and job creation within a highly accessible location, the proposal would support the projected population and housing growth in the area and enhance the liveability of the community.

4.2.2 The Greater Sydney Region Plan – A Metropolis of Three Cities

The Greater Sydney Region Plan – A Metropolis of Three Cities (Greater Sydney Commission, 2018) divides the Sydney Region into three (3) Cities, with a vision of growth until 2056 (refer to **Figure 25** below). The Plan aims to anticipate the housing and employment needs of a growing and vastly changing population. The overall vision pursues an objective of transforming 'Greater Sydney' into a Metropolis of Three Cities, including:

- The Western Parkland City
- The Central River City; and,
- The Eastern Harbour City.

The Plan seeks to foster productivity, liveability and sustainability, to be achieved through the '30 minute city' model by which more than 60% of people live within 30 minutes of jobs, education, health facilities and services. The creation of the 30-minute city is to be promoted through infrastructure investment and coordinated transport and land use planning.

The ten (10) directions underpinning the Plan emphasise infrastructure delivery, increasing housing choice, creating walkable neighbourhoods and 'great places to live', supporting economic growth, and promoting environmental sustainability. Overall, the Plan aims to accommodate an additional 725,000 dwellings and 817,000 new jobs.

For the purpose of the Plan, Wentworthville is located in proximity to Greater Parramatta, which is identified as the core of the Central River City. As identified in the Plan, Greater Parramatta is one of the largest

integrated health, research education and training precincts in Australia. The proposed development is considered to contribute to the provision of health services infrastructure in the Central River City and boost the role of the Westmead health and education precinct as an economic analyst for Greater Parramatta.

Accordingly, the expansion of Wentworthville Northside West Clinic would reinforce the objectives and strategies of this Plan by further enhancing this existing health services facility which is already renowned for its facilities and quality of care. The proposal would positively contribute to the overall productivity of the area. Similarly, the proposed extension of Wentworthville Northside West Clinic would contribute to the creation of the 30-minute city owing to the proximity of the Site to residential dwellings, services and transport infrastructure.

In summary, the Proposed development contributes to the objectives set out in *The Greater Sydney Region Plan – A Metropolis of Three Cities* by promoting minor environmental impacts and the further promotion of employment-generating opportunities to the wider locality and community, positioned within the Cumberland LGA.

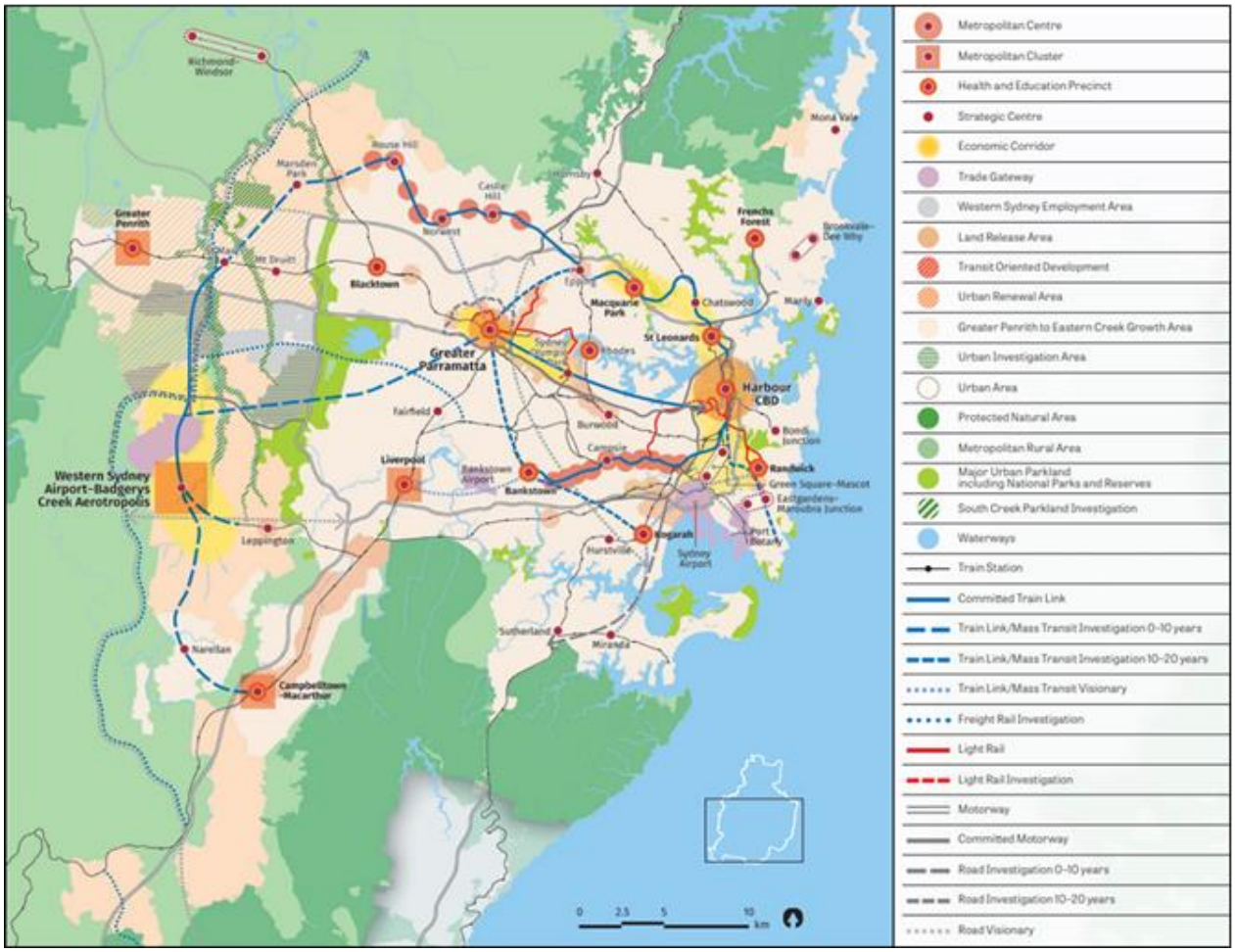

Figure 27 A Metropolis of Three Cities: A Vision to 2056 (Greater Sydney Commission 2018)

4.2.3 Central City District Plan

The *Central City District Plan* is applicable to the Cumberland LGA in which the Site is located within. The Plan encourages a twenty-year plan to help encourage and establish goals set out in *A Metropolis of Three Cities – Greater Sydney Region Plan* mentioned above in **Section 4.2.2**. The Plan is considered the 'bridge' between Regional and Local planning.

The Subject Site is situated within the Central City District (**Figure 28**), which is envisioned to benefit from unprecedented city-scale infrastructure investments, quicker and easier access to a wider range of jobs, housing types and activities, enhanced lifestyle opportunities and improved environmental assets.

Overall, 550,500 additional people and 207,500 dwelling are projected for the Central City district by 2036, and 137,000-151,500 jobs are targeted for Greater Parramatta by 2036.

The Plan establishes a number of priorities and actions to guide growth, development and change, relating to infrastructure & collaboration, liveability, productivity and sustainability. The priorities and actions relevant to Greater Parramatta and the Proposed development are discussed as follows.

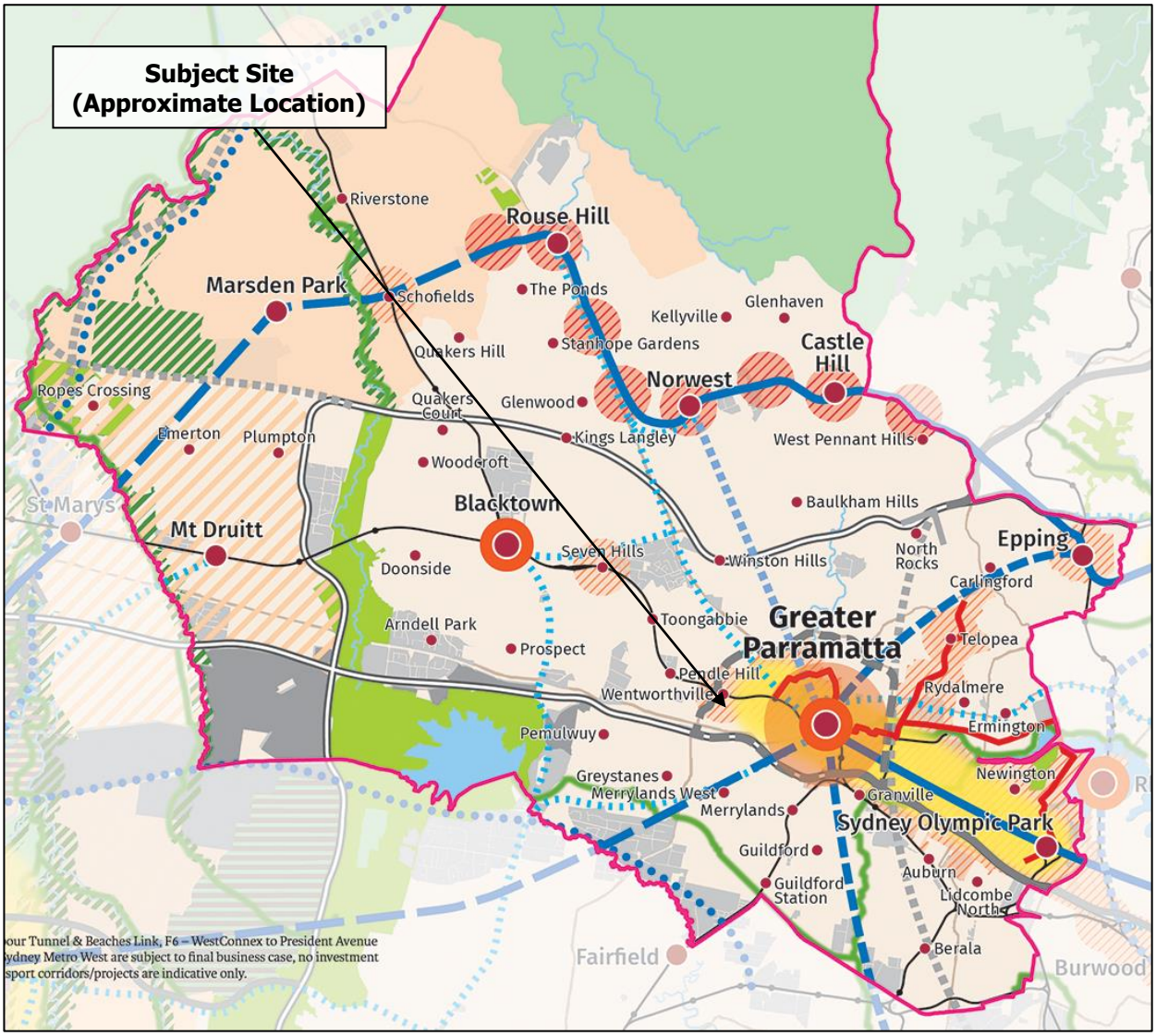

Figure 28 Central City District Structure Plan (Greater Sydney Commission 2019)

Infrastructure and Collaboration

Additional infrastructure and services are required to support Sydney's growth, and in turn infrastructure investment will contribute to the shape and connectivity of Greater Sydney. Planning for infrastructure requires coordination across all levels of government, industry and the community.

The Proposed development would support the transformation that is being pursued by various levels of government in conjunction with the major transport investment in Parramatta Light Rail and Sydney Metro West. The development would effectively align jobs growth with new infrastructure, in accordance with Planning Priority C1.

Liveability Priorities

Additional services such as health services facilities are important as the District grows, and major demographic changes are also occurring. Planning must recognise the changing composition of population groups and provide services and social infrastructure that meet the changes in people's needs through different stages of life.

Integrated and targeted delivery of services and infrastructure is needed to support growth and respond to the different needs of population groups. Accessible local health services and regional health infrastructure such as health services facilities are important for all people across the District.

Therefore, the expansion and enhancement of Wentworthville Northside West Clinic is aligned with the strategic priorities set out by the Central City District Plan.

Productivity Priorities

Greater Parramatta is a growing centre with an increasing range of jobs and services. It is in a strong position to attract a critical mass of knowledge-intensive businesses, health and educational institutions, convention facilities, and retail, leisure, art and cultural experiences. The south western part of the Greater Parramatta and Olympic Peninsula (GPOP) is located in the Cumberland LGA. The Plan recognises the important need for integrated planning at Wentworthville and Westmead, across both sides of the T1 Western Line. As Greater Parramatta strengthens its metropolitan centre at the centre of Greater Sydney, suburbs in the Cumberland LGA, including Wentworthville, will grow to provide a diversity of housing and jobs for the community.

In accordance with the District Plan's Productivity Priorities, including for Greater Parramatta, GPOP and Wentworthville specifically, the proposal would expand and enhance the existing Wentworthville Northside West Clinic, further creating employment opportunities and supporting the GPOP economic corridor. This proposal seeks to increase the productivity of the precinct and contribute to the realisation of the 30-minute city.

Sustainability Priorities

As the Central City District grows, landscapes, waterways and biodiversity should be protected and enhanced, and efficiency and resilience promoted. Sustainability also requires the protection of open spaces and building design that promotes energy and water efficiency.

The redevelopment of the Site for the expansion of the existing health services facility development would augment the efficiency with which land is used through the densification of uses that are highly compatible with surrounding development and coordinated with supportive infrastructure. The Proposed development for the purposes of a health services facility would promote the creation of a better quality environment built on the principles of sustainability.

4.2.4 Greater Parramatta and the Olympic Peninsula (GPOP) Vision

The Greater Parramatta to Olympic Peninsula (GPOP) (**Figure 29**) is envisioned by the Greater Sydney Commission (GSC) as Greater Sydney's true centre, the connected and unifying heart.

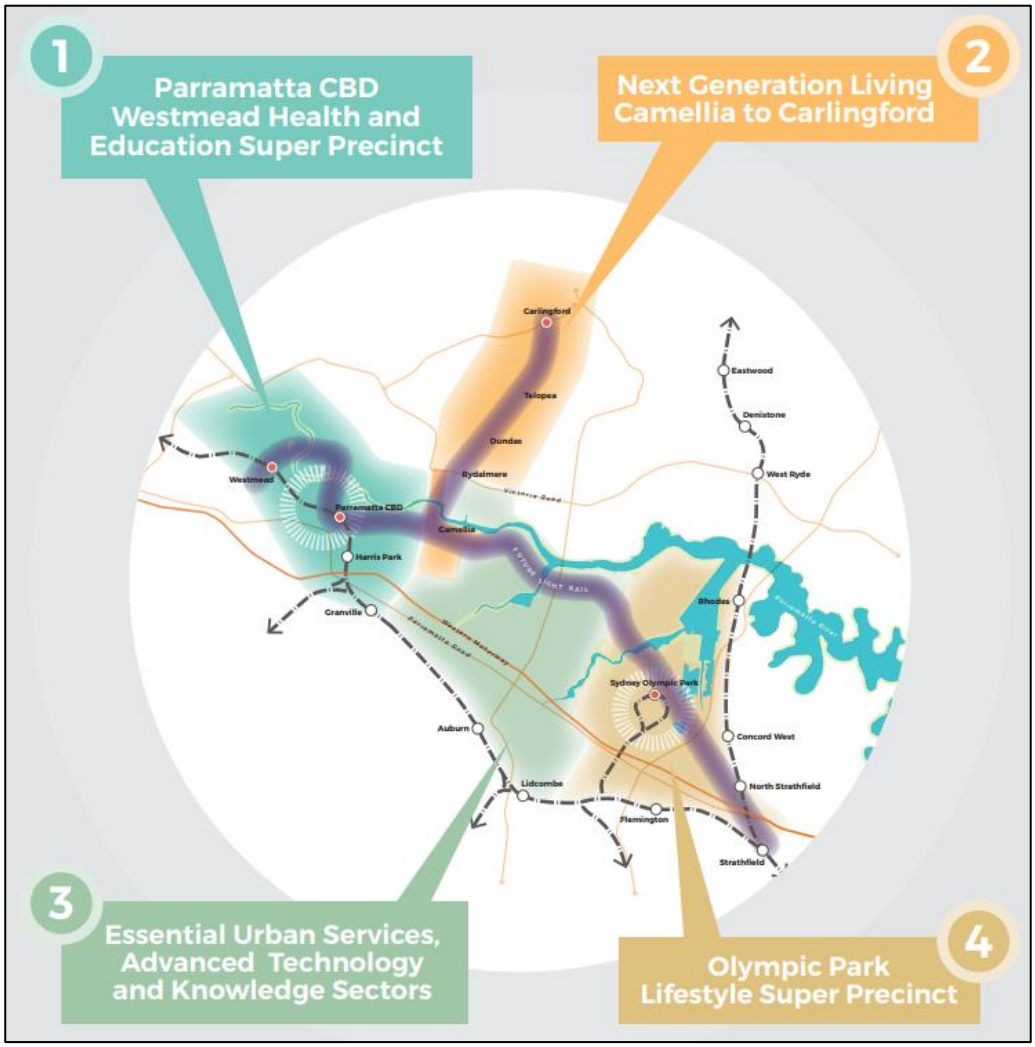

Figure 29 GPOP (Greater Sydney Commission 2016)

GPOP is located at the heart of the Central River City and exhibits an area of 6,000ha, spans 13km east-west from Strathfield to Westmead, and spans 7km north-south from Carlingford to Lidcombe and Granville. GPOP is set to benefit from city-shaping investment by the NSW Government in projects including a new metro, light rail, hospital redevelopment, a museum, motorway and stadium.

In particular, Westmead is identified as a health and education super precinct offering a health, education and research hub and is served by rail, light rail and rapid bus. The Westmead Health and Education Super Precinct will deliver a diverse and resilient urban economy focused on world-class health, education, research and enterprise. The Precinct will be designed as a '30-minute city', provided with easy connections to the surrounding area in order to maximise the catchment of talent, enhance social inclusion and offer an attractive lifestyle in the centre of Greater Sydney.

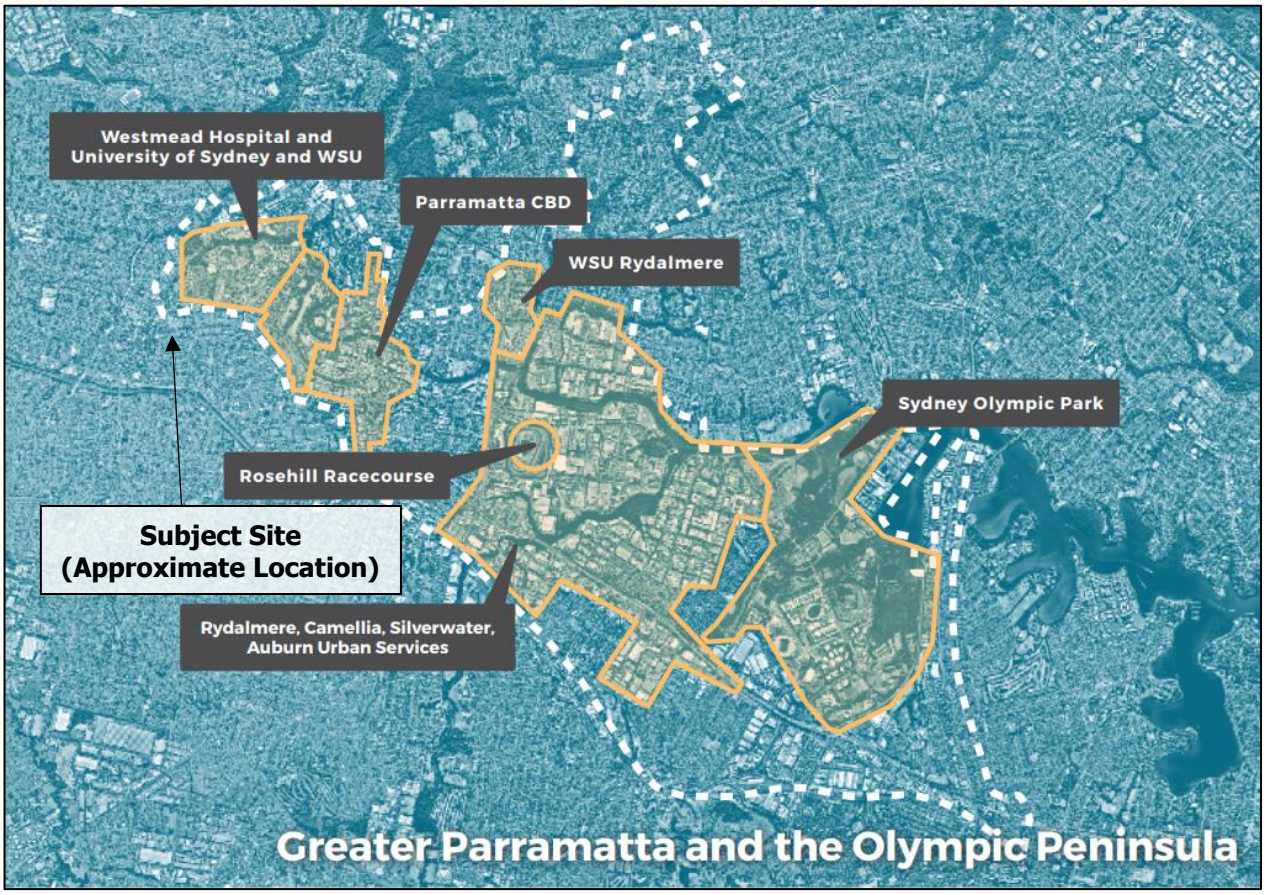

Figure 30 GPOP configuration (Greater Sydney Commission 2016)

As depicted in **Figure 30**, it is noted that the Site is located outside of the GPOP area. However, the Site will support the Westmead Health and Education Super Precinct by expanding and upgrading the existing mental health facility and providing additional beds to accommodate for the emerging demand for mental health care services in the area. The proposal will contribute to the provision of social and health infrastructure in the Cumberland LGA and increase the supply of health care services whilst capitalising on the proximity to public transport infrastructure such as train and bus services in the area.

4.2.5 Draft A City Supported by Infrastructure: Placed-based Infrastructure Compact Pilot

Draft A City Supported by Infrastructure – Place-based Infrastructure Compact Pilot was published by the Greater Sydney Commission in November 2019 to introduce the Place-based Infrastructure Compact (PIC), a strategic planning model that looks holistically at a place to better align growth with the provision of infrastructure and services.

The proposed high level sequencing plan of the PIC is illustrated in **Figure 31** below.

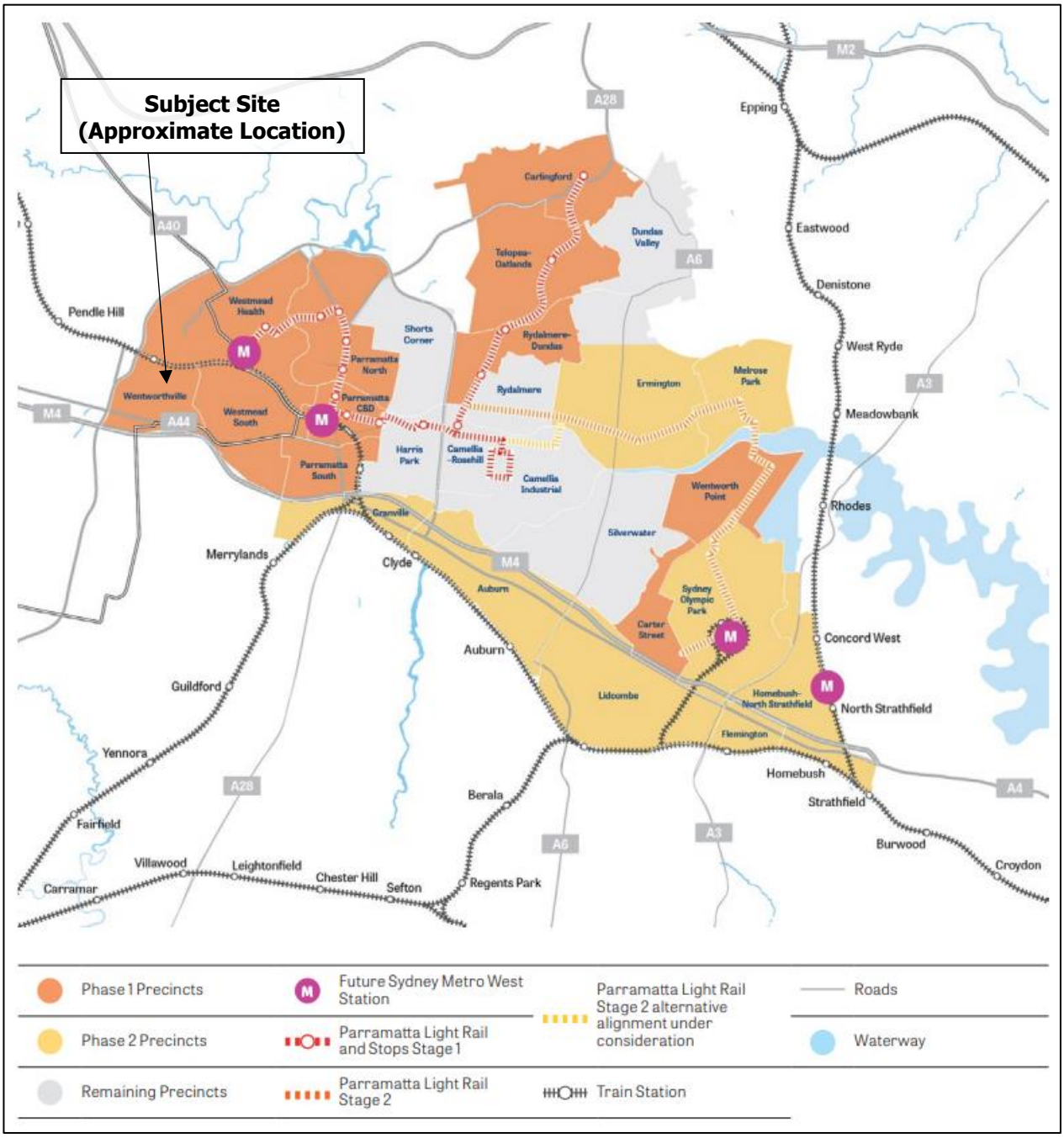

Figure 31 Proposed high-level sequencing plan (Greater Sydney Commission 2019)

As identified in the PIC, Wentworthville is identified as part of the Phase 1 priorities, which focus on aligning growth with already committed infrastructure, supporting job creation in Greater Parramatta and new development in line with the Greater Sydney Region Plan. The Parramatta (CBD, North and South), Westmead (Health and South) and Wentworthville Precincts are identified as being strategic places to grow and relatively cost-effective compared with other precincts in GPOP.

The Parramatta (CBD, North and South), Westmead (Health and South) and Wentworthville Precincts support jobs, health services, tertiary education, housing diversity and create great cultural experiences. They are well positioned to leverage the investment in major infrastructure, particularly the new Parramatta Light Rail, the redevelopment of Westmead Hospital, the new Powerhouse Precinct and WestConnex.

In particular, proposals relevant to the Wentworthville and Westmead Precincts in Phase 1 of the sequencing plan as short to medium term priorities (the next five to 10 years plus) are outlined as follows:

- Education – Primary and secondary school proposals
- Health – Integrated Mental Health Complex at Westmead
- Housing – Social housing renewal/expansion
- Justice – Fire station upgrades
- Transport – Transport interchange upgrades at Westmead Station

Though the identified proposals in the health sector are not directly relevant to Wentworthville, the proposed extension of the Wentworthville Northside West Clinic is consistent with outcomes identified for the health proposals, being:

- *Improving access to world class healthcare and research facilities*
- *Delivering high quality health outcomes for the GPOP community*

The proposed development will enhance the operational efficiency and functionality of the Clinic by providing 95 additional inpatient units and nine consulting suites with upgrades to the amenities within the Clinic to provide a beneficial health care facility to the area. In addition, the proposal will facilitate delivery of health infrastructure by providing exceptional mental health care services and inpatient residential services in response to the emerging demand for specialist clinical care in the community. The proposal would also facilitate the co-location of health and social infrastructure which would deliver substantial public benefits and support the growth of the Wentworthville local centre.

4.2.6 Cumberland 2030: Local Strategic Planning Statement

Cumberland 2030: Our Local Strategic Planning Statement (LSPS) provides strategic direction and a coordinated approach to effectively manage growth and development in the Cumberland area. It sets a land use vision and structure plan and identifies priorities and actions to support the vision.

Council has progressed planning for a number of centres and strategic corridors to facilitate additional housing supply and jobs growth. Specifically, the Wentworthville Centre is identified as a focus of this planning for growth with a total of around 2,500 additional dwellings planned for Wentworthville.

The LSPS is focused on place-based centres to promote the 30-minute city and the need for future housing, and employment needs to be based around public transport nodes. The proposed extension of the Wentworthville Northside West Clinic will contribute to the provision of health care services that are necessary to the growing population. The Proposed development will also create employment opportunities in the vicinity of residential areas and the Wentworthville Local Centre, which will provide jobs close to homes and city centres, further promoting the 30-minute city concept.

4.2.7 State Infrastructure Strategy 2018-2038

The *State Infrastructure Strategy 2018-2038: Building Momentum* endorses and supports the land use directions set out in the *Greater Sydney Region Plan* and the plans for regional NSW prepared by the former Department of Planning and Environment. Specifically, the proposed development aligns with the strategic objective for the health sector, being "*plan and deliver world-class health infrastructure that supports a 21st century health system and improved health outcomes for the people of NSW*".

As identified in the State Infrastructure Strategy, over the next 20 years, the demand for in-patient health services is forecast to grow by over 50 percent. Locating the right assets in the right places to provide readily accessible services to a growing and aging population is identified as an ongoing challenge as Sydney grows and regional NSW population increasingly move into towns and cities.

The proposed development will facilitate the renewing and expansion of the existing Wentworthville Northside West Clinic, which will increase the capacity of the existing health services facility and continue to offer health services reliably. Further, the proposed development will support the Westmead Health and Education Precinct to deliver high quality health care services, as a key component of the GPOP vision.

4.2.8 Future Transport 2056

Future Transport 2056 has been developed in coordination with the *Greater Sydney Region Plan*, Infrastructure NSW's *State Infrastructure Strategy* and the DPIE's Regional Plans.

The Plan sets out a 40-year plan supported by plans for both regional NSW and for Greater Sydney. The proposed plans set out a number of Greater Sydney committed and potentially committed initiatives for Greater Parramatta within the next 0-20 years and visionary initiatives in 20+ years. These include:

- M4 Smart Motorway – (committed 0-10 years)
- Parramatta Light Rail – Stage 1 (committed 0-10 years)
- Parramatta Light Rail – Stage 2 (subject to final business case and funding) (committed 0-10 years)
- East-West Rail Link via Western Sydney Airport – (committed 0-10 years)
- Sydney Metro West (detailed planning has commenced) – (committed 0-10 years)
- Parramatta Inner Ring Road – (potentially committed 0-10 years)
- Improved bus services between North of Parramatta and centres to the south of Parramatta – (potentially committed 0-10 years)
- Parramatta to Epping and Kogarah mass transit/train link (potentially committed 10-20 years)
- Central City strategic road corridor (visionary initiatives 20+ years)

The Proposed development has considered the future committed initiatives set out by the Future Transport 2056 document. However, it must be noted that the committed impacts will not have a direct impact on the Site. Rather, it is likely to improve the overall transport network and flow of traffic in Greater Parramatta which would indirectly positively impact the Proposed development. The Traffic and Accessiblity Impact Assessment prepared by Traffix and attached at **Appendix 9** demonstrates that the existing road network can manage the additional traffic generation from the Proposed development.

4.2.9 Crime Prevention through Environmental Design

The following measures have been implemented as part of the design strategy to address the principles of Crime Prevention through Environmental Design (CPTED):

Surveillance and Visibility

The entire street perimeter of the proposed development is lined with ward rooms with large areas of glazing, and which overlook Lytton Street, the side lane to the south of the Site, and the Lytton Street Park interface.

Further, the facility is operational 24 hours a day and there are continual staff and patient movement within the Site. The Stage 2 development consolidates the landscaping approach and provides patient areas at ground level across the Lytton Street Park frontage (albeit separated by a visually permeable fence).

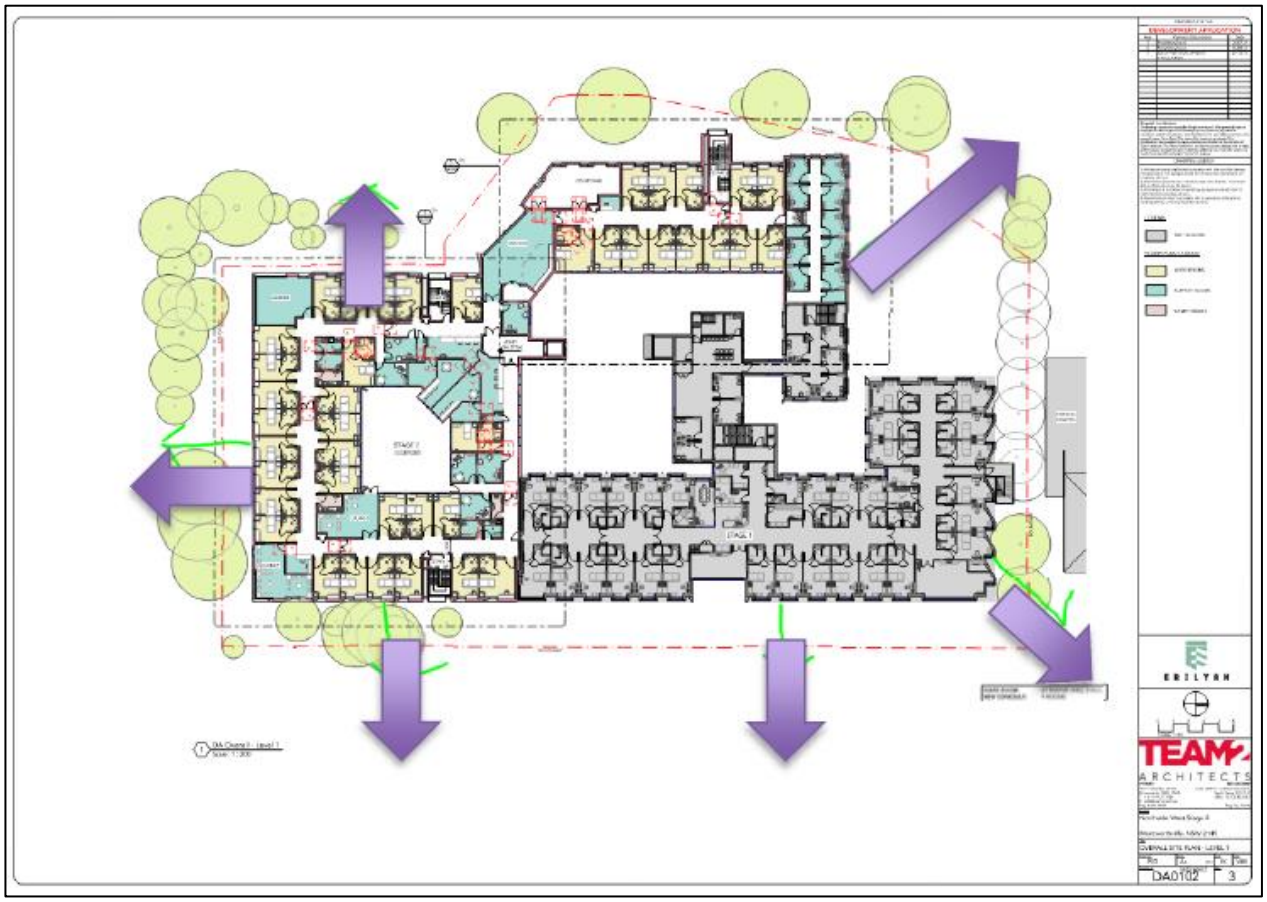

Figure 32 Diagram indicating passive surveillance resulting from perimeter activiation (Team 2 Architects 2021)

Access Control

While the proposed development is a non-acute facility, there is strict access control to the facility via the main front entry. Access to the Site is constantly monitored and controlled, and members of the general public are not permitted inside the building unless they are visiting a patient.

Staff are equipped with swipe cards to obtain access into non-patient areas which are linked back to the Site security system.

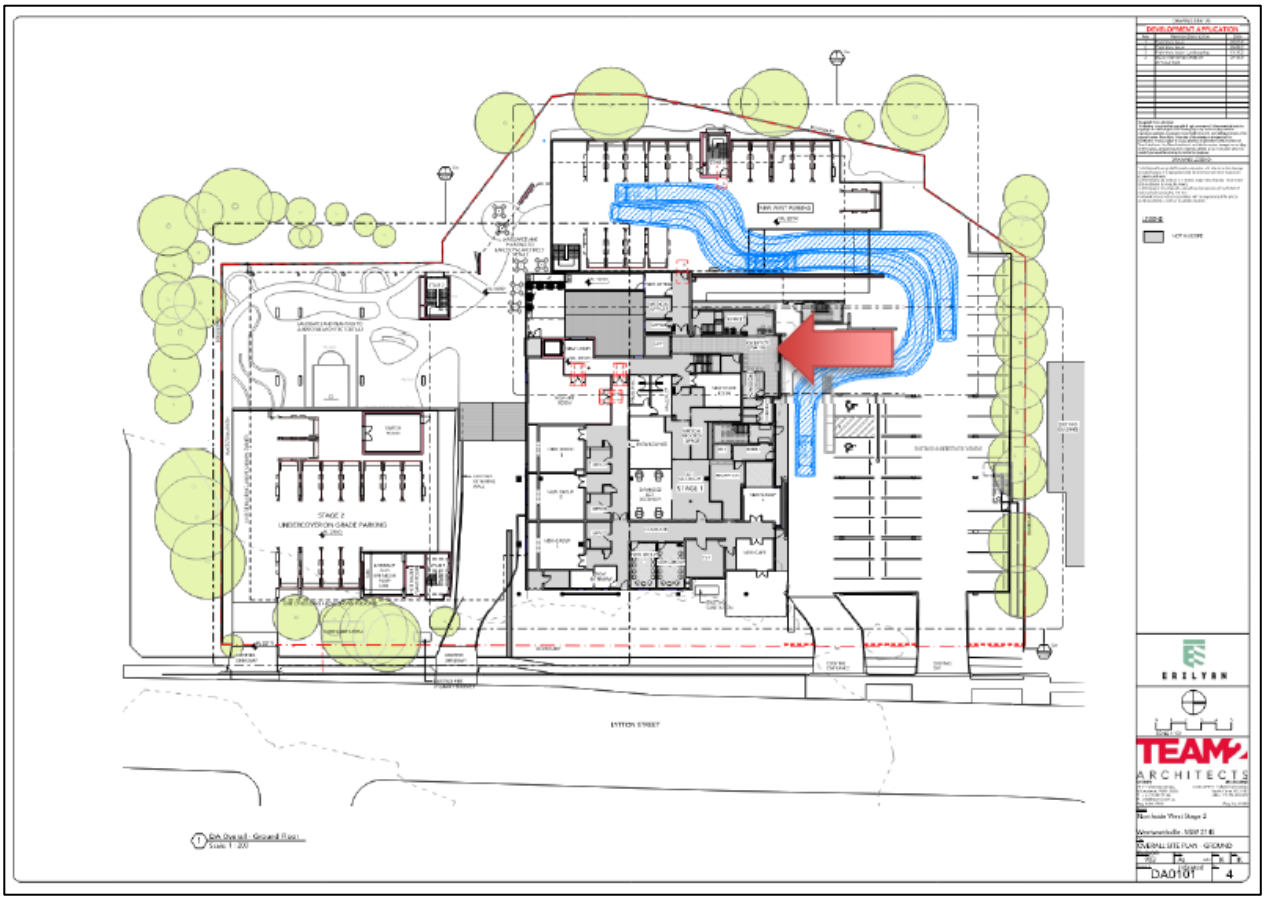

Figure 33 Ground level showing access to facility (Team 2 Architects 2021)

Territorial Reinforcement

Places that are well maintained and designed are often more regularly visited and endowed with a sense of community, accordingly well used spaces reduce crime opportunities. In this instance, it is intended that the new landscaped perimeter will provide patients with recreational and congregating opportunities which, from experience of other facilities, will be well used.

A key part of the therapy is a gardening elective which will take place in the grounds, and encourages patients to engage with, and augment the landscape, which in turn populates the landscaped areas, and improves the appearance of the facility.

Figure 34 Landscape proposal incorporating leisure and sports facilities along the western boundary (Team 2 Architects 2021)

Space Management

Well maintained and managed spaces discourage crime as they tend to be more actively used and unwelcome persons readily identified.

The hospital is a secure facility from the perspective of public access, with monitored access points at the main entry, and CCTV monitoring of the external areas.

Accordingly, the proposed development has incorporated the CPTED principles throughout the design of the development and is unlikely to result in any significant risks in terms of crime generation.

4.2.10 Better Placed: An integrated design policy for the built environment of New South Wales

Careful consideration has been given to the aspirations of the Better Placed Policy set out by the NSW Government Architect as follows:

Better Fit

The building has been designed to harmonise with the existing Stage 1 development, and the scale of the local residential building stock. This is followed through in the strong accentuated rhythm of the elevations, and architectural relief of the recessed and projecting panels. Ample landscaping is provided at the ground level interface on all aspects of the building as relates to the public realm.

Better Performance

The new extension has been designed with sustainability at the forefront (within the context of what is achievable within a mental health facility), and incorporate initiatives including double glazing, passive solar control, high levels of insulation, efficient mechanical systems; rainwater harvesting (for irrigation), and water efficient appliances.

The intention is, where possible, to achieve a performance at least 10% better than a National Construction Code (NCC) Deemed-to-Satisfy (DTS) reference building, which would effectively correspond to a 4-Star Greenstar building.

Better for Community

The facility will provide a valuable piece of social infrastructure, which will provide a highly valuable and much needed service for local community into the future.

Better for People

By building over the existing on-grade car park, the new development will effectively 'complete' the overall development of the Site and provide a defined 'edge' on all boundaries. The outcome will be a suitably scaled addition to the streetscape with drastically improved passive surveillance of Lytton Street, the side lane to the south of the Site, and the Lytton Park interface.

Each of the ward rooms will provide generous areas of glazing and state of the art facilities for patients and staff.

Better Working

The proposed development essentially cleans up the Site, removing the remaining end-of-life facilities in the West Wing, and replacing them with fit for purpose, light filled ward, support and staff spaces. The connectivity across the Site is a lose drastically improved providing a better and more efficient working environment, and existing security concerns over the on-grade car park have been addressed by providing secure staff and visitor car parking.

Better Value

The proposed development will round out the development opportunities on the Site, and at its conclusion will provide a world leading, state of the art non-acute mental health unit.

Better Look and Feel

As demonstrated in the Architectural Plans, the Stage 2 development presents an articulated architectural and urban outcome, using high quality and hard-wearing materials that will patinate and improve over time. The existing mature trees surrounding the Site are retained and augmented with new landscaping to provide a lush and softened interface with the public realm.

Accordingly, the proposed development is consistent with the objectives for good design in the Better Placed Policy.

4.2.11 Healthy Built Environment Checklist

The Healthy Built Environment Checklist was published by the NSW Ministry of Health in 2020 and supersedes the Healthy Urban Development Checklist. The Healthy Built Environment Checklist is designed to support engagement with planning processes and guide feedback on development policies and plans.

The Checklist comprises 11 themes outlined as follows:

1. Healthy eating
2. Physical activity

3. Housing
4. Transport and connectivity
5. Quality employment
6. Community safety and security
7. Open space and natural features
8. Social infrastructure
9. Social cohesion and connectivity
10. Environment and health
11. Environmental sustainability and climate change

The proposed extension of the Wentworthville Northside West Clinic is consistent with the 11 themes outlined above, particularly with respect to transport and connectivity, quality employment, open space and natural features and social infrastructure. Specifically, the Site is highly accessible via public transport, including the Wentworthville train station and bus services along Jordan Street and Veron Street. The Site is also situated in a walkable neighbourhood which provides employment opportunities close to homes and safe and accessible routes to the Wentworthville Local Centre, which is located 400m from the Site.

The Site adjoins the Lytton Street Park to west and south, which provides convenient access to the green open space and facilitates passive surveillance to the public domain. Further, the proposed development will provide additional mental health services which responds to the future demand of the growing population.

4.2.12 Draft Greener Places Design Guide

The Draft Greener Places Design Guide has been developed to deliver the strategic approach for the planning, design and management of green infrastructure and ecosystems and provides a consistent methodology to help State and local government, and industry create a network of green infrastructure.

The policy sets out four principles that will facilitate the delivery green infrastructure NSW, which have informed the built form of the proposed development:

Integration

The proposed development has been designed to integrate the adjoining green open space at Lytton Street Park with the proposed green space, proposed built form and grey infrastructure within the Site. The proposed design will provide critical ecosystem services and promote health and active living.

Connectivity

The proposed development includes a high quality landscaped open space in the western portion of the Site and a central courtyard within the Stage 2 building which have been designed in response to the adjoining public open space at the Lytton Street Park. The proposed health services facility has been designed to be sympathetic to the adjoining public open space and the surrounding residential properties, creating a network of open spaces.

Multifunctionality

Multifunctionality represents the ability of green infrastructure to deliver multiple ecosystem, environmental and other services simultaneously. The proposed landscaped open space presents a multi-functional recreation space for use by patients and staff through the provision of seating areas, a basketball court and high quality landscaping. The proposed landscape open space and central courtyard will provide relief of the built form and alleviate the urban heat island effect through the incorporation of the planting of native species and deep soil landscaping.

Participation

Consultation with the local community was undertaken via a number of communication and engagement activities. Additionally, ongoing consultation with Registered Aboriginal Parties (RAPs) has been undertaken to assess impacts to Aboriginal heritage that may result from the proposal. Government agencies including Cumberland City Council, Transport for NSW and Government Architect NSW were also consulted during the design process in accordance with the consultation requirements in the issued SEARs. Further details of the consultation undertaken with the local community, Aboriginal stakeholder groups and government agencies are stipulated in **Sections 5.1** and **6.8** respectively.

Accordingly, the proposed development is consistent with the Draft Greener Places Design Guide.

4.2.13 Cumberland Development Control Plan 2021

The Cumberland Development Control Plan 2021 (CDCP2021) provides guidance for the design and operation of development within the Cumberland LGA to achieve the aims and objectives of CLEP2021. However, the SRD SEPP excludes the application of development control plans to SSD projects under Clause 11. Notwithstanding, an overall commentary of the project relative to key CDCP2021 controls has been provided in the DCP Compliance Table at **Appendix 31**.

Overall, the proposal is generally consistent with the provisions of CDCP2021. An assessment of the proposal against the relevant sections of CDCP2021 is provided in the DCP Compliance Table. Where the proposed development departs from the certain controls, the design satisfies the objectives of the control.

PART E CONSULTATION

5.1 STAKEHOLDER CONSULTATION

In response to the SEARs, the following stakeholder consultation has been undertaken. The following stakeholders were required to be consulted with under this SSD Application:

- Cumberland City Council
- Government Architect NSW (GANSW) (through the NSW SDRP process)
- Transport for NSW (TfNSW)

A comprehensive level of community and stakeholder engagement has been undertaken for the Proposed Development. This has included meetings and notification letters to both agencies and all potentially impacted residents and community members.

The Consultation Outcomes Report provides details with a comprehensive analysis of the overall strategy undertaken to date (refer to **Appendix 26**), offering a summary and analysis of all community and stakeholder consultations, distilling into themes, and those items identified in the consultation process, as significant.

The information provided herein, demonstrates that genuine consultation has already taken place with stakeholders seeking feedback on the Proposed development.

5.1.1 Agency Consultation

In preparation of this EIS, relevant agencies were consulted with to inform the proposed development. Agency consultation undertaken to date includes, but is not limited to, those detailed in **Table 8**.

Table 8 Relevant Government Agency Consultation

Stakeholder	Consultation Notes
Cumberland City Council	A meeting was held with Council on 7 April 2021 to discuss the key matters associated with the proposed development. Attendees included: ▪ Olivia Yana – Council ▪ Jai Shankar – Council ▪ Michael Lawani – Council ▪ Mike Ryan – Erilyan ▪ Zack Ashby – Team 2 Architects ▪ Lewis McAulay – Willowtree Planning ▪ Stephanie Wu – Willowtree Planning Further to the discussion held in the meeting, the following comments were provided by Council: *In regards to the matters raised during the meeting relating to the proposed non-compliances with FSR, building height, car parking provision and setbacks for the proposed development, it is recommended that they are to be justified. Council generally would support the breach in the building height where it relates to vertical circulation, such as lift overrun and staircases, and not within the habitable areas. Council also notes that the proposed buildings will be located in close proximity to Council's parkland and will impact on the integrity of the existing mature trees. Further information and subsequent consultation with Council's Parks section will be*

Table 8 Relevant Government Agency Consultation	
Stakeholder	**Consultation Notes**
	required. In relation to the proposed relocation of Council's stormwater asset within the subject site, please contact Council's Senior Stormwater Engineer Mark Evens on 8757 9538, or Manager of Engineering and Traffic Siva Sivakumar on 8757 9513. Comments from Council have been acknowledged and have been addressed accordingly throughout the EIS. A Clause 4.6 Variation (**Appendix 30**) has been prepared to provide justification to the proposed non-compliances with FSR and building height development standards. In addition, a consultation letter was sent to Council on 13 August 2021 to organise another meeting in order to satisfy the consultation requirement. However, it is noted that Council requested a formal pre-lodgement meeting to be undertaken to provide further comments. It is considered that Council's pre-lodgement process is not applicable to the subject SSD is to be assessed and determined by DPIE. Therefore, a subsequent meeting was not held with Council. Notwithstanding, it is acknowledged that Council provided comments in the letter dated 11 May 2021 as part of the SEARs process. The matters raised by Council are further addressed in **Table 9**.
Transport for NSW	A consultation letter was sent to TfNSW on 31 May 2021 to seek commentary on the proposed development. An email was received from TfNSW on 3 June 2021 advising TfNSW has no further comments upon review of the preliminary plans. Notwithstanding, it is acknowledged that TfNSW provided comments in the letter dated 7 May 2021 as part of the SEARs process requiring issues to be addressed in the Transport and Accessibility Impact Assessment detailed under point 5 – Traffic and Accessibility of the SEARs. The matters raised by TfNSW are addressed in **Section 6.5** of this EIS.
Government Architect NSW	A consultation letter was sent to GANSW on 13 August 2021 to seek commentary on the proposed development. A meeting with the State Design Review Panel (SDRP) was subsequently held on 15 September 2021. Attendees included: ▪ Rory Toomey (Chair, GANSW), Oi Choong, Paul Stoller and Penny Collins – SDRP Panel members ▪ Laura Graham – GANSW Design Advisor ▪ Ingrid Berzins – DPIE ▪ Mike Ryan – Erilyan ▪ Zack Ashby – Team 2 Architects ▪ Ayeh Haji – Hatch RobertsDay ▪ Andrew Cowan – Willowtree Planning ▪ Stephanie Wu – Willowtree Planning An Advice Letter was received from GANSW on 30 September outlining commentary for the project. The key matters raised by GANSW relate to the following:

Table 8 Relevant Government Agency Consultation	
Stakeholder	**Consultation Notes**
	▪ Connecting with Country ▪ Site strategy and landscape ▪ Architecture ▪ Sustainability and Climate Change The matters raised by GANSW have been taken into consideration and are addressed in **Table 10**.
	The second SDRP meeting was held on 24 November 2021. Attendees included: ▪ Rory Toomey (Chair, GANSW), Oi Choong, Paul Stoller and Penny Collins – SDRP Panel members ▪ Laura Graham – GANSW Design Advisor ▪ Ingrid Berzins – DPIE ▪ Mike Ryan – Erilyan ▪ Zack Ashby – Team 2 Architects ▪ Alex Longley – Arcadia Landscape Architecture ▪ Andrew Cowan – Willowtree Planning ▪ Stephanie Wu – Willowtree Planning The matters raised by GANSW in the second SDRP meeting have been taken into consideration and are addressed in **Table 11**.

The comments provided by Cumberland City Council during the SEARs process are addressed in **Table 9** below.

Table 9 Cumberland City Council comments	
Key issues	**Response**
Development standards	
1. The proposed development is seeking to vary both of Holroyd Local Environmental Plan (HLEP) 2013 development standards for building height and FSR. Council generally would not contend to the breach in the building height where it relates to vertical circulation, such as lift overrun and staircases, and not within the habitable areas. Clause 4.6 variation request shall be submitted with the application to address any non-compliances proposed with the HLEP development standards.	Noted. A Clause 4.6 Variation has been prepared for the proposed height and FSR variations and is provided at **Appendix 30**.
Council Pipeline/Easement	
2. Council's record shows that Council's stormwater pipe runs through the subject site. The proposed development will interfere with existing Council's stormwater pipe and easement. No building or structures are permitted over the Council's stormwater pipe and/or associated easements. In this regard exact location of the pipe shall be annotated on the plan to verify that the development is clear of Council's stormwater pipe and associated easements. Any redirection of stormwater drainage system shall comply with attached Council's 'Drainage Redirection Requirements' and 'Drainage system capacity analysis' (copy of documents supplied).	As demonstrated in the Stormwater Management Report prepared by Stellen Consulting, it is proposed to relocate the existing easement and drainage pipe to the southern boundary of the Site. The proposed stormwater diversion is shown in DR-200 of the Stormwater Management Plans. The proposed stormwater diversion has been designed generally in accordance with these designed generally in accordance with the requirements of 'Drainage Redirection Requirements' and 'Drainage system capacity analysis'. In particular, the design conforms

Table 9 Cumberland City Council comments	
Key issues	**Response**
	to the following key criteria outlined by Council: ▪ No structures overhang the pipe or easement. ▪ Proposed system matches existing hydraulic function of system (5% AEP). ▪ Surcharging flow is safely managed with a surcharge pit on the downstream end of the new drainage line. Further details of the proposed easement relocation are provided in **Section 6.15** of this EIS, the Stormwater Management Report and Plans at **Appendix 10**.
Noise Impact	
3. An acoustic assessment should be undertaken by a suitably qualified acoustical consultant to ensure that any noise created by the proposed carpark, gymnasium, café, loading dock and associated mechanical plant/equipment will not have an adverse impact on nearby sensitive receivers. The assessment should also consider potential noise impacts upon the future occupants/patients of the development, and if required, inform the building design to ensure any potential impacts are mitigated.	A Noise and Vibration Impact Assessment Report (**Appendix 8**) has been prepared by JHA Services. Details of the acoustic assessment are further discussed in **Section 6.10** of this EIS.
Land Contamination	
4. No contamination reports have been supplied with this referral to allow for comments. Due to the site's location and surroundings being entirely residential, significant contamination of subsoils at the subject site is unlikely. Notwithstanding, the SEE does state that given the extent of proposed excavation required for the development, a Geotechnical Study and Preliminary Site Investigation will be carried out as part of the future Environmental Impact Statement (EIS).	A Geotechnical Investigation (**Appendix 20**), Preliminary Site Investigation (**Appendix 18**) and Detailed Site Investigation (**Appendix 19**) have been prepared. Details of the geotechnical study and investigation are discussed in **Sections 6.17** and **6.19**.
Parkland	
5. The delineation of the boundary bordering Council's Reserve (and access laneway) by a continuous 2.1m high black rod top & bottom palisade fence (tubular steel / school type) with no direct access to the reserve shall be provided. Street tree planting needs to be consistent with the existing (intervals and species). Built structure is very close to the western boundary bordering Council's Lytton Street Park and the proposal would be expected to increase overshadowing of the park and to impact on the integrity of mature trees adjoining to the site's boundaries.	Fencing will be provided along the western and southern boundaries of the Site. As demonstrated in the Shadows Diagrams within the Architectural Plans (**Appendix 3**), the proposed extension has been designed to maintain a minimum of three hours of solar access for Lytton Street Park on winter solstice. Therefore, the proposed development is not anticipated to result in adverse overshadowing impacts on the adjoining open space. Appropriate tree planting will be undertaken as illustrated in the Landscape Plans. Further

Table 9 Cumberland City Council comments	
Key issues	**Response**
	details of the landscape design are discussed in **Section 6.3** of the EIS.
Waste Management	
6. No details have been provided regarding the current waste management arrangement and whether it can accommodate the proposed extension to the existing clinic. Should new/amended waste management arrangement be proposed, details need to be provided to Council.	A Waste Management Plan has been prepared by MRA Consulting and is provided at **Appendix 27**. Further details of the proposed waste management measures are provided in **Section 6.18**.
Exclusion of Application of Development Control Plans	
7. In accordance with Clause 11 of State Environmental Planning Policy (State and Regional Development) 2011, *development control plans (whether made before or after the commencement of this Policy) do not apply to (a) state significant development.* Notwithstanding this, the following items as per the Parts A General and B Residential Controls under Holroyd Development Control Plan (HDCP) 2013, are raised for your attention. a) Setbacks – The setbacks proposed are not considered as sufficient. A minimum side setback of 3m, and rear setback of 20% of the length of the site or 6m (whichever is greater) are required.	It is noted that the Site is subject to the Site Specific Controls in Part F4 of CDCP2021 with the following requirements: ▪ Minimum of 6m setback from the front (street facing) property boundary. This setback distance may be reduced in order to align the new building with an existing building on the property. ▪ Minimum of 6m setback from the rear property boundary. ▪ Minimum of 3m setback from the side property boundary. ▪ Minimum of 3m setback from the side and from the rear property boundaries to be applied to basement levels. The proposed development exhibits the following setbacks: ▪ Eastern (front) boundary: Approximately 6m ▪ Western (rear) boundary: 0 to 6m ▪ Southern (side) boundary: Minimum 3.7m ▪ Northern (side) boundary: Approximately 1.9m (unchanged) The proposed development is generally consistent with the setback requirements under CDCP2021. While the proposed development exhibits a western setback of 0 to 6m, this is due to the design requirements of the proposed car park and the irregular shape of the Site. Further, as demonstrated in the Landscape Plans (**Appendix 6**), a landscaped open space will be provided in the south western portion of the Site. Therefore, the proposed setbacks are deemed appropriate for the development.
b) Height – The permitted number of storeys shall not exceed 4 for a 15m building height limit within the locality being a high density residential area. Part of the proposed building appears to	The proposed development presents a four-storey built form and does not include a five-storey component. Further details of the

Table 9 Cumberland City Council comments	
Key issues	**Response**
contain a 5 storey element that is incompatible with the existing adjoining developments.	proposed built form are provided in the Architectural Plans at **Appendix 3**.
c) Earthworks – Details of cut and fill proposed shall be provided	It is noted that the proposed development involves minimal earthworks and excavation. As demonstrated in the Geotechnical Investigation, the lower level of the proposed ward building will be a maximum of about 1.7m above the existing ground surface. It is unknown if fill will be placed to raise site levels, or a void left below a suspended floor slab. The following recommendations should be followed where fill is to be placed and for preparation of the subgrade below the undercroft parking on the western side of the Site. Where the lowest floor slab is designed as a fully suspended floor slab no particular subgrade preparation would be required, but good practice would include stripping of any vegetation and root affected soils. Minimal excavation is anticipated for the proposed development as it will be at or above the existing surface levels. Local excavations may be required for lift pits and service trenches. However it is not anticipated that these will exceed 1.5m in depth. Further details of the proposed earthworks and excavation are provided in **Section 6.17** and the Geotechnical Investigation at **Appendix 20**.
d) Flooding – The subject site is located within the Flood Risk precinct. In this regard, flood advice letter shall be obtained from Council. The subject development shall comply with flood advice letter and Part A Section 8.0 Stormwater Management of Council DCP 2013. Supporting documents shall be submitted in order to ensure that the development complies with the controls nominated in Table 8 of the DCP.	A Flood Impact Study (**Appendix 12**) has been prepared by ACOR Consultants to investigate flood behaviour throughout the overland flooding catchment impacting the Site. Findings of the Flood Impact Study are further discussed in **Section 6.16** of the EIS.
e) Stormwater – Stormwater plans has not been submitted. Stormwater runoff from the entire site shall be discharged by gravity system. Development shall demonstrate compliance with Part A Section 7.0 Stormwater Management of Council DCP 2013. Onsite stormwater detention system shall be designed in accordance Council's On-site Stormwater Detention policy and Upper Parramatta River Catchment Trust "On-Site Detention Handbook" (Third edition).	A set of Stormwater Management Plans and Report (**Appendix 10**) have been prepared by Stellen Consulting. Findings of the Stormwater Management Report and Plans are further discussed in **Section 6.15** of the EIS.
f) Traffic and Parking – Traffic impact assessment report shall be prepared. The traffic impact assessment report shall address the impacts of the proposed developments. These should	A Traffic and Accessibility Impact Assessment has been prepared by Traffix and is provided at **Appendix 9**.

Table 9 Cumberland City Council comments	
Key issues	**Response**
include, but not limited to, queuing, parking, traffic generation, entry and exit and be addressed in the report. The proposed parking spaces are not adequate based on the following car parking rate. Car parking space numbers shall comply with Council's DCP or similar development shall be compared to determine the parking demand. Tandem parking spaces are not generally supported by Council. Turning area shall be provided in the blind aisles as per as per Australian standard AS2890.1 requirement. All the access ramps and circulation aisle shall be designed for two-way access. Width of the two-way driveway/ramp shall be minimum 6.1m (5.5m plus 0.3m clearance either side). Location of the driveway access to Staged 2 parking does not comply with Section 3.2.3and Figure 3.1 of the Australian standard AS2890.1. Driveway access to Staged 2 parking shall be designed comply with two way access. Driveway/layback shall be minimum 1.2m from the power pole. Parking layout and ramp gradients shall comply with Australian standard AS2890.1 and AS2890.6. Minimum 2.2m headroom clearance shall be provided. Head room shall be measured perpendicular to the wheelbase as shown on the Figure 5.3 of AS 2890.1.Head room details shall be marked on the plan. In this regard, detail longitudinal sections of the access ramp to a scale of 1:20 shall be submitted. Truck loading area shall be provided. Truck loading design must comply with Australian standard AS2890.2.All the vehicles shall enter and leave the site in a forward direction. Proposed accessible parking spaces are not adequate. Ambulance parking area shall be provided. Dimensions (parking space length and width, aisle width, parking space gradients, head height clearance, extensions at dead end aisles, etc.) shall be shown on the plan.	Details of the traffic and parking assessment are discussed in **Section 6.5** of the EIS.

The comments provided by GANSW during the SEARs process are addressed in **Table 10** below.

Table 10 GANSW comments dated 30 September 2021	
Key issues	**Response**
The increased FSR and height beyond the approved planning proposal (PP-2020-2448) are not supported – the increased density leads to compromised internal amenity, lack of quality landscape spaces and excessive overshadowing to the south residential neighbour. The current proposal is responding primarily to the challenges of the site and	The proposal has been developed with the focus of expanding in order to meet the increasing demand, and providing the much needed services and facilities to support the mental health and well being of young people in the local community. The brief was to provide a dedicated Adolescent and Young Adult Mental Health Service to provide

Table 10 GANSW comments dated 30 September 2021	
Key issues	**Response**
the high yield brief rather than prioritising wellbeing, recovery and amenity for the vulnerable future patients. The opportunities outlined below allow for a competitive clinical facility and provide an improved patient experience.	inpatient care and day programs to young people aged 14 to 25 years old. It builds on the adult programs which have been running at the facility since 2002. A landscaped open space will be provided in the undercroft area of the Stage 2 building to provide outdoor recreation area for patients and staff. As demonstrated in the Shadow Diagrams, the proposed development has been designed to retain solar access for the surrounding residential properties. It is noted that the residential property located directly south and south east of the Site (31 Lytton Street and 48 Haig Street) will continue to receive a minimum of three hours of solar access during winter solstice and unobstructed solar access throughout the day during summer solstice. Additionally, Lytton Street Park will also receive a minimum of three hours of solar access during winter solstice. As such, the proposed development is not anticipated to result in any adverse overshadowing or visual amenity impacts to the surrounding residential properties.
Connecting with Country	
1. Explore additional locations for Aboriginal artwork and develop the design by partnering with local Aboriginal artists where possible.	Additional locations have been identified in the increased landscape area to the south-west of the site and the project team will consider further interaction with local Aboriginal Artists where possible throughout the detailed design stage of the project.
2. Applied art alone is not considered comprehensive or an integrated response to Country. It is challenging to respond to Country when the building is elevated spatially, but still possible. For example, consider what parts of the landscape or building people gravitate to in order to feel connected to the place during different times of the year. Consider access to running water, the breeze, endemic plant species, biophilia and, critically, solar access to useable spaces.	The additional landscape area will be developed with a strong focus on Connection and Response to Country. It is intended that it will expand and connect directly with the large vertical indigenous artwork opportunities. Given the unique location of the extended landscape area, the design team has identified the importance of ensuring the selection plant species and biophilia are undertaken with withing the Connection to Country framework to ensure best possible outcomes for the spaces and the people who will use them.
3. It is recommended the project team engages with local Indigenous Community members early and consistently throughout the project lifecycle. If this is not possible due to Covid-19, consider engaging with an Aboriginal cultural heritage and spatial expert. Refer to the draft framework Connecting with Country on the GANSW website for further information.	The project team undertook an Aboriginal Cultural Heritage Assessment Report which included consultation in accordance with the Consultation Requirements of the Department of Environment, Climate Change and Water (DECCW 2010a). Four responses were provided by RAPs all of which were in support of the project. That being said the project team will consider the engagement of Indigenous community members

Table 10 GANSW comments dated 30 September 2021	
Key issues	**Response**
	should they wish to be involved to assist in the development of design and specific spaces within the facility.
Site strategy and landscape	
4. Prioritise the reconfiguration of the stage 2 massing to improve the amenity of the raised courtyard. A courtyard enclosed on four sides by three-storey walls is not supported. Creating a U-shaped courtyard could provide an outdoor space facing the park, providing airflow and western sun during winter. When designing outdoor spaces, strive for high amenity and quality – beyond making an area for smokers.	The circular layout is a requirement for the wards to operate in an efficient, safe and secure manner whilst also allowing flexibility for beds to swing between different services dependent on demand. If the design were to provide a U-shaped layout the staffing levels would be required to be doubled on each level as would the provision of support spaces. The Australian Health Facility Guidelines require units to be designed in order to ensure ease of observation for staff to permit continuous monitoring via: ▪ Line of sight from staff station or bases to common areas such as a communal lounge, dining, activity and outdoor areas. Further to this providing a courtyard that faced the park, would result in a minimum of eight rooms no longer receiving park views as well as the loss of the Level 3 courtyard facing the park. It should be noted that the south-west corner of levels 1 & 2 level consists of a large lounge area with excellent solar access and views of the park and level 3 already has a courtyard overlooking the park. The panel's comments regarding designing outdoor spaces are noted and it is confirmed that all courtyards on ward levels will be non-smoking areas.
5. Reduce the parking to the minimum requirement to enable internal communal spaces and increased external landscape on the ground level, taking advantage of favourable outlooks to the park and creek. Explore the possibility of physically opening the facility up to the park or providing a ground-level visual connection through reconsidered boundary and fencing conditions	The parking provision has been reduced to provide additional landscaped area on the Site. The design of the proposed landscaped area is illustrated in the Landscape Strategy (**Appendix 6**) and Architectural Plans (**Appendix 3**). Unfortunately from a safety and security perspective fencing is required however it will be made as recessive and integrated with the landscaping as possible.
6. The entry sequence is unclear and could feel unsafe as it is located at the back of the car park. Relocate or reconfigure the entry so it is well lit with access to natural light and visibility and clarity of approach from the public domain to help with orientation. Additionally, consider how	The existing photos in **Figure 35** demonstrate that suitable natural light and visibility are provided on Site. Patients and visitors who will be transitioning from ground to upper levels are escorted by staff and the pathway is clear and welcoming.

Table 10 GANSW comments dated 30 September 2021	
Key issues	**Response**
to make the transition from ground level to the upper levels clearer and more welcoming.	
7. The stage 2 undercroft car park height of approximately 5m is significantly higher than required for vehicles. It is recommended the design team explore providing a different floor level for stage 2 compared to stage 1 to reduce the floor to floor height closer to 3m, resulting in a lower overall building height.	This cannot be achieved as it will affect connectivity between ward and support spaces. Providing different floor levels between the new and existing buildings will require the facility to be operated separately and will essentially double staff numbers. It will also have major impacts on DDA Compliance and well as Fire Egress paths.
8. The residential property to the south is overshadowed, which requires mitigation as described above. For future presentations, clarify the shadows produced by buildings by removing the trees from the shadow diagrams.	As demonstrated previously, the proposed development has been designed to retain solar access for the surrounding residential properties. The proposed development is not anticipated to result in any adverse overshadowing or visual amenity impacts to the surrounding residential properties.
9. Some of the ground floor rooms have no windows or views. Re-evaluate how these occupied spaces could receive natural light and outlooks.	Natural light has been provided wherever possible. Several skylights have been provided where access to windows is not possible.
10. Where possible, provide access to natural light and views to the outdoors at the end of corridors. The stage 2 extension blocks the natural light to the stage 1 corridor – consider how this condition could be improved.	Lounges situated on the corners have internal glazing to the corridor which will assist in transmitting natural light to the corridors in the stage 2 extension. The end of the stage 1 corridor is a fire rated door which current does not have natural light so stage 2 is not blocking any natural light at this end of the corridor.
11. Use high quality and visually considered screening to the undercroft car park, which does not rely on planting as it could die or take some time to provide coverage to mitigate views of the undercroft car park. Additionally, this screening could form the secure line to the facility rather than a fence in some locations to create a more nuanced and welcoming boundary condition.	Noted and this will be adopted. As demonstrated in the Elevations within the Architectural Plans, landscaping will be planted around the security fence to enhance the visual amenity of the screening.
12. Use the built fabric as the secure line where appropriate to blend the public domain and the private space. Allow for landscaping at this boundary that benefits the public, staff and patients and integrates the project into the neighbourhood. Where a fence is required, provide a high-quality one that is well integrated with the landscape design.	Noted and this will be adopted. As discussed previously, landscaping will be provided along the western boundary to soften the built form and enhance the visual interest of the proposed development. The proposed fencing is well integrated into the architectural and landscape design of the proposal.
13. During construction, ensure the existing tree roots on and around the site are protected for long term tree survival.	Noted. This forms part of the Arborist Report and will form part of the landscape specification.
14. Consider the placement of site sheds during construction as the site lacks open space.	Noted. This will be considered as part of the design development process.
15. Consider the use of the undercroft car park for future extensions.	The use of the undercroft car park will be taken into consideration in future extensions.
Architecture	

Table 10 GANSW comments dated 30 September 2021	
Key issues	**Response**
16. To provide increased amenity to patients (and create a point of difference in the mental healthcare market), consider if patient rooms could have a balcony or Juliet balcony	In order to ensure compliance with the Australian Health Facility Guidelines in particular the HPU 131 Mental Health –Overarching Guideline. Providing Juliet balcony's to patient rooms would then require 3.5m fencing or barriers with no handhold or foothold points to prevent scaling.
Sustainability and Climate Change	
17. Develop ESD ambitions for the project. Utilise the vast roof surfaces for renewable energy and capturing stormwater. Provide operable windows for natural ventilation.	The ESD objectives of this project is to encourage a balanced approach to designing new facilities for the project; to be resource-efficient, cost-effective in construction and operation; and to deliver enhanced sustainability benefits with respect to impacts on the environment and on the health and well-being of patients, staff, and visitors whilst providing the best possible facilities for a constructive environment. The proposal has been designed in accordance with the Green Star Design & As-Built v1.3 Rating System. Whole of Life considerations including running costs, long-term maintenance, quality, life-span, future improvement, value of money and sustainability, will be used to inform the design of the development.
18. Aiming for a net-zero building is highly encouraged to reach NSW's Net Zero emissions goal by 2050. Refer to 'NSW, DPIE, Net Zero Plan, Stage 1: 2020-2030' for further information.	Noted. The proposed development has been designed to address the ecologically sustainable development (ESD) principles.

Figure 35 Photos of existing entry (Erilyan 2021)

Table 11 GANSW comments dated 8 December 2021	
Key issues	**Response**
The SEARs requires the EIS submission to include evidence of issues raised at the SDRP and how the "design of the development has been amended in	The SDRP comments are acknowledged and changes to the proposed development have been made for the betterment of the design wherever

Table 11 GANSW comments dated 8 December 2021	
Key issues	**Response**
response to these issues". The proposal presented at the second SDRP has largely remained unchanged from the first SDRP, at which fundamental aspects of the scheme were not supported. The specific requirements of the brief, site constraints, the increased FSR over the permissible 1:1 FSR and height limits have resulted in a compromised proposal. Refer back to the advice letter from the first SDRP to review and re-examine concerns raised. The project team is encouraged to strive for better amenity outcomes. This may not be achievable without a significant redesign from first principles.	possible. As discussed in the SDRP meeting there are several patient and operational requirements that take precedent over some of the issues raised by the SDRP. As has always been the case throughout the design process, the development has been designed to provide the best possible design solutions, whilst still complying with Australian Health Facility Guidelines, Mental Health Facility operational requirements and most importantly meeting and exceeding the needs to youth mental health patients from the area. As discussed previously, the additional floor space is necessary to respond to the increasing demand for mental health services in Greater Sydney and increase the supply for health care services in the Cumberland LGA. The proposed height of building is primarily due to the sloping topography of the Site. It should be noted that the maximum building height of 19.6m (30.7% variation) is measured from the level of the existing access driveway, which had previously been excavated as part of the construction of current facility. Further, the maximum height variation of 30.7% occurs in the central portion of the building only, and it is noted that the built form surrounding the central courtyard comprises a building height of 16.3m, presenting a variation of 8.6%. As measured from the East Elevation, the proposed development presents a building height of 15.9m fronting Lytton Street, which exhibits a variation of 6% only. The proposed development has been designed to preserve the existing topography through providing an undercroft parking area rather than basement carpark. The proposed height is also required to enable the physical connection with the Stage 1 building to ensure optimal operational efficiency and compliance with access requirements. Further details on the proposed height and FSR variations are provided in the Clause 4.6 Variation Request at **Appendix 30**. Importantly, the proposed development is generally consistent with the development controls under CLEP2021 and CDCP2021 which would ensure minimal impact on the local community.

Table 11 GANSW comments dated 8 December 2021	
Key issues	**Response**
The scheme is currently car-parking driven, although parking numbers in Stage 2 are not significant (13 spaces). The stage 2 undercroft parking could be relocated elsewhere to allow for redistribution of GFA and useable space at ground level to reduce overall height, bulk and create a better public interface. The quality of the open space, terraces and the central courtyard should be prioritised to promote the health and wellbeing of the future vulnerable patients and staff.	The proposed development is subject to the parking requirements under CDCP2021, which refers to the parking rates under the TfNSW Guide. The proposed development will provide a total of 77 carparking spaces which are required to accommodate the parking demand of the proposed facility. Throughout the design process, the south western portion of the Stage 2 has been changed from a parking area to a landscaped area in response to the SDRP comments dated 30 September 2021, which is considered adequate to provide high quality landscape space and recreation area for patients and staff.
Connecting with Country	
1. Develop an architectural design response to Country in addition to the art and landscape response. Applied art and native planting are not considered a comprehensive or an integrated response to Country. Below are some examples of how Country can be better integrated into the design: a. consider how ground-level landscaped space and upper-level terraces can celebrate the microclimate (breeze, sunlight) and frame views toward the park b. think about how flood mitigation could be celebrated – for example, a rain garden c. consider the possibility of a native sensory garden/bush tucker garden with input from the local Indigenous community d. develop the finishes and colour palette in areas to relate to the site e. consider Indigenous language for naming and wayfinding with guidance by the local Indigenous community.	The proposed landscaped space on ground level has been designed to provide shade and cooling urban area through the planting design to mitigate the urban heat island effect. The landscape strategy will provide a minimum of 40% canopy including retained existing significant trees canopy across the ground level landscape area to mitigate urban heat island effect based on the 5 Million Trees Program (5MT Program). The strategy will provide approximately 70% of green space including the tree canopy to provide urban cooling. Biophilia is fundamental to the design and consideration has been given to maximise opportunities for providing live planting, both internally and externally, which has been proven to have a positive effect on patient experience and recovery times. The proposal will include herb gardens, green walls, external planting and climbers to soften interface with the ground and meandering landscape routes. The modelling and materiality of the building were explored and evaluated through a series of sketch studies to determine the most appropriate outcome given in respect of the internal planning and surrounding context.
2. Hold in-person consultation throughout the project lifecycle with local Indigenous community members on the art strategy, landscape and architectural design. Demonstrate how this consultation input is reflected within the design.	Engagement with Indigenous community members will be taken into consideration should they wish to be involved to assist in the development of design and specific spaces within the facility.

Table 11 GANSW comments dated 8 December 2021	
Key issues	**Response**
Refer to the draft framework Connecting with Country on the GANSW website for further information.	
3. As mentioned in the first SDRP advice, show the development of the Aboriginal artwork by partnering with local Aboriginal artists where possible, as early as possible in the design process to assist a rich integration of ideas.	Further interaction with local Aboriginal artists will be undertaken to further develop the Aboriginal artwork.
Site strategy and Landscape	
4. The central courtyard should be reconsidered fundamentally. It is recommended that the courtyard be enlarged to improve its proportions. The central courtyard is the only open space that is completely open to the sky, and it is enclosed on all four sides and overshadowed. For example, improve the courtyard by: a. increasing its size b. considering its use for all possible users c. considering acoustics d. including vertical planting for privacy, beautification and softening e. consider hanging sculptural and planting elements to make it an interesting area to look onto f. think about what Indigenous themes could be further integrated into the design.	Details of the central courtyard design are illustrated in the Landscape Strategy and Landscape Plans at **Appendix 6** and are discussed in **Section 6.3**.
5. Invest in the other terraces to improve access to the sun and sky. Given the limitations of the brief and program, the terraces should be designed to feel like a destination and an enjoyable space where people want to spend time.	Design of the Level 1 inner courtyard in the western building is illustrated in the Landscape Strategy.
6. Develop the tactility of the ground level and terrace landscaped areas, so the building does not feel institutional. Consider planting and materials that appeal to all the senses.	Landscaping has been incorporated as part of the design to soften the built form and engage with the open space at Lytton Street Park.
7. There is not enough justification for this scheme to be driven by parking. Explore options to relocate the 13 parking spaces under stage 2. Consider introducing basement parking or half-sunken parking below the stage 2 building. Alternatively, the stage 2 undercroft parking could be relocated by extending the west parking area and introducing parking off Lytton Street in front of the stage 1 building.	The provision of basement parking and parking in front of the Stage 1 building off Lytton Street are not considered to be beneficial to the facility or the public. As discussed previously, the provision of basement parking will require extensive excavation and earthworks, which is likely to result in significant impacts on the amenity of the surrounding residential properties. Further, excavation or earthworks may also impact on the soil stability and drainage patterns on the Site. Provision of carparking at the front of the Stage 1 building is also not considered to be appropriate. Given the site constraints and limited space within the Site, major redesign will be required to accommodate the turning paths and access

Table 11 GANSW comments dated 8 December 2021	
Key issues	**Response**
	arrangements for carparking in front of the Stage 1 building. The scheme is not driven by parking however it should be acknowledged that CDCP2021 provides minimum carparking requirements for the proposed development. The proposal will provide a total of 77 parking spaces which are considered suitable to the development to accommodate the anticipated parking demand.
8. Explore how to reduce the building height by removing car parking at the stage 2 ground level and introducing ramps to mitigate the level change between stages 1 and 2.	As demonstrated in **Section 3.4**, numerous design options were explored before arriving at the current design. Further details of the proposed height variation are provided in the Clause 4.6 Variation Request at **Appendix 30**.
9. The building height should be reduced to below 15m to mitigate overshadowing to the park during winter.	As above. The proposal has been designed to preserve adequate solar access for the neighbouring properties and Lytton Street Park.
10. Place active rooms on the ground level to articulate the street and park entrance path in a friendly manner.	As carparking is proposed to be provided on ground level, active rooms are unable to be facilitated on ground level. Entry area will be provided on ground level to facilitate access into the building.
11. Reconsider the fence design to be a part of the architecture to create privacy and a positive interface with the park. For example, avoid using only metal fencing and provide sections of solid materials such as stone piers or hedges with portions that allow views into the park. Alternatively, create a dense buffer to the fence with planting on both sides. Define the security function of this boundary fence in relation to the open, unfenced boundary to Lytton Street.	As demonstrated in the Architectural Plans, landscaping will be planted along the security fence to enhance the visual interest of the building when viewed from Lytton Street Park.
12. Carefully consider the design development of the landscaped and recreation open space within the under-croft area to ensure it is inviting.	Details of the proposed landscape design and open spaces are provided in the Landscape Plans and Landscape Strategy at **Appendix 6**.
13. Discuss the inclusion of additional street trees with the Council to improve the street interface. Additionally, as mentioned within the first SDRP, allow for landscaping at this boundary that benefits the public, staff and patients and integrates the project into the neighbourhood.	Discussion with Council will be undertaken to explore the inclusion of additional street trees. Existing trees along the Lytton Street boundary will be retained and protected for the proposal.
14. Communicate the quality of the open space, courtyard and terraces through design sections and 3Ds. For example, these could be hand-drawn. Show people within the drawings to demonstrate spatial qualities.	Updated renders have been provided to demonstrate the design of the undercroft landscaped space. People are included in the renders to demonstrate spatial qualities (refer to **Section 3.2**). Further details of the design of the open spaces are provided in the Landscape Strategy and Plans.
Architecture	
15. Provide updated perspectives that demonstrate the visually considered screening to the	As above.

Table 11 GANSW comments dated 8 December 2021	
Key issues	**Response**
undercroft car park. This suggestion was noted as "adopted" but is not shown within the 3Ds.	
16. Consider safety through environmental design and lighting to the existing facility, including the current entry and the new stage 2 extension.	CPTED principles have been incorporated in the design and are addressed in **Section 4.2.9** and the Architectural Design Statement at **Appendix 4**.
17. Consider including skylights for the upper-level communal spaces to introduce additional light.	Skylights have been incorporated in the architectural design and are illustrated in the Architectural Plans.
18. Dimension the 350mm articulation zone of the façade.	The 350mm articulation zone has been shown in the Architectural Plans.
Sustainability and Climate Change	
19. Include health and wellbeing targets within the ESD principles. For example, refer to the WELL Building Standard.	The proposed development has been designed to incorporate ESD principles. Further details are provided in **Section 6.6** and ESD Report at **Appendix 7**.
20. Consider an ESD rating standard, such as Green Star, to guide the sustainability ambitions and promote your business commitment to sustainability.	The proposal has been designed in accordance with the Green Star Design & As-Built v1.3 Rating System. Whole of Life considerations including running costs, long-term maintenance, quality, life-span, future improvement, value of money and sustainability, will be used to inform the design of the development.
The issues outlined above are to be addressed as part of the EIS submission. This project should return to the SDRP after the exhibition period and prior to lodging the RTS. Allow time for SDRP comments to be incorporated in the RTS submission when booking the next SDRP session.	Noted. Further consultation will be undertaken in line with the statutory timings set by DPIE. Comments received from SDRP during exhibition will be responded to at Response to Submission (RtS) stage.

5.1.2 Community Stakeholder Consultation

A Consultation Outcomes Report has been prepared by Australian Public Affairs to document community consultation undertaken for the proposed development. The information provided herein, demonstrates that genuine consultation has already taken place with stakeholders seeking feedback for the proposed development and its proposed future benefits and possible impacts.

The stakeholders engaged for the purposes of community consultation were the local community, including residential and commercial neighbours.

The following communication and engagement activities have been implemented to ensure stakeholders are made aware of the proposed development and have an opportunity to participate in the planning process:

- Information about the proposal and an invitation to the virtual community sessions was shared with the community through flyers that were letterbox dropped to 2,156 residential dwellings and 73 commercial premises surrounding the Site.
- In addition to the letterbox dropped flyer, letters were delivered to adjacent neighbours offering them a one-on-one briefing by phone or videoconference.
- Media coverage in The Daily Telegraph.
- Virtual community sessions, in line with health advice relating to COVID-19, were delivered to:

  - Provide information about the proposal, the planning process and feedback opportunities.
  - Provide opportunity for community and stakeholders to meet the project team, discuss the proposal, share feedback, and ask questions.
  - Invite follow-up feedback through feedback forms.

- A dedicated project email for the community and stakeholders to ask questions and provide feedback was available throughout the consultation phase.

- Opportunity to contact the project team via the Wentworthville Clinic phone number.

- Stakeholder meetings and briefings including telephone or videoconferencing discussions with individual and groups were offered.

- Stakeholder correspondence by email to individuals and groups, including provision of an information sheet.

- Updates to the community and stakeholders as the proposal progresses through the planning process, including reporting back to the community and stakeholders on issues raised and how the project team has responded.

Three local residents responded to the invitation to participate in the virtual community sessions, with two residents participating in online sessions and the third resident participating in a phone conference as per their preference.

Key issues that emerged from the feedback and the project response are described below.

Table 12 Engagement outcomes

Key issues	Project response
Mental health services ▪ There was support for the provision of new and upgraded mental health services at the Clinic. ▪ The high standard of current operations and contribution to the local community were cited as reasons for support of the extension. ▪ A question was asked about who the Clinic would service and how it would cater to culturally and linguistic diverse (CALD) people.	▪ The Clinic will support patients from the local area as well as surrounding parts of Sydney. ▪ All programs and services cater for CALD communities, including through the use of interpreters, capacity to meet dietary requirements, and doctors who come from CALD backgrounds so are well equipped to service diverse patients.
Operations ▪ Favourable comments were made about the current aesthetics of the Clinic, noting that it is well maintained, neat and tidy. ▪ Favourable comments were made about the catering offer at the Clinic. ▪ Favourable comments were made about the helpfulness of Clinic staff in resolving a situation where a patient had partially obstructed a private residential driveway a few years ago.	▪ Clinic staff will remain available to respond to feedback from surrounding residents about the Clinic's operations. ▪ As part of a commitment to being a good neighbour, open house events will be explored for the local community to give them an opportunity to step inside the Clinic to learn about its operations and services.
New jobs ▪ A question was raised about how new operational jobs would be filled. ▪ The proposal will create 23 new jobs once operational, and these would preferably be filled by local candidates.	▪ The proposal will create 23 new jobs once operational, and these would preferably be filled by local candidates. ▪ Jobs will be in housekeeping, maintenance, catering, cleaning, nursing and medical, and allied health psychologists and counsellors.

Table 12 Engagement outcomes	
Key issues	**Project response**
Building design ▪ Favourable comments were made about the proposal's design, being tasteful and well-integrated with the existing building.	▪ Noted.
Building siting ▪ A question was raised about the extension's proximity to Lytton Street, and whether the building could be pushed further towards the park.	▪ The extension is being built as far back on the Site as possible, sited right up to the rear minimum setback. The setback to Lytton Street will be 6 metres greater than the minimum requirement.
Building height ▪ Some concerns were raised about the building height impacting privacy and solar access.	▪ The existing Stage 1 building fronting Lytton Street will not increase in height. ▪ The extension to the south will be significantly screened from Lytton Street with existing and new trees and landscaping to maintain privacy for neighbours. ▪ Solar access diagrams show that during the winter solstice (the day with the least hours of daylight), the extension will have minimal impact on neighbouring properties and the adjacent park.
Lighting ▪ A question was raised about lighting on the site and how it would be managed to mitigate impact on neighbours.	▪ Internal and external lighting on the proposal will meet stringent standards to avoid any light spilling on to the street and any loss of amenity to neighbours
Traffic and parking ▪ Some questions were raised about the provision of parking at the site and traffic movements.	▪ Traffic studies show that the proposed extension will have a low impact on traffic flow around the Clinic and on-street parking. ▪ An extra 34 car parking spaces will be provided for patients, doctors and staff. ▪ People visit the Clinic at different times due to the variety of day and group programs and individual appointments. This means that access to the Clinic and parking needs are staggered, so even though services will increase, there will be a minimal impact on traffic and parking. ▪ In-patients are not allowed to bring their cars to the Clinic, which reduces impact on on-street parking. ▪ Deliveries to the Site will be minimal, relating to the provision of laundry and catering services.
Local traffic ▪ Some concerns were raised about occasional reckless drivers speeding through local streets and community advocacy to council for speed bumps.	▪ Traffic studies show that this proposal does not generate the need for any traffic calming devices due to its minimal impact. However, community feedback regarding this issue generally will be passed on to Cumberland Council for consideration.
Construction • Favourable comments were made about previous construction at the site, which gave	▪ Noted. ▪ Construction of the extension would be well managed, with details to be documented in a

Table 12 Engagement outcomes	
Key issues	**Project response**
confidence that this next stage would be similarly managed.	Construction Management Plan that would be prepared at a later stage in the process.
Environmental management ▪ Some concerns were raised about development in the neighbourhood impacting on local wildlife.	▪ A Biodiversity Development Assessment Report has been completed and has confirmed that the extension will not directly affect any threatened fauna species or breeding habitat for threatened fauna species. ▪ New semi-mature trees and landscaping will support local wildlife.
Community engagement ▪ Favourable comments were made about the project team's engagement with the community, with the virtual community session found informative.	▪ Noted.

The project team will remain available to engage with the community about the proposal as it progresses through the planning process, in line with both the SEARs and the project team's commitment to community engagement.

PART F ENVIRONMENTAL ASSESSMENT

6.1 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

The SEARs were issued by DPIE on 13 May 2021. The key issues included in the SEARs and addressed by this EIS are:

1. Statutory Context, Strategic Context and Policies
2. Built Form and Urban Design
3. Trees and Landscaping
4. Environmental Amenity
5. Transport and Accessibility
6. Ecologically Sustainable Development (ESD)
7. Heritage
8. Aboriginal Cultural Heritage
9. Social Impacts
10. Noise and Vibration
11. Biodiversity
12. Contributions
13. Staging
14. Utilities
15. Stormwater Drainage
16. Flooding
17. Soil and Water
18. Waste
19. Contamination
20. Hazards and Risk

The above 20 matters have all been specifically addressed in the various sections of this EIS, as detailed below.

Other aspects evaluated throughout this EIS (for added due diligence) include the following:

21. Building Codes of Australia

6.2 BUILT FORM AND URBAN DESIGN

Architectural Plans have been prepared by Team 2 Architects and are attached at **Appendix 3**.

6.2.1 BUILT FORM

The proposed extension to the Wentworthville Northside West Clinic is a state-of-the-art, non-acute mental health facility which responds architecturally to the existing Stage 1 building, and has been carefully considered to sit within its context having regard for the historic and cultural significance of the locality, as well as the specific site context and topography.

Mental health facilities are a highly specific health proposition and must be designed to straddle the operational and patient safety requirements, while simultaneously being inviting and imbuing a sense of comfort and domesticity. The proposed development has been designed in accordance with the highly prescriptive directions set out in the Australasian Health Facility Guidelines (AHFG's) which must be fulfilled to obtain a private licence. Ramsay Healthcare, the owner and operator of the facility, are the national leader in non-acute mental health, have an additional overlay of requirements to achieve best practice.

The modelling and materiality were explored and evaluated through a series of sketch studies to determine the most appropriate outcome given in respect of the internal planning and surrounding context. **Figure 36** below illustrates the design process of the modelling and materiality of the proposed facility.

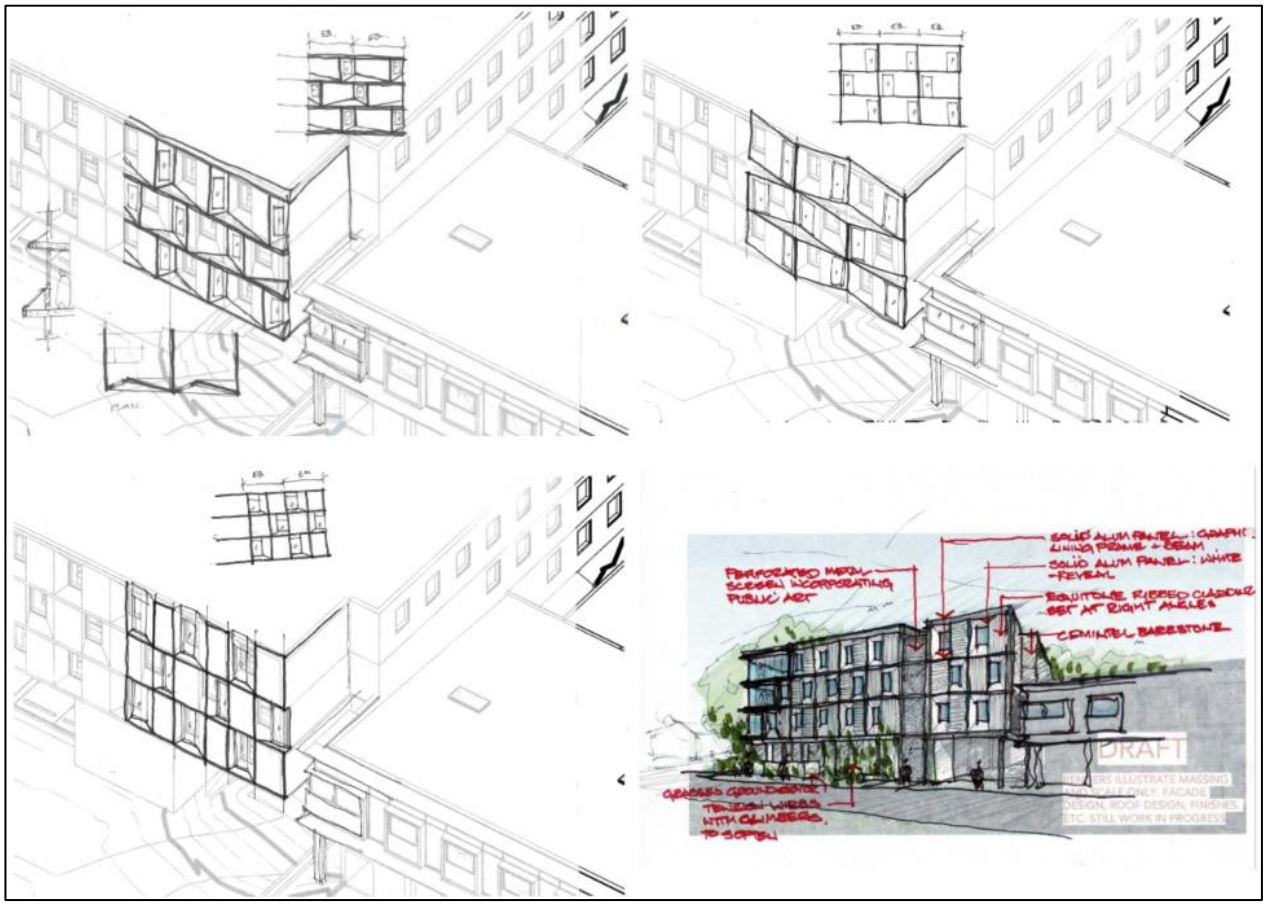

Figure 36 Facade design sketch studies (Team 2 Architects 2021)

In relation to the architectural approach, the façade treatment is a café composition of rhythmic reveals set out of phase between floors, and interspersed with textured panels between glazing bays. The elevations are ordered and anchored by an overriding horizontal grid which simultaneously provides an order the elevations, and references the existing Stage 1 extension.

The texture and modelling will make the appearance of the elevations change throughout the day as the sun moves around the building which will create a highly dynamic façade.

The design of the building has been arranged such that building steps down at the south west corner of the building are stepped down visually or physically, harmonise with the scale of the surrounding residential building stock and public domain.

6.2.2 URBAN DESIGN

The central theme to the planning is patient and staff safety, and this is addressed with the centralised entry to the facility. The plan of the new wards contains a corridor loop which allows for access if a patient becomes distressed; and access points to the facility are minimised.

Biophilia is fundamental to the design and consideration has been given to maximise opportunities for providing live planting, both internally and externally which has been proven to have a positive effect on patient experience and recovery times. proposals will include; herb gardens, green walls, external planting and climbers to soften interface with the ground, and meandering landscape routes.

Ramsay Healthcare and the design team acknowledge and pay respects to the Dharug People, and the notion of belonging to land is extremely important to the development of the design. The architectural and landscape design has been carefully considered to incorporate a number of significant pieces of public art, both at a tactile level in the landscaped paths and planting, and in the building where each of the three staircases offer the possibility of a major installation by local artists on a canvas nearly 3m wide by between 15 and 20m high. It is noted that the public art opportunities will not exceed the height of the proposed health services facility. An art strategy will be considered as part of the design process and will be developed in consultation with local Aboriginal artists. The opportunities for public and indigenous art are depicted in **Figure 37** below.

Figure 37 Opportunities for public and indigenous art (Team 2 Architects 2021)

Further, the comments raised by Government Architect NSW during the SDRP process have been addressed as part of the design and are discussed in **Section 5.1** of the EIS.

6.2.3 VISUAL IMPACTS

A Visual Impact Assessment (VIA) has been prepared by Hatch RobertsDay to investigate on the possible visual impacts that the proposed development may have on the surrounding and adjacent publicly accessible areas and provides detailed assessment of the sensitivity and magnitude of the changes from different vantage points in comparison to the existing.

Specifically, the key vantage points analysed include:

- 42 Haig Street, Wentworthville
- 16 Lytton Street, Wentworthville
- Finlaysons Creek pathway view from north to south
- Finlaysons Creek pathway view from west to east
- Finlaysons Creek pathway view from south to north

- 37 Lytton Street, Wentworthville

The location of the key vantage points is illustrated in **Figure 38** below.

Figure 38 Location of key vantage points (Hatch RobertsDay 2021)

Overall, the visual assessed from multiple viewpoints surrounding the Site result in impacts considered to be in the none to moderate/low ranges. This is mostly due to the proposal's integration with the existing building and retaining the existing vegetation.

There are limited public open views towards the Site that are not already screened by landscape detectors. Where visible, the proposal is consistent with the surrounding character and the proposed architectural design helps integrate the proposal into its setting and make it visually attractive.

A summary of the visual impact to the key viewpoints is illustrated in **Figures 39** to **44** and **Table 13**.

Figure 39 Viewpoint 1 - 48 Haig Street, Wentworthville (Hatch RobertsDay 2021)

Figure 40 Viewpoint 2 - 16 Lytton Street, Wentworthville (Hatch RobertsDay 2021)

Figure 41 Viewpoint 3 - Finlaysons Creek Pathway View (From North to South) (Hatch RobertsDay 2021)

Figure 42 Viewpoint 4 - Finlaysons Creek Pathway View (From West to East) (Hatch RobertsDay 2021)

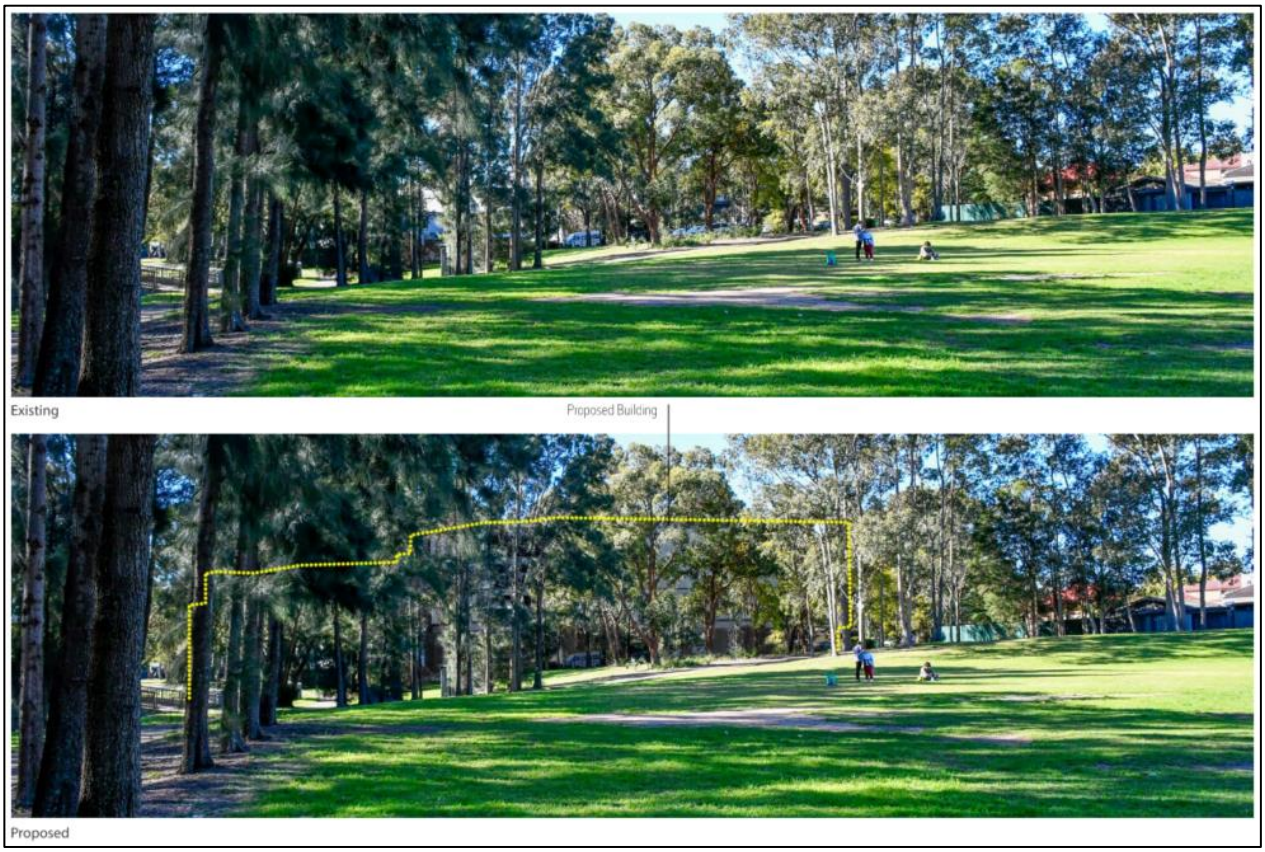

Figure 43 Viewpoint 5 - Finlaysons Creek Pathway View (From South to North) (Hatch RobertsDay 2021)

Figure 44 Viewpoint 6 - 37 Lytton Street, Wentworthville (Hatch RobertsDay 2021)

Table 13 Summary of Visual Impact to Key Viewpoints			
Viewpoints	**Visual Sensitivity**	**Magnitude of Visual Change**	**Impact Level**
Viewpoint 1 – 42 Haig Street, Wentworthville	Moderate	Moderate	Moderate/Low
Viewpoint 2 – 16 Lytton Street, Wentwortville	Low	Low	Low/Negligible
Viewpoint 3 – Finlaysons Creek pathway view from north to south	High	Very Low	Low
Viewpoint 4 – Finlaysons Creek pathway view from west to east	High	Very Low	Low
Viewpoint 5 – Finlaysons Creek pathway view from south to north	High	Negligible	None
Viewpoint 6 – 37 Lytton Street, Wentworthville	Moderate	Moderate	Moderate/Low

The findings of the VIA reveal that the proposal incorporates a number of key measures designed to mitigate the potential visual impacts:

- Retaining high quality landscaping and existing mature trees to reduce the visual impact in close proximity
- Retaining native planting to reinforce the exisiting landscape character of the precinct
- Scale and bulk consistent with the existing building
- Facade treatment and articulation to reduce the height impact
- Material and colour selection that blend with the surrounding environment and reduce the visual impact

Given the assessment above and the visual analysis contained within the VIA, the proposed development is considered acceptable in terms of visual impact. Further details of the VIA are provided at **Appendix 5**.

6.3 TREES AND LANDSCAPING

6.3.1 Tree removal and retention

An Arboricultural Development Impact Assessment Report (**Appendix 16**) has been prepared by Birds Tree Consultancy to outline the health, condition and stability of the trees on Site and their viability for retention within the context of the proposed development.

Tree 36 is in poor and declining condition with a short useful life expectancy. Tree 41 has a bark inclusion within the primary junction which places this tree at increased risk of failure at this point. In consideration of the future development and the increased number of targets and therefore increased hazard posed, it is recommended that a Level 2 (TRAQ) Risk Assessment be carried out on this tree to determine the level of risk and viability of the tree for retention.

The Tree Protection Zones (TPZ) of Trees 3, 4, 5, 6, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 42, 43, 50 and 51 are encroached by the proposed construction and required earthworks by a total or major encroachment as defined by AS4970-2009 Protection of Trees on Development Sites. These trees will not be viable to be retained and will be required to be removed due to the proposed development.

The TPZ of Tree 47 is encroached by the proposed construction and required earthworks by major encroachment as defined by AS4970-2009. These trees will not be viable to be retained based on this encroachment, however this tree is located on the adjacent property and is required to be protected. Further

investigation by means of root mapping is required to determine the extent of root development within the area of the existing carpark at the line of the proposed building.

The proposed building line will impact on the canopies of 41, 47, 48 and 49 and will require canopy reduction pruning of these trees. Trees 41, 48 and 49 will require less than 10% of the canopy to be reduced. Tree 41 will require canopy reduction of approximately 20% of the canopy. All canopy reduction is to be caried out in accordance with AS4373-2007 Pruning of Amenity Trees by qualified arborists with minimum AQF Level 3 qualifications under the Supervision and direction of the Site Arborist. Prior to pruning works and site-specific Pruning Specification is to be prepared.

All other trees are viable to be retained and are to be protected.

The trees identified for removal and retention are illustrated in **Figure 45** below.

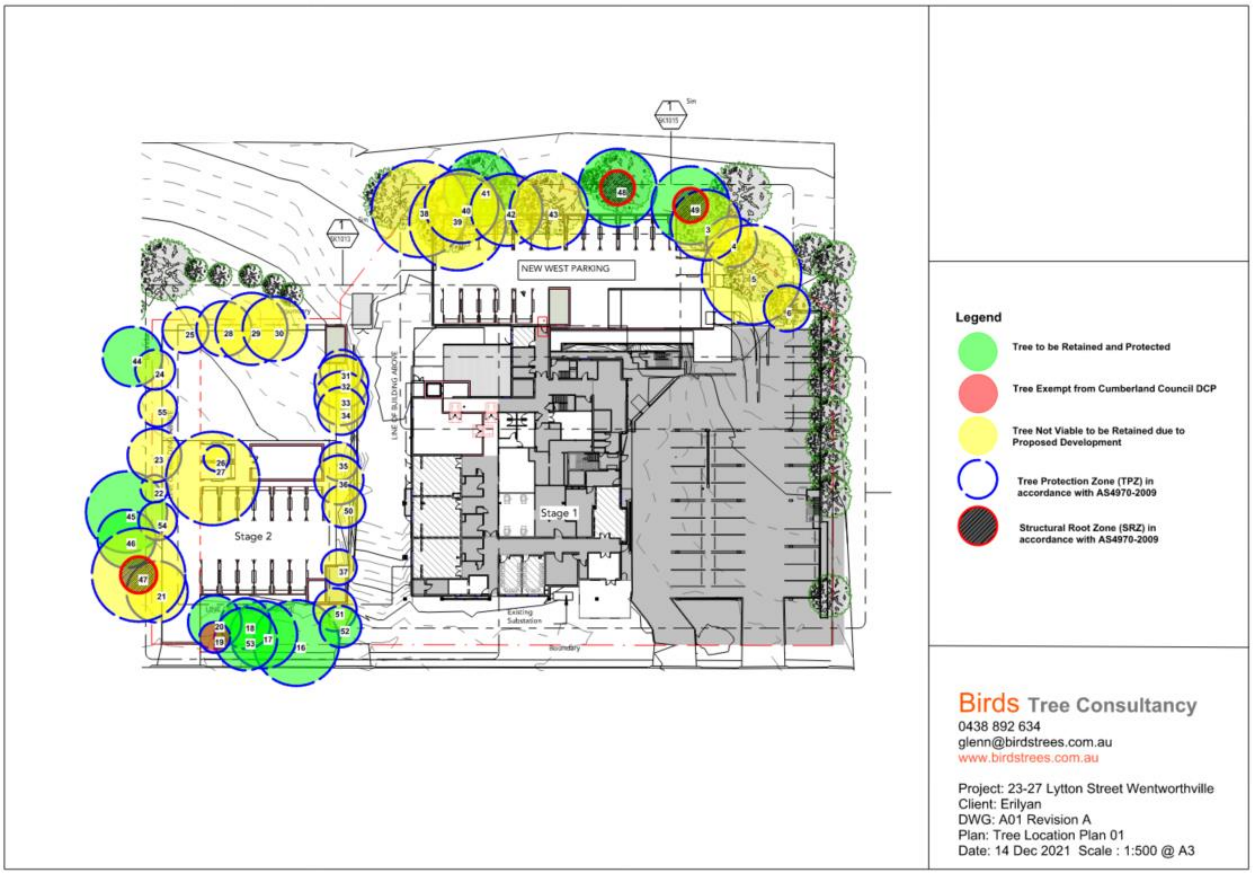

Figure 45 Tree Location Plan (Birds Tree Consultancy 2021)

6.3.2 Landscape design

A set of Landscape Plans has been prepared by Arcadia to illustrate the proposed landscape design. A carefully selected landscape setting comprising a mix of native and endemic plant species, shrubs, trees and groundcover will be incorporated, which will help to improve the aesthetic for patients and employees, as well as create a landscaped open space to outdoor recreation. The overall landscape design for the Site is illustrated in **Figure 46**.

Figure 46 Overall Landscape Design (Arcadia 2021)

In particular, a landscaped open space is proposed to be provided in the south western portion of the Site to create an outdoor recreation space for patients and employees. The open space will be provided with a basketball court, timber seating and feature planting, which will enhance the amenity of the ground floor plane and encourage social interaction by providing a gathering point within the Site. The proposed design of the landscaped open space is illustrated in **Figure 47** below.

Figure 47 Landscaped Open Space Design (Arcadia 2021)

In addition, an internal courtyard will be provided within the proposed Stage 2 building to provide a hanging garden with seating area and planting. The internal courtyard will provide additional outdoor recreation area for patients and staff and enhance the amenity of the health services facility. The proposed design of the proposed central courtyard is illustrated in **Figures 48** and **49** below.

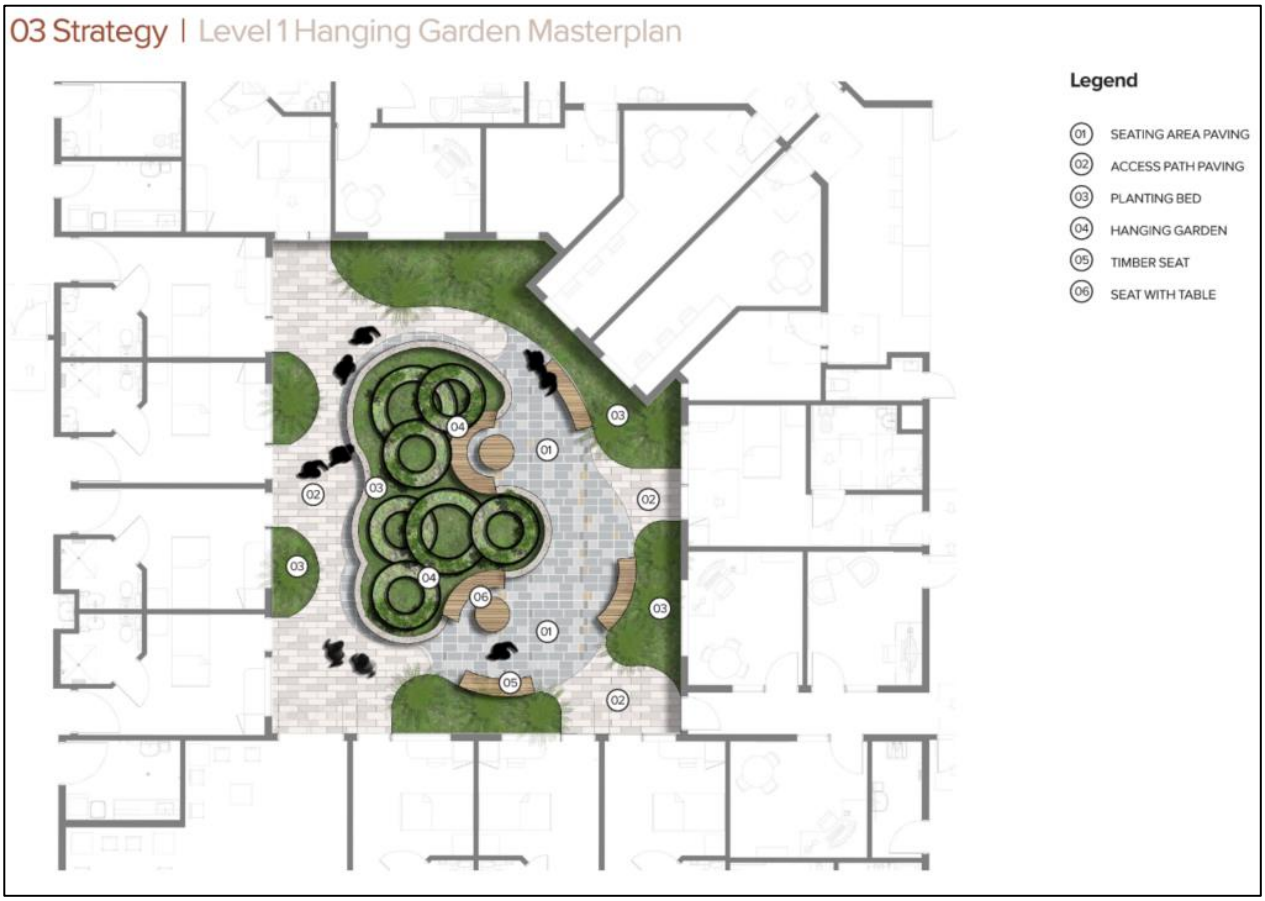

Figure 48 Internal courtyard masterplan (Arcadia 2021)

Figure 49 Internal courtyard section (Arcadia 2021)

As discussed in **Section 6.3.1**, a number of existing trees will be retained and protected on Site. A number of features, planting, turf and planting beds are also proposed to be incorporated to the ground plane to enhance the visual interest of the Site. Specifically, the proposed development will provide a total landscape area of 1,211m^2 and provide seven new trees on the Site, resulting in a total tree canopy cover of 1,323m^2.

The proposed landscape strategy aims to provide shade and cooling urban area through the planting design to mitigate the urban heat island effect. The strategy will provide a minimum of 40% canopy including retained existing significant tree canopy across the ground level landscape area to mitigate the urban heat island effect based on NSW Western Sydney Five Million Trees (5MT) program. Approximately 70% of green space including the tree canopy will also be provided to facilitate urban cooling.

A Planting Schedule and Landscape Details are provided within the Landscape Plans at **Appendix 6**.

6.4 ENVIRONMENTAL AMENITY

The proposed development has been designed to minimise and mitigate the potential impacts on amenity of the surrounding environment.

Overall, the proposed development seeks to minimise adverse impacts on the surrounding locality.

6.4.1 VISUAL PRIVACY

The overall intention of the proposed development is to sensitively respond to visual impacts by addressing the compatibility and harmony of the built form within the context of its existing surroundings.

The Site adjoins residential properties to the north and east across Lytton Street, which have been taken to be sensitive receivers.

The proposal has been designed to be conducive to the neighbouring properties by retaining the existing setbacks from the adjoining residential dwellings to the north and east. Specifically, the eastern elevation has a separation distance of approximately 28m from the dwelling directly to the east, which is deemed adequate to mitigate the potential visual impacts. Further, the height of the building is largely within the 15m height plane when viewed from Lytton Street by strategically locating the maximum height exceedance in the rear portion of the building facing Lytton Street Park, for which it is visually screened by the built form in the front portion of the building. The proposed building height is therefore compatible with the streetscape character of the Lytton Street and is not anticipated to disrupt the view corridor to and from the surrounding residential properties. Additionally, the proposal has also been designed to prevent direct overlooking into the neighbouring properties through articulation of the building elevations and the incorporation of high quality landscaping.

While the proposal seeks a reduced setback to the west and south adjoining Lytton Street Park, it would not result in unacceptable impacts on the amenity of the Park and is not anticipated to disrupt any view corridors or key vistas of the Park.

Therefore, it is considered that the proposed development would not create any significant visual privacy concerns.

6.4.2 SOLAR ACCESS AND OVERSHADOWING

Shadow Diagrams have been prepared by Team 2 Architects and are provided within the Architectural Plans at **Appendix 3**. **Figures 50** and **51** demonstrate the proposed overshadowing from the proposed development during summer solstice and winter solstice.

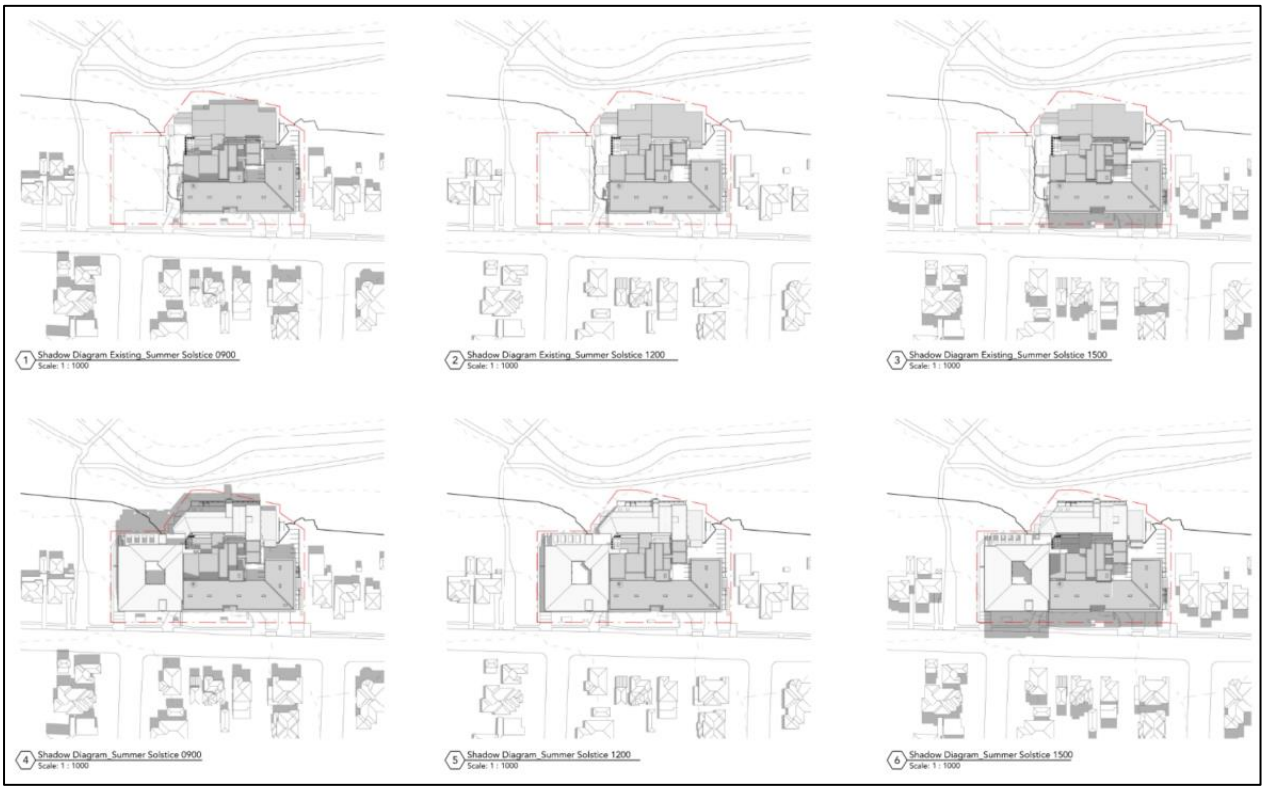

Figure 50 Shadows Diagram during summer solstice (Team 2 Architects 2021)

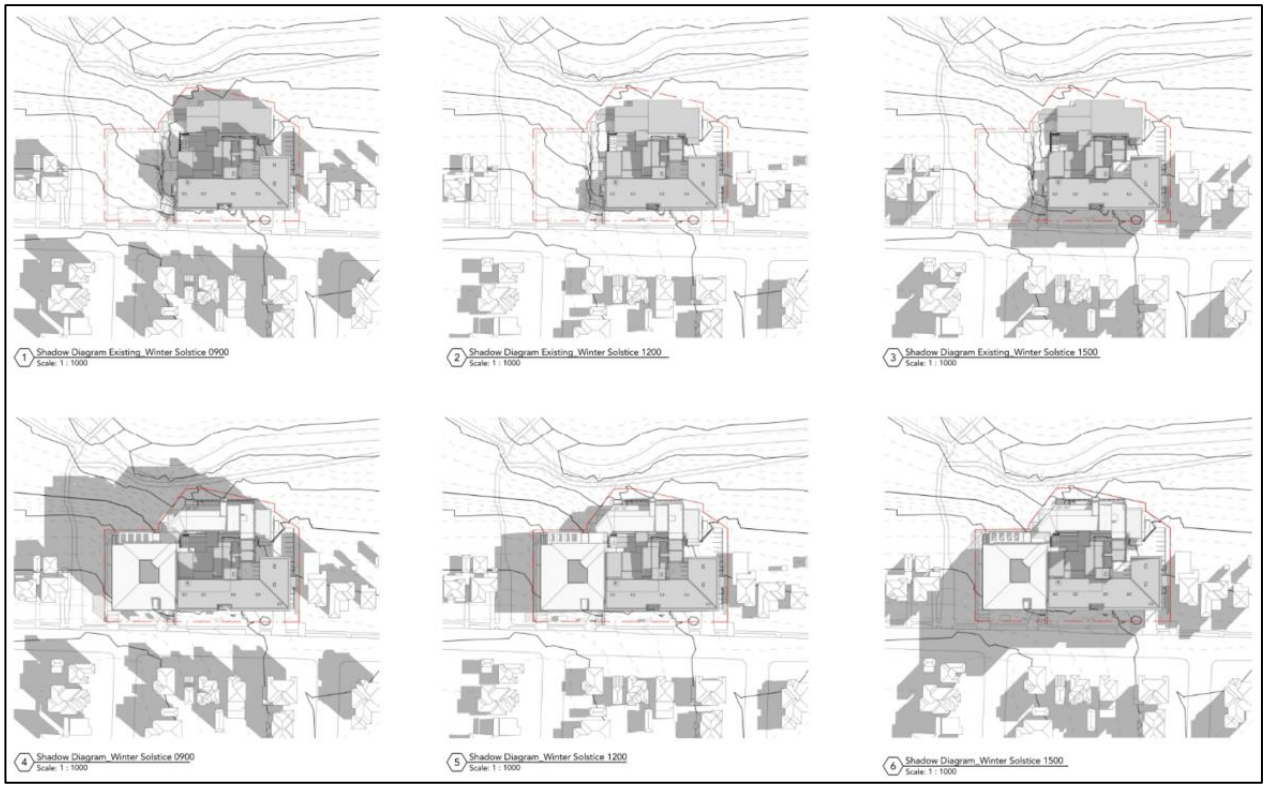

Figure 51 Shadows Diagram during winter solstice (Team 2 Architects 2021)

As demonstrated in **Figures 50** and **51**, the proposed development has been designed to retain solar access for the surrounding residential properties. It is noted that the residential property located directly south and south east of the Site (31 Lytton Street and 48 Haig Street) will continue to receive a minimum of three hours of solar access during winter solstice and unobstructed solar access throughout the day during summer solstice. Additionally, Lytton Street Park will also receive a minimum of three hours of solar access during winter solstice. As such, the proposed development is not anticipated to result in any adverse overshadowing or visual amenity impacts to the surrounding residential properties.

6.4.3 VIEWS AND VISTAS IN THE LOCALITY

As demonstrated in the VIA prepared by Hatch RobertsDay at **Appendix 5** and as summarised in **Section 6.2.3** of this EIS, the proposed development would not compromise any views and vistas in the locality.

6.4.4 ACOUSTIC IMPACTS

A Noise and Vibration Impact Assessment has been prepared by JHA Services and is attached at **Appendix 8**. This assessment has been summarised at **Section 6.10** of this EIS including operational noise impacts.

6.4.5 LIGHTING IMPACTS

A lighting strategy has been prepared and is contained within the Building Services Interface Report prepared by DSA Consulting and provided at **Appendix 21**.

An external lighting system will be required for the proposed new extensions to Northside West as proposed below.

The design and installation of a system of lighting to operate from dusk to dawn via a photo-electric switch within areas where the public have general access will be implemented (external carparking, public vehicle/pedestrian drop-off areas and pathways). Internal carparks will be controlled via movement sensor systems, and/or via the Building Management System.

Any lighting to the facade and accent lighting to highlight the external features of the building, will be incorporated into the design where requested by the design architect. This lighting will be timer controlled via a Building Management System, and linked to a photo-electric switch.

The obtrusive effects of lighting will be controlled in accordance with the requirements of AS4282. This standard outlines the requirements to limit/remove light spill to neighbouring properties from external lighting sources.

Lighting to the external areas of the development will be designed to the minimum following requirements:

- *AS/NZS1158.3.1 – Pedestrian Area (Minimum Category P11c External Carpark / Driveway Lighting)*
- *AS/NZS1158.3.1 – Pedestrian Area (Category P4 for General External Lighting)*
- *AS/NZS1680 Series – Interior and Workplace Lighting (AS/NZS 1680.2.1 – for Indoor Carparks)*

Lighting will be designed to minimise light spill to the night sky.

Therefore, it is considered that the lighting impacts from the proposed development will be adequately mitigated through the implementation of the above lighting strategy and should be considered acceptable in this regard.

6.5 TRANSPORT AND ACCESSIBILITY (CONSTRUCTION AND OPERATION)

A Transport Impact Assessment has been prepared by Traffix and is attached at **Appendix 9**. The Traffic Impact Assessment has evaluated the parking requirements, traffic and transport impacts, sustainable travel plans, access and internal design aspects and construction traffic management plan. The relevant sections have been summarised below.

6.5.1 Existing traffic conditions

The road hierarchy in the vicinity of the Site is shown in **Figure 52** below, with the following roads of particular interest:

- Great Western Highway;
- Cumberland Highway;
- Bridge Road;
- Veron Street;
- Lytton Street;
- Fullagar Road;
- Jordan Street; and
- Haig Street.

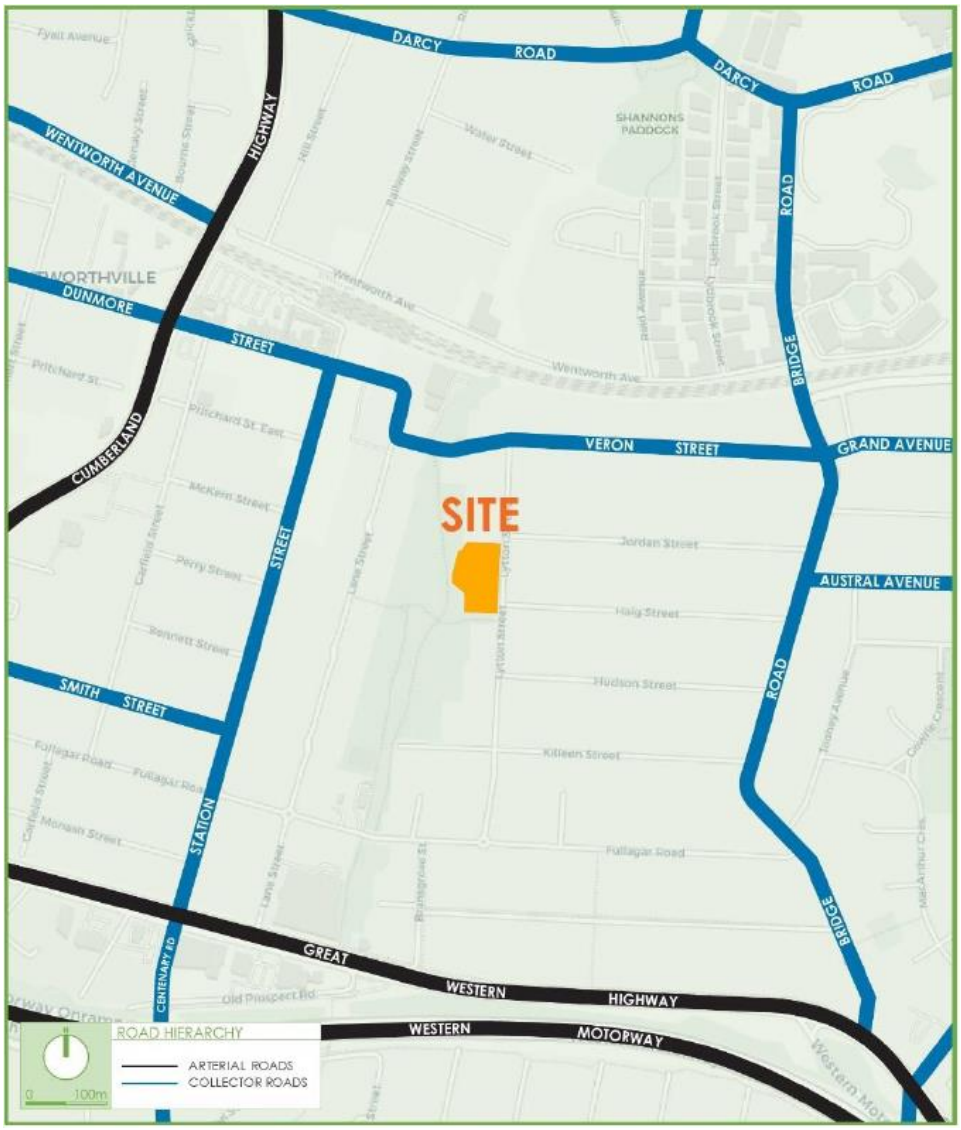

Figure 52 Road Hierarchy (TRAFFIX 2021)

6.5.2 Public transport and its adequacy

The Site is serviced by existing bus services and rail services which provide connections to Parramatta, Blacktown, Constitution Hill, Westmead Hospital, Merrylands and the wider region. The existing public transport infrastructure is illustrated in **Figure 53** below.

Whilst the 2016 Census Data suggests that an additional three staff will utilise bus services and an additional 11 staff will utilise rail services, the implementation of a Workplace Travel Plan will likely increase this number. Overall, no concerns are raised over the additional bus or train trips, with existing services expected to easily accommodate the additional demand.

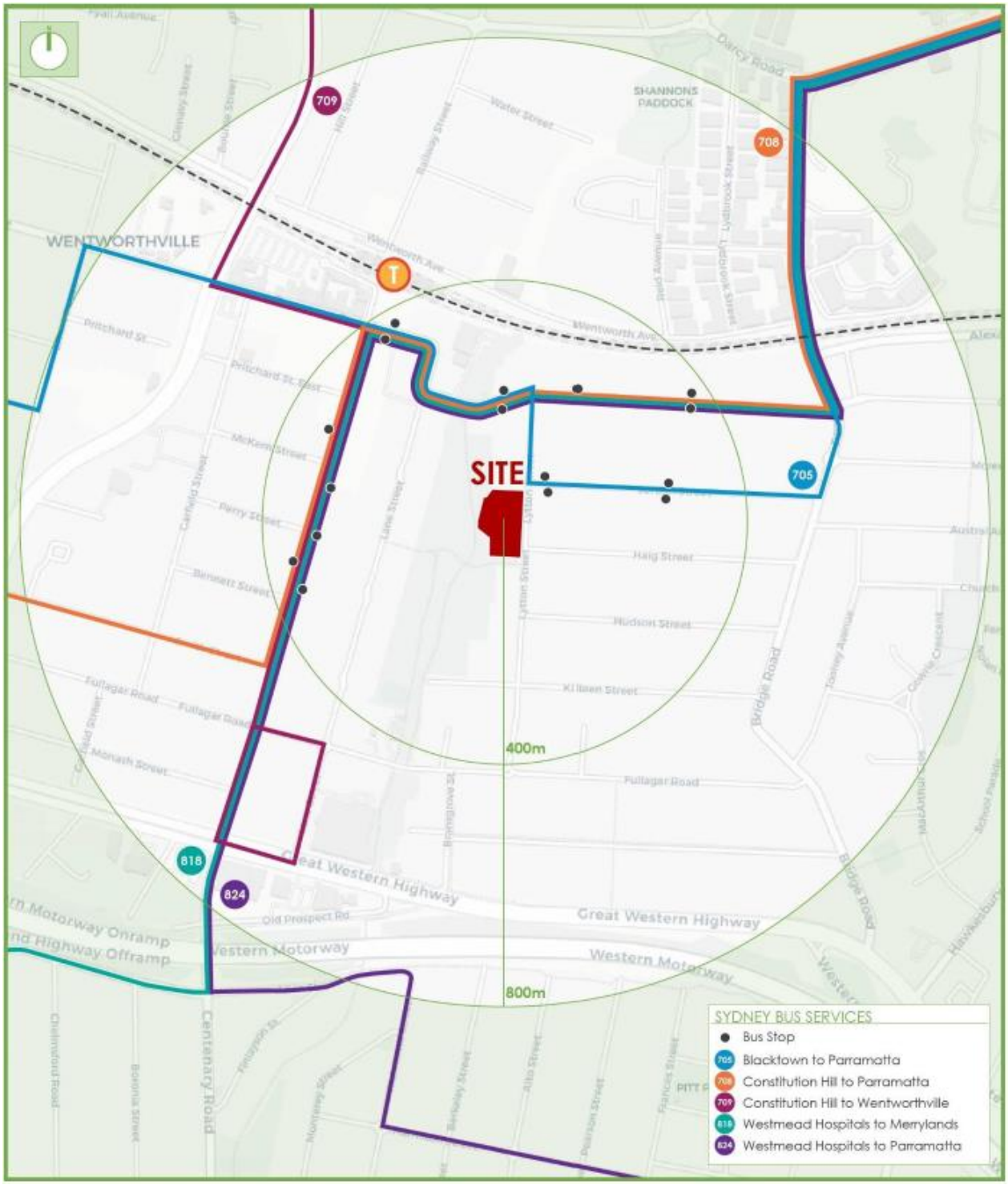

Figure 53 Existing public transport (TRAFFIX 2021)

6.5.3 Existing pedestrian and cycling facilities

The Site is presently accessible by pedestrian and cycling facilities. The main pedestrian facilities within the locality include paved footpaths along the western side of Lytton Street, both sides of Veron Street and both

sides of Fullagar Road. Key intersections north and south of the Site provide pedestrian refuge islands on each leg and traffic calming thresholds are provided at each intersection road with Lytton Street.

Bicycle facilities are also provided in the surrounding area, with several on-road and off-road bicycle routes available in the locality. These cycleways can be used in conjunction with one another in order to provide connections to the wider bicycle network throughout the Wentworthville region. Shared paths are provided adjacent to Finlaysons Creek that provide connections between Veron Street in the north, Lytton Street in the east, Lane Street in the west and the wider shared path network south of the Western Highway.

6.5.4 Parking

Part G3 of CDCP2013 does not provide car parking rates for rehabilitation centres or private hospitals. The DCP states that "*where a parking rate has not been specified in the table, the Guide to Traffic Generating Developments shall be used to calculate the parking requirements for the proposed development. Alternatively, a parking study may be used to determine the parking, subject to prior approval by Council.*"

Application of the TfNSW Guide to Traffic Generating Developments results in a parking requirement of 102 carparking spaces. It is noted that the TfNSW parking rate is considered a generic state-wide rate that does not consider local conditions or the implementation of any sustainable travel initiatives, such as a green travel plan. As such, reference is made to the former Holroyd Development Control Plan DCP 2013 (HDCP2013), which historically provided parking rates for hospitals (rehabilitation centre) within the Wentworthville area.

The carparking provision and requirements under the former HDCP2013 are summarised in **Table 14** below.

Table 14 DCP Minimum Car Parking Rate and Provisions

Type	Number	DCP Minimum Car parking Rate	Minimum Requirements	Permissible Provided
Beds	125	1 space per 3 beds	42	77
Employee	58	1 space per 2 employees	29	
Resident matron	0	1 space per resident matron	0	
		Total	**71**	**77**

As demonstrated in **Table 14**, the proposed development is required to provide a minimum of 71 carparking spaces, including 42 spaces for patients/visitors and 29 spaces for staff. In response, the proposed development provides a total of 77 parking spaces in accordance with HDCP2013.

Additionally, a total of four accessible spaces will be provided for the development.

In relation to bicycle parking, in the absence of a bicycle parking rate under CDCP2021, the bicycle provision has been assessed in accordance with the Cycling Aspects of Austroads Guides (2017) at the rates outline below:

- 1 space per 15 hospital beds (staff); and
- 1 space per 30 hospital beds (visitor).

Based on a total of 125 inpatient rooms, the proposed development will require a total of 12 bicycle spaces, comprising eight staff spaces and four visitor spaces. The location of the proposed bicycle spaces across Lower Ground Level and Ground Level is illustrated in the Architectural Plans (**Appendix 3**).

6.5.5 Loading and servicing

The existing development currently provides a servicing area on the Lower Ground Floor which is accessed via the internal roadway off Lytton Street (driveway immediately north of Haig Street). The application does not propose to amend the existing servicing arrangements which have been operating sufficiently for the existing development and shall continue to be sufficient for the proposed extension.

The emergency vehicle access arrangements will remain unchanged and are considered to be sufficient for the existing and proposed development.

Ambulance and public typically enter via the Lytton Street driveway entrance which leads to the reception/waiting area (driveway opposite No. 20 Lytton Street).

Swept path analysis of a 6.4m long SRV (comparable to size of NSW ambulance) entering and exiting the Site is presented in Appendix D within the updated Traffic and Accessibility Impact Assessment (TAIA) at **Appendix 9**, demonstrating satisfactory movements.

6.5.6 Traffic generation

The existing facility with 70 beds generates a maximum of 14 vehicles per hour during the critical morning peak hour of 8am to 9am and 35 vehicles per hour during the afternoon peak hour of 3pm to 4pm. This equates to the following trip rates:

- 0.2 vehicle trips/bed/hour during the morning peak period; and
- 0.5 vehicle/trips/bed/hour during the afternoon peak period.

Application of the above rates to the net increase of 55 beds (125 minus 70) results in the following:

- +11 vehicle trips between 8am and 9am; and
- +28 vehicle trips between 3pm and 4pm.

The above traffic volumes were distributed onto the surrounding network. It should be noted that the afternoon site peak period (3pm-4pm) does not coincide with evening network peak period (5pm-6pm), and therefore the following evening assessment is considered a highly conservative assessment and worse-case scenario.

It is noted that ambulance arrivals currently occur 1-2 times per month on average. Noting the low arrival frequency currently experienced, it is not expected that arrivals would significantly increase as a result of the proposed development.

The operator has confirmed that the number of service vehicles accessing the development will not increase as a result of the proposed development. As such, continual use of the existing and approved loading area is proposed.

6.5.7 Intersection performance

6.5.7.1 Trip distribution

In order to estimate the traffic distribution to and from the subject development, available and convenient traffic routes to and from nearby collector roads were assessed. In this regard, traffic has been distributed at the following percentage splits:

- 25% of vehicles arrive to the site from the western leg of the Lytton Street and Veron Street intersection, equating to:
  - +3 vehicles per hour during the morning peak period; and
  - +7 vehicles per hour during the afternoon peak period.
- 25% of vehicles arrive to the site from the eastern leg of the Lytton Street and Veron Street intersection, equating to:
  - +3 vehicles per hour during the morning peak period; and

- +7 vehicles per hour during the afternoon peak period.
- 25% of vehicles arrive to the site from the western leg of the Lytton Street and Fullagar Road intersection, equating to:
  - +3 vehicles per hour during the morning peak period; and
  - +7 vehicles per hour during the afternoon peak period.
- 25% of vehicles arrive to the site from the eastern leg of the Lytton Street and Fullagar Road intersection, equating to:
  - +3 vehicles per hour during the morning peak period; and
  - +7 vehicles per hour during the afternoon peak period.

6.5.7.2 Scenarios

In order to assess the potential traffic impacts of a proposed development, the following scenarios were identified:

- 2021 Scenario
  - 2021 Base case
  - 2021 Base case + development
- 2031 Future Scenario
  - 2031 Future base case
  - 2013 Future base case + development

It is noted that the 2031 future scenario incorporated a 2% annual growth of traffic to the existing surveys, resulting in significant input flow (cumulative 22% increase) onto the surrounding road network. This is considered a conservative assumption, noting the land zoning located in the vicinity of the Site.

A SIDRA intersection analysis was undertaken to measure performance of the surrounding intersections in the 2021 and 2031 scenarios.

The intersection performance in the 2021 scenario is summarised in **Figure 54** below.

Intersection	Control Type	Scenario	Period	Degree of Saturation (DoS)	Intersection Delay	Level of Service
Lytton Street and Veron Street	Roundabout	2021 Base	AM	0.367	10.9	A
			PM	0.339	11.3	A
		2021 Base + Development	AM	0.370	10.9	A
			PM	0.349	11.3	A
Lytton Street and Fullagar Road	Roundabout	2021 Base	AM	0.296	9.8	A
			PM	0.216	8.9	A
		2021 Base + Development	AM	0.301	9.8	A
			PM	0.222	8.9	A

Figure 54 Intersection performance for 2021 scenario (TRAFFIX 2021)

Intersection	Control Type	Scenario	Period	Degree of Saturation (DoS)	Intersection Delay	Level of Service
Lytton Street and Veron Street	Roundabout	2031 Base	AM	0.460	11.7	A
			PM	0.421	12.2	A
		2031 Base + Development	AM	0.463	11.7	A
			PM	0.435	12.2	A
Lytton Street and Fullagar Road	Roundabout	2031 Base	AM	0.363	10.3	A
			PM	0.271	9.1	A
		2031 Base + Development	AM	0.370	10.3	A
			PM	0.278	9.1	A

Figure 55 Intersection Performance for 2031 Scenario (TRAFFIX 2021)

As demonstrated in **Figure 54**, the Lytton Street and Veron Street intersection experiences no reduction in Level of Service (LoS) or intersection delay as a result of the proposed development in both peak periods. This is largely due to the minor increase in traffic during both peak hour periods, noting the evening is a worse-case scenario. The Lytton Street and Fullagar Road intersection also experiences no reduction in LoS or intersection delay during both peak periods. This is considered acceptable from a traffic planning perspective, with both intersections operating with acceptable delays and spare capacity. Therefore, no external improvements are required to support the proposed development.

The '2031 Base Case' scenario reflects traffic conditions arising from 10 years of 'background' traffic growth at a rate of 2% per annum, which is a cumulative increase of 22% on all movements at all intersections. It is noted that the '2031 Base Case' scenario will arise even if the proposed development is not considered and does not occur. It was modelled to provide an indication of the traffic flows within proximity of the Site in 10 years' time, which is a scenario that Council and TfNSW will be required to address in any event (without the development), in terms of road network performance and required associated infrastructure.

Further, as demonstrated in **Figure 55**, both intersections would continue to experience a LoS of 'A', with the proposed development resulting in no reduction to the LoS, noting minor increases in the degree of saturation. Accordingly, both intersections in the 2031 scenario will continue to operate good with acceptable delays and no external improvements required to support the proposed development.

Based on the above, it is considered that the proposed development generates minor impacts on the road network and proportionally would contribute negligibly to external network improvements.

6.5.8 Trip generation

The anticipated person trip generation for the proposed development have been assessed under the RTA Land Use Traffic Generation Data and Analysis 28 – Private Hospitals (1994). The following formula has been utilised to estimate the number of person trips associated with the proposal:

> *Peak Person Trips = -13.34 + (0.72 x No. of Beds) + (0.7 x Average number of staff per weekday day shift)*

Application of the above rate to the existing and proposed development, results in the following anticipated peak person trips:

- Existing Person Trips: 58 person trips during peak periods
- Proposed Person Trips: 117 person trips during the peak periods
- Net Person Trips: +59 person trips during the peak periods

6.5.9 Travel modal splits

All staff and visitors will be encouraged to utilise alternative and sustainable modes of transport to/from the Site as appropriate. Staff travel mode splits have been summarised in **Table 15** below.

Table 15 Non-Car Person Trips during the Peak Period		
Travel Mode	**Percentage**	**No. of Persons**
Train	9.1%	11
Bus	2.4%	3
Bicycle	0.1%	0
Walked Only	4.2%	5
Total	**15.8%**	**19**

As demonstrated in **Table 15**, approximately 15.8% of trips within Wentworthville are completed using alternative means of travel, of which, a large percentage (73.7% of alternative trips) utilise public transport options.

A Workplace Travel Plan will be implemented for staff of the development to encourage the use of bicycle trips to and from the proposed, with on-site bicycle parking and end of trip facilities proposed to be provided. It is anticipated that the above person trip generations can be used for infrastructure planning with regards to alternative modes of transportation during the development peak periods, such as extended bus services during staff shift changes and improved bicycle facilities in the locality.

6.5.10 Green travel plans

A comprehensive Green Travel Plan (GTP) can be developed for patients and staff of the development. The GTP is intended to encourage the use of public transport and alternative modes of transportation, with the primary objectives outlined as follows:

- Promote the use of sustainable transport methods, thus reducing congestion and pollution in the local area;
- Promote the private hospital as an innovative and environmentally aware organisation; and
- Provide an active environment by encouraging healthier travel for patients and staff, such as walking and cycling.

Notwithstanding, it is acknowledged that the development proposes adequate on site car parking facilities. Hence, the travel targets are to be uniquely tailored to encourage alternative modes of transport and car-pool schemes.

The GTP is to be reviewed and monitored by a Travel Plan Coordinator to ensure the GTP is operating effectively, and identify which areas require more attention in order to achieve the proposed long-term targets of the GTP.

6.5.11 Access and internal design aspects

The development proposes a total of 92 car parking spaces access from Lytton Street as a local road. It will therefore require a Category 2 driveway in accordance with AS2890.1 (2004), being a combined entry and exit driveway with a width of 6 to 9m. in response, the development proposes to retain the existing arrangement which comprises the following:

- 13 spaces accessed via the 6m wide two-way driveway to southern car park;
- 64 spaces accessed via the 6m wide entry driveway to the northern carpark; and
- 64 spaces departing the Site via the 6m wide exit driveway to the northern carpark.

These arrangements are considered superior to the minimum requirements of AS2890.1 (2004) and will continue to operate satisfactorily.

As discussed in **Section 6.5.5**, the existing development currently provides a servicing area on the Lower Ground Floor which is accessed via the internal roadway off Lytton Street. The application does not propose to amend the existing servicing arrangements which have been operating sufficiently for the existing development and shall continue to be sufficient for the proposed extension.

Overall, the internal configuration of the carpark has been designed in accordance with AS2890.1 (2004) and AS2890.6 (2009).

In addition, the proposed design of the southern driveway is illustrated as follows:

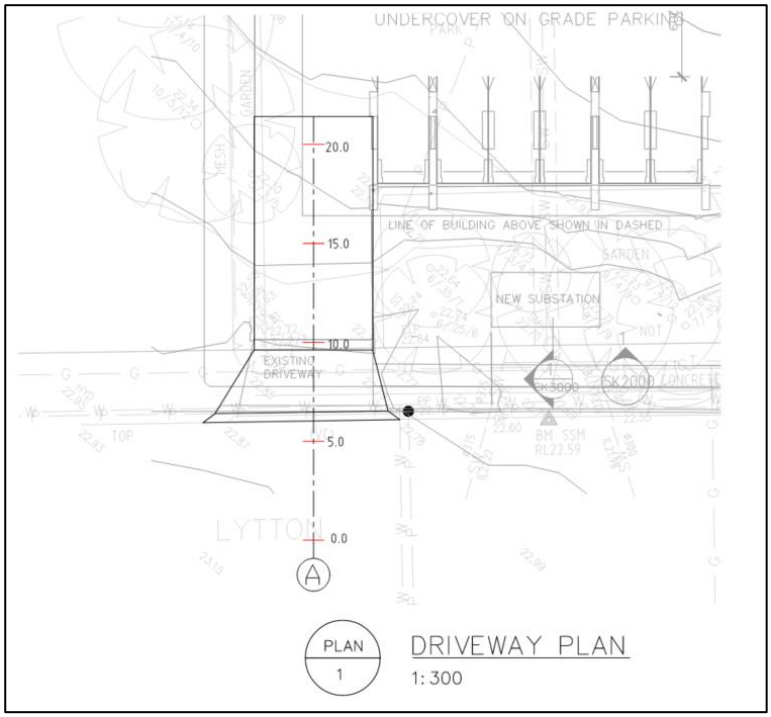

Figure 56 Driveway Plan (Stellen Consulting 2021)

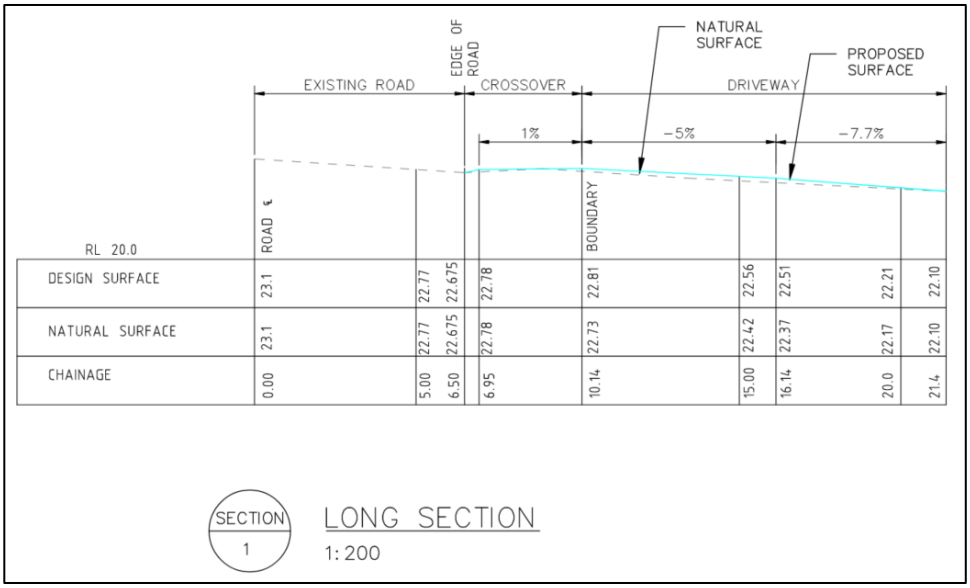

Figure 57 Long section (Stellen Consulting 2021)

As stipulated in the Driveway Access Design Statement (**Appendix 11**) prepared by Stellen Consulting, the driveway access design for the proposed development conforms to the relevant requirements of the following:

- *Australian Standard AS2890.1:2004 – Parking Facilities Part 1: Off-Street Car Parking*

6.5.12 Construction traffic management

A comprehensive Construction Traffic and Pedestrian Management Plan will be prepared in response to a suitable condition of consent addressing the following stages:

- Site establishment;
- Demolition;
- Bulk excavation;
- Structure; and
- Fitout and finishes.

The preliminary construction truck volumes are outlined in **Table 16** below.

Table 16 Preliminary Truck Volumes

Phase	Vehicle types	Movements per day (approx.)
Site establishment and preparatory works	Small rigid vehicles	20
	Medium rigid vehicles	12
Construction	Small rigid vehicles	10
	Medium rigid vehicles	10
	Heavy rigid vehicles	20

Truck movements are expected to be scheduled outside of peak network periods, where practical. In addition, workers typically arrive and depart the site (6am-4pm) outside of the network peaks, further reducing impacts.

Based on the preliminary truck volumes outlined in **Table 16**, there will be a maximum of 20 vehicle arrivals per day. This equates to approximately 1-2 truck arrivals every 30 minutes and this level of construction vehicle activity raises no concerns with regards to conflicts between construction vehicles and the existing traffic on surrounding streets/intersections. With regards to construction vehicles entering or exiting the site/works zone, these movements would be appropriately managed through the implementation of Traffic Control Plans.

Construction vehicles are expected to access the Site via the Lytton Street frontage/southern car park driveway. Preliminary truck routes have also been developed for potential works zones along the Lytton Street frontage. All trucks shall enter and exit the Site and work zone/s in a forward direction and a TfNSW certified traffic controller will be located at the access gate to supervise vehicle movements to/from Lytton Street.

All trucks will be linked via CB radio and/or hands-free mobile and will only be called to the Site when required and when there is capacity within the Site to accommodate the truck. Truck movements will also be staged to mitigate the potential for on-street queuing. This management arrangement of loading/unloading/deliveries will help minimise on-street queuing and will result in minimal disruptions to the surrounding road network. As such, there is no requirement for a layover area under the proposal.

Furthermore, the construction activities of neighbouring developments are not expected to conflict with those of the proposed development. However, the contracted builder will liaise with any neighbouring developments under construction to stagger large deliveries and concrete pours, if required.

The proposed truck routes will be refined with the appointed builder prior to issue of the comprehensive CPTMP. The final truck routes will be provided to all drivers prior to attending the Site, making use of main roads where possible. The proposed truck routes are presented in **Figure 58**, with a copy of the routes provided to all drivers prior to attending the Site.

The proposed truck route to/from the Site are summarised as follows:

Routes to Site from Great Western Highway (IN)	1. Trucks will arrive on the Great Western Highway, eastbound/westbound 2. Turn left/right onto Station Street, northbound 3. Turn right onto Fullagar Road, eastbound 4. Turn left onto Lytton Street, northbound 5. Continue to site/works zone
Routes from Site towards Great Western Highway (OUT)	1. Trucks will turn left out of site and depart onto Lytton Street, northbound 2. Turn right onto Jordan Street, eastbound 3. Turn right onto Bridge Road, southbound 4. Turn left/right onto the Great Western Highway eastbound/westbound

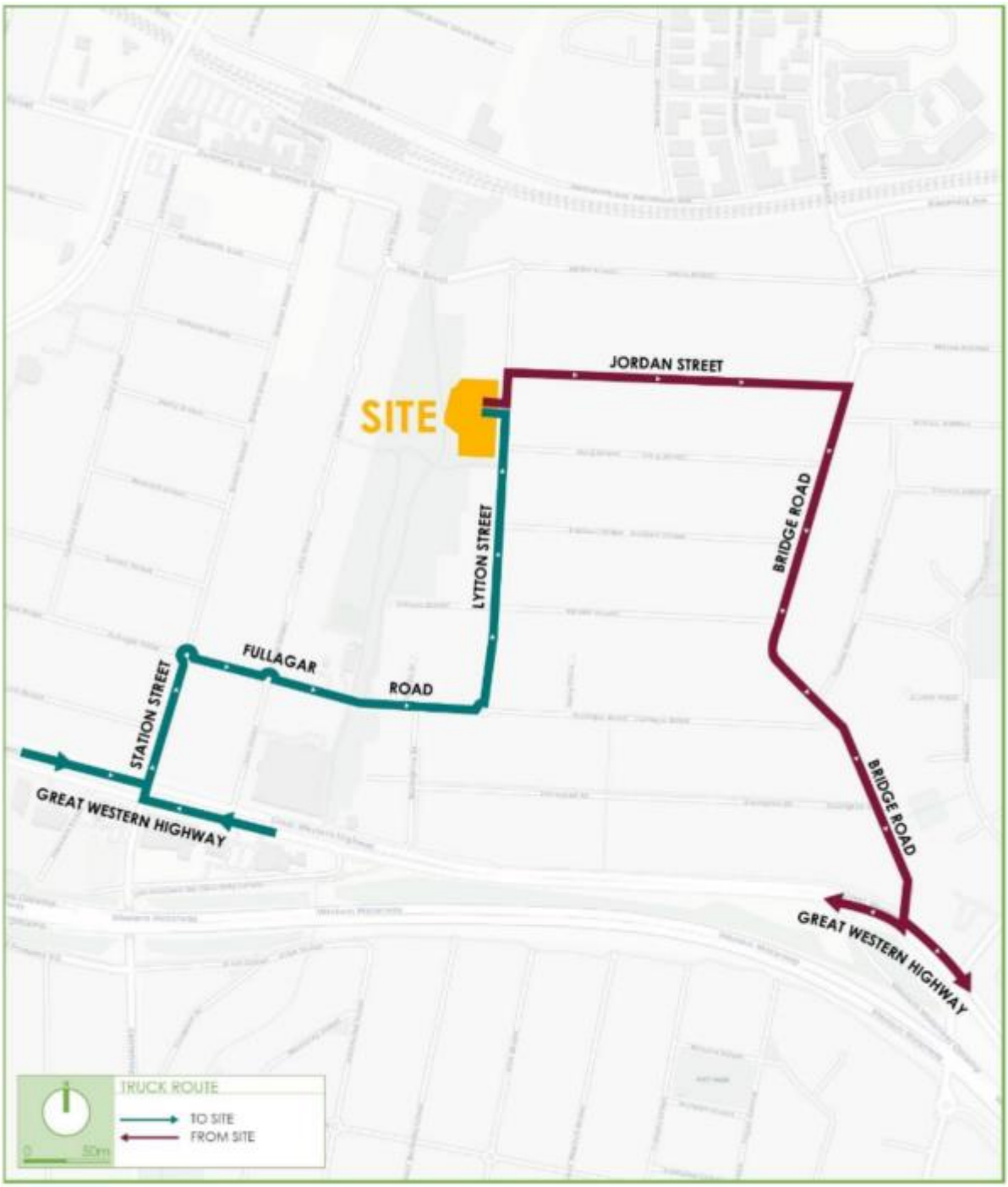

Figure 58 Proposed truck routes to/from the Site (TRAFFIX 2021)

Overall, the Traffic Impact Assessment demonstrates that the proposed development is supportable on traffic planning grounds and has adequately addressed the traffic and accessibility requirements in Section 5 of the issued SEARs.

6.6 ECOLOGICALLY SUSTAINABLE DEVELOPMENT

An Ecologically Sustainable Development (ESD) Report (**Appendix 7**) has been prepared by JHA to identify and summarise the ESD initiatives that have been considered in the design of the proposed development.

The ESD objectives of this project is to encourage a balanced approach to designing new facilities for the project; to be resource-efficient, cost-effective in construction and operation; and to deliver enhanced

sustainability benefits with respect to impacts on the environment and on the health and well-being of patients, staff, and visitors whilst providing the best possible facilities for a constructive environment.

6.6.1 ENVIRONMENTAL INITIATIVES

The principles as defined in Clause 7(4) of Schedule 2 of the EP&A Regulation have been incorporated into the design and ongoing operation phases of the development as follows:

Precautionary principle

*(a) the **precautionary principle**, namely, that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. In the application of the precautionary principle, public and private decisions should be guided by—*
(i) careful evaluation to avoid, wherever practicable, serious or irreversible damage to the environment, and
(ii) an assessment of the risk-weighted consequences of various options,

This development is being designed in accordance with a wide range of ESD goals that pertain to the design, construction and operational stages. The development team will ensure that the building minimises the impact on the environment in the areas of energy, water and materials. The design will incorporate with external high performance glazing and shading devices, together with energy efficiency favoured passive design features to minimise severe or irreversible environmental damages.

Increasing resilience to natural hazards have been considered in the development. In regards to the NSW and ACT Government Regional Climate Modelling (NARCliM) climate change projections, details of this assessment is addressed in Section 6 of the ESD report, Climate Response Statement.

Inter-generational equity

*(b) **inter-generational equity**, namely, that the present generation should ensure that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations,*

This development will not cause any significant impact on the health, diversity and productivity of the environment and will provide a community benefit in the form of increased access to health services and increased employment capacity.

The project will contribute positively to the community environment and add architectural interest to the area.

Refer to in Section 6 of the ESD report, Climate Response Statement, for the details of climate risks identified for this project and the relative responses, actions and responsibilities for high and extreme risks identified.

Conservation of biological diversity and ecological integrity

*(c) **conservation of biological diversity and ecological integrity**, namely, that conservation of biological diversity and ecological integrity should be a fundamental consideration,*

The assessment identifies the Site to be an existing health services facility. The proposed development will not impact significant, threatened or engaged based on review of the Biodiversity Values Map.

Improved valuation, pricing and incentive mechanisms

*(d) **improved valuation, pricing and incentive mechanisms**, namely, that environmental factors should be included in the valuation of assets and services, such as—*

(i) polluter pays, that is, those who generate pollution and waste should bear the cost of containment, avoidance or abatement,

(ii) the users of goods and services should pay prices based on the full life cycle of costs of providing goods and services, including the use of natural resources and assets and the ultimate disposal of any waste,

(iii) environmental goals, having been established, should be pursued in the most cost effective way, by establishing incentive structures, including market mechanisms, that enable those best placed to maximise benefits or minimise costs to develop their own solutions and responses to environmental problems.

The proposal has been designed in accordance with the Green Star Design & As-Built v1.3 Rating System. Whole of Life considerations including running costs, long-term maintenance, quality, life-span, future improvement, value of money and sustainability, will be used to inform the design of the development. A Waste Management Plan will be implemented to cover the construction and demolition waste and operational waste.

Therefore, it is considered that the SEARs requirement to detail how ESD principles will be incorporated in design, construction and ongoing phase of the development in accordance with Clause 7(4) of Schedule 2 of the EP&A Regulation has been met.

6.7 HERITAGE

A Non-Aboriginal (Historical) Heritage Impact Statement (**Appendix 13**) has been prepared by Artefacts Heritage to identify any heritage items which may be impacted by the proposed works, to determine the level of heritage significance of each item, assess potential impacts to heritage items, recommend mitigation measures to reduce the level of heritage impact and to identify management and statutory obligations.

The Non-Aboriginal (Historical) Heritage Impact Statement has undertaken a summary of existing citations and listings and provides the following information in respect of the Site:

- *No listed heritage items are within the study area.*
- *Four heritage items listed on the Cumberland City Council's HLEP2013 are within 250m of the study area.*
- *No unlisted heritage items were identified within the study area or within 250m of the study area.*
- *Historical documentary investigation has not identified any significant associations with the study area.*
- *Aerial evidence indicates that all currently standing built structures in the study area date to after 1986.*
- *The assessment of heritage impacts has found that the proposed development will not directly or indirectly impact on any listed or unlisted heritage items.*

Specifically, the heritage listed items within 25m of the Site are summarised as follows:

Table 17 Heritage listed items within 250m of the study area

Item name	Location	Type	Distance to Study Area (m)	LEP number
Federation cottage	42 Lane Street	Built	75	I135
"Dalremos", Federation/Queens Anne bungalow	44 Veron Street	Built	130	I143
Federation/Queen Anne bungalow	57 Veron Street	Built	180	I144
Federation period cottage	26 Jordan Street	Built	220	I134

The impacts to listed heritage items are identified as follows:

Physical impacts

- The proposed works will not result in physical impacts to any heritage items. The closest listed heritage item is I135 and is 125m away and will not be directly impacted by the proposed works.

Visual impacts

- The proposed works will not result in visual impacts to any heritage listed item within 250m of the study area. No view lines exist between the study area in current or proposed built form and any heritage listed item within 250m of the study area.
- The visual impacts are minimised through the existing soft landscaped setting, including trees, and higher built forms.
- The proposal includes the introduction of additional landscaping, including trees, which will minimise the visual impact on the existing setting.

Impacts to unlisted heritage items

- The proposed works will not result in impacts to any unlisted heritage item

Potential Archaeological Impacts

Research undertaken by Artefact has not identified any non-Aboriginal Archaeological Heritage potential apart from the early 20th century houses previously on the Site. However, it is unlikely that any surviving remains of the 20th century houses would meet the significance threshold. Therefore, there are no identified archaeological constraints.

The following recommendations will aid in mitigating the heritage impact of the proposed development:

- No further assessment of historical heritage values at the study area is required for the proposal to proceed.
- Future development entailing ground disturbing works should have an Unexpected Finds Policy in place.

6.8 ABORIGINAL CULTURAL HERITAGE

An Aboriginal Cultural Heritage Assessment Report (ACHAR) (**Appendix 14**) has been prepared by Artefact Heritage to identify Aboriginal cultural heritage values within the study area, conduct consultation with Aboriginal stakeholder groups and to assess impacts to Aboriginal heritage that may result from the proposal.

Consultation with Registered Aboriginal Parties (RAPs) is currently ongoing for the proposal.

Aboriginal community consultation has been conducted in accordance with the Consultation Requirements.

In accordance with step 4.1.2 of the Consultation Requirements, Artefact Heritage corresponded with the following organisations by email on 21 April 2021 requesting the details of Aboriginal people who may hold cultural knowledge relevant to determining the Aboriginal significance of Aboriginal objects and/or places within the local area:

- Cumberland Council
- Deerubbin Local Aboriginal Land Council (Deerubbin LALC)
- Greater Sydney Local Land Services
- Heritage NSW
- National Native Title Tribunal
- Office of the Registrar, Aboriginal Land Rights Act 1983
- Native Title Service Corporation (NTSCorp)
- Heritage NSW – Parramatta Office

An advertisement was also placed in the *Parra* on 27 April 2021 in accordance with Step 4.1.3 of the Consultation Requirements, inviting the participation of Aboriginal people who may hold cultural knowledge relevant to determining the Aboriginal significance of Aboriginal objects and/or places within the local area.

A total of 14 groups and individuals registered their interest. A copy of the assessment methodology was sent to the RAPs by email on 22 June, requesting comments by 21 July 2021. These RAPs supported the findings of the methodology and of the Archaeological Survey. It is noted that all RAPs supported the assessment methodology. Summary of the Aboriginal stakeholders comments on the methodology and draft ACHAR is provided within the ACHAR.

The Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW (OEH 2011) provides guidelines for heritage assessment with reference to the Burra Charter (Australia ICOMOS 2013). The assessment is made in relation to four values or criteria.

Socio/cultural significance

Socio/cultural heritage values should be addressed by Aboriginal people who have a connection to, or interest in, the area.

The RAPs who provided feedback did not make any specific comments regarding socio/cultural heritage significance.

Historic significance

Historic values refer to the association of place with aspect of Aboriginal history. Historic values are not necessarily reflected in physical objects, but may be intangible and relate to memories, stories, or experiences.

The RAPs who provided feedback did not make any specific comments regarding historical significance.

Scientific significance

Scientific values refer to a Site's potential to contribute to our current understanding and information. As there are no archaeological values in the Site, there is no scientific significance.

Table 18 Scientific significance assessment

Site Name (AHIMS ID)	Research potential	Representativeness	Rarity	Education potential	Overall significance assessment
No AHIMS sites	None	None	None	None	None

Aesthetic significance

Aesthetic values refer to the sensory, scenic, architectural, and creative aspects of the place. These values may be related to the landscape and are often closely associated with social/cultural values.

The RAPs who provided feedback did not make any specific comments regarding aesthetic significance.

Statement of significance

In summary, the RAPs who provided feedback did not make any specific comments regarding the social/cultural, historic or aesthetic significance of the study area. The significance of the study area is therefore assessed to be of low.

Cumulative impacts

A cumulative impact is an impact on Aboriginal cultural heritage resulting from the incremental impact of the action/s of a development when added to other past, present and reasonably foreseeable future actions.

As no archaeological finds have been discovered in the study area, the impact of the proposed development has been assessed has having no harm or cumulative impacts to the Aboriginal heritage of the region.

A draft of the ACHAR was provided to RAPS for commentary and feedback on July 23 July 2021. The RAPs did not provide additional information.

Based on the results of the assessment and in accordance with Aboriginal heritage guidelines mandated in the SEARs for the proposal, the following recommendations are made:

- As the study area was found to be disturbed and to have a nil-low potential for Aboriginal objects to be located within it, it is recommended that further assessment is not required.
- As the results of the consultation indicate that there are no sites or places of significance in the study area, no further consideration is required.
- Consultation supports the view of the Deerubbin LALC representative during the site inspection who did not identify any particular cultural significance associated with the study area.
- If changes are made to the proposal that may result in impacts to areas not assessed by this
- ACHAR further assessment would be required.
- Unexpected Aboriginal objects remain protected by the National Parks and Wildlife Act 1974. If any such objects, or potential objects, are uncovered in the course of the activity, all work in the vicinity should cease immediately. A qualified archaeologist should be contacted to assess the find and Heritage NSW and Deerubbin LALC must be notified.
- If human remains, or suspected human remains, are found in the course of the activity, all work in the vicinity should cease, the Site should be secured, and the NSW Police and Heritage NSW should be notified.

Further details of the Aboriginal heritage assessment are provided in the ACHAR at **Appendix 14**.

6.9 SOCIAL & ECONOMIC IMPACTS

An Economic Impact Assessment has been prepared by Macroplan and is attached at **Appendix 15**. This assessment has analysed the social impacts of the proposal and provided a detailed assessment within the report which is summarised in the sections below.

6.9.1 Employment Generation

The proposed development can support the local economy and complement other health care facilities within the local and wider catchment by providing more employment floorspace and promoting industry diversification. It will also generate more employment during the planning, construction, and maintenance stage.

In terms of the development phase, assuming two years of construction, Macroplan envisages that this development will generate 50 to 60 full-time equivalent jobs per annum directly in the construction industry and a further 80 to 90 full-time equivalent jobs per annum indirectly (for example, jobs in transport, manufacturing, fabrication, design etc).

In terms of post development, it is estimated that an additional 23 FTE direct jobs per annum could be generated on Site once the expansion is fully completed and operational. Furthermore, based on the multiplier assessment, the additional direct jobs at the Stage 2 will also generate an additional 20 indirect and induced jobs outside the Wentworthville Northside West Clinic.

6.9.2 Gap Assessment

For the assessment, Macroplan generated two catchments identified as relevant in capturing the provision of psychological and psychiatric practitioners. Catchment Area A was imputed based on the concept of where we envisage most of demand for psychiatric services will stem from, whilst Catchment Area B was imputed based on the concept of where we envisage most of demand for psychological services will stem from.

It is noted that Catchment Area A comprises Blacktown, Canterbury-Bankstown, Cumberland, Fairfield, Parramatta, and The Hills Shire LGA. Catchment B comprises Parramatta and Cumberland LGAs. The two catchment areas are depicted as follows:

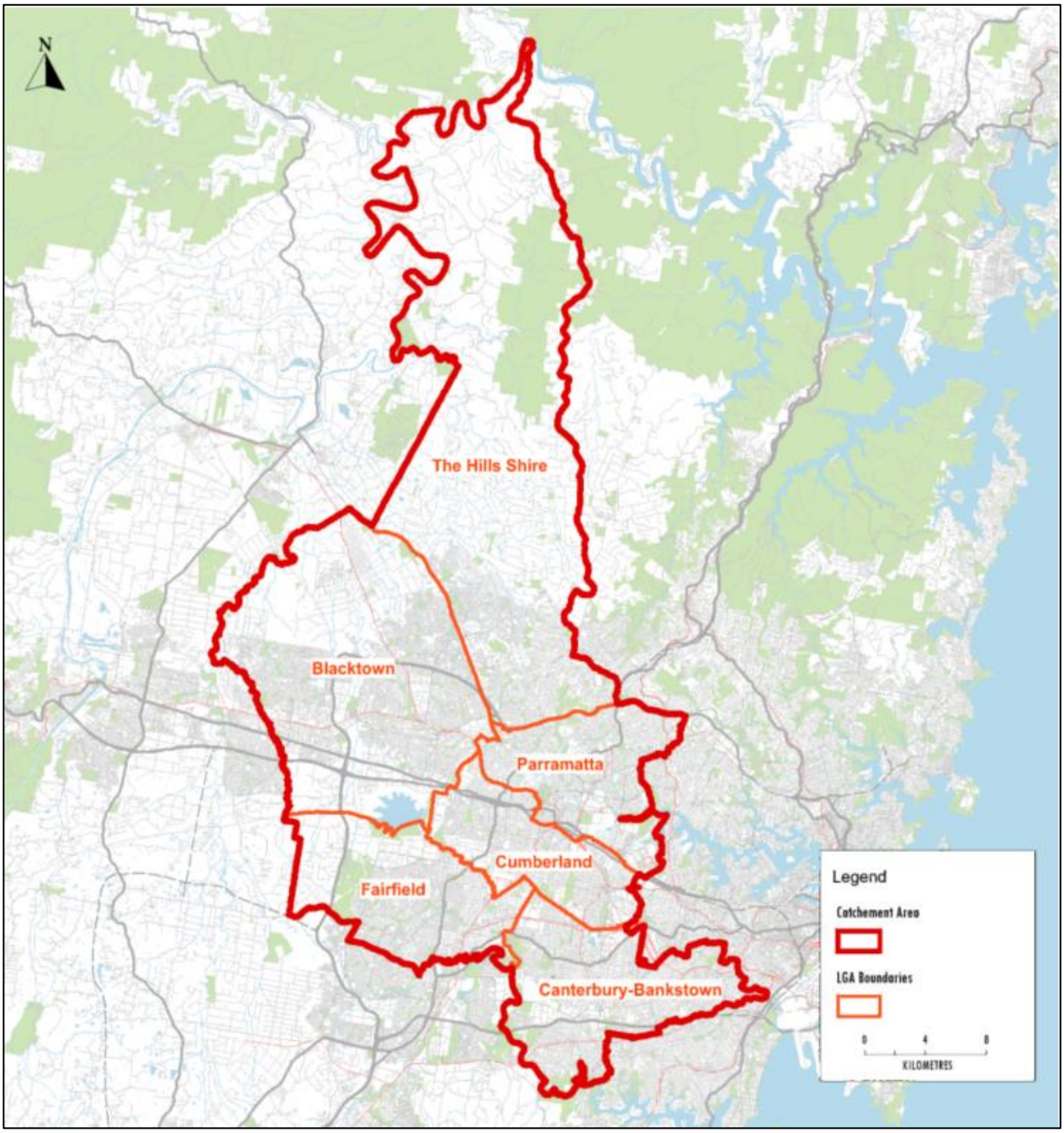

Figure 59 Catchment Area A (Psychartrist Demand) (Macroplan 2021)

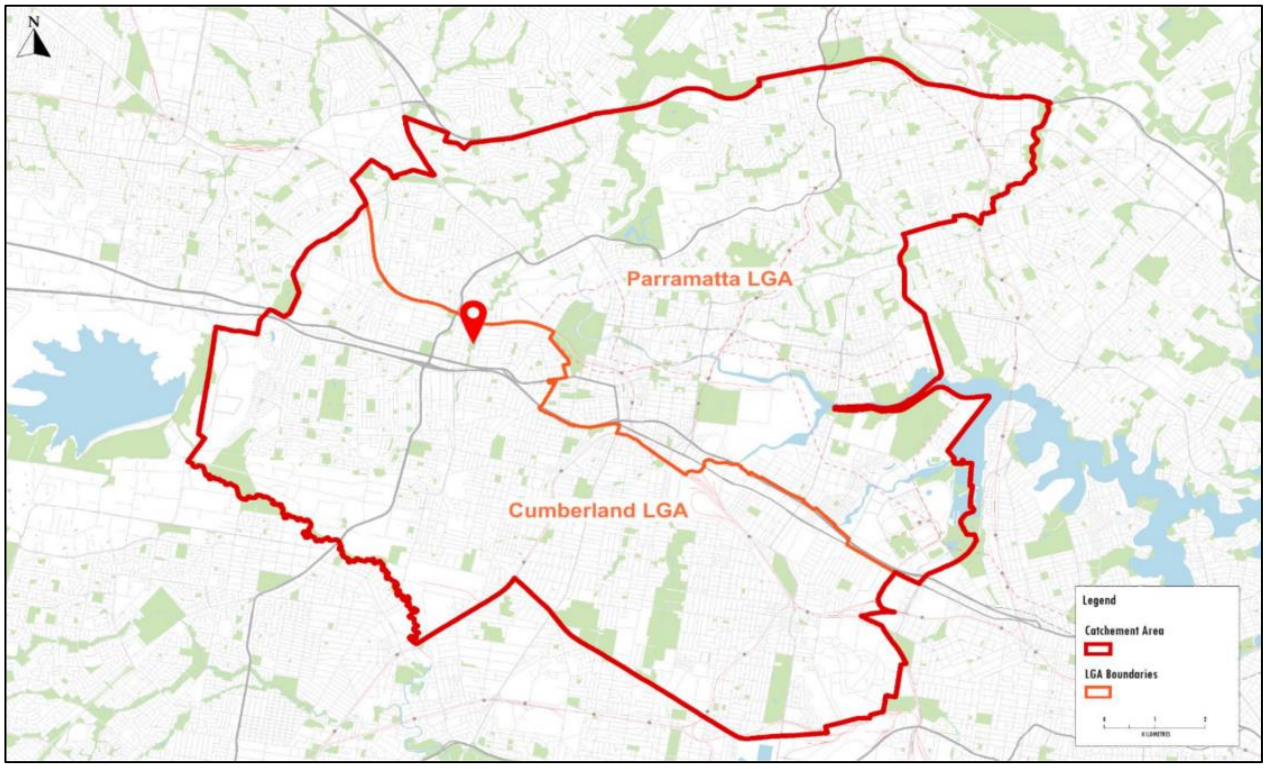

Figure 60 Catchment Area B (Psychologist Demand) (Macroplan 2021)

Macroplan assessed the supply and demand of psychiatrists and psychologists, with research indicating a total of 90 psychiatrists within Catchment Area A and a total of 188 psychologists within Catchment Area B. Demand for mental health specialists was derived using provisional rates sourced from the Department of Health. A provisional rate 13.4 psychiatrists per 100,000 residents, and 83 psychologists per 100,000 residents was used to calculate demand in line with population growth over the period between 2021 and 2036.

Macroplan's gap assessment found that, there is an immediate need for more psychiatrists and psychologists in Wentworthville and its surround. Without this proposed expansion, the current shortages will deteriorate further into the future.

- As of 2021, there is a shortage of 131 psychiatrists and 283 psychologists.
- As of 2026, there is a shortage of 160 psychiatrists and 358 psychologists.
- As of 2031, there is a shortage of 183 psychiatrists and 402 psychologists.
- As of 2036, there is a shortage of 202 psychiatrists and 481 psychologists.

<u>Other Considerations</u>

Macroplan also considered other economic and community impacts that are achievable as a result of the proposed expansion of the Site.

- Research undertaken by Macroplan indicates a growing requirement for additional mental health professionals as evidenced by an already strong prevalence of mental illness within Australia and historical figures suggesting proportionally increased rate of mental illness (i.e. depression and anxiety) into the future. Increasing the supply of mental health professionals in the short- to medium-term future will be critical in meeting projected (unmet) demand and mitigating the 'total burden of disease' on the local and wider community.

- Macroplan also notes a growing requirement for additional mental health hospital beds, evidenced by limited to nil growth in specialized public sector and residential mental health hospital beds within NSW between 1992 and 2019. Relevant statistics indicate that public sector beds increased marginally by 84 beds to reach 2,736 beds in 2018-19, whilst residential beds decreased by 223

beds to reach 60 beds. Over the same time-period the NSW residential population increased by 2,022,350 residents to reach 7,980,200 in 2019 (addition of about 77,783 persons per annum).

- In note of the deteriorating gap between the supply of mental health hospital beds and the growing population of NSW (also noting that a large portion of this growth will be concentrated around Western Sydney), expanding the subject Site to provide for additional specialized mental health hospital beds will be a major contribution to the existing shortfall of mental health hospital beds in NSW.

- Increasing the supply of mental health services (via site expansion) will also alleviate pressure from surrounding hospital and general medical facilities. Macroplan notes that there is an array of care providers in Australia widely accessible to individuals seeking treatment – notably hospital emergency departments and general practitioners. If approved, the expansion of the Wentworthville Northside West Clinic will improve the current position of the clinics to absorb unmet demand whilst complementing/supporting surrounding facilities, ensuring they are better equipped to deal with critical emergencies (e.g. hospital emergency departments) and general broader services (e.g. medical centres & GPs).

- The impact of COVID-19 is another factor to consider as it has potential to contribute to or exacerbate long-term mental illness, with statistical figures indicating a significant increase in the number of mental health services used throughout 2020 and 2021. Macroplan notes existing concerns about the long-term impacts on mental health stemming from COVID-19, with reference to insights from previous pandemics and national emergencies. The case study indicated that the outbreak was associated with a 30% increase of suicides in Hong Kong for people over the age of 65. It will therefore be critical to ensure that sufficient resources are committed over the short- to mid-term future, to prepare for any increased rates of mental illness stemming from the COVID-19 pandemic.

- Expanding the existing clinic will generate additional spatial capacity to provide vocational training and educational platforms for prospective medical graduates. As population and proportion levels of mental illness are expected to increase, there is a greater need to train more mental health professionals. An increase in quality clinical placements is required to ensure that more mental health professionals can perform their clinical roles when they graduate.

Further details are provided in the Economic Impact Assessment at **Appendix 15**.

6.10 NOISE AND VIBRATION

A Noise & Vibration Impact Assessment has been prepared by JHA Services (JHA) and is attached at **Appendix 8**. This assessment has been prepared to satisfy Section 10 of the SEARs which states that an assessment must be prepared to detail construction and operational noise impacts on nearby sensitive receivers and outline the proposed management and mitigation measures.

6.10.1 Site measurements

Attended and unattended noise surveys were conducted in the locations shown in **Figure 61** to establish the ambient and background noise levels of the Site and surrounds, in accordance with Fact Sheets A and B of the NSW Noise Policy for Industry.

Figure 61 Noise survey locations and boundary of the site (JHA 2021)

From observations during the noise survey, it is noted that ambient noise levels are dominated by low activity of residential, active recreation using the adjacent park and local traffic using the existing car park and Lytton Street.

6.10.2 NSW EPA Noise Policy for Industry

The NSW EPA Noise Policy for Industry 2017 assesses noise from industrial noise sources – scheduled under the POEO. Mechanical noise from the development shall be addressed following the recommendations in the NSW NPI.

The assessment is carried out based on the existing ambient and background noise levels addressing the following:

- Intrusiveness Criteria, to control intrusive noise into nearby sensitive receivers.
- Amenity Criteria, to maintain the noise level amenity for particular land uses.

These criteria are established for each assessment period (day, evening and night) and the more stringent of the two criteria sets the Project Noise Trigger Level (PNTL).

Intrusiveness criteria

Based on the intrusiveness criteria definition and the measured background noise levels on Site, **Figure 62** shows the intrusiveness criteria for the noise sensitive receivers.

Indicative Noise Amenity Area	*Period*	*Rating Background Level dB(A)*	*Intrusiveness Criterion dB(A)*
Medium Density Residential (R2/R3)	Day	44	49
	Evening	46	51
	Night	42	47
High Density Residential (R4)	Day	44	49
	Evening	45	50
	Night	42	47

Figure 62 Determination of the intrusiveness criterion (JHA 2021)

Amenity criteria

Based on the land zoning of the noise sensitive receivers plus amenity criteria definition, **Figure 63** shows the amenity criteria for the noise sensitive receivers.

Indicative Noise Amenity Area	*Period*	*Recommended Amenity Noise Level ($L_{Aeq,period}$) dB(A)*	*Amenity Criterion ($L_{Aeq15min}$) dB(A)*
Medium Density Residential (R2/R3)	Day	55	53 (55-5+3)
	Evening	45	43 (45-5+3)
	Night	40	38 (40-5+3)
High Density Residential (R4)	Day	60	58 (60-5+3)
	Evening	50	48 (50-5+3)
	Night	45	43 (45-5+3)
Public Recreation (RE1)	When In Use	55	53 (55-5+3)

Figure 63 Determination of amenity criterion (JHA 2021)

Project noise trigger levels

The project noise trigger levels are shown in **Figure 64** and have been obtained in accordance with the requirements of the NSW NPI. These shall be assessed to the most affected point of within the noise sensitive receiver boundary.

Indicative Noise Amenity Area	*Period*	*Intrusiveness Criterion dB(A)*	*Amenity Criterion dB(A)*
Medium Density Residential (R2/R3)	Day	49	53
	Evening	51	43
	Night	47	38
High Density Residential (R4)	Day	49	58
	Evening	50	48
	Night	47	43
Public Recreation (RE1)	When In Use	--	53

Figure 64 Project noise trigger levels for noise sensitive receivers (JHA 2021)

6.10.3 Operational noise emissions assessment

Noise break-out from the proposed development has the potential to impact on existing noise sensitive receivers. For the purpose of this noise impact assessment, the noise sources are assumed as follows:

- Mechanical plant from the proposed development.
- New loading bay.
- Traffic generation noise.
- Car Park noise.
- Sleep Arousal.

Each of these noise sources has been considered in the noise impact assessment and are demonstrated in the following sections.

External mechanical plant

Noise from proposed mechanical plant rooms should be controlled to ensure external noise emissions are not intrusive and do not impact the amenity of noise sensitive receivers.

Mechanical plant will operate continuously during operating hours. At this stage, mechanical plant selections have not been made; therefore, it is not possible to undertake a detailed assessment of the mechanical plant noise emissions.

Noise controls will need to be incorporated with the design of the mechanical plant rooms to ensure that the cumulative noise levels from plant areas to the nearest noise sensitive receivers meets the NSW NPI noise level criteria. Refer to Section 4.4.3 within the Acoustic Report.

Acoustic assessment of all mechanical plant shall continue during the design phases of the project in order to confirm any noise control measures to achieve the relevant noise criteria at the nearest noise sensitive receivers.

Loading bay

An acoustic assessment for the use of the new loading bay has been conducted to predict the noise levels to the nearest noise sensitive receiver. The loading bay activities will take place on the lower-ground level service area. **Figure 65** shows the approximate distance from the loading bay to the nearest noise sensitive

receiver at 31 Lytton Street. Ground level of new loading bay is lower than noise sensitive receiver, plus there is a retaining wall which will provide shielding of the noise emissions.

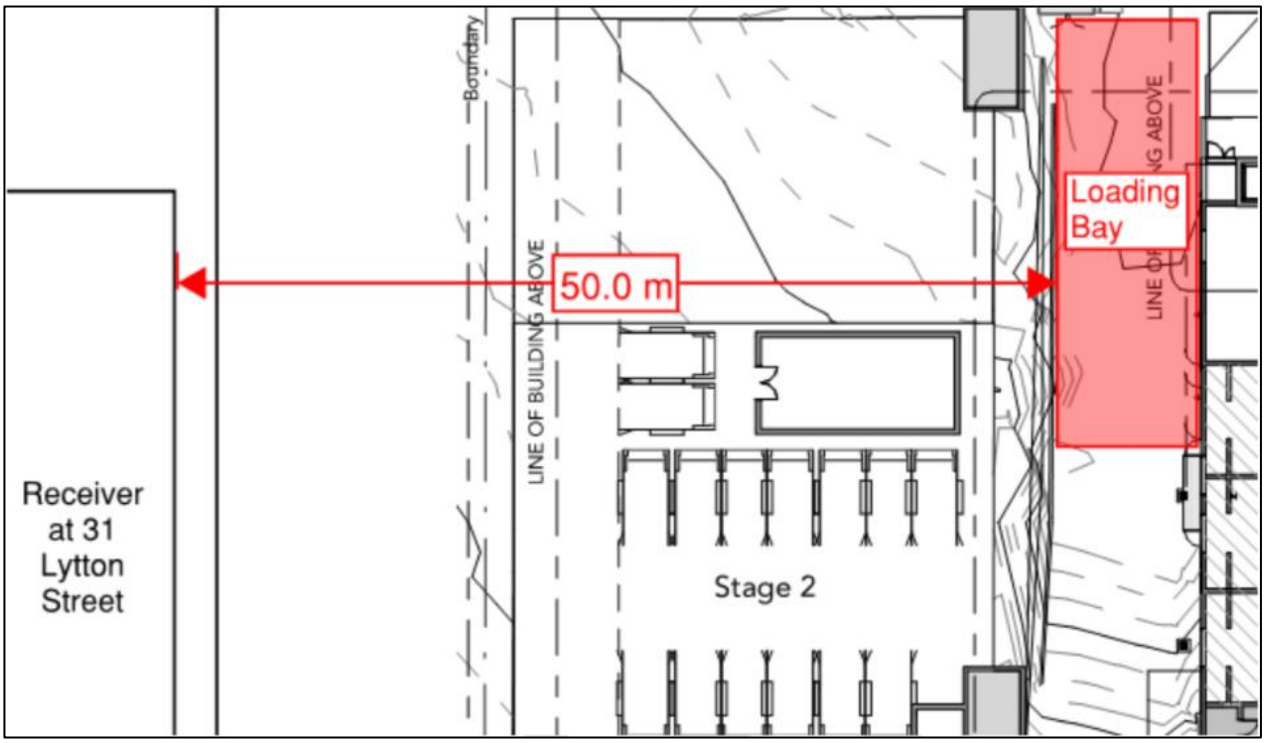

Figure 65 Loading Bay Location (JHA 2021)

The predicted noise levels are shown below in **Table 19**.

Table 19 Loading bay noise assessment	
Calculation	**Noise Levels, dB(A)**
$L_{Aeq,\ 15\ minutes}$ of loading bay operations	67
Directivity/Reflection/Shielding Correction	3
Distance attenuation (50m), dB	-34
Resulting level at receiver boundary	36
Noise Level Criterion Night-Time / Complies?	42 / Yes

Based on the noise assessment, operational noise associated with use of the loading bay meets the required noise level criteria (background + 0dB) during the night-time period (6am – 7am). However, it is recommended that deliveries will not take place between 10:00pm and 7:00am in order to minimise any potential risk.

Traffic generation noise

The traffic impact report for the proposed development prepared by Traffix (dated October 2021) provides an analysis of the existing traffic flows and the predicted increase due to traffic generation from the proposed development. This is summarised in **Table 20**.

Table 20 Two-way peak hour traffic flows plus traffic generated by the proposed development					
Road	**Direction**	**Weekday Morning Peak**		**Weekday Afternoon Peak**	
		Current	**Predicted increase**	**Current**	**Predicted increase**
Lytton Street	Northbound	194	+6	137	+14
	Southbound	110	+6	94	+14

When considering land use redevelopment and the impact on sensitive land uses (residential / schools / hospitals / recreational) the NSW Road Noise Policy (RNP) states that an increase up to 2.0dB in relation to existing noise levels is anticipated to be insignificant. As shown in **Table 21**, the increase of traffic noise levels due to the proposed development, is less than the maximum allowable increase of 2.1dB(A).

Table 21 Predicted noise level increase due to traffic movements from the proposed development

Road	Direction	Weekday Morning Peak	Weekday Afternoon Peak
		Increase $L_{Aeq, 1hour}$ dB(A)	
Lytton Street	Northbound	+0.1	+0.4
	Southbound	+0.2	+0.6

Therefore, the traffic increase due to the proposed development will not result in any noticeable change in traffic noise levels and is expected to meet the NSW Road Noise Policy requirements.

Sleep arousal

Due to staff shift changes, a sleep arousal noise assessment of the car movements from the basement carpark has been carried out. It is expected that vehicles will be moving slowly (approx. 10km/h) and the number of vehicle movements during night-time will be low compared with day-time and evening-periods. **Figure 66** shows the approximate distance from the basement carpark to the nearest noise sensitive receiver.

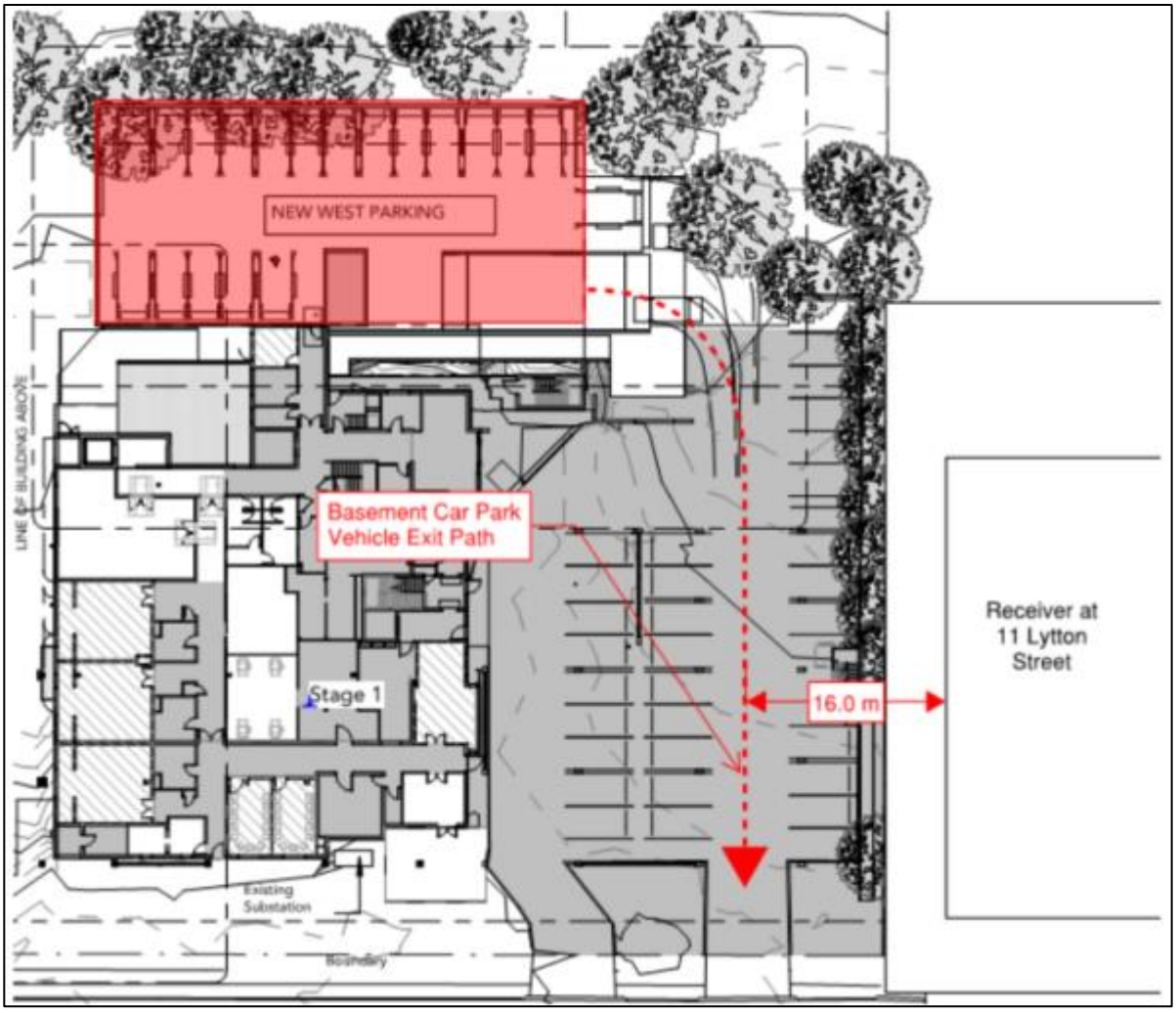

Figure 66 Basement car park vehicle path (JHA 2021)

The results of sleep disturbance assessment are demonstrated in **Table 22** and **23** below.

Table 22 Sleep arousal noise assessment at residential receiver from vehicle departures during night-time. Condition 1.	
Calculation	**Overall A-Weighted Noise Level, in dB(A)**
L_{Aeq} of vehicle movements accelerated at 1m	82
Distance attenuation (16m), dB	-24
1 minute over 15 minutes operations time correction, dB	-12
$L_{Aeq, 15min}$ resulting at residential façade	46
NPI Sleep Arousal Criteria. Condition 1 / Complies?	47/Yes

Table 23 Sleep arousal noise assessment at residential receiver from vehicle departures during night-time. Condition 2.	
Calculation	**Maximum Sound Power Level dB(A), ref 1pW**
L_{Amax} of vehicle movements accelerated at 1m	87
Distance attenuation to façade (16m), dB	-24
LAmax resulting at residential façade	63
LAmax resulting within a bedroom with windows open	53
NPI Sleep Arousal Criteria. Condition 2 / Complies?	57 / Yes

Based on the above, internal noise levels are at a level that according to NSW RNP are unlikely to cause awakening reactions.

A sleep disturbance of the on-grade carpark has been conducted due to the staff shift changes occurring during the night-time period (6:00am to 7:30am). **Figure 67** shows the approximate distance from the on-grade carpark to the nearest noise sensitive receiver at 31 Lytton Street.

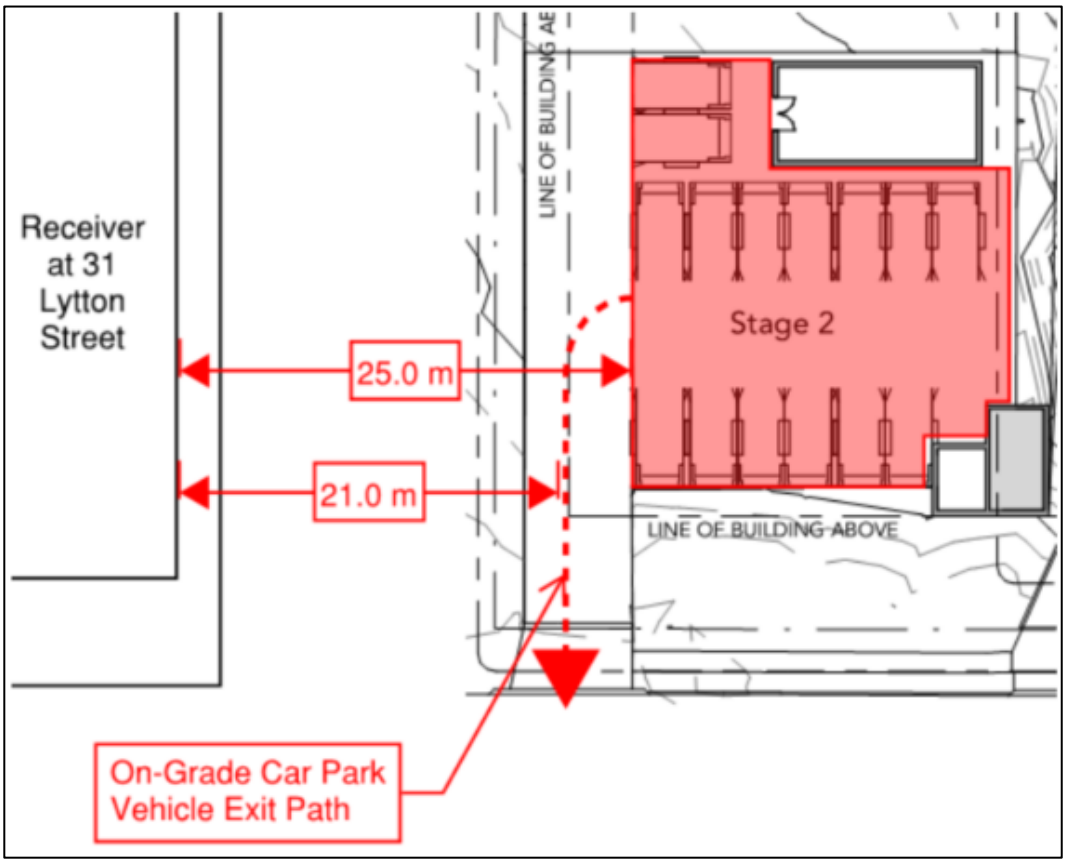

Figure 67 On-grade car park vehicle exit path (JHA 2021)

The results of on-grade carpark sleep disturbance assessment are presented in **Table 24** and **25**.

Table 24 Sleep arousal noise assessment at residential receiver from vehicle departures during night-time. Condition 1.	
Calculation	**Overall A-Weighted Noise Level, in dB(A)**
L_{Aeq} of vehicle movements accelerated at 1m	82
Distance attenuation (21m), dB	-26
1 minute over 15 minutes operations time correction, dB	-12
$L_{Aeq, 15min}$ resulting at residential façade	44
NPI Sleep Arousal Criteria. Condition 1 / Complies?	47/Yes

Table 25 Sleep arousal noise assessment at residential receiver from vehicle departures during night-time. Condition 2.	
Calculation	**Maximum Sound Power Level dB(A), ref 1pW**
L_{Amax} of vehicle movements accelerated at 1m	92
Distance attenuation to façade (25m), dB	-28
L_{Amax} resulting at residential façade	64
L_{Amax} resulting within a bedroom with windows open	54
NPI Sleep Arousal Criteria. Condition 2 / Complies?	57 / Yes

Based on the above, internal noise levels are at a level that according to NSW RNP are unlikely to cause awakening reactions.

6.10.4 Construction noise and vibration planning

The following preliminary advice in relation to construction noise and vibration management shall form the basis for the Contractor's Construction Noise and Vibration Management Plan (CNVMP) which shall identify any noise criteria exceedance once construction methods and stages are known.

Any noise from demolition and construction activities to be carried out on site must not result in 'offensive noise' to any noise sensitive receiver. To this end, the Contractor employed to undertake the demolition and/or construction works is responsible for ensuring that any site noise and, in particular, any complaints shall be monitored, investigated, managed and controlled.

Figure 68 below shows the Noise Management Levels (NMLs) of the identified noise sensitive receivers surrounding the Site.

Sensitive Receiver ID	*Receiver Type*		*Airborne Construction Noise Criteria, L_{Aeq} dB(A)*	
			Within Standard Hours	*Outside Standard Hours*
1, 2, 3, 4, 6 and 7	Residential	Noise affected / External	54	49
		Highly noise affected / External	75	N/A
5	Public Recreation	Noise affected / External	65	65

Figure 68 Surrounding noise sensitive receivers and NMLs (JHA 2021)

Assumed worst-affected noise sensitive receivers are 2, 3 and 4 as receiver 1 will be shielded by the existing building and receivers 6 and 7 are further away than the assumed worst-affected receivers. It is noted that if noise impacts associated with the proposed development are controlled at the nearest noise sensitive receivers, then compliance with the recommended criteria at all noise sensitive receivers will be achieved.

Working hours

The following construction hours are proposed:

- Monday to Friday: 7am to 6pm
- Saturday: 8am to 1pm
- Sundays and Public Holidays: No excavation or construction works

It is noted that the proposed construction hours are within the recommended NSW EPA hours. Noise control measures are to be implemented during these hours following consultation and engagement with the community.

Respite periods should generally be implemented into the work methodology in order to reduce the impact onto the surrounding noise sensitive receivers. The following general respite periods should be applied during these phases of demolition and excavation, primarily due to the use of rock breakers and excavators:

- No use of rock breakers or large excavation equipment before 8am or after 5pm.
- Rock breaking and excavation should not occur for more than 3 hours continuously, and at least a 1-hour respite period in between.

A detailed Construction Noise & Vibration Management Plan (CNVMP) shall further assess the noise impact of construction works, and shall include a protocol to minimise any potential noise impacts to identified sensitive receivers, and ensure that appropriate noise control measures are defined and implemented to comply with all relevant noise guidelines.

Preliminary construction and vibration noise assessment
A preliminary construction noise assessment has been carried out based on typical plant and machinery expected throughout the construction stages. The preliminary noise assessment has been considered at the nearest existing residential receivers.

It is noted that if construction noise impacts associated with the proposed development are controlled at the nearest sensitive receivers, then compliance with the recommended criteria at all noise sensitive receivers will be achieved. Therefore, noise sensitive receivers 2, 3 and 4 have been modelled in the tables below for being the nearest sensitive receivers.

Two assessments for each assumed stage of construction have been conducted:

1. Construction activities occurring at distances of between 5m and 40m from the boundary of the Site without a hoarding around the construction site.
2. Construction activities occurring at distances of between 5m and 40m from the boundary of the Site with a 2.4m high hoarding around the construction site.

Demolition

Figure 69 below shows the predicted range of sound pressure levels of demolition activities occurring at distances of between 5m and 40m from the boundary of the Site without a hoarding around the construction site.

Item	Typical Noise Level (dB ref 1pW)	Predicted Noise Levels $L_{Aeq,15min}$ dB(A) (re. 20μPa) – no hoarding		
		Receiver 2	Receiver 3	Receiver 4
30t Excavator	117	69-51	69-51	71-53
Truck (>25tonne)	114	66-48	66-48	68-50
Front end loader	116	68-50	68-50	70-52
Excavator Rock breaker	119	71-53	71-53	73-55
Demolition Saw	116	68-50	68-50	70-52
Total	---	76-58	76-58	78-60

Figure 69 Predicted airborne noise levels for equipment used during demolition works at the nearest residential receivers – no hoarding (JHA 2021)

Figure 70 shows the predicted range of sound pressure levels of demolition activities occurring at distances of between 5m and 40m with a 2.4m high hoarding around the construction site. allowances have been made for distances attenuation and reflections.

Item	Typical Noise Level (dB ref 1pW)	Predicted Noise Levels $L_{Aeq,15min}$ dB(A) (re. 20μPa) – with hoarding		
		Receiver 2	Receiver 3	Receiver 4
30t Excavator	117	54-37	54-37	56-39
Truck (>25tonne)	114	51-34	51-34	53-36
Front end loader	116	53-36	53-36	55-38
Excavator Rock breaker	119	56-39	56-39	58-41
Demolition Saw	116	53-36	53-36	55-38
Total		61-44	61-44	63-46

Figure 70 Predicted airborne noise levels for equipment used during demolition works at the nearest residential receivers – with hoarding (JHA 2021)

As demonstrated in **Figures 69** and **70**, without the hoarding around the construction site all predicted demolition activities are expected to cause exceedances of the noise maximum levels (NML) (orange font) at close distances for the nearest residential receivers. The Highly Affected Noise level of 75dB(A) (red font) is predicted to be exceeded at the nearest residential receivers when plant activities are running cumulatively at close distances.

With the hoarding around the construction site, all predicted demolition activities, except the excavator with rock breaker attachment and demolition saw, are predicted to be within the NML for residential receivers 2 and 3 at close and far distances. The 30-tonne excavator, excavator with rock breaker and demolition saw are expected to exceed the NML at close distances for residential receiver 4. The NML of all the nearest residential receivers is also predicted to be exceeded with all plant activities are running cumulatively at close distances

The predicted exceedance of the NMLs in the nearest residential receivers triggers the proponent to apply all reasonable and feasible work practices to minimise the noise as much as possible and community

consultation for the noisy construction activities, as per the requirements of the Interim Construction Noise Guideline (ICNG).

Earthworks

Figure 71 shows the predicted range of sound pressure levels of earthworks activities occurring at distances of between 5m and 40m from the boundary of the site without a hoarding around the construction site.

Item	Typical Noise Level (dB ref 1pW)	Predicted Noise Levels $L_{Aeq,15min}$, dB(A) (re. 20µPa) – no hoarding		
		Receiver 2	Receiver 3	Receiver 4
30t Excavator	117	69-51	69-51	71-53
Truck (>20tonne)	107	59-41	59-41	61-43
Bored Piling Rig	116	68-50	68-50	70-52
Front end loader	116	68-50	68-50	70-52
Total	---	73-55	73-55	76-58

Figure 71 Predicted airborne noise levels for equipment used during earthworks at the nearest residential receivers – no hoarding (JHA 2021)

Figure 72 shows the predicted range of sound pressure levels of earthworks activities occurring at distances of between 5m and 40m with a 2.4-metre-high hoarding around the construction site. Allowances have been made for distances attenuation and reflections.

Item	Typical Noise Level (dB ref 1pW)	Predicted Noise Levels $L_{Aeq,15min}$, dB(A) (re. 20µPa) – with hoarding		
		Receiver 2	Receiver 3	Receiver 4
30t Excavator	117	54-37	54-37	56-39
Truck (>20tonne)	107	44-27	44-27	46-29
Bored Piling Rig	116	53-36	53-36	55-38
Front end loader	116	53-36	53-36	55-38
Total	---	58-41	58-41	61-44

Figure 72 Predicted airborne noise levels for equipment used during earthworks at the nearest residential receivers – with hoarding (JHA 2021)

As demonstrated in **Figures 71** and **72**, without the hoarding around the construction site, all predicted earthworks activities are predicted to exceed the NML (orange font) when at close distances at the nearest residential receivers. With the hoarding around the construction site, all predicted earthworks activities were within the NML for residential receivers 2 and 3 at close and far distances. The Highly Affected Noise level of 75dB(A) (orange font) is predicted to be exceeded at receiver 4 with all plant activities are running cumulatively at close distances.

With the hoarding around the construction site, all predicted earthworks activities were within the NML for residential receivers 2 and 3 at close and far distances. All earth-works activities, except the truck, are predicted to exceed the NML at close distances for residential receiver 4. The NML of all the nearest residential receivers is predicted to be exceeded with all plant activities are running cumulatively at close distances.

The predicted exceedance of the NMLs in the nearest residential receivers triggers the proponent to apply all reasonable and feasible work practices to minimise the noise as much as possible and community consultation for the noisy construction activities, as per the requirements of the ICNG.

Structure

Figure 73 shows the predicted range of sound pressure levels of structural activities occurring at distances of between 5m and 40m from the boundary of the site without a hoarding around the construction site.

Item	Typical Noise Level (dB ref 1pW)	Predicted Noise Levels $L_{Aeq,15min}$ dB(A) (re. 20μPa) – no hoarding		
		Receiver 2	Receiver 3	Receiver 4
Concrete pump	110	62-44	62-44	64-46
Concrete mixer	112	64-46	64-46	66-48
Mobile Crane	104	56-38	56-38	58-40
Electric Hand-Tools	102	54-36	54-36	56-38
Angle grinders	102	54-36	54-36	56-38
Total	---	67-49	67-49	69-51

Figure 73 Predicted airborne noise levels for equipment used during structural works at the nearest residential receivers – no hoarding (JHA 2021)

Figure 74 shows the predicted range of sound pressure levels of structural activities occurring at distances of between 5m and 40m with a 2.4-metre-high hoarding around the construction site. Allowances have been made for distances attenuation and reflections.

Item	Typical Noise Level (dB ref 1pW)	Predicted Noise Levels $L_{Aeq,15min}$ dB(A) (re. 20μPa) – with hoarding		
		Receiver 2	Receiver 3	Receiver 4
Concrete pump	110	47-30	47-30	49-32
Concrete mixer	112	49-32	49-32	51-34
Mobile Crane	104	41-24	41-24	43-26
Electric Hand-Tools	102	39-22	39-22	41-24
Angle grinders	102	39-22	39-22	41-24
Total	---	52-35	52-35	54-37

Figure 74 Predicted airborne noise levels for equipment used during structural works at the nearest residential receivers – with hoarding (JHA 2021)

As demonstrated in **Figures 73** and **74**, without the hoarding around the construction site, all the structural activities except the electric hand tools and angle grinder, are predicted to exceed of the NML (orange font) at the nearest residential receivers 2 and 3 at close distances. All structural activities, without the hoarding around the construction site, are predicted to exceed the NML for residential receiver 4 at close distances. Without the hoarding, the NML of all the nearest residential receivers is predicted to be exceeded with all plant activities are running cumulatively at close distances.

With the hoarding around the construction site, all of the structural activities, including a cumulative total, are predicted to be within the NML for all the nearest residential receivers at close and far distances.

Façade

Figure 75 shows the predicted range of sound pressure levels of façade activities occurring at distances of between 5m and 40m from the boundary of the site without a hoarding around the construction site.

Item	Typical Noise Level (dB ref 1pW)	Predicted Noise Levels $L_{Aeq,15min}$ dB(A) (re. 20μPa) – no hoarding		
		Receiver 2	Receiver 3	Receiver 4
Mobile Crane	104	56-38	56-38	58-40
Electric Hand-Tools	102	54-36	54-36	56-38
Total	---	58-40	58-40	61-43

Figure 75 Predicted airborne noise levels for equipment used during facade works at the nearest residential receivers – no hoarding (JHA 2021)

Figure 76 shows the predicted range of sound pressure levels of façade activities occurring at distances of between 5m and 40m with a 2.4-metre-high hoarding around the construction site. Allowances have been made for distances attenuation and reflections.

Item	Typical Noise Level (dB ref 1pW)	Predicted Noise Levels $L_{Aeq,15min}$ dB(A) (re. 20μPa) – with hoarding		
		Receiver 2	Receiver 3	Receiver 4
Mobile Crane	104	47-30	47-30	49-32
Electric Hand-Tools	102	39-22	39-22	41-24
Total	---	48-31	48-31	50-33

Figure 76 Predicted airborne noise levels for equipment used during facade works at the nearest residential receivers – with hoarding (JHA 2021)

Without the hoarding around the construction site, the mobile crane, at close distances, is predicted to exceed the NML (orange font) for the nearest residential receivers. Electric hand tools are also predicted to exceed the NML at residential receiver 4 at close distances. Without the hoarding, the NML of all the nearest residential receivers is predicted to be exceeded (orange font) when all plant is running cumulatively at close distances.

With hoarding around the construction site, all façade activities, including a cumulative total, are predicted to be within the NML for the nearest residential receivers.

Vibration Assessment

The NSW RMS 'Construction Noise and Vibration Guideline' provides safe working distances for vibration intensive plant and are quoted for both 'cosmetic' damage (in accordance with BS 7385.2:1993) and human

comfort (in accordance with DECC's 'Assessing Vibration: A Technical Guideline'). The recommended safe working distances for typical construction plant are provided in **Figure 77**.

Plant Item	*Description*	*Cosmetic Damage*	*Human Response*
Small Hydraulic Hammer	5-12 tonne	2m	7m
Medium Hydraulic Hammer	12-18 tonne	7m	23m
Large Hydraulic Hammer	18-34 tonne	22m	73m
Vibratory Pile Driver	Sheet piles	2-20m	20m
Pile Boring	<800mm	2m	N/A
Jackhammer	Hand held	1m	Avoid Contact with Structure

Figure 77 Recommended minimum working distances for vibration intensive plant from sensitive receivers (JHA 2021)

For any vibration intensive plant expected to be within close proximity of the minimum distances described above, the contractor must engage a qualified engineer to carry out a vibration survey in order to assess any potential risks.

The vibration survey and assessment will determine whether the vibration levels might exceed the relevant criteria then vibration mitigation and management measures will need to be put in place to ensure vibration impacts are minimized as far as practicable.

6.10.5 Mitigation measures

6.10.5.1 Specific noise control measures

Construction Site Boundary

Acoustic screening is recommended during all phases of the construction work, except for the internal refurbishments works. The acoustic screening should be 2.4m high acoustic screen (Class A hoarding or equivalent) and constructed from minimum 19mm thick plywood or similar mass surface, and be free of any air gaps.

Impact to Existing Premises

To minimise the noise and vibration impacts to the existing premises of the development, the following noise control measures are recommended:

- Incorporate respite periods for noisy activities as per Section 7.2.1 of the Noise and Vibration Impact Assessment
- Provide information to clinic staff before and during construction
- Implement all feasible and reasonable measures to address the noise source of complaint. Implementation of all reasonable and feasible mitigation measures for all works will ensure that any adverse noise impacts to clinic patients and staff are minimised when noise goals cannot be met due to space constraints

6.10.5.2 General control elements

As a general rule, minimising noise and vibration should be applied as universal work practice at any time of day, but especially for any construction works to be undertaken at critical times outside normal daytime/weekday periods.

Construction noise and vibration shall be managed by implementing the strategies listed below:

- *Plant and equipment*. In terms of both cost and results, controlling noise and vibration at the sources is one of the most effective methods of minimising the impacts from any work site activities. Work practices that will reduce noise and vibration at the source include:
    - Employing quieter techniques for all high noise activities such as rock breaking, concrete sawing, and using power and pneumatic tools.
    - Use quieter plant and equipment based on the optimal power and size to most efficiently perform the required tasks.
    - Selecting plant and equipment with low vibration generation characteristics.
    - Operate plant in a quietest and most effective manner.
    - Where appropriate, limit the operating noise of equipment.
    - Regularly inspecting and maintain plant and equipment to minimise noise and vibration level increases, to ensure that all noise and vibration reduction devices are operating effectively.

- *On Site noise management*. Practices that will reduce noise from the Site include:
    - Maximising the distance between noise activities and noise sensitive receivers. Strategically locate equipment and plant.
    - Undertaking noisy fabrication work off-site where possible.
    - Avoid the use of reversing beeping alarms or provide for alternative systems, such as broadband reversing alarms
    - Maintaining any pre-existing barriers or walls on a demolition or excavation site as long as possible to provide optimum sound propagation control.
    - Constructing barriers that are part of the project design early in the project to afford mitigation against site noise.
    - Using temporary site building and material stockpiles as noise barriers. These can often be created using site earthworks and may be included as a part of final landscape design.
    - Installing purpose built noise barriers, acoustic sheds and enclosures.

- *Work scheduling*. Scheduling work during periods when people are least affected is an important way of reducing adverse impacts. The following scheduling aspects may reduce impacts:
    - Provide respite periods, including restricting very noisy activities to daytime, restricting the number of nights that after-hours work is conducted near residences, or by determining any specific requirements, particularly those needed for noise sensitive receivers.
    - Scheduling activities to minimise impacts by undertaking all possible work during hours that will least adversely affect sensitive receivers and by avoiding conflicts with other scheduled events.
    - Scheduling work to coincide with non-sensitive periods.
    - Scheduling noisy activities to coincide with high levels of neighbourhood noise so that noise from the activities is partially masked and not as intrusive.
    - Planning deliveries and access to the Site to occur quietly and efficiently and organising parking only within designated areas located away from sensitive receivers.
    - Optimising the number of deliveries to the Site by amalgamating loads where possible and scheduling arrivals within designated hours.
    - Designating, designing and maintaining access routes to the Site to minimise impacts.

- *Consultation, notification and complaints handling*.
    - Provide information to neighbours before and during construction.
    - Maintain good communication between the community and Project staff.
    - Have a documented complaints process and keep register of any complaints.
    - Give complaints a fair hearing and provide for a quick response.
    - Implement all feasible and reasonable measures to address the source of complaint.
    - Implementation of all reasonable and feasible mitigation measures for all works will ensure that any adverse noise impacts to surrounding receivers are minimised when noise goals cannot be met due to safety or space constraints.

6.10.5.3 Additional noise and vibration control measures

If, during construction, an item of equipment exceeds ether the noise criteria at any location or the equipment noise level limits, the following noise control measures, together with construction best practices, shall be considered to minimise the noise impacts on the neighbourhood.

- Schedule noisy activities to occur outside of the most sensitive times of the day for each nominated receiver.
- Consider implementing equipment-specific screening or other noise control measures recommended in Appendix C of AS 2436:2010.
- Limit the number of trucks on Site at the commencement of Site activities to the minimum required by the loading facilities on Site.
- When loading trucks, adopt best practice noise management strategies to avoid materials being dropped from height into dump trucks.
- Avoid unnecessary idling of trucks and equipment.
- Ensure that any miscellaneous equipment (extraction fans, hand tools, etc) not specifically identified in the CNVMP incorporates silencing/shielding equipment as required to meet the noise criteria.

Implementation of all reasonable and feasible mitigation measures for all internal and underground works will ensure that any adverse noise impacts to surrounding noise sensitive receivers are minimised when noise goals cannot be met due to safety or space constraints.

Therefore, it is considered that this assessment has considered the construction and operational noise impacts on nearby sensitive receivers and has outlined the proposed management and mitigation measures in accordance with Section 10 of the issued SEARs.

6.11 BIODIVERSITY

A Biodiversity Development Assessment Report (BDAR) has been prepared by Eco Logical and is attached at **Appendix 17**.

Vegetation within the development Site was identified as planted native vegetation. Therefore, this BDAR was prepared under the streamlined assessment module for planted native vegetation in accordance with Appendix D of Biodiversity Assessment Method (BAM) 2020. Species credits are not required to offset the proposed impacts. The vegetation and threatened species identified within the Site is illustrated in **Figure 78** below.

Figure 78 Vegetation and threatened species identified within the Site (Eco Logical 2021)

One planted threatened species were identified within the study area; *Eucalyptus nicholii* (Narrow-leaved Black Peppermint), listed as vulnerable under both the *Biodiversity Conservation Act 2016* (BC Act) and *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). This species does not naturally occur on the Cumberland Plain and is well outside its natural range. The Site also contains planted native

vegetation which includes feed tree species (*Eucalyptus microcorys*, *Eucalyptus saligna*, *Corymbia citriodora* and *Lophostemon confertus*) these species were considered foraging habitat for *Pteropus poliocephalus* (Grey-headed Flying-fox). Planted native vegetation (0.14 ha) also represents marginal foraging habitat for the Grey-headed Flying Fox. No breeding habitat (camps) would be affected.

Two Matters of National Environmental Significance (MNES) were identified as having potential to be adversely affected by the proposed works. *Pteropus poliocephalus* (Grey-headed Flying-fox) is listed as Vulnerable under the *Commonwealth Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) and it is considered that this species is likely to use some of the development Site for foraging. *Eucalyptus nicholii* is also a MNES and will be impacted by the proposed works. Application of the Commonwealth Significant Impact Criteria was undertaken for the Grey-headed Flying-fox and *Eucalyptus nicholii* and the assessments concluded that the project is unlikely to have a significant impact on these species.

The impacts of the development not requiring offset for native vegetation and threatened species are outlined in **Table 26**.

Table 26 Impacts to native vegetation and threatened species that do not require offsets

Native vegetation/threatened species and or habitat impacted	Direct impact (ha/number of individuals)	Rationale
Planted vegetation	0.14 ha	Under Appendix D: Streamlined assessment module – Planted native vegetation of the BAM 2020, the use of Chapters 4 and 5 are not required to be applied.
Eucalyptus nicholii (Narrow-leaved Black Peppermint)	1 individual	Species credits are not required to offset the proposed impacts in accordance with Appendix D.2 of BAM 2020.
Foraging habitat for *Pteropus poliocephalus* (Grey-headed Flying-Fox)	0.14 ha	The 0.14 ha of planted native vegetation does not conform to a PCT or TEC and under Chapters 4 and 5 of the BAM Species credits are not required to offset the proposed impacts in accordance with Appendix D.2 of BAM 2020.

An indirect impact of 2m was applied adjoining the direct impact area. The indirect impacts primarily relate to rubbish dumping, being illegal dumping by construction crews which may affect local fauna which visit Site intermittently. The indirect impacts are summarised in **Table 27** below.

Table 27 Indirect impacts

Indirect impact	Description (nature, extent and frequency)	Biodiversity affected	Duration/timing	Consequence
Rubbish dumping	Illegal dumping by Construction crews, may affect local fauna which visit Site intermittently	Potential for rubbish to spread via wind outside the development Site.	Potential to occur at any time throughout construction phases	Rubbish is unlikely to remain into the operational phase of the proposal

A map displaying the direct impacts to planted native vegetation and threatened flora species is displayed in **Figure 79**.

Figure 79 Direct impacts to planted native vegetation and threatened flora species (Eco Logical 2021)

The indirect impact zone is illustrated in **Figure 80** below.

Figure 80 Indirect impact zone (Eco Logical 2021)

In accordance with Appendix D of BAM 2020, no offsets are required for impacts to planted *Eucalyptus nicholii* or Grey-headed Flying-fox habitat. Significant Impact Criteria were also applied for each of these species as they are all listed as MNES under the EPBC Act. It was concluded that the proposed action would not result in a significant impact to any of the three species.

Given the assessment above and the BDAR prepared by Eco Logical, it is considered that the proposed development is in accordance with the requirements of the BC Act and Section 11 of the issued SEARs.

6.12 CONTRIBUTIONS

The proposed development is subject to the Section 7.12 levy under the *Cumberland Local Infrastructure Contributions Plan*. Given that the proposed development has a construction cost greater than $200,000, the Section 7.12 contribution will be applicable at a rate of 1%.

6.13 STAGING

The approval strategy sought, seeks to obtain Development Consent to complete the construction works over several construction stages upon issue of the relevant Construction Certificates; however, any such staging does not constitute staged development as defined under Section 4.22 of the EP&A Act. Further details of the construction staging are addressed in **Section 6.21.3** and the Preliminary Construction Management Plan at **Appendix 22**.

6.14 UTILITIES

A Building Services Interface Report has been prepared by DSA and is provided at **Appendix 21** to outline the mechanical, electrical and hydraulic services requirements for the proposed development.

6.14.1 Mechanical services

The existing Site inspection undertaken to review the Mechanical Services interface between the existing and new building has identified the following:

- The existing consulting area currently does not have outside air and each room is served by a wall mounted split system. Each room is deemed compliant from opening windows, however the main waiting area does not comply with natural ventilation and is a potential compliance issue as the building is being extended.
- The existing kitchen exhaust duct will need to be raised to above the new roof.
- Lower ground floor rooms reworked will require new outside air provided for compliance.
- The demolished ward building will require all units pumped down and sealed for return to the Hospital.
- Group Room 1 and Group Room 2 were not upgraded in the previous project, do not have ventilation and do not comply with the BCA.
- The recreation centre is not ventilated and also does not comply with the BCA.
- The male toilet has insufficient ventilation and does not comply to code.
- The waiting area of Level 1 Consulting currently has no compliance for outside air.

<u>New building air conditioning</u>

The mechanical services for the new building are to consist of individual bulkhead mounted fan coil units installed in the ceiling of the vestibule corridor to each ward unit connected to a separate inverter condensing set mounted on roof platforms. The ward units are to be provided with outside air from multiple central systems. The nurse station, corridors, clean utility, office and lounge areas are to be provided with separate inverter heat pump rooftop systems. The lounge and group room are each to be provided with a separate ducted split system. The condensing sets are to be mounted on the roof platforms.

<u>Outside air/ventilation</u>

The ward building is to be provided with outside air ventilation, to meet the required Australian Standard AS 1668, ducted to each of the air conditioning units from an approved source with filter.
The amount of outside air provided to a space is to be selected as a minimum value listed in AS 1668.2, though the minimum figures can be reduced provided the requirements for odour and particulate control are met. The contractor is reminded that the new requirements of AS 1668 and the BCA require the exhaust air to be made up with outside air.

Acoustics

The internal spaces of the facility are to be designed to maintain the noise levels recommended in AS 2107 whilst the outside noise levels are to be designed to achieve a level that is in consideration of the surroundings and not obtrusive to the complex or the adjacent neighbours.

6.14.2 Electrical services

All services are to be installed to meet (but not limited to) the requirements of:

- NSW Service and Installation Rules
- Endeavour Energy Network and Installation standards
- AS3000
- AS3003
- AS/NZS3008.1
- AS3009
- AS1670 Series
- NCC 2019 A1
- ACMA Manuals and associated Australian Standards
- All other relevant standards for MATV, Access Control and CCTV systems.

ESD provisions/considerations

Additional load meters will be provided to BCA Section J8 requirements, and to any additional heavy power load equipment systems. Coordination of interconnection to mechanical systems BMS will be required.

Metering Inclusions (but not limited to):

- Mechanical Plant (gas and electricity consumption to be separately metered)
- Lifts
- Lighting
- Power
- Hot Water

Meters will be located in an area that allows regular monitoring and maintenance by facilities managers and other facilities management personnel.

Energy information is proposed to be monitored through an electronic system capable of capturing and processing the data produced by the installed energy meters to meet BCA Section J8.3. The automatic monitoring system must be capable of:

- Collecting data from all meters;
- Alerting to missing data due to failures;
- Recording and processing of data on energy use consumption at user adjustable levels;
- Provide a breakdown of the information by building system type;
- Include the energy consumption, the load versus time (load profile) and the power factor

Substations

A preliminary maximum demand based on area methods give a preliminary additional demand of 500kVA. The existing substation is rated at 750kVA. It services the current hospital, plus a street feeder. A recorded peak of 491kVA has been advised by the supply authority.

It is anticipated the substation will require upgrade/replacement to allow for the additional extension works to the hospital – Preliminary calculations indicate a 1500kVA substation to replace existing or a new substation installed adjacent the existing (subject to Endeavour Energy assessment).

It will be proposed to establish a new padmount substation located adjacent the new extension. This will supply a new main switchboard for the entire facility (new and existing) allowing for the exiting substation to be decommissioned and removed (subject to Endeavour Energy assessment and advice).

The new substation would be commissioned prior to the decommissioning of the existing substation to remove/minimise interruptions to the existing Endeavour Energy network system.

Final supply arrangements are required to be negotiated by the successful contractor with the local supply authority.

It is noted that demand calculation will be revisited upon confirmation of final internal make-up/usage of building.

It is anticipated that padmount type substations will be required to service the Site. Final substation arrangements and design will be carried out by an authorised Level 3 Accredited Services Provider (ASP) during the detailed design phases of the project.

Main switchboard

The existing main switchboard is estimated to be in the order of 50 years old. Parts and equipment are no longer available making it difficult to service and repair.

It cannot support the new extension and therefore will be required to be replaced, and be in compliance with the latest BCA2019, AS/NZS3000 and Endeavour energy requirements.

It is proposed to establish the new Site main switchboard in a dedicated 2hr fire rated switchroom, basement level of the existing building (adjacent the existing main switchboard location). Existing loads can then be transferred across for the old to new reducing power interruptions across the Site. The new main switchboard will be arranged to suit NCC2019 A1 and AS/NZS3000 requirements.

The new building will have direct supplies from the new main switchboard for Life Safety dedicated supplies to lifts, smoke control equipment etc. and a general main switch to a proposed new main distribution board for the new building (carpark level).

6.14.3 Hydraulic services

Hydraulic services within the existing stage 1 building will remain unchanged other than the renovation of the existing ground floor amenities and alterations involved for the lower ground floor loading bay.

Hydraulic services for these works will be retained and altered to suit proposed scope, requirements and proposed fixtures. The lower ground floor will include the removal, replacement and relocation of the existing kitchen grease arrestor.

All services are to be installed to meet (but not limited to) the requirements of:

- National Construction Code (NCC) – 2019 Volume 1, 2 & 3
- Work Cover Authority requirements
- Local Council regulations having jurisdiction on this project
- NSW Fire and Rescue requirements

- Sydney Water Corporation requirements
- Jemena network operator rules and requirements
- AS 2419.1 Fire Hydrant Installation
- AS 2441 Installation of fire hose reels
- AS 2444 -2001 Portable fire extinguishers and fire blankets -selection and location
- AS 2941-2013 Fixed fire protection installation - pumpset system
- AS 3500.0 Glossary of terms
- AS 3500.1 Water services
- AS 3500.2 Sanitary plumbing & drainage
- AS 3500.4 Heated water services
- AS 5601 Gas installations
- NSW Environmental Planning and Regulation 2000

Metering

Stage 2 drinking cold water metering inclusions are as below (but not limited to):

- Stage 2 drinking cold water authority billing meter
- Stage 2 hot water plant
- Stage 2 irrigation supplies
- Stage 2 mechanical supplies

Stage 2 natural gas metering inclusions are as below (but not limited to):

- Stage 2 hot water plant
- Stage 2 mechanical supplies

Coordination of interconnection of hydraulic meters to mechanical systems BMS will be required. Meters will be located in an area's that allow regular monitoring and maintenance by facilities managers and other facilities management personnel.

Drinking cold water and natural gas consumption is proposed to be monitored through an electronic system capable of capturing and processing the data produced by the installed hydraulic meters. The automatic monitoring system must be capable of:

- Collecting data from all meters;
- Alerting to missing data due to failures;
- Recording and processing of data on water and gas use consumption at user adjustable levels;
- Provide a breakdown of the information by building system type;

Drinking cold water

A new drinking cold water connection and supply from the existing authority water main is proposed, with a new boundary billing meter and reduced pressure zone device (RPZD). The new drinking cold water meter and RPZD will supply stage 2 hydraulic fixtures, outlets and fire hose reels only.

Hot water

A new hot water plant serving stage 2 hydraulic fixtures and outlets is proposed. Hot water plant location is to be suitable for a natural gas centralised hot water plant with sufficient natural air flow for natural gas burners and allowance for gas flues to atmosphere.

Warm water

Warm water to amenities and fixtures requiring warm water will be provided from NSW Health approved thermostatic mixing valves (TMV) installed at an accessible height within a recessed lockable stainless-steel

box. Each ensuite or double back-to-back ensuites will incorporate a TMV. Dead legs from hot water supplies to each TMV along with dead legs from each TMV to warm water outlets will be kept to a minimum.

Natural gas

Natural gas for the proposed stage 2 works will connect to the existing stage 1 natural gas meter set adjacent to the loading dock drive way entrance. New stage 2 sub meters will be incorporated for the proposed stage 2 hot water plant and any mechanical gas provisions. The existing natural gas meter and regulator assemblies will be assessed for available capacity to supply stage 2 gas loads.

Fire hydrant system

The existing fire hydrant system will be extended to the proposed stage 2 building. The existing fire hydrant booster assembly location will ideally be retained, with protection of the booster assembly for attending fire personnel meeting AS2419.1 requirements. Flows and pressures will meet the requirements of AS2419.1, and where a shortfall exists tanks and or pumps will be incorporated.

Fire hose reel system

A new fire hose reel system supplied of the new drinking cold water system will be proposed. Flows and pressures will meet the requirements of AS2441, and where a shortfall exists tanks and or pumps will be incorporated. New fire hose reels will be installed within dedicated fire hose reel cupboards as per the architectural drawings. Fire hose reel cupboards will be locked and released by the FIP in the event of a fire, this is to maintain consistency between stage 1 and stage 2 due to mental health patients.

Stormwater plumbing

New stage 2 stormwater plumbing will connect to civil provisions at ground floor. All eave and box gutter details will be sized as per AS3500.3 requirements.

6.15 STORMWATER DRAINAGE

A Stormwater Management Report and Plans have been prepared by Stellen Consulting and is attached at **Appendix 9**.

6.15.1 Stormwater Diversion

6.15.1.1 Design and Modelling

The Site is currently burdened by an existing stormwater drainage easement containing a 600mm diameter pipe which conveys stormwater from Lytton Street to a Sydney Water drainage channel at the rear of the Site. The development proposed relocation of the existing easement and drainage pipe to the southern boundary of the Site. the proposed stormwater diversion is shown in **Figure 81** and DR-200 of the Stormwater Management Plans.

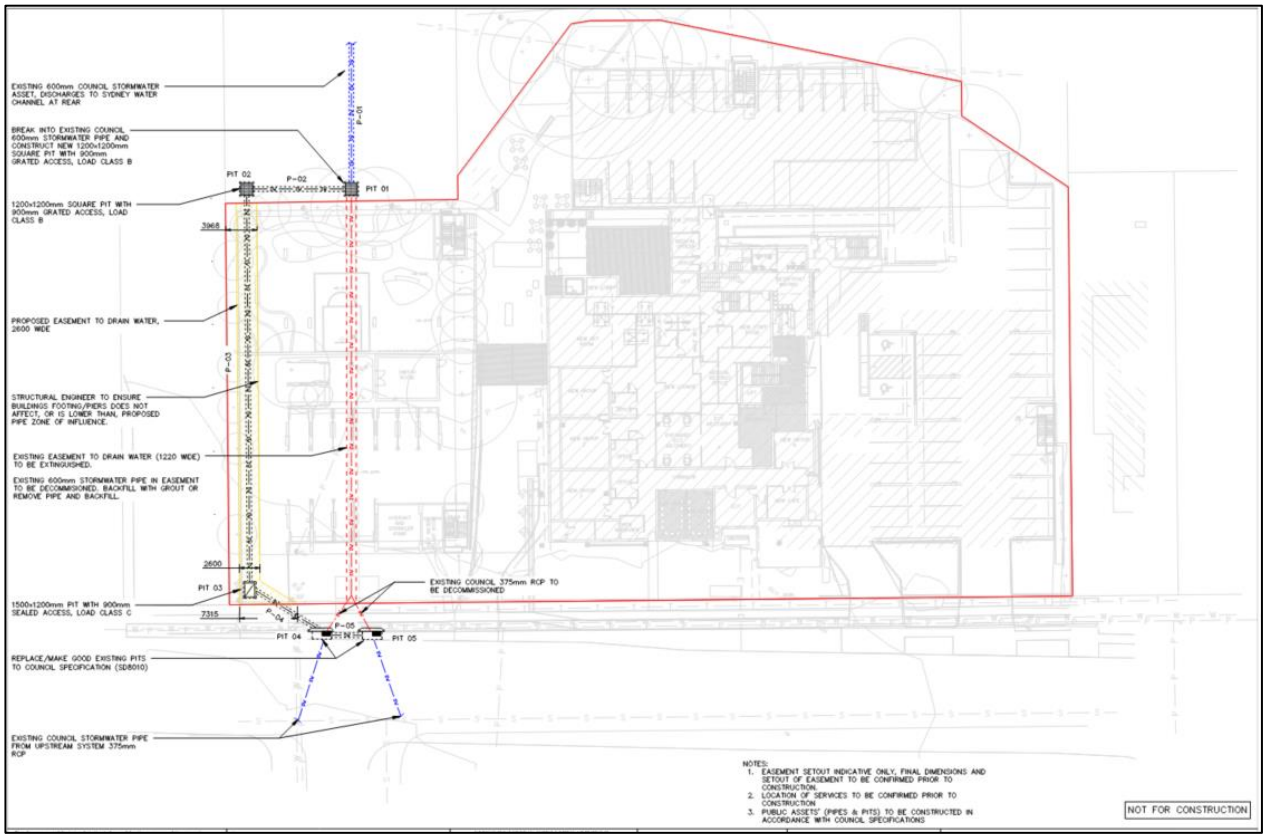

Figure 81 Stormwater diversion (Stellen Consulting 2021)

The proposed stormwater system was designed using DRAINS Hydrologic and Hydraulic Urban Catchment modelling. The modelling results are shown in Appendix B of the Civil Engineering Report. The DRAINS model showed that the proposed diversion will have an overall net positive effect on the system. The proposed works:

- Increase the conveyance capacity of the system by approximately 40%
- Reduce peak overland flow in Lytton Street by 5-10%.

6.15.1.2 Council Consultation

The proposed stormwater diversion was discussed in principle with Council (Rolyn Sario and Mark Evans) and Sydney Water, with sketches provided for comment. During a number of phone calls, Council indicated that they were open to the proposed diversion but were only able to provide limited feedback/comments without full detailed drawings to review formally.

As part of the SEARs process, Council provided a set of "*Drainage Redirection Requirements*" and "*Drainage System Capacity Analysis*" documents (refer Appendix C). The proposed stormwater diversion has been design generally in accordance with these requirements. In particular, the design conforms to the following key criteria outlined by Council:

- No structures overhang the pipe or easement.
- Proposed system matches existing hydraulic function of system (5% AEP).
- Surcharging flow is safely managed with a surcharge pit on the downstream end of the new drainage line.

6.15.2 Stormwater Quality

Conceptual water quality modelling using the Model for Urban Stormwater Improvement Conceptualisation (MUSIC) Version 6.3 was undertaken to estimate the effectiveness of the proposed stormwater

management strategy at removing pollutants, particularly sediment, phosphorous and nitrogen, over the long term.

A number of Water-sensitive urban design (WSUD) measures are proposed to manage runoff from the Site including:

- Rainwater tanks with combined volume of 20kL connected to an outdoor irrigation system.
- A total of 4 off Ocean Protect Psorb cartridges (690mm) split into two pits.
- 6 Ocean Protect pit baskets.

The water quality catchments for roof/rainwater and other areas were estimated based on the proposed architectural drawings listed in Appendix A of the Civil Engineering Report. **Figure 82** shows the WSUD catchment plan and areas. The model configuration and proposed treatment train is shown in **Figure 83**.

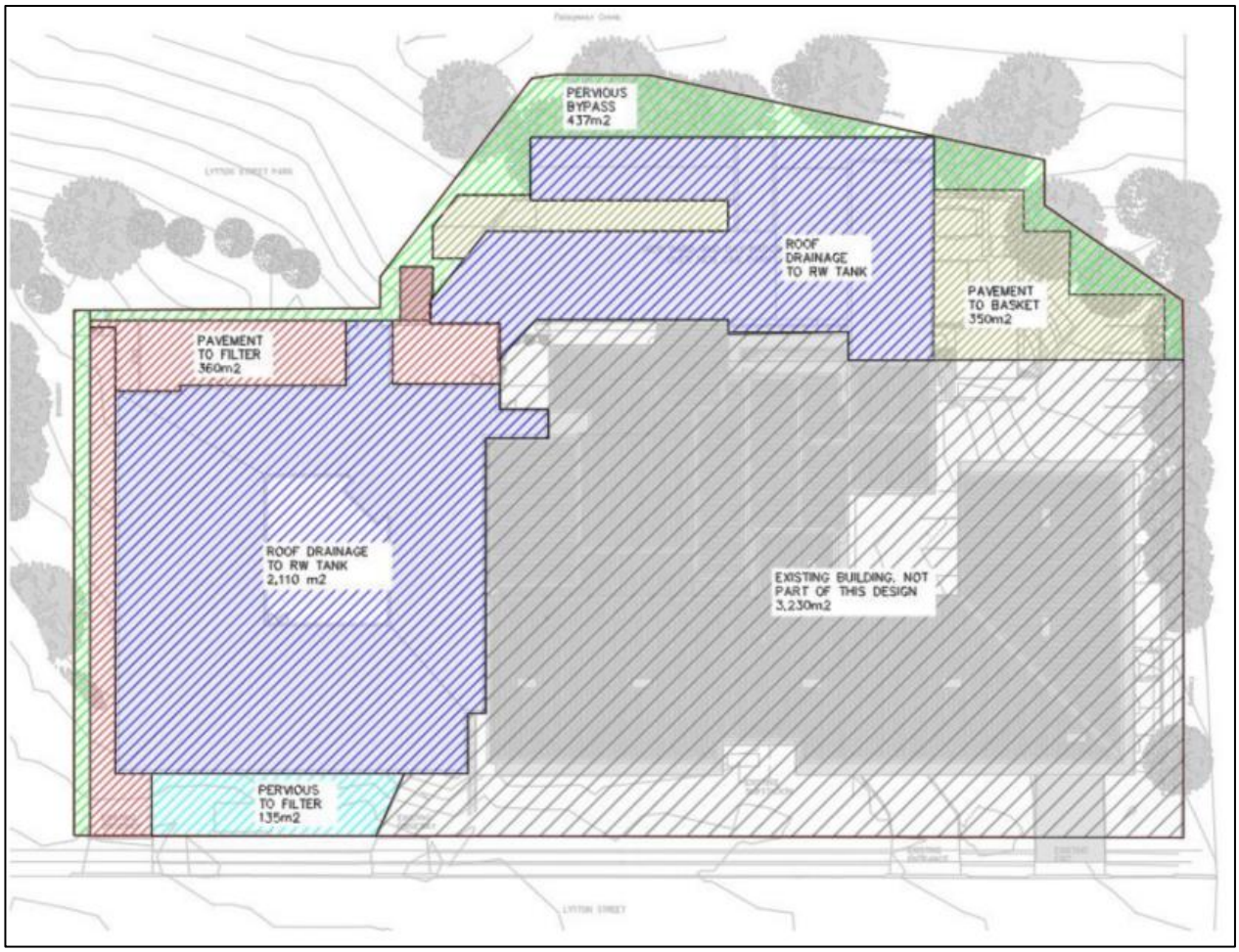

Figure 82 Catchment Plan (Stellen Consulting 2021)

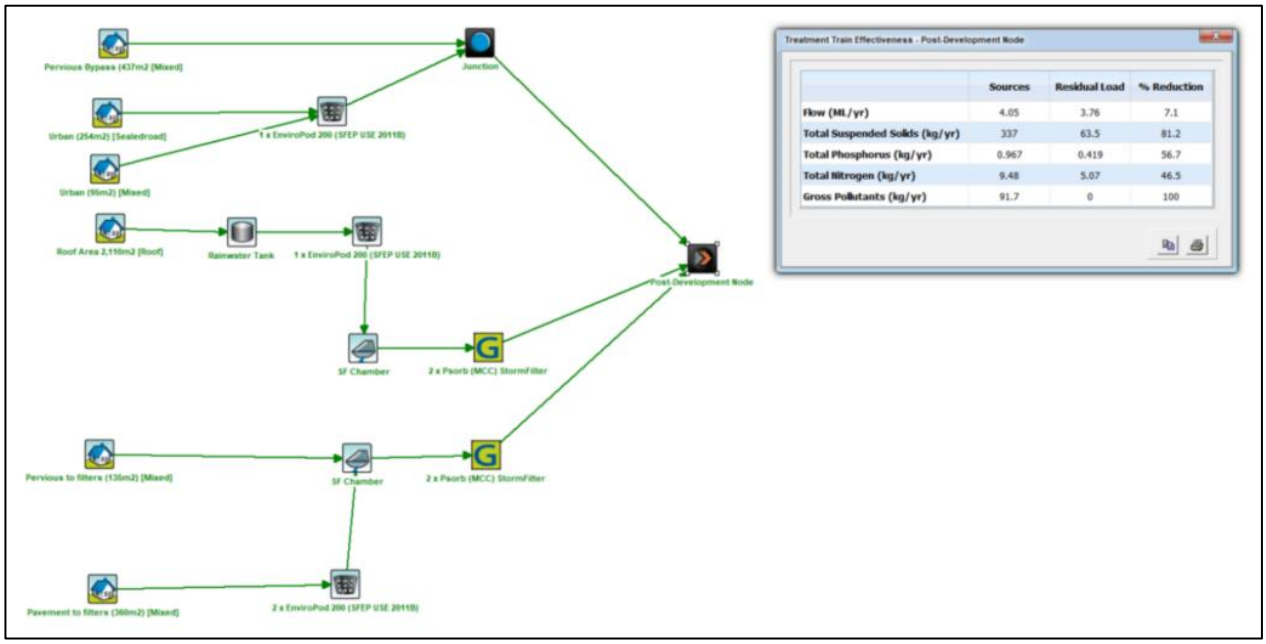

Figure 83 Water Quality Management Strategy MUSIC Model Configuration (Stellen Consulting 2021)

The Water Quality Management Strategy design is required to meet the requirements of HDCP2013 Part Table 6. The stormwater quality improvement targets are outlined in **Table 28** below.

Table 28 Water Quality Objectives (HDCP2013)	
Pollutant	**Load Reduction Targets**
Total Suspended Solids (TSS)	80%
Total Phosphorus (TP)	45%
Total Nitrogen (TN)	45%
Gross Pollutants	70%

The MUSIC model results (**Figure 83**) show that the proposed Water Quality Management Strategy provides a reduction in post-development loads of Total Suspended Solids, Total Phosphorous, Total Nitrogen and Gross Pollutants that meet Council's pollution reduction targets of 80%, 45%, 45% and 70% respectively.

6.15.3 Rainwater Harvesting Initiatives

Clean rainwater collected from the non-trafficable areas will be harvested via charged or syphonic drainage systems through first flush devices prior to entry into the proposed 20m^3 (total) rainwater storage tanks. The rainwater captured will be used in the outdoor irrigation system.

In the event of overflow from rainwater harvesting tanks, the water will overflow via a piped gravity drainage system to the surface drainage system for collection. The proposed design of the rainwater harvesting tanks is illustrated in DR-100 and DR-110 of the Stormwater Management Plans.

Overall, the proposed stormwater management plan has been designed in accordance with the relevant codes and standards.

A DRAINS model was prepared for assessment of the proposed stormwater diversion through the development and predicts an overall net positive effect on the system in terms of overall conveyance and flooding within Lytton Street.

The MUSIC model results showed that the proposed WSUD measures are capable of meeting council's pollutant reduction targets.

Further details are provided in the Stormwater Management Report and Plans at **Appendix 9**.

Therefore, it is considered that given the above assessment the proposed stormwater layout has demonstrated how stormwater will be appropriately managed in accordance with Council's requirements and has adequately addressed Section 15 of the issued SEARs.

6.16 FLOODING

A Flood Impact Study (**Appendix 12**) has been prepared by ACOR Consultants to investigate flood behaviour throughout the overland flooding catchment impacting the Subject Site.

A two-dimensional computer model of the catchment was established to analyse overland flood behaviour under existing and proposed catchment conditions. The model provides information on the extent of flood inundation, flood depths and flood velocities throughout the catchment for the 1% AEP overland flood event.

6.16.1 Flood characteristics

The Subject Site is impacted by overland flows draining towards the Finlayson Creek drainage reserve at the rear of the property. The catchment upstream of the Site is dominated by residential land use. Elevations within the upstream catchment are generally within the range 47 m AHD to 22 m AHD.

The Site is impacted by flooding during the 1% AEP flood event, with 1% AEP floodwater levels within the range of 22.50 m AHD to 19 m AHD, resulting in partial inundation of the Site. Inundation depths vary within overland areas, with flood depths generally less than 0.30 m.

The 1% AEP overland floodwaters generally pose Low Hazard to occupants, vehicles and building structure of the surrounding areas.

6.16.2 Flood model results

This section summarises the results of the hydrologic and hydraulic modelling of overland flows within the catchment. PO lines have been used in modelling to extract the overland flood discharge and velocity around the vicinity of the subject Site. Location of the PO lines are shown in flood map results in Appendix C of the Flood Impact Study. The 1% AEP flood event critical duration and peak flowrate through the catchment are presented. The behaviour of the 1% AEP floodwaters within the vicinity of the subject Site are described in general terms, and the impact of flooding on the Subject Site is discussed.

The 1% AEP peak flowrate passing through the Site area and its vicinity are tabulated below:

Table 29 1% AEP Peak Flowrates at PO lines

PO Line Name/Location	Peak Flowrate (m^3/s)	
	Pre-development	Post development
PO_1 (subject site)	0.21	0.21
PO_3 (11 Lytton & subject site)	0.27	0.27
PO_2 (35-37 Lytton)	2.60	2.60

The 1% AEP flood level in the vicinity of the Site is within the range of 22.2 m AHD to 19.00 m AHD, with majority of depths of less than 0.25 m.

Flood waters enter the Site from 11 Lytton Street and the frontage of 23-27 Lytton Street, flows are then guided to the Finlayson creek via undercover carpark at the northern end and via paved driveway along the southern end. The existing 600 mm diameter pipe passing through the open carpark helps to relieve some of the overland flooding from the street. The pipe conveys approximately 0.39 m^3/s of discharge during Predeveloped condition, while during the post developed condition, the diverted pipe can capture discharge up to 0.34 m^3/s from the street.

Inundation is largely confined to the existing drainage route passing through the northern carpark of the Site, with floodwaters also flowing between the proposed and existing buildings within the driveway.

The 1% AEP floodwater velocities are generally between 0.1 – 1.0 m/s, which are in accordance with pre-development conditions.

The proposed development does not result in any flood levels increase external to the Site. The entire incremental flood levels are within the Site and lies within landscaped area at the rear of the carparks. A change in flood level of up to 150 mm has been noticed at the rear end of the northern and the southern carpark area. Once the floodwaters leave the building footprint, they match to the existing flood levels external to the Site. In spite of increase in flood levels, the flood hazard ratings within the area are still within Low category which justifies the suitability of the proposal.

The crest provided at RL 20.35 m AHD at the top of driveway ramp leading to the proposed western undercover car park has not only protected the entrance of floodwaters to the carpark, but also provided a freeboard of 150mm above the peak flood level of RL 20.20 m AHD at that spot.

6.16.3 Flood affectation of the Site

The Site is impacted by flooding during the 1% AEP flood event, with 1% AEP floodwater levels within the range of 22.20 m AHD to 19 m AHD, resulting in partial inundation of the Site. Inundation depths vary greatly by location.

The proposed entrance lobby at the southern face of the existing building, which is simple change of existing building, has recorded a peak flood level of RL 19.25 m AHD. Based on Council's DCP requirements, the minimum floor level at the lobby can be maintained at the current level of RL 19.25 m AHD as it will be impractical to raise the existing level.

The proposed building within southern end of the Site is unaffected by flooding as the floodwater is confined within the driveway area between the proposed and the existing buildings.

The crest provided at RL 20.35 m AHD at the top of driveway ramp leading to the proposed western undercover car park has prevented from an ingress of floodwaters from level above. The floodwaters running along the northern side of the carpark continues to its westerly flow towards the Finlayson reserve without impacting the proposed carpark area. A low gully line will be provided along the rear car parking bays as indicated below with the kerb replaced with bollards next to the parking bay to allow for floodwater to flow through unhindered as shown in **Figure 84** below.

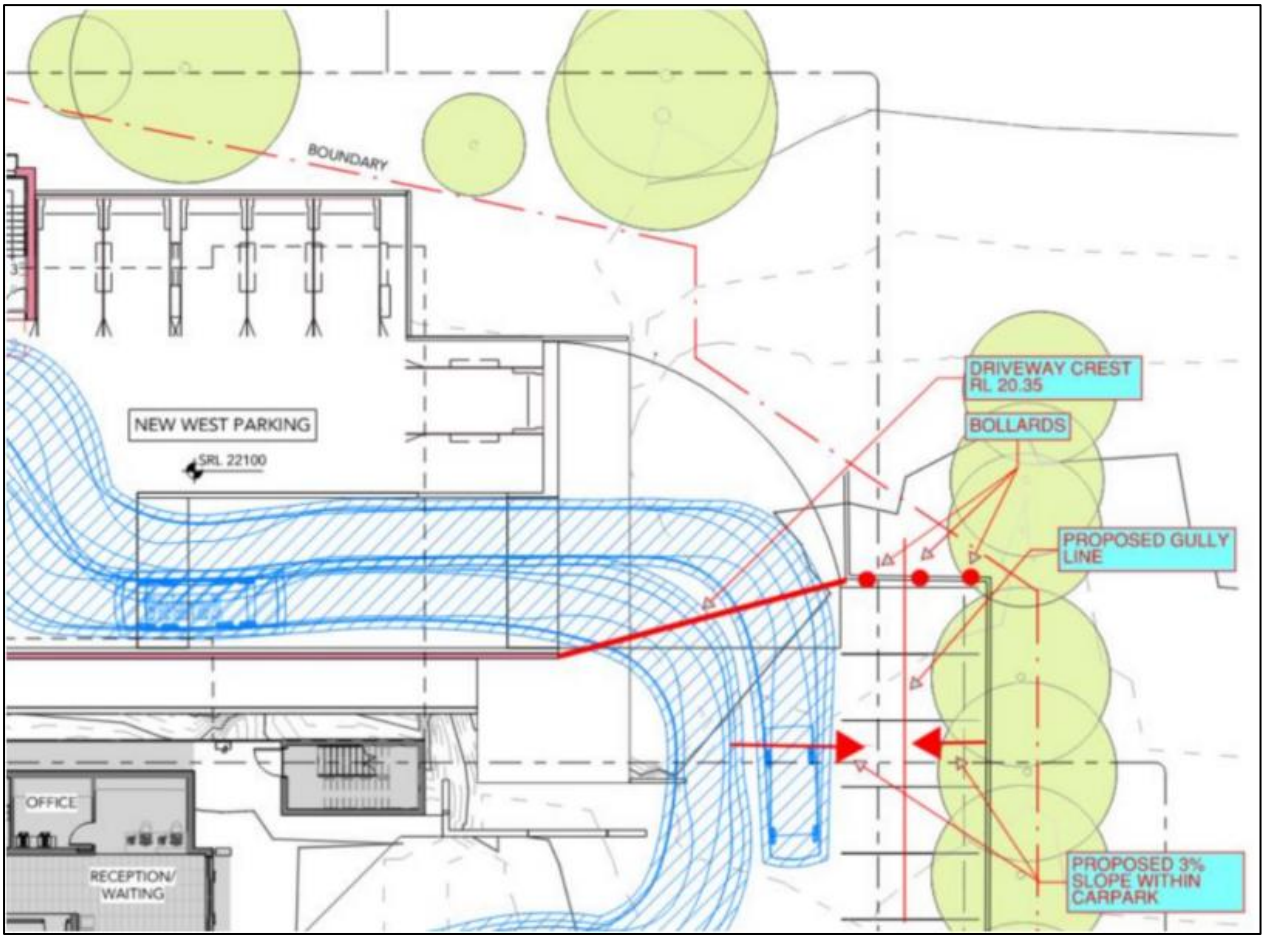

Figure 84 Proposed Flood Mitigation Strategy (ACOR Consultants 2021)

There are no changes to the flood waters along Lytton Street frontage to the east of the Site.

The PMF flood event was not modelled. PMF floodwater velocities and hazards are not presented in this flood study. It is anticipated that the severity of flooding during the PMF event could be higher around the rear of the Site being received from Finlayson Creek flooding. As the mainstream flood from Finlayson Creek has not been analysed during this study, severity of PMF flooding could not be quantified. However, from the evacuation perspective, the upper levels within the existing and the proposed building could provide a safe refuge during such rarer flooding events.

6.16.4 Flood risk management

Based on HDCP2013 Table 7, the Site falls within 'Redevelopment' land use category and within Medium Flood Risk Precinct. Based on this, the following major flood controls will be applicable to this development.

Floor levels

The entrance lobby to the existing building along the southern face is currently proposed at RL 19.25 m AHD where the floodwaters peak at RL 19.21, slightly under the existing floor level. Since the proposed entrance lobby is just a change of use and the peak water surface during 1% AEP flooding is below the

existing floor level and it is impractical to raise the existing floor levels to Flood Planning Level (FPL) of RL 19.71, the design floor level control 6 under Council's DCP Part J Section 8 allows to maintain the floor level as high as practicable subject to Council approval. Therefore, it is considered that the RL 19.25m AHD at the proposed entrance lobby is suitable.

The proposed undercover carpark at RL 22.73 m AHD at the southern side of the Site is not affected by flooding. The peak floodwater next to the area has been estimated at RL 22.20 m AHD which is 0.53 m below the proposed car park level.

A peak flood level of RL 20.20 m AHD was estimated at the entrance to the western under croft car park. The proposed driveway crest at top of the entrance ramp at RL 20.35 m AHD will prevent an ingress of floodwaters during 1% AEP flood event. The crest has been provided to achieve 150 mm freeboard as per Council's DCP requirement.

The under croft carpark at the northern end of the Site is partially affected by flooding during the pre-developed condition. During the post developed scenario, some minor grading of the new segment of carpark with provision of a low gully line across the rear parking bays and bollards next to the end parking bay will assure the floodwaters get captured within the northern carpark and leave the Site without any impediments.

Building components and method

All building components below the 1% AEP flood level plus 500mm freeboard are to be constructed from flood compatible building materials. Flood affected building components for the proposed development that needs such flood compatible materials are floors and walls near the lobby entrance to the existing building, new undercover carpark & its associated structure along the western part of the Site.

The suitable wall structure materials include solid brickwork, blockwork, concrete, timber stud walls constructed from Class 1 (highly durable), Class 2 (durable) or H3 treated timber.

Extensive guidance on flood compatible building materials and methods is provided in 'Reducing Vulnerability of Buildings to Flood Damage: Guidance on Building in Flood Prone Areas' (HNFMSC 2006).

Structural soundness

Proposed building structure with the flood exposure should be capable of withstanding the forces of the 1% AEP floodwaters, including hydrostatic, hydrodynamic, debris impact and buoyancy forces.

Due to the nature of the proposed works including concreting, it is unlikely that structural soundness will be required. Any slabs should be designed to be capable of withstanding the forces imposed by the 1% AEP floodwaters, including hydrostatic, hydrodynamic, debris impact and buoyancy forces. The concrete design should be certified by a practicing Civil Engineer.

Fencing

Due the flooded nature of the Site, a mixture of light / open style fences and solid flood walls must be provided around all boundaries to provide a safe passage for floodwaters.

Evacuation

The proposed hospital building provides multiple levels above the ground level where evacuation can be facilitated. Floor levels of 27.50 m AHD are available on the first floor of the dwelling which would provide adequate shelter in place scenarios for existing and the proposed buildings.

In the event that the 1% AEP flood event is expected to be exceeded, strategies should be adopted in accordance with NSW Government operational guidelines and NSW SES Emergency Evacuation operational guidelines.

As mentioned earlier, upper floor levels within the existing and the proposed building could provide safe refuge during the rarer events such as PMF flooding. The proposed lifts and access stairs to upper levels will provide reliable evacuation routes during such flood events.

Climate change

A Statement has been prepared by ACOR Consultants in relation to the impact of climate change, sea level rise and increase in rainfall intensity on the flood risks associated with the Site.

It is noted that the Site is not located on the major floodways or floodpaths within the catchment. The base case 1% AEP flood model has demonstrated that the Site only receives minor overland floodwaters from the adjoining driveway entries. The overland flow entering from its southern driveway entry (labelled as PO_1 in Table 3 of the Flood Impact Study) is 0.21 m^3/s and the one entering from the neighbouring site at 11 Lytton Street (labelled as PO_3 in Table 3 of the Flood Impact Study) is 0.27 m^3/s, with the flood depths less than 250 mm throughout the Site.

The NSW Government requires an analysis of sensitivity test with the peak rainfall increment of 10% as one of the measures of climate change (DECC, 2007). The 10% increase in the rainfall peaks has been applied to the base case hydrological and hydraulic models. The model shows no increase in flood discharge value at locations PO_1 and PO_3. Consequently, flood level increments were not noticed within the immediate vicinity of the Site. The differential depths flood impact map for the climate change scenario is attached in Addendum A to the Statement.

Sea Level Rise

The Site lies within Finlaysons Creek which is a tributary of Toongabbie Creek and Toongabbie Creek is a tributary to the Parramatta River. There are two sets of high-level weir along the Parramatta River downstream of Toongabbie Creek; one located near Marsden Street in Parramatta and another located next to the Parramatta Wharf. The Marsden Street weir, located at RL 4.00 m AHD tentatively, is approximately 2 m in height and acts as a barrier to attenuate flooding from the upstream end and tidal waves from the downstream end.

The NSW sea level rise policy statement requires an adoption of sea level rise by 40 cm by 2050 and 90 cm by 2100 relative to 1990 mean sea levels.

Therefore, it is considered that the effect of such sea level rise to the upstream of Marsden Street weir, including the Site, will be none.

Overall, there are no flood impacts identified external to the Site. The increase in flood levels identified is limited to within the Subject Site with maximum change in flood level being recorded up to 0.15 m. However, as the associated hazard rating is low within the area of 0.15 m increment, it is reasonable to consider this flood rise as acceptable.

In light of the above, it is considered that the proposed development is generally consistent with the intent of the provisions for sites affected by flooding outlined within CDCP2021.

6.17 SOIL AND WATER

A Geotechnical Investigation and Detailed Site Investigation have been prepared by JK Geotechnics and JK Environments and are attached at **Appendix 16** and **Appendix 17**, respectively. The issues raised in the SEARs have been addressed below.

6.17.1 Subsurface conditions

A summary of the subsurface conditions encountered during the investigation is presented in **Table 30** below.

Table 30 Summary of Subsurface Conditions	
Profile	**Description**
Pavement	Asphaltic Concrete (AC) or Concrete pavement, approximately 50mm to 150mm thick, was encountered at the surface in BH301, BH302 and BH307 to BH309.
Fill	Fill was encountered at the surface or beneath the pavement in all boreholes and extended to depths of approximately 0.2m to 1m. BH304 to BH306 were terminated in the fill at a maximum depth of approximately 0.4m. The fill typically comprised gravelly clay, silty clay, silty sandy clay or silty sand with inclusions of ironstone and igneous gravel, AC fragments, ash, building rubble (brick and porcelain fragments) and root fibres. FCF was observed in the fill in BH304.
Natural Soil	Silty clay was encountered beneath the fill in BH301, BH303 and BH307 to BH309 and extended to depths of approximately 1.6m to 6m. BH307 to BH309 were terminated in the natural soil at a maximum depth of approximately 6m. The silty clay was typically brown or grey with red-brown mottling.
Bedrock	Siltstone bedrock was encountered beneath the fill or natural soil in BH301 to BH303 and extended to the termination of these boreholes at a maximum depth of approximately 6m. The siltstone was typically grey and included iron indurated bands.
Groundwater	Groundwater seepage was not encountered in the boreholes during drilling. All boreholes remained dry on completion of drilling and a short time after. Monitoring wells were installed in BH302 and BH307, in addition to wells installed at the Site previously (MW101 and MW103). The SWLs were measured at depths between 1.53m to 4.47m below the ground surface. It is noted that the ground surface at MW302 is approximately 1.5-2m below the other wells.

6.17.2 Excavation

Minimal excavation is anticipated for the proposed development as it will be at or above the existing surface levels. Local excavations may be required for lift pits and service trenches, but it is not anticipated that these will exceed 1.5m depth. Excavation to these depths will encounter fill and natural silty clay soils which should be readily achievable using the buckets of hydraulic excavators.

Based on the groundwater observations within the boreholes and the limited excavation depths it is not anticipated that the excavations will encounter the groundwater table. However, groundwater seepage may occur into the excavation through the fill, particularly during and following heavy rainfall. Such seepage should be able to be controlled using a combination of gravity drainage and sump and pump techniques.

6.17.3 Earthworks

The lowest level of the proposed Ward Building will be a maximum of about 1.7m above the existing ground surface. It is unknown if fill will be placed to raise site levels, or a void left below a suspended floor slab. Where the lowest floor slab is designed as a fully suspended floor slab no particular subgrade preparation would be required, but good practice would include stripping of any vegetation and root affected soils.

Prior to carrying out any earthworks the effect of such works on the existing crib retaining wall on the northern side of the existing car park must be considered. Any fill placed will place a surcharge load on the existing wall and a structural assessment of the wall must be carried out to assess if it can accommodate the additional surcharge load. If the wall is not adequate to accommodate the additional loads then a void should be left below the lowest slab and the slab designed as a fully suspended slab supported on piles found within the siltstone below the base opt the existing retaining wall. Alternatively, the existing wall could be replaced with a new retaining wall designed to support the full height of the fill proposed.

Fill was encountered in the boreholes to a maximum depth of 1.3m. JK Geotechnics are unaware of any records of placement or compaction control of the fill and as such it must be considered 'uncontrolled'. Such uncontrolled fill is not suitable for the support of floor slabs and where the slabs are to be supported on the fill it should be fully excavated and replaced by engineered fill. Within pavement areas, the fill may be left in place provided it is proof rolled and any weak areas treated. However, since the pavement areas will be below buildings this would only be appropriate where the pavements are independent of the building structure and can be repaired in the future if required. If such risks are to be reduced then all existing fill below pavement areas should also be removed and replaced with engineered fill.

The measures listed in the Geotechnical Investigation are to be followed where pavements are proposed or fill is placed below buildings.

6.17.4 Batters and retaining walls

The need for permanent batters and/or retaining walls as part of the proposed development will depend on whether the ground floor level of the Ward Building is constructed on an engineered fill platform or with a fully suspended floor slab. Some low-height landscaping walls may also be required in various portions of the Site. It is assumed that the height of batters or retaining walls does not exceed 3m, and should higher batters/walls be required further advice should be sought.

Where space permits, temporary excavation batters should be no steeper than 1 Vertical in 1 Horizontal (1V:1H) within the soils. Such batters should remain stable in the short term provided all surcharge loads, including construction loads, are kept well clear of the crest of the batters.

Permanent batters should be no steeper than 1V:2H, but flatter batters of the order of 1V:3H may be preferred to allow access for maintenance. Where filled batters are created, each fill layer should extend past the final batter geometry and then the edge cut back to the final geometry. This will allow full compaction of the fill to the edge of the batter. All permanent batters should be covered with topsoil and planted with a deep-rooted runner grass, or other suitable coverings, to reduce erosion. All stormwater runoff should be directed away from all temporary and permanent batters to also reduce erosion.

Retaining walls less than 3m in height may be designed as cantilevered walls based on a triangular earth pressure distribution using an 'active' earth pressure coefficient, K_a, of 0.3 and a bulk unit weight of 20kN/m^3.

This assumes that some resulting ground movements will be acceptable. For cantilever walls which will be propped by floor slabs or where movements are to be reduced, we recommend a triangular lateral earth pressure distribution using an 'at rest' earth pressure coefficient, K_0, of 0.6.

Further details of the Geotechnical Investigation are provided in **Appendix 20**.

6.18 WASTE

A Waste Management Plan (**Appendix 27**) has been prepared by MRA Consulting Group to address waste generation and storage associated to the excavation, construction and ongoing occupation of the proposed development.

6.18.1 Demolition waste

Figure 85 below describes the expected demolition material quantities and appropriate management methods for the proposed development, related to the demolition or deconstruction of:

- A roofed courtyard;
- A fibro shed, an astroturf and portions of a concrete path and paved areas;
- A concrete retain wall;
- Ancillary structures; and

- Removal of some vegetation and trees

Type of waste generated	Quantity	Reuse	Recycling	Disposal	Methods for reuse, recycling and disposal
Concrete	700m³	✓	✓	-	On site: to be separated wherever possible to enhance resource recovery. Reuse: on-site for filling or under gravel carpark. C&D Processor: crushing and recycling for recovered products.
Bricks/Pavers	100m³	✓	✓	-	On site: cleaned and separated wherever possible for reuse or to enhance resource recovery. C&D Processor: recovery for reuse where possible, crushing and recycling for recovered aggregate products.
Roof Tiles	40m³	✓	✓	-	On site: cleaned and separated wherever possible for reuse or to enhance resource recovery. C&D processor: recovery for reuse where possible, crushing and recycling for recovered aggregate products.
Timber	<10m³	✓	✓	-	On site: to be separated wherever possible to enhance resource recovery. C&D Processor: recovery and recycling for recovered product (e.g. mulch) or organics processing.
Insulation material	50m³	✓	-	-	Reuse: retuned to supplier or manufacturer for reuse.
Metal (ferrous and non-ferrous)	5m³	-	✓	-	On site: to be separated wherever possible to enhance resource recovery. C&D Processor: metals recovery and recycling.

Type of waste generated	Quantity	Reuse	Recycling	Disposal	Methods for reuse, recycling and disposal
Plasterboard	<10m³	✓	✓	-	On site: to be separated wherever possible to enhance resource recovery. Reuse: surplus and offcut material returned to manufacturer for reuse where possible or replacement for gypsum in landscaping.
Glass	<5m³	✓	✓	-	On site: to be separated wherever possible to enhance resource recovery. Reuse: surplus and offcut material returned to manufacturer for reuse where possible. Aggregate for concrete production. Glass recycler: recovery and recycling.
Fixtures and Fittings	5m³	✓	✓	-	Reuse: second hand building materials. C&D Processor: recovery and recycling.
Floor Coverings	15m³	✓	✓	-	On site: to be separated wherever possible to enhance resource recovery. C&D Processor: recovery and recycling.
Garden Organics	<20m³	✓	✓	-	Garden organics resulting from the removal of vegetation and trees. Onsite: Woodchipped for use in landscaping. Organics Processor: storage on-site (from minor excavations) processing for recovered product.
Mixed Recyclables	<2m³	-	✓	-	Commercial contractor: recycling of paper, cardboard and mixed material containers (plastic, metal, glass).
Type of waste generated	**Quantity**	**Reuse**	**Recycling**	**Disposal**	**Methods for reuse, recycling and disposal**
Residual Waste	15m³	-	-	✓	Separate recyclables where possible and disposal at principal licensed waste facility.
Hazardous/Special Waste (e.g. spills and contaminated wastes)	Unknown	-	-	✓	It is possible that asbestos bearing material may be disturbed or removed during demolition works. Appropriate management methods specified by a licensed asbestos and site hygienist should hazardous be found at the site.

Figure 85 Estimation of demolition materials for reuse, recycling and landfill (MRA Consulting Group 2021)

6.18.2 Construction waste

Figure 86 below outlines the expected construction waste quantities to be generated at the Site, in addition to the appropriate management methods for each material type. The information below presents multiple options for materials reuse, recycling and disposal where applicable (e.g. return to manufacturer, recycled at construction and demolition (C&D) processor, or disposed to landfill if contaminated).

Type of waste generated		Quantity	Reuse	Recycling	Disposal	Methods for reuse, recycling and disposal
Excavation material		800m³	✓	-	-	On site: testing (if necessary) for contamination and stockpiling of material for reuse as fill material. C&D processor: reuse/recycling of VENM and ENM Landfill if contaminated.
Concrete		50-100m³	✓	✓	-	On site: to be separated wherever possible to enhance resource recovery. C&D processor: crushing and recycling for recovered products (aggregates).
Bricks/pavers		5-10m³	✓	✓	-	On site: cleaned and separated wherever possible for reuse or to enhance resource recovery. C&D processor: recovery for reuse where possible, crushing and recycling for recovered aggregate products.
Tiles	Roof	N/A	✓	✓	-	On site: cleaned and separated wherever possible for reuse or to enhance resource recovery. C&D processor: recovery for reuse where possible, crushing and recycling for recovered aggregate products.
	Interior	<3m³	✓	✓	-	
Timber (engineered/treated)		<5m³	-	✓	-	On site: to be separated wherever possible to enhance resource recovery.

Type of waste generated	Quantity	Reuse	Recycling	Disposal	Methods for reuse, recycling and disposal
					Reuse: surplus and offcut material returned to manufacturer for reuse. C&D processor: recovery and recycling for recovered product (e.g. mulch) or organics processing.
Metals (ferrous and non-ferrous)	<5m³	-	✓	-	Onsite: to be separated wherever possible to enhance resource recovery. C&D processor: metals recovery and recycling.
Plasterboard	<10m³	✓	✓	-	On site: to be separated wherever possible to enhance resource recovery. Reuse: surplus and offcut material returned to manufacturer for reuse.
Glass	<1m³	✓	✓	-	On site: to be separated wherever possible to enhance resource recovery. Reuse: surplus and offcut material returned to manufacturer for reuse where possible. Glass recycler: recovery and recycling.
Fixtures and fittings	<2m³	✓	✓	-	On site: reuse wherever possible or return to manufacturer. Reuse: surplus and offcut material returned to manufacturer for reuse where possible. C&D processor: recovery and recycling.

Type of waste generated	Quantity	Reuse	Recycling	Disposal	Methods for reuse, recycling and disposal
Floor coverings	<5m³	✓	✓	-	On site: to be separated wherever possible to enhance resource recovery. Reuse: surplus and offcut material returned to manufacturer for reuse where possible. C&D processor: recovery and recycling.
Packaging (used pallets, pallet wrap)	20-40m³	✓	✓	-	On site: to be separated wherever possible to enhance resource recovery. C&D processor: recycling of timbers and plastic.
Garden organics (Vegetation)	<10m³	✓	✓	-	Minimal garden organic waste from landscaping. Organics processor: storage on-site (from minor excavations) processing for recovered product (e.g. mulch or other blended recovered fines) or organics treatment.
Containers (cans, plastic, glass)	<5m³	-	✓	-	Commercial contractor: recycling.
Paper/cardboard	5m³	-	✓	-	Commercial contractor: segregation of paper, cardboard or other streams.
Residual waste (general refuse)	20m³	-	-	✓	Separate recyclables where possible and disposal at principal licensed waste facility.
Hazardous/special waste (e.g. spills and contaminated wastes)	Unknown	-	-	✓	Management by a licensed asbestos and site hygienist should hazardous or special waste be found at the site.

Figure 86 Construction waste generation estimates (MRA Consulting Group 2021)

6.18.3 Ongoing waste management

Medical waste

Medical wastes are classified as hazardous wastes under the Waste Regulation. The clinic will be required to obtain the relevant licencing as required by the Waste Regulation. The medical waste streams expected to be generated by the proposed development during operation include the following:

- Clinical waste (incl. pathological waste)
- Cytotoxic waste
- Anatomical waste
- Clinical sharps waste
- Pharmaceutical waste
- Radioactive waste

Mobile bins, trolleys and waste bags will be utilised in conjunction with sharps containers to manage medical related waste.

All the medical waste generated will be safely stored and removed by an approved medical waste transporter holding a valid licence to transport medical waste as issued by the Department of Environment and Conservation. All used sharps must be stored in purpose designed containers to prevent needle stick injury.

All the medical waste generated shall be removed from the premises on regular intervals. Council and the NSW Environment Protection Authority may be contacted for seeking advice on specific matters.

Based on the waste generation rates for clinic or medical uses established by MRA Consulting, the clinic portion of the Site is expected to generate approximately:

- General Waste: 5,215L per week
- Recycling: 5,845L per week
- Medical Waste: 7,490L per week

Other waste streams

Bulk waste

Space should be allocated for the temporary storage and consolidation of bulk wastes unsuitable for general waste and recycling bins. Items such as pallets, crates and broken furniture are typical bulk wastes and, given appropriate management of the space, can be stored in a small area prior to being collected. The facilities management or Site waste caretaker will be responsible for access to the bulk waste cage and will monitor and schedule collections for this waste stream. A private waste service provider will be engaged for the collection of bulk wastes.

Specialist waste

A range of specialist wastes unsuitable for disposal in general waste bins will likely be generated as a result of typical operation of this development. Materials such as paints, cleaning chemicals, batteries, e-waste, and lightbulbs will be stored temporarily before appropriate disposal by a suitably qualified waste contractor. The site waste caretaker will be responsible for the management of specialist wastes and the scheduling of collections.

6.18.4 Waste storage areas

The minimum space required for the waste storage area is summarised in **Figure 87** below.

Site Use	Equipment	Minimum Area	Total Minimum Space Required
Clinic	General Waste Bin (2 x 1,100L bins)	8m^2	34m^2
	Recycling Bin (3 x 1,100L bins)	8m^2	
	Medical Waste (4 x 1,100L bins)	10.5m^2	
Café	General Waste (1 x 240L bins)	1m^2	
	Recycling (1 x 240L bins)	1m^2	
General	Bulky Waste Storage	4m^2	
	Specialist Waste	1m^2	

Figure 87 Minimum waste storage requirements (MRA Consulting Group 2021)

The space allocation for the bin room is 34m^2, which is suitable to accommodate the required waste infrastructure to service the proposed development.

6.18.5 Collection method and loading areas

A private waste contractor will be the waste service provider for the Site and will utilise a rear or side loading waste collection vehicle. The collection point for the waste service provider (WSP) and areas for handling and loading are as follows:

- Collection and loading will occur in the loading areas within the Site;
- Clear, safe, accessible and convenient space for handling of MGBs and equipment and loading of collection vehicles; and
- Identifiable areas where pedestrians, visitors and site staff can recognise and avoid any risk associated with moving vehicles, and bin moving and handling.

The Site will be accessed from Lytton Street by waste collection vehicles. Vehicles will access the B1 loading dock through the truck lift. The loading area is illustrated in **Figure 88** below.

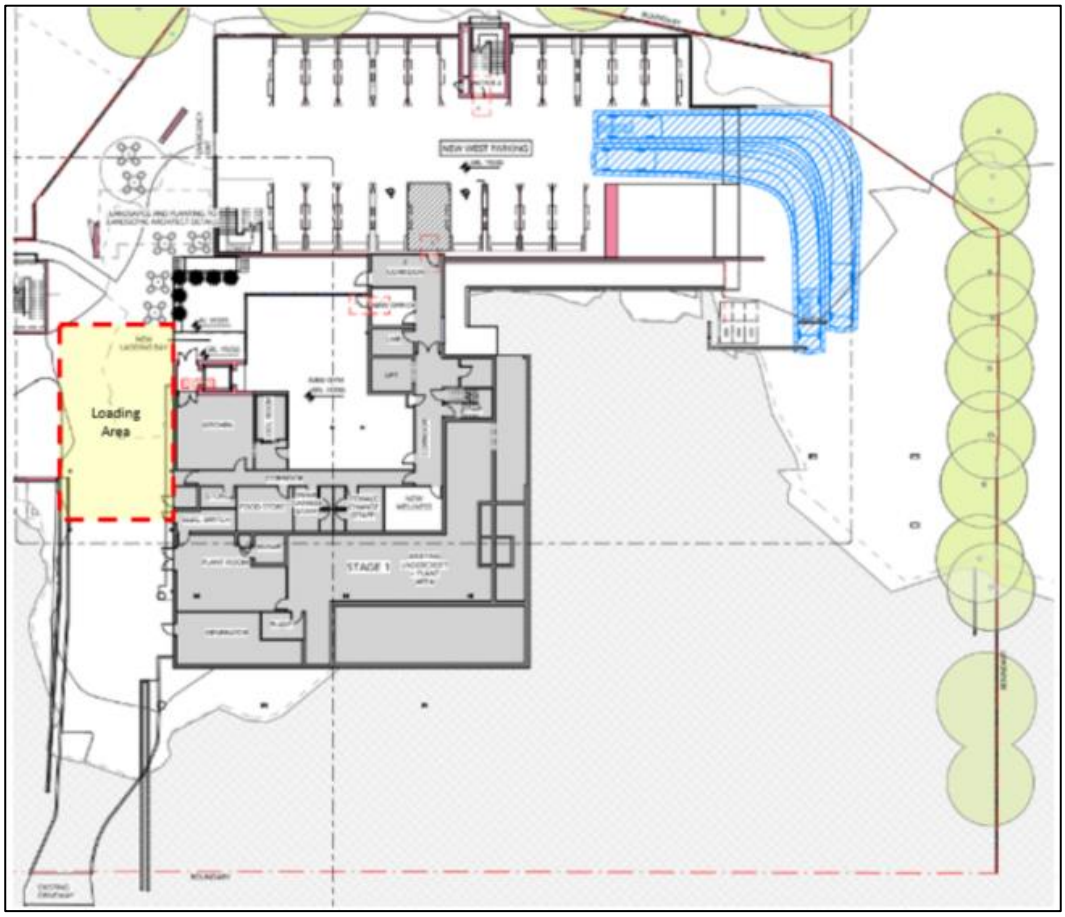

Figure 88 Loading area location (MRA 2021)

Further details of the proposed waste management measures are provided in the Waste Management Plan at **Appendix 27**.

6.19 CONTAMINATION

A Detailed Site Investigation has been prepared by JK Environments (JKE) and is provided at **Appendix 19**. It is noted that Detailed Site Investigation is prepared by based on the recommendations contained in the Preliminary Site Investigation (**Appendix 18**) prepared by JKE.

6.19.1 Salinity assessment

The Salinity Assessment undertaken at the Site included soil sampling from three borehole locations and groundwater sampling from two monitoring wells. The results indicated that that the majority of soil and groundwater at the Site was generally non-aggressive to buried concrete and steel. Some soils deeper than 2m were found to be mildly aggressive towards steel and some soils deeper than 1m were found to be mildly aggressive towards concrete.

Soils at the Site were generally non-saline to slightly saline to a depth of approximately 2m and the majority of the pH results from surficial soils were within the optimum range for plant growth. As the proposed development will not include new landscaping, these results are unlikely to impact the proposed development.

Due to the nature of the proposed development, which will be either at existing levels or require filling in some areas, it is considered that no salinity management plan will be required.

It should be noted that soils at the Site were found to be slightly saline to a depth of approximately 2m and moderately saline beyond 2m. As a result, concrete that will be in contact with these soils should be designed

appropriately. This includes using N20 grade concrete to a depth of 2m and N25 grade concrete for any foundations that will be deeper than 2m. The soil aggression characteristics must be factored into the engineering design as required.

6.19.2 Acid sulfate soil

The Site is not located in an acid sulfate soil risk area according to the risk maps prepared by the Department of Land and Water Conservation.

6.19.3 Waste classification assessment

Waste classification of fill

Based on the results of the waste classification assessment, and at the time of reporting, the fill material is considered to be classified as General Solid Waste (non-putrescible) containing Special Waste (asbestos). Surplus fill should be disposed of to a facility that is appropriately licensed to receive this waste stream. The facility should be contacted to obtain the required approvals prior to commencement of excavation.

It is understood that only small quantities of waste soil, if any at all, is to be disposed off-site under this waste classification. Prior to off-site disposal of waste, the receiving facility will require a letter confirming the quantity of material being disposed under the above waste classification. This letter should be prepared by a suitably qualified environmental consultant.

Classification of natural soil and bedrock

Based on the scope of work undertaken for this assessment, and at the time of reporting, JKE are of the opinion that the natural soil and bedrock at the Site is likely to meets the definition of Virgin Excavated Natural Material (VENM) for off-site disposal or re-use purposes. This classification will need to be confirmed following removal of asbestos impacted fill.

VENM would be considered suitable for re-use on-site (from a contamination viewpoint), or alternatively, the information included in this report may be used to assess whether the material is suitable for beneficial reuse at another site as fill material.

It is understood that it is unlikely that natural soil and/or bedrock will be excavated and disposed off-site. Additional waste classification assessment and documentation will be required prior to excavation and any disposal of VENM.

6.19.4 Contamination Sources/AEC and Potential for Site Contamination

Based on the scope of work undertaken for this investigation, JKE identified the following potential contamination sources/Area of Environmental Concern (AEC):

- Fill material across the Site, encountered during the previous screenings identified fill to a maximum depth of 1.3m. FCF was encountered in the fill in BH203 during the PSI and on the ground surface during previous screenings;
- Pesticides may have been used beneath the buildings and/or around the Site;
- Hazardous building materials may be present as a result of former building and demolition activities across the Site. In particular in the footprints of the original residential buildings. These materials may also be present in the existing buildings/ structures on Site; and
- Potential Fuel Storage or UST – Based on several lines of evidence, including the identification of hydrocarbon odours in groundwater well MW103 and petroleum compounds in soil in BH102, it is considered possible that an unidentified UST exists, or that a localised fuel spill has occurred at the southern end of the Site.

Considering the above, and based on a qualitative assessment of various lines of evidence as discussed throughout this report, JKE are of the opinion that there is a potential for site contamination.

Based on the findings of the Tier 1 Risk Assessment, it is noted that the asbestos has been encountered in the fill and on ground surface at the Site. The asbestos presents a risk to human receptors due to the surficial nature of the impact. The risk would be expected to increase during excavation (i.e. disturbance of soil containing asbestos) and development works.

Therefore, it is recommended that a Remediation Action Plan (RAP) be prepared for the Site to outline measures to reduce the risk to human receptors at the Site following completion of development works. An Asbestos Management Plan (AMP) should also be prepared to outline control measures to be implemented during the excavation and construction phases of work.

It is considered that the Site can be made suitable for the proposed development via implementation of the RAP and AMP during construction works.

6.19.5 Remediation

A Remediation Action Plan (**Appendix 33**) has been prepared by JK Environments to render the site suitable for the proposed development from a contamination viewpoint. The primary aim of the remediation at the site is to reduce the human health risks posed by site contamination to an acceptable level.

The most viable remediation options include:

- In-situ capping and long-term management of the capped areas via a Long Term Environmental Management Plan (LTEMP), which is applicable in all areas where fill will remain; and
- Excavation and off-site disposal of asbestos impacted fill, which applicable to any areas where excavation of all fill will be required to achieve finished levels.

The capping specification is outlined in the following table:

Table 31 Capping specification

Area	Capping Specification
Continuous hardstand (e.g. pavement/concrete, or beneath permanent fixed features such as steps, retaining walls etc.)	Installation of: ▪ Geotextile (or geogrid) marker1 layer over the contaminated fill; ▪ Clean imported (validated) basecourse, as required based on the engineering specification; and ▪ Pavement material (i.e. concrete) as per engineering specification, or construction of the above ground feature.
Other areas with non-continuous hardstand (e.g. tiled areas, paving/pavers etc.)	Installation of: ▪ Geotextile (or geogrid) marker over the contaminated fill; ▪ At least 200mm clean imported (validated) capping material; and ▪ Surface finish to required development design.
New planting areas (trees, shrubs, shallow/mass plantings, garden beds etc) and turfed areas This excludes any planting that occurs in planter boxes above pavements	Installation of: ▪ Geotextile (or geogrid) marker layer over the contaminated fill; ▪ At least 500mm clean imported (validated) topsoil/growing medium; and All plantings to occur within the 500mm clean material (or see below for tree pits). Excavation of a tree pit at least 500mm greater than the outer diameter of the root ball in all directions, and installation of: Geotextile (or geogrid) marker layer over the contaminated fill. This must be secured to the geotextile/geogrid marker in the area adjoining the tree pit – a 1,000mm overlap (at least) and use of soil 'U' nails to pin down the geotextile would be acceptable. The geotextile/geogrid marker at the base of the tree pit may need to be perforated with small holes to allow root growth (to be confirmed by the project arborist); ▪ Backfill with clean imported (validated) topsoil/growing medium; and

	▪ Surface finish as required (e.g. mulch).
Service trenches	With the exception of sections of the existing services that extend below the proposed depth of excavation (which we have assumed with remain in-situ), all underground services must be installed within clean material, above the geotextile/geogrid marker. In the event that services/service trenches extend deeper than clean capping layer, the minimum clean capping thickness must be increased at that location so that the principle of installing all services within clean material, above the geotextile/geogrid marker, is adhered to.

It is acknowledged that some areas of the site are not being developed as part of Stage 2. In these areas where existing building slabs and pavements remain, no remedial actions are required. For other areas where there are no pavements (e.g. garden beds, unpaved areas/lawns etc), the following is to occur:

- The areas to be inspected by a competent person and any visible fibre cement fragments (FCF) is to be removed and disposed of appropriately in accordance with the asbestos management plan (AMP) which is to be prepared for the remediation/construction works;
- A Licenced Asbestos Assessor is to provide a surface clearance certificate for visible asbestos materials; and
- Any existing garden beds are to be topped with clean (validated) mulch cover and this is to be inspected and documented by the validation consultant.

The validation includes a combination of visual inspections/asbestos clearances, inspection and documentation of the capping process, and validation of imported materials.

As the remediation includes capping, remediation will occur concurrently with the development works as the built form of the development and the landscaping forms part of the capping requirements.

It is therefore considered that the site can be made suitable for the proposed development via remediation and the implementation of the RAP. A site validation report is to be prepared on completion of remediation activities and submitted to the consent authority to demonstrate that the site is suitable for the proposed development. The site will require management via a LTEMP. The LTEMP will provide a passive management approach which would not impose any onerous constraints on the day-to-day site use under the proposed development scenario.

6.20 HAZARDS AND RISK

A SEPP 33 Statement (**Appendix 23**) has been prepared by MRA Consulting Group to address matters related to SEPP 33. It is understood that the proposed development would act as a short stay accommodation for recovering patients. The proposed development would not include the handling or storage or any dangerous or hazardous materials (e.g. pressurised oxygen, medical chemicals/compounds, radioactive materials or fuels) as no medical procedures are proposed to take place at the Site. Furthermore, an existing diesel generator situated at the Site is proposed to be removed (and not replaced elsewhere) as part of the preparation works of Stage 2, hence there would be no diesel fuel storage on the Site.

Based on the above criteria and the proposed development use, a preliminary risk screen and hazardous materials assessment in accordance with SEPP 33 is deemed unnecessary for the purpose of the SSD.

6.21 CONSTRUCTION MANAGEMENT PLAN

A Preliminary Construction Management Plan has been prepared by Erilyan and is attached at **Appendix 22**. The report has set out management and mitigation measures that are to be incorporated throughout the construction of the proposed development. In addition, the proposed Construction Management Plan has included a commitment to provide a communication and stakeholder engagement to ensure the key local stakeholders abreast of proposed works and strategies to minimise disruption to these key stakeholders.

6.21.1 Hours of work

The following normal working hours are proposed for the construction:

- Monday-Friday: 7am to 6pm
- Saturdays: 8am to 1pm
- Sundays & public holidays: No work

6.21.2 Site access control

The Contractor(s) will be required to erect a temporary 2.4m high fence or hoarding around the Site and will be responsible for ensuring that the Site may not be accessed via the public.

Temporary bollards, road and pedestrian barriers with signage will be erected where works impede on areas external to the Site. Additionally, the Contractor(s) will be required to liaise with the neighbours to ensure pedestrian safety.

All works are to be undertaken in accordance with the public protection measures as required in the Australian Standards.

The Contractor (s) will maintain a Site entry register requiring all visitors to sign in upon entry. All visitors are required to wear an identification "visitor" badge and wear appropriate PPE at all times while on Site. All gates are securely locked outside of working hours and regularly patrolled by security staff. This security network will continue to work closely with the Contractor(s) to ensure that security is being maintained though out construction.

Vehicular access into Site will be managed through appropriate site signage and traffic management. A plan will be developed for the project and will be implemented progressively throughout the stages of Construction which aims to provide safe working detail for vehicle access into and around Site.

6.21.3 Construction staging

As demonstrated in this EIS, the Site may be constructed in 3 stages. Should this be the case the design allows for the construction with minimal impact to the continued operation of the previously completed and operating Stage 1.

Practical Measures will be put in place to reduce the impact of noisy works on the building occupants and surrounding properties already in operation as part of Stage 1. Acoustic hoardings will be implemented wherever possible and all temporary connection works will be undertaken at times in order to minimise impact the existing facility. Prior to any being approved an Acoustic & Vibration Assessment will be required along with a specific and detailed Construction Traffic and Noise Management Plan.

The following site plans outline how the proposal can be undertaken whilst Stage 1 remains in operation. Works are required to be undertaken in this order as it is imperative there is no net loss of mental health beds to the community whilst this extension takes place. It should be noted that staged construction or extensions are the norm in healthcare construction in order to allow for future growth of facilities in line with the community needs.

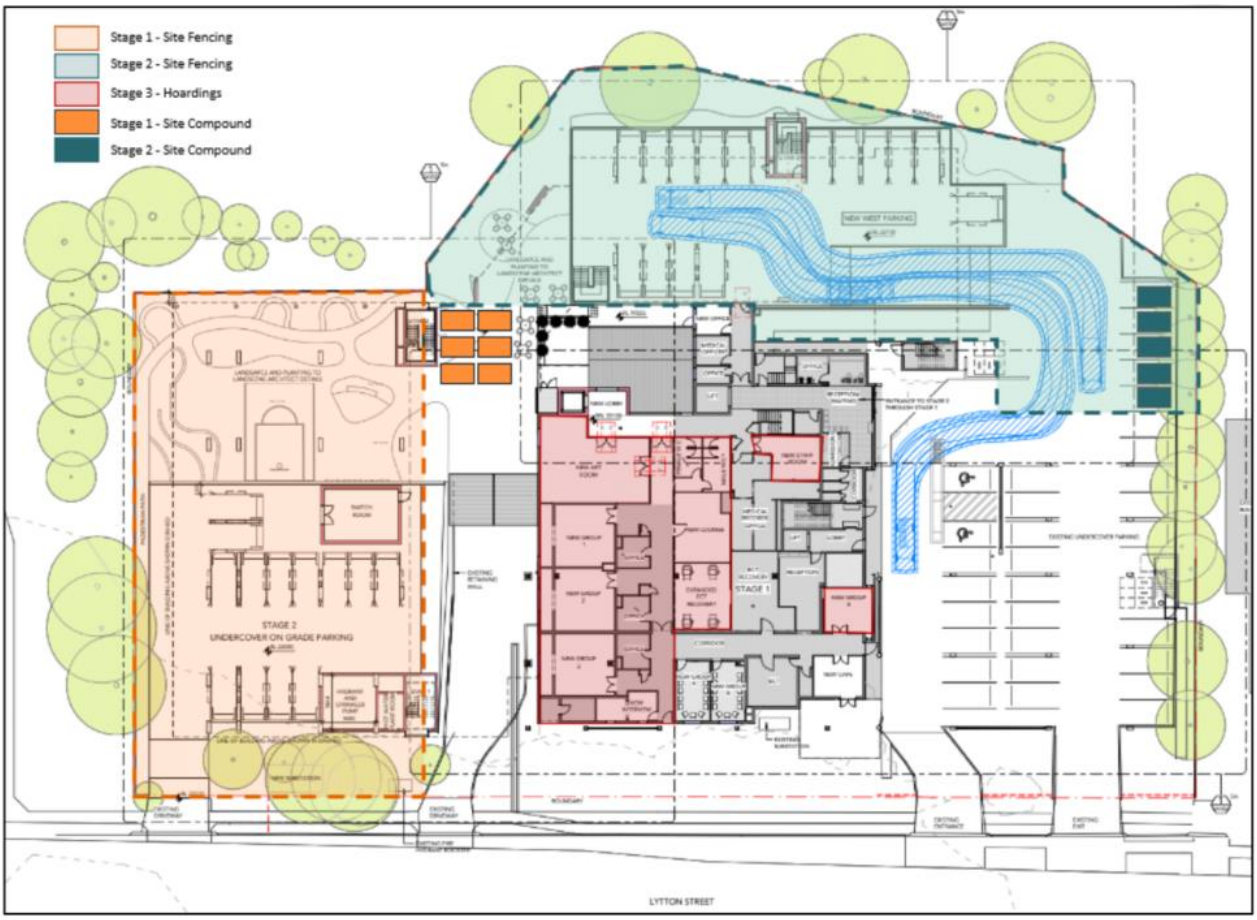

Figure 89 Site Establishment (Erilyan 2021)

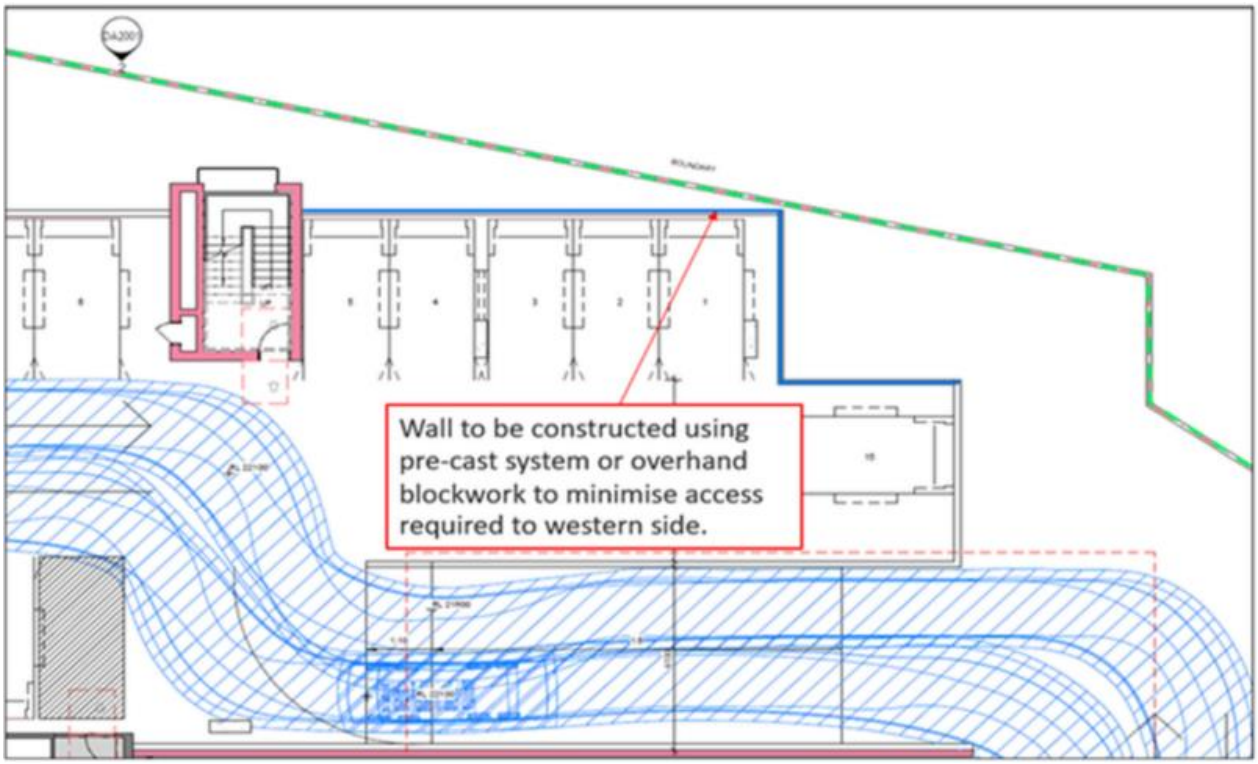

Figure 90 Works in close proximity to boundary (Erilyan 2021)

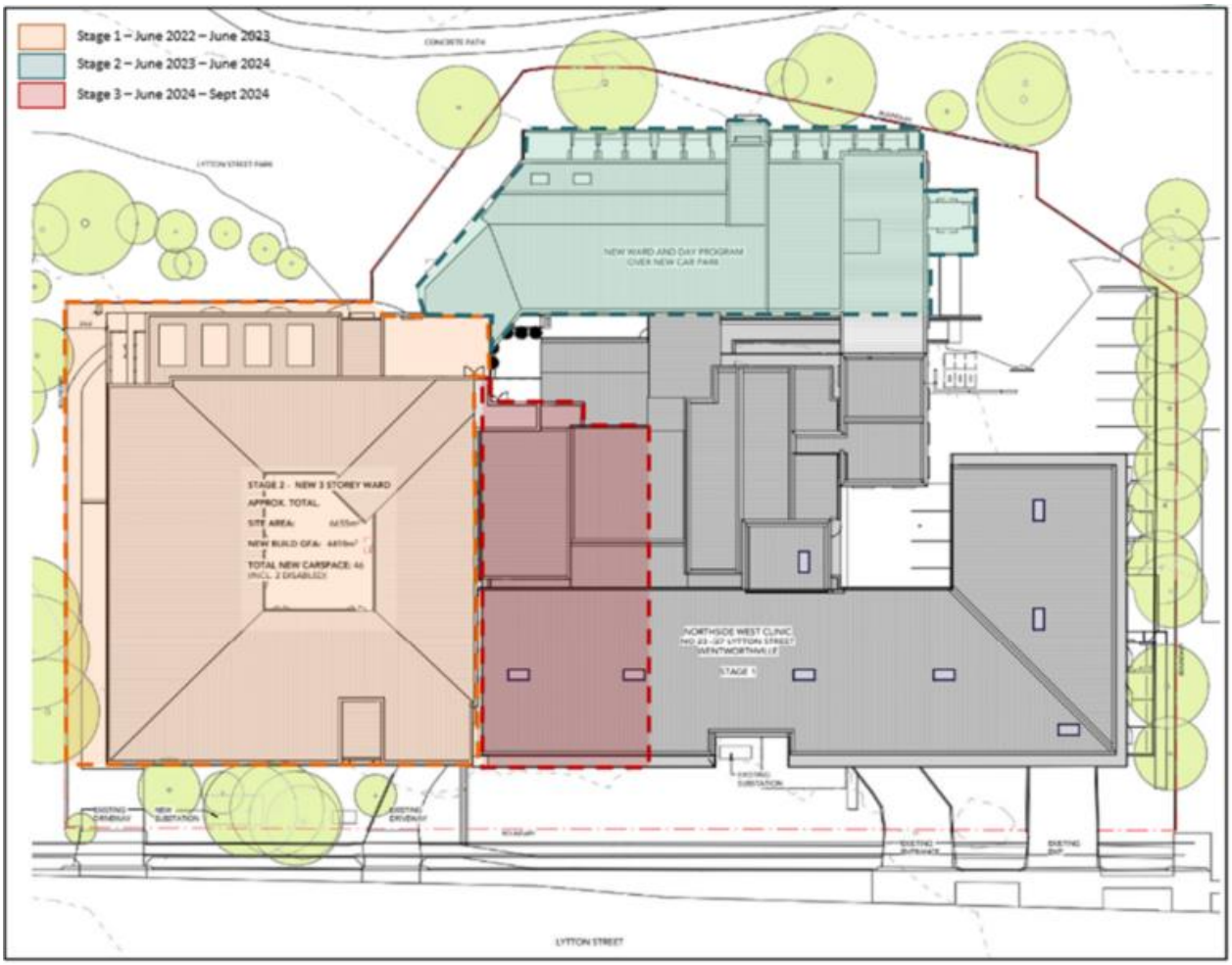

Figure 91 Staging Plan (Erilyan 2021)

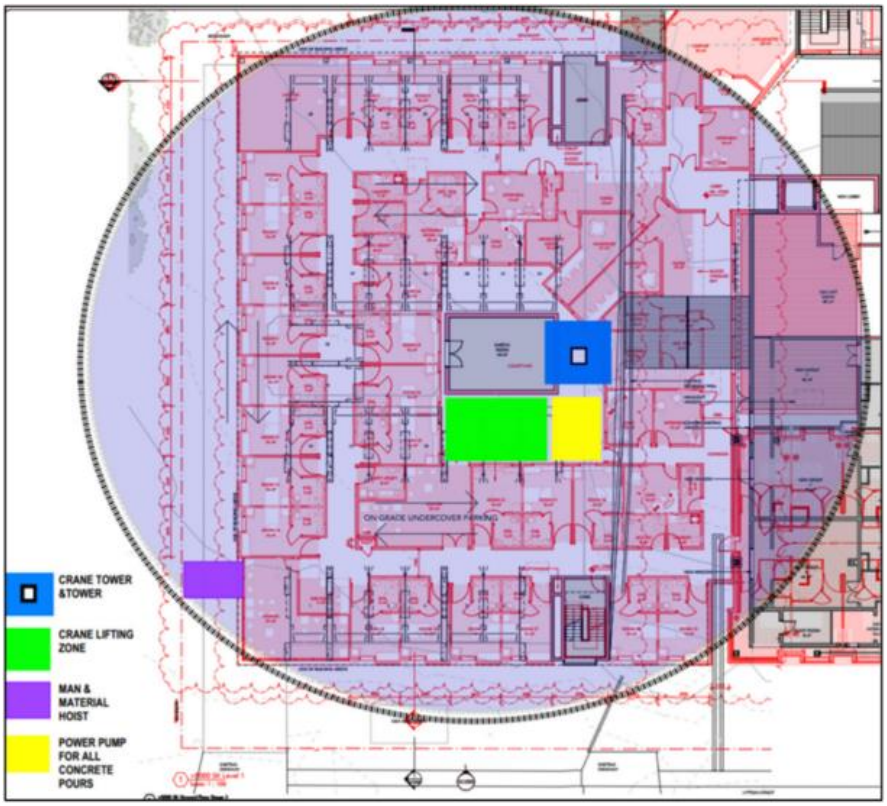

Figure 92 Stage 1 – Man & Materials Management (Erilyan 2021)

Figure 93 Stage 2 - Man & Materials Management (Erilyan 2021)

6.21.4 Major infrastructure improvements

Preliminary design and feasibility indicate that a new substation will be required in order to serve the new facility. This has been located directly out the front of the new stage 1 works adjacent to the proposed switch room location. **Figure 94** below identifies the location of the proposed substation. Discussion and design will be undertaken in consultation with Endeavour Energy. The new substation will be installed during the stage 1 works and made live in order to serve the site from the commissioning phase onwards.

An existing Council stormwater line will also be relocated so that it is outside the building line in adherence with Council easement requirements. It is proposed to also increase pit sizes so that overland flow issues within the Council street are improved and any overland flow that may have been present across the Site is largely reduced. This has also been marked in **Figure 94** below.

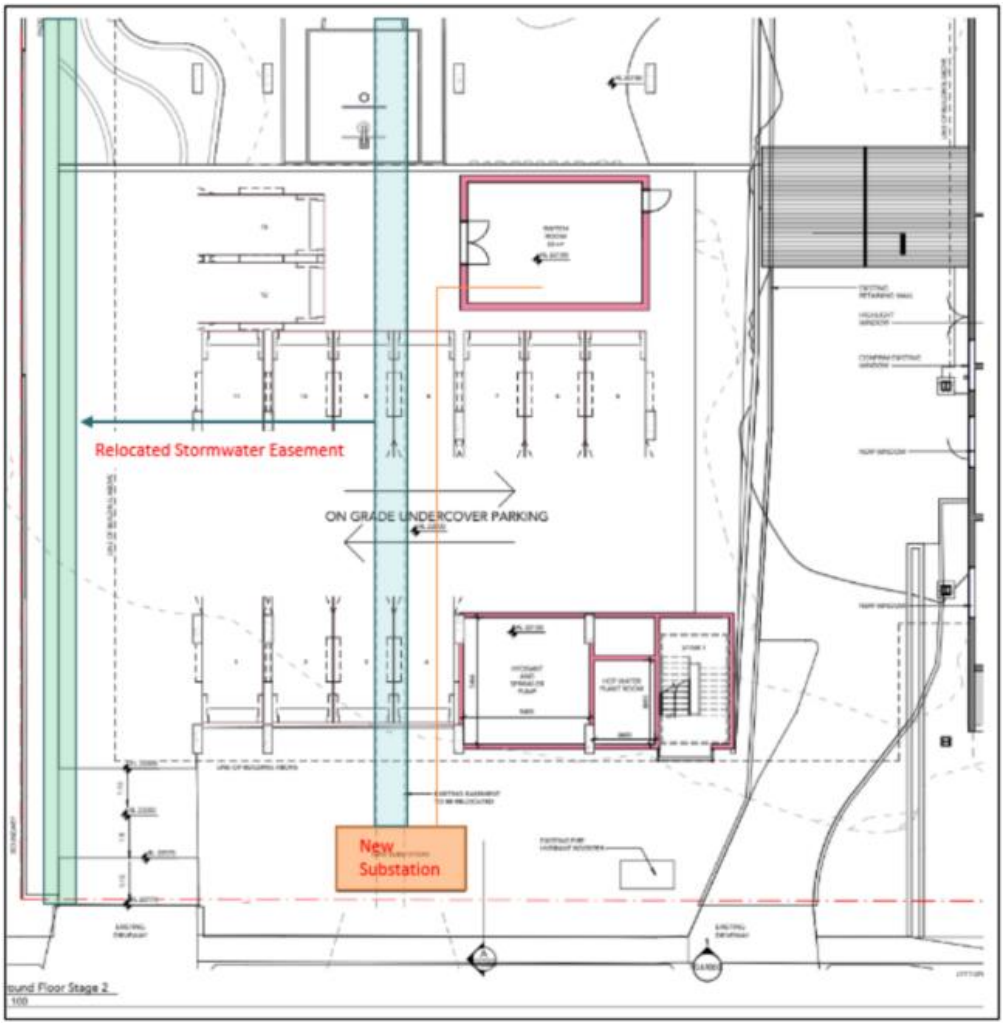

Figure 94 Major infrastructure works (Erilyan 2021)

6.21.5 Traffic management

Prior to the commencement of construction, a Construction Traffic Management Plan (CTMP) is to be prepared by the Principal Contractor(s). The CTMP will address the following:

- The likely construction vehicle numbers and frequency;
- Approach and departure routes;
- Anticipated special out of hours or escorted deliveries;
- Parking access arrangements during construction;
- Construction work zone locations;
- Site entry and exit points;
- Proposed traffic control signage;
- Proposed traffic management at critical locations i.e. entrance to main Hospital; and
- Provision of acceptable pedestrian management measures

Surrounding stakeholders such as local businesses and neighbours will be consulted on truck movements, so that their operations are not impacted, particularly around peak periods.

The entry and exit from Site, delivery times and frequencies will be confirmed and identified as part of the Contractor(s) Traffic Management Plan.

6.21.6 Environmental management

The Contractor(s) undertaking/managing the works will be required to provide an Environmental Management Plan (EMP) to ensure that all elements of the plan meet all statutory requirements as well as NSW Health requirements. As a minimum this plan will address the following:

- Sediment laden water from the construction site may potentially flow into the stormwater or adjoining canal
- Stormwater collected in excavations and requiring disposal
- Groundwater entering excavations and requiring disposal after dewatering
- Vehicles leaving the Site depositing dirt/mud on public roads after rain periods
- Removal of bulk materials off site escaping from vehicles and polluting roadways
- Management of debris and litter collecting along roads and in catch drains.

The environmental performance of the Contractor(s) will be monitored through-out the works and will be formally reported on a monthly basis.

The erosion and sediment controls for the works shall be designed, installed and maintained in accordance with the requirements of the Managing Urban Stormwater: Soils & Construction, as described in "The Blue Book" 2004 (4th edition).

Noise and vibration

Noise from any of the site areas will not exceed the limits set-out in the Noise Control Act 1975. No machine will operate outside the normal working hours previously described, unless prior approval has been granted by the local consent authority.

Demolition and excavation works shall comply with Australian Standard 2436-1981 "Guide to Noise Control on Construction, Maintenance and Demolition Sites".

As part of the noise mitigation strategy for the project, all trucks, excavating equipment and machinery will be checked for defective or operationally noisy exhaust systems.

Prior to commencement of the works, liaison will take place with occupants from the neighbouring departments within the hospital site and adjoining neighbours for the HWP site.

Dust mitigation

During construction, dust control, minimisation and where possible, mitigation, will occur at the source of dust and where dust occurs. This will prevent airborne dust particles transferring to the hospital campus and environs within proximity to the hospital.

Odour control

The air quality assessment has not identified any significant issues with odour associated with the works. Plant and machinery involved in the works will be serviced regularly and checked for emissions. The Contractor(s) will also be required to implement safe work methods for the use and containment of solvent-based paints, adhesives and sealers.

Storage of dangerous goods

Works will require the use of flammable fuels such as petrol, diesel and oxy-acetylene etc. Storage of such items will be in a secure, lockable compound with sufficient ventilation in accordance with relevant codes of practice & standards.

Material Safety Data Sheets for all flammable or potentially harmful liquids or gases will be provided by the Contractor(s) prior to works commencing on site.

Where required, the Contractor(s) will be responsible to apply for any dangerous goods licences associated with the storage and transportation of dangerous goods.

Stormwater run-off and sediment control

Drainage of surface water run-off will be allowed to flow along the existing contours of the site surface water infrastructure which includes kerb-lines, gutters, gully-pits and stormwater run-off drains.

The site areas associated with the project will be continually cleaned of rubble to minimise possible sediment flow during rainfall periods. Stormwater kerbs and drainage lines will have sediment controls in place. Stormwater grate inlets surrounding the demolition areas will be covered with a selected geotextile fabric to allow water to enter the drains and retain the sediment generated by the works.

All drainage controls will be frequently checked, particularly during heavy rainfall periods.

Complaint procedure

A procedure for dealing with complaints regarding noise dust and other environmental nuisance will be established and a register will be maintained at each project office.

The Contractor(s) will be required to notify the Client of any complaints so they can be addressed accordingly.

Waste management/recycling principles

The Principal Contractor(s) will be committed to achieving compliance with the Environment Protection Authority (EPA) guidelines.

Prior to commencing works the Contractor(s) will be required to confirm the geotech investigation completed to date and to complete and additional site geotechnical investigations that may be carried out if the information is not adequately covered in available geotechnical investigations for the purposes of waste / recycling classifications. All hazardous materials will be managed in accordance with section 6 of the Construction Management Plan.

All waste material generated from the works will be recycled and repurposed where possible, with the exception of soft demolition materials and hazardous materials such as asbestos and the like.

6.21.7 Hazardous materials management

Identification

The Contractor(s) will be required to complete a full hazardous materials assessment prior to any works commencing on Site, over and above what has been completed to date. The management and removal from Site of any/all hazardous material will be undertaken in accordance with the Australian Standards.

Air monitoring

In accordance with all codes and standards; air monitoring will be carried out by a registered occupational hygienist although it is not anticipated that asbestos removal works will be undertaken.

The daily monitoring results will be assessed by a hygienist and the records will be provided daily to the Project Manager.

Removal

Removal of any hazardous material will be carried out by a registered WorkCover licensed contractor supervised by both the Contractor(s) and monitored by a registered occupational hygienist. All works will occur and comply within the requirements of relevant codes and standards.

Disposal

Hazardous materials will be sealed and loaded prior to transport in accordance with relevant codes and standards. All asbestos materials will be bagged, wrapped and placed in plastic lined disposal containers and will be disposed at a registered EPA landfill with full accountability and traceability of transport and disposal monitoring, enforced and monitored through-out the works contract. The Contractor(s) will be required to provide and maintain certificates and verification documents.

Further details of the Construction Management Plan are provided in **Appendix 22**.

6.22 BUILDING CODE OF AUSTRALIA AND ACCESSIBILITY

A BCA Assessment Report has been prepared by Blackett Maguire + Goldsmith (BM+G) and is attached at **Appendix 25**. The BCA Assessment Report undertook a preliminary assessment of the architectural plans in terms of compliance with the relevant provisions of the Building Code of Australia – 2019 Amendment 1. It is noted that the proposed building works are capable of complying with the BCA. While the building is proposed to generally comply with the deemed-to-satisfy provisions of the BCA, the departures will need to be addressed as a fire engineered performance solution.

An Accessibility Review Report (**Appendix 24**) has been prepared by ABE Consulting to undertaken an assessment of the proposed design in relation to the accessibility related requirements, including BCA 2019 Amendment 1, The Disability (Access to Premises – Buildings) Standards 2010, The Guide to the BCA 2019 Amendment 1 and Australian Standards. Following the review and with the adoption of the recommendations/Performance Solutions proposed, ABE Consulting are able to confirm that the development can readily achieve compliance with the relevant BCA provisions.

PART G ENVIRONMENTAL RISK ASSESSMENT

In accordance with the SEARs, this section addresses potential impacts of all stages of the development using sufficient baseline data and identifies the residual risk following the incorporation of mitigation and management measures.

Table 32 below sets out the potential impacts, the level of impact in terms of severity (low, medium, high), identifies mitigation measures, and the residual risks with the implementation of mitigation measures.

Table 32 Environmental Risk Assessment

Impact	Detail	Level of Impact	Mitigation Measures	Residual Risk
Traffic				
Construction	The Site is in proximity to public transport network including the Wentworthville train station and bus services. Therefore, construction works should be encouraged to take public transport. Due to the limited availability of off-street parking, carpooling should also be encouraged to and from the Site. Pedestrian access surrounding the Site should be managed during all construction stages. It is noted that the preliminary construction truck volumes are as follows: ▪ Site establishment and preparatory works: o Small rigid vehicles: 20 o Medium rigid vehicles: 12 ▪ Construction: o Small rigid vehicles: 10 o Medium rigid vehicles: 10 o Heavy rigid vehicles: 20 Based on the preliminary truck volumes above, there will be a maximum of 20 vehicle arrivals per day. This equates to approximately 1-2 truck arrivals every 30 minutes and this level of construction vehicle activity raises no concerns with regards to conflicts between construction vehicles and the existing traffic on surrounding streets/intersections.	Medium	<u>Construction traffic and pedestrian management</u> A Preliminary Construction Management Plan (**Appendix 22**) has been prepared by Erilyan outlining the management measures to be implemented during construction. A detailed Construction Pedestrian and Traffic Management Plan (CPTMP) will be prepared by the appointed builder prior to construction. <u>Worker parking</u> Given the proximity to public transport network, contractors will be encouraged to utilise public transport. Carpooling to and from Site will also be encouraged to minimise the number of vehicles arriving during peak periods and the broader road network. In order to minimise the impact on surrounding streets, any on-site parking would be prioritised to construction employees who carpool. This would however be subject to the detailed CPTMP when more information is available regarding employee numbers. <u>Pedestrian control</u> Temporary bollards, road and pedestrian barriers with signage will be erected where works impede on areas external to the Site. Additionally, the Contractor(s) will be required to liaise with the neighbours to ensure pedestrian safety. Pedestrian access to neighbouring properties shall be maintained at all times and no building materials shall be placed, dumped or left on any Council road or footpath area. Footpaths are to remain in a safe condition for use by pedestrians. A TfNSW certified traffic controller will also be positioned at any vehicle access point to manage vehicle movements and to ensure pedestrian safety.	Low

			All works are to be undertaken in accordance with the public protection measures as required in the Australian Standards. <u>Construction hours</u> The following construction hours are proposed: ▪ Monday to Friday: 7am to 6pm ▪ Saturdays: 8am to 1pm ▪ Sundays and public holidays: No work No works will occur outside the hours nominated above unless prior consent is granted by the consent authority. Delivery of heavy machinery or excavating equipment may be required outside the proposed hours of work to conform to the requirements of the Cumberland City Council and Roads & Maritime Services (RMS). <u>Truck routes</u> The truck routes for the construction of the development will utlise the main arterial roads near the site, mainly the Great Western Highway and Cumberland Hwy and then access Lytton Street via Bridge Rd or Veron Street. Surrounding stakeholders such as local businesses and neighbors will be consulted on truck movements, to ensure their operations and amenity are not impacted, particularly around peak periods. The entry and exit from site, delivery times and frequencies will be confirmed and identified as part of the Contractor(s) Traffic Management Plan. <u>Emergency vehicle access</u> Ambulance and Police would enter via the Lytton Street driveway entrance which leads to the reception/waiting area (driveway opposite No. 20 Lytton Street).	
Operation	As demonstrated in the Traffic and Accessibility Impact Assessment (**Appendix 9**), all intersections will operate satisfactorily (with LoS A) under both 2021 Base Case + Development Scenarios and 2031 Base Case Scenario. In the 2031 Base Case Scenario, the intersections will continue to operate satisfactorily with	Low	<u>Sustainable travel plan</u> A comprehensive Green Travel Plan (GTP) will be developed for patients and staff to encourage the use of public transport and alternative modes of transportation. Car sharing schemes are encouraged for staff of the development. Initiative are to be implemented for staff whereby on-site parking spaces are prioritised for	Low

	acceptable delays and no external improvements required to support the proposed development. It is anticipated that there will be a net increase of 59 person trips during peak periods. It is noted that approximately 15.8% of trips within Wentworthville are completed using alternative means of travel, of which a large percentage (73.7% of alternative trips) utilise public transport options. No concerns are raised over the expected additional bus or train trips, with existing services expected to easily accommodate the additional demand.		vehicles with two or more staff members.	
Noise and Vibration				
Construction	Based on the results of the preliminary construction noise assessment in the Noise and Vibration Impact Assessment (**Appendix 8**), the noise levels associated with some normal construction works are expected to exceed the noise management level (NML) criteria in accordance with the ICNG Guideline. Mitigation measures are to be implemented to ensure compliance with the relevant construction noise criteria is achieved.	Medium	<u>Construction Noise and Vibration Management Plan</u> A Construction Noise and Vibration Management Plan will be prepared by a suitably qualified acoustic consultant to undertake noise and vibration monitoring for the duration of the project. <u>Site specific noise control measures</u> Acoustic screening will be installed during all phases of the construction work, except for the internal refurbishment works. The following noise control measures will also be implemented to minimise the noise and vibration impacts to the existing premises of the development: ▪ Incorporate respite periods for noisy activities ▪ Provide information to clinic staff before and during construction ▪ Implement all feasible and reasonable measures to address the noise source of complaint and ensure that any noise impacts to patients and staff are minimised when noise goals cannot be met due to space constraints	Low
Operation	The following noise sources have been identified with the potential to impact on existing noise sensitive receivers: ▪ Mechanical plant from the proposed development ▪ New loading bay ▪ Traffic generation noise ▪ Carpark noise ▪ Sleep arousal	Low	A detailed acoustic assessment will be undertaken during design development stage once the mechanical plant and glazing system have been confirmed. This will be undertaken in accordance with the recommendations of the Noise and Vibration Impact Assessment prepared by JHA. <u>Delivery</u>	Low

	External mechanical plant Acoustic assessment of all mechanical plant shall continue during the design phases of the project in order to confirm any noise control measures to achieve the relevant noise criteria at the nearest noise sensitive receivers. Loading bay Based on the acoustic assessment, operational noise associated with use of the loading bay meets the required noise level criteria during the night time period. Traffic noise The traffic increase due to the proposed development will not result in any noticeable change in traffic noise levels and is expected to meet the NSW Road Noise Policy (RNP) requirements. Sleep arousal The internal noise levels associated with car movements in the basement and at-grade carpark are at a level that according to NSW RNP are unlikely to cause awakening reactions. Noise intrusion It is considered that traffic noise break-in will not be an issue if a typical façade design and the nominated glazing recommendations are followed. Nevertheless, the acoustic design of the façade is to be progressed further throughout the design stage.		It is recommended that deliveries will not take place between 10pm and 7am in order to minimise any potential risk and noise from the loading bay during the night time period. Mitigation measures Recommendations have been provided to minimise the impact of external noise emissions associated with the mechanical plant of the proposed development to the nearest sensitive receivers. The recommended glazing system is to be adopted to minimise traffic noise break-in.	
European heritage				
Construction	In accordance with the Non-Aboriginal (Historical) Heritage Impact Assessment (**Appendix 13**) prepared by Artefact, no listed heritage items are located within the study area. Four heritage items listed on CLEP2021 are within 250m of the study area. The assessment of heritage impacts has found that the proposed development will not directly or indirectly impact on any listed or unlisted heritage items.	Low	An Unexpected Finds Policy will be in place for any ground disturbing works.	Low
Operation	Nil	Nil	Nil	Nil

Aboriginal Heritage				
Construction	Based on the ACHAR prepared by Artefact, no previously unrecorded Aboriginal sites or objects were identified within the study area during the site inspection. The result of archaeological assessment and consultation indicate that the study area has nil to low potential for the preservation of Aboriginal heritage. The Site is also found to be disturbed.	Low	If any Aboriginal objects, or potential objects, are uncovered in the course of the activity, all work in the vicinity should cease immediately. A qualified archaeologist will be contacted to assess the find and Heritage NSW and Deerubbin LALC must be notified. If human remains, or suspected human remains, are found in the course of the activity, all work in the vicinity should cease, the Site should be secured, and the NSW Police and Heritage NSW will be notified.	Nil
Operation	Nil	Nil	Nil	Nil
Contamination				
Construction	Asbestos has been encountered in the fill and on the ground surface at the Site and is considered to represent a risk to human receptors.	Moderate/High	Implementation of the Remediation Action Plan (RAP) prepared by JK Environments and Asbestos Management Plan. A site validation report will be prepared on completion of remediation activities to demonstrate the Site is suitable for the proposed development.	Low
Operation	Any contamination unearthed during construction will be treated/removed from Site.	Low	A Long Term Environmental Management Plan (LTEMP) will be implemented for in-situ capping and long-term management of the capped areas, which will be applicable to all areas where fill will remain.	Low
Light spill				
Operation	The neighbouring properties have been identified as sensitive to light spill during operation of the proposed development.	Low	The obtrusive effects of lighting will be controlled in accordance with the requirements of AS4282. This standard outlines the requirements to limit/remove light spill to neighbouring properties from external lighting sources. The design and installation of a system of lighting to operate from dusk to dawn via a photo-electric switch within areas where the public have general access will be implemented (external carparking, public vehicle/pedestrian drop-off areas and pathways). Internal carparks will be controlled via movement sensor systems, and/or via the Building Management System. Any lighting to the facade and accent lighting to highlight the external features of the building, will be incorporated into the design where requested by the design architect. This lighting will be timer controlled via a Building	Low

			Management System, and linked to a photo-electric switch.	

PART H PLANNED MANAGEMENT AND MITIGATION MEASURES

By:	Ramsay Health Care
In relation to:	SSD-17899480 – Proposed Extension of Wentworthville Northside West Clinic
Site:	23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

Ramsay Health Care would undertake the facilitated construction of the proposed extension of Wentworthville Northside West Clinic in accordance with the following:

Below prescribes some terms and abbreviations used in this Statement, including:

Approval	The Minister's approval of the proposed development
BCA	Building Code of Australia
Council	Cumberland City Council
Department	Department of Planning, Industry and Environment
EIS	Environmental Impact Statement
EP&A Act	Environmental Planning and Assessment Act 1979
Project	The development as described in the EIS
Proponent	Ramsay Health Care
Secretary General	Secretary-General of the Department (or delegate)
Site	23-27 Lytton Street, Wentworthville (Lot 1 DP787784)
WorkCover	NSW WorkCover

ADMINISTRATIVE COMMITMENTS

Commitment to Minimise Harm to the Environment

1. Ramsay Health Care would implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction or operation of the project.

Occupation Certificate for a Hospital

2. Ramsay Health Care would ensure a staged Interim and Final Occupation Certificate is obtained prior to the occupation of the hospital.

Terms of Approval

3. Ramsay Health Care would carry out the project generally in accordance with the:

    a) Environmental Impact Statement;
    b) Drawings prepared by Health projects International;
    c) Management and Mitigation Measures;
    d) Any Conditions of Approval.

4. If there is any inconsistency between the above, the Conditions of Approval shall prevail to the extent of the inconsistency.

5. Ramsay Health Care would ensure compliance with any reasonable requirement/s of the Secretary-General of the Department of Planning, Industry and Environment arising from the Department's assessment of:

    a) Any reports, plans, programs, strategies or correspondence that are submitted in accordance with this Approval; and

b) The implementation of any recommended actions or measures contained in reports, plans, programs, strategies or correspondence submitted by the Project Team as part of the application for Approval.

Structural Adequacy

6. Ramsay Health Care would ensure that all new buildings and structures on the Site are constructed in accordance with the relevant requirements of the BCA.

Operation of Plant and Equipment

7. Ramsay Health Care would ensure that all plant and equipment used on Site is maintained and operated in proper and efficient manner, and in accordance with relevant Australian Standards.

SPECIFIC ENVIRONMENTAL COMMITMENTS

Noise

9. Construction on the Site would only be undertaken between 7am and 6pm Monday to Friday, and 8am and 1pm on Saturdays. No work on Sundays and public holidays. The following specific measures are proposed throughout the construction and operational phases of development:

    a) Prompt response to any community issues of concern;
    b) Noise monitoring on-site and within the community;
    c) Refinement of on-site noise mitigation measures and plant operating procedures where practical;
    d) Preparation of a formal noise management plan including noise monitoring program;
    e) For equipment with enclosures (i.e. compressor rooms) ensure door and seals are well maintained and kept closed when not in use;
    f) Keep plant and equipment well maintained, regular inspection and maintenance of equipment to ensure it is good working order;
    g) Equipment not to be operated until it is maintained or repaired;
    h) Regularly train workers (i.e. toolbox talks) to use equipment in ways to minimise noise;
    i) Operate mobile plant in a quiet, efficient manner;
    j) Switching off vehicles and plant when not in use; and,
    k) Incorporate clear signage at the Site including relevant contact numbers for community enquiries.

10. The acoustic screening should be 2.4m high acoustic screen (Class A hoarding or equivalent) and constructed from minimum 19mm thick plywood or similar mass surface, and be free of any air gaps.
11. Respite periods in accordance with Section 7.2.1 of the Noise and Vibration Impact Assessment prepared by JHA are to be implemented.

Construction Traffic

12. During construction:

    a) all trucks entering or leaving the Site with loads have their loads covered;
    b) trucks associated with the project do not track dirt onto the public road network; and,
    c) the public roads used by these trucks are kept clean.

Dust Management

13. During the construction phase of the project, all reasonable and feasible measures to minimise the dust generated by the project. These include:

Source	Control Measures
General	
Visual Inspection	Carry out visual inspections of the Site during site preparatory / construction activities and employ measures where necessary to minimise any visible air pollution generated by the Project.
Regular Maintenance	Regularly inspect and perform maintenance on dust control technologies (i.e. water sprays nozzles) and measures to ensure the effectiveness of these controls.
Erosion Control Structures	Silt and other material removed frequently from around erosion control structures to ensure deposits do not become a dust source.
Vegetated Buffers	Retain existing vegetation where appropriate and implement additional vegetated buffers around the boundary of the Site to provide act as a physical barrier to the transport of pollutants in the direction of sensitive receptors.
Waste Materials	Cleared vegetation, demolition materials and other combustible waste material should not be burnt on-site. All waste materials be appropriately contained (in skips, bins) and covered during adverse weather conditions and handled in accordance with the Site's Waste Management Plan.
Wind Blown Dust Sources	
Disturbed Areas	– Disturb only the minimum area necessary. – Stabilise all disturbed areas as soon as practicable to prevent or minimise windblown dust. – Regularly assess weather conditions to identify adverse weather conditions that are unfavourable in terms of dust levels at receptor locations surrounding the Site.
Stockpile/s	– Water sprays and/or covers would be employed for material stockpiles, particularly during adverse weather conditions, to minimise dust generation. – Stockpiles would be covered overnight. – Use of chemical dust suppressants would also be used where necessary. – Fencing, bunding or shelterbelts used to reduce ambient wind speeds (in some areas).
Transportation (Trucks)	– Truck loads covered with tarpaulin or lid prior to transport of dusty materials by road. – Minimise truck queuing and unnecessary trips through logistical planning of materials delivery and work practices. – Reduce vehicle / truck idling times. – Maintain a following distance of trucks of 20 seconds minimum to allow for dust clouds generated by the lead truck to dissipate. – Install a truck wheel wash or shaker grid to remove any loose dirt.
Activity Generated Dust Sources	
Internal Road Dust	– Roads and trafficked areas would be watered down using a watercart and/or sprinkler(s) to minimise the generation of dust. – Haulage vehicles would be restricted to the most direct route and minimal manoeuvring areas to prevent indiscriminate driving over non-active areas. – Haul roads and hard stand areas will have designated speed limits (i.e. generally 20 km/hour). – Enforce speed limits on all on-site vehicles to minimise wheel-generated dust. – Stabilise access roads and work areas as soon as practicable to prevent or minimise windblown dust. – Maintain roads on a regular basis to ensure roads are clearly marked, potholes and corrugations are eliminated, and extra material build up is removed or redistributed on the road.

	– Chemical dust suppressants used where necessary.
External Road Dust	– Vehicles causing dirt track out onto main roads would be cleaned up on a regular basis to prevent this becoming an additional source of dust. – Material spillages would be cleaned up promptly.
Excavation	– Apply water sprays to trucks and loading points for dust suppression.
Loading and Dumping	– Dump heights would be minimised wherever possible (reduce to 5 m).
Plant and Equipment	– All plant and equipment used during activities would be maintained and operated in a proper and efficient condition. – Reduce idling times of trucks and other machinery. – Fixed plant should be located as far from local receptors as possible.
Excessive Dust Events	
Internal Roads	– Employ additional water spraying / water carts. – Further reduce speed on haul roads during high winds. – Halt traffic movements.
Stockpiles	– Cover stockpiles of material.
Project Site	– Temporarily halt activities and resume once weather conditions have improved.

Tree Preservation

14. All tree protection works shall be carried out before excavation, grading and site works commence. Tree protection works shall be inspected and approved by a Consulting Arborist meeting AQF Level 5 prior to construction works commencing.

    Storage of materials, mixing of materials, vehicle parking, disposal of liquids, machinery repairs and refueling, site office and sheds, and the lighting of fires, stockpiling of soil, rubble or any debris shall not be carried out within the TPZ of existing trees. No backfilling shall occur within the TPZ of existing trees. Trees shall not be removed or lopped unless specific instruction is given in writing by the Superintendent.

15. Prior to all site works commencing, a Site Arborist is to be appointed with the responsibility of implementing all Tree Protection Measures in this report as well as compliance with AS4970-2009 Protection of Trees on Development Sites. The Site Arborist is to hold qualifications equivalent of AQF Level 5.

16. All tree protection and removal works are to be undertaken in accordance with the recommendations and tree protection measures in the Arboricultural Development Impact Assessment Report (dated 30 April 2021) prepared by Birds Tree Consultancy.

Waste Management

17. Ramsay Health Care would ensure that all waste generated on site during operation is classified in accordance with the Office of Environmental and Heritage's *Waste Classification Guidelines: Part 1 Classifying Waste* and disposed of to a facility that may lawfully accept the waste.
18. Consider measures and performance-based targets for reduction, reuse and recycling options.

Protection of Vegetation

19. Ramsay Health Care would mark the clearance boundaries prior to commencement of construction to ensure that there is no unnecessary removal of vegetation.

Noise and vibration

20. If, during construction, an item of equipment exceeds ether the noise criteria at any location or the equipment noise level limits, the following noise control measures, together with construction best practices, shall be considered to minimise the noise impacts on the neighbourhood.

    - Schedule noisy activities to occur outside of the most sensitive times of the day for each nominated receiver.
    - Consider implementing equipment-specific screening or other noise control measures recommended in Appendix C of AS 2436:2010.
    - Limit the number of trucks on Site at the commencement of Site activities to the minimum required by the loading facilities on Site.
    - When loading trucks, adopt best practice noise management strategies to avoid materials being dropped from height into dump trucks.
    - Avoid unnecessary idling of trucks and equipment.
    - Ensure that any miscellaneous equipment (extraction fans, hand tools, etc) not specifically identified in the CNVMP incorporates silencing/shielding equipment as required to meet the noise criteria.

Aboriginal Heritage

21. During works, Ramsay Health Care would notify the NSW Office of Environment and Heritage should an Aboriginal site and/or object be recorded in the Aboriginal Heritage Information Management System (AHIMS).

22. Unexpected Aboriginal objects remain protected by the National Parks and Wildlife Act 1974. If any such objects, or potential objects, are uncovered in the course of the activity, all work in the vicinity should cease immediately. A qualified archaeologist should be contacted to assess the find and Heritage NSW and Deerubbin LALC must be notified.
23. If human remains, or suspected human remains, are found in the course of the activity, all work in the vicinity should cease, the Site should be secured, and the NSW Police and Heritage NSW should be notified.

Ecologically Sustainable Development

24. Ramsay Health Care would investigate the following ESD measures in respect of:

a) Energy & Greenhouse Gas Emissions;
b) Potable water reduction;
c) Minimising waste to landfill;
d) The Indoor Environment;
e) Occupant amenity and comfort;
f) Land Use & Ecology;
g) Emissions; and
h) Building Management

Contamination

25. A contaminated land professional should be consulted with should any unexpected finds concerning stained or odorous material be uncovered during the demolition and construction phases of development.
26. Remediation is to be undertaken in accordance with the Remediation Action Plan and Asbestos Management Plan prepared by JK Environments.

Geotechnical

19. Site preparation and filling should be carried out in accordance with the guidelines contained in AS 3798 – 2007.

20. All excavated materials which are to be removed off the Site will be disposed of in accordance with the provisions of the current legislation and guidelines including the Waste Classification Guidelines (EPA, 2014).

Building Code of Australia

21. All new buildings will be designed to comply with the BCA standards.

Accessibility

22. Ramsay Health Care would ensure at the Construction Certificate stage compliance with Part D3 BCA standards.

PART I PROJECT DEVELOPMENT JUSTIFICATION

The proposal is considered to be justified in the context of environmental, social and economic terms and is compatible with the locality in which it is proposed. **Part F** provides details regarding the justification of the environmental, social and economic impacts of the Proposed development.

The subject SSD Application is considered supportable on this basis for the following reasons:

1. Supporting State, Regional and Local planning objectives

The proposal is consistent with the objectives, provisions and strategies outlined within *The Greater Sydney Region Plan – A Metropolis of Three Cities*, *Central City District Plan*, LSPS and CLEP2021.

2. Appropriate use of an approved site

The proposal will contribute to the provision of a state-of-the-art health services facility. The strengthening of this sector is an important strategy for the infrastructure of the Wentworthville area and the wider Cumberland LGA as described in the *Central City District Plan* and LSPS. The development complements significant investment in infrastructure and will be an employment generating development.

3. Environmental impacts have been minimised

Specialist consultants have assessed the risks and determined that the development can be undertaken with minimal environmental impacts. No significant risk to the locality is to result from the proposal.

4. Compatibility with surrounding development

The proposed use is compatible with surrounding development including the commercial, industrial, education, residential and health services development in the general vicinity of the Site. The investigations undertaken as part of this application conclude that no significant cumulative impact would occur from the proposed use for the purpose of a health services facility.

5. Ecologically Sustainable Development

The principles of ecological sustainable development as outlined in Clause 7(4) of the EP&A Regulation are addressed follows:

- **Precautionary Principle**

  No unmanageable threat or irreversible damage to the environment has been identified in relation to the proposal.

- **Inter-generational Equity**

  No unreasonable use of resources, affectation of environmental processes or prevention of the use of land for future generations will occur from the proposal.

- **Conversation of Biological Diversity and Ecological Integrity**

  The Site has been previously disturbed and does not present any risk to any significant ecological integrity.

  No processes, habitats or species outside the Site are likely to be significantly affected by the development.

- **Improved Valuation, Pricing and Incentive Mechanisms**

The proposal seeks to implement measures to avoid, contain and address any associated waste or pollution through appropriate design and management.

6. Community and Stakeholder Engagement

A comprehensive community engagement strategy has been executed, which involved virtual meetings and phone interviews with Cumberland City Council and community members. All nearby residents were also notified of the Proposed development with no objections received. All matters raised by the agencies have been comprehensively addressed throughout this EIS.

7. Infrastructure Requirements

The Site can be appropriately serviced.

8. Traffic and Transport

Sufficient access and parking arrangements are provided for in the proposed development. Additionally, traffic generation has been assessed and it is considered that the existing road networks in close proximity to the Site can continue to operate at a satisfactory Level of Service.

9. Urban Design and Visual Assessment

As clearly demonstrated in the submitted Architectural Plans, the proposed development provides a superior urban design outcome that sets a desirable precedent for future development in the locality. The Visual Impact Assessment also confirms that there will be no unacceptable amenity impacts given the scale, form and overall positioning of the Wentworthville Northside West Clinic extension on the Site.

10. Soils and Water

The Subject Site is unconstrained in terms of geotechnical conditions and contamination and is therefore deemed suitable for the proposed development's land use. This is attributed to the underlying Site conditions and historical land use.

The proposed stormwater design has been designed in accordance with the relevant codes and standards. An overall net positive effect on the stormwater system in terms of overall conveyance and flood within Lytton Street is predicted for the development.

11. Noise and Vibration

Noise monitoring carried out and the project specific criteria established establishes that the proposed development can successfully co-exist with all surrounding land uses, subject to appropriate management and mitigation measures. Construction noise and vibration is able to be suitably managed by way of conditions of consent and management plans.

12. Biodiversity

The BDAR concludes that proposed development would not result in a significant to the threatened species identified on Site. No offsets are required for impacts to the threatened species or habitats on Site.

13. Aboriginal and Non-Aboriginal Cultural Heritage

Both a Heritage Impact Statement and ACHA have been completed which confirm that the Site has low Aboriginal and Historical heritage significance:

- Historical Heritage – There are no items of heritage significance which preclude the Development from proceeding; and

- Aboriginal Heritage – Following extensive field work and consultation with the RAPs, it is noted that there is a nil-low potential for Aboriginal objects to be located within the Site.

14. Social and Econonmic Impact

The proposed development will provide a variety of benefits including increased employment opportunities during construction and operation phases of the development and significant improvement in health infrastructure.

15. Hazards and Risks

The proposed development would not include the handling or storage or any dangerous or hazardous materials (e.g. pressurised oxygen, medical chemicals/compounds, radioactive materials or fuels) as no medical procedures are proposed to take place at the Site. Furthermore, an existing diesel generator situated at the Site is proposed to be removed (and not replaced elsewhere) as part of the preparation works of Stage 2, hence there would be no diesel fuel storage on the Site.

16. Waste Management

A Waste Management Plan has been provided which considers construction and operational waste measures to be undertaken for the proposed development. All built form proposed has considered the provision for waste management areas to ensure the effective management and disposal of waste can occur.

17. Ecologically Sustainable Development

The proposed development has been designed in accordance with Clause 7(4) of Schedule 2 of the EP&A Regulation and has incorporated ESD objectives to deliver enhanced sustainability benefits with respect to impacts on the environment, health and wellbeing of patients, staff and visitors, whilst providing the best possible facilities for a constructive environment.

18. Development Contributions

The proposed development is subject to the Section 7.12 levy under the *Cumberland Local Infrastructure Contributions Plan*.

PART J CONCLUSION

This EIS has been prepared to consider the environmental, social, and economic impacts of the proposed extension of Wentworthville Northside West Clinic. The EIS has addressed the issues outlined in the SEARs (**Appendix 1**) and accords with Schedule 2 of the EP&A Regulation with regards to consideration of relevant environmental planning instruments, built form, social and environmental impacts.

The proposal is considered appropriate for the location and should be supported by the Minister for Planning for the following reasons:

- It has been prepared having regard to the relevant planning legislation and is permissible with consent;
- The proposal has been prepared with regard to the relevant state and regional planning policies and strategies, and demonstrates consistency and compliance with the objectives of the strategic documents including *The Greater Sydney Region Plan – A Metropolis of Three Cities*, *Central City District Plan* and LSPS which outline directions in prioritising increased health services facilities;
- It has been prepared having regard to Council's planning policies and generally complies with the aims and objectives of the planning controls for the Site including the CLEP2012 and CDCP2021;
- While the proposal results in a numerical non-compliance with the maximum building height and FSR development standards in CLEP2021, justification has been provided in the accompanying Clause 4.6 Variation Request at **Appendix 30** which finds that the standard is unnecessary and unreasonable under the proposal's circumstances;
- The proposal is suitable for the Site as evidenced by the site analysis and various site investigations, including but not limited to, geotechnical, visual impact assessment and biodiversity.
- The proposal does not have any unacceptable off-site impacts on adjoining or surrounding properties or the public domain, in terms of traffic, stormwater, social and environmental impacts;
- The proposed development is of high quality in terms of built form, bulk and architectural treatment and responds positively to adjoining development. The proposal exhibits high standards of architectural design as addressed in the Design Report and will make a positive contribution to the overall built form, and respects the architectural integrity and heritage character of the surrounding urban area;
- The proposed landscaping design is well-resolved and is pedestrian oriented and prioritises circulation through the Site;
- The proposal has addressed the concerns raised during community consultation with key stakeholders;
- The proposed development will result in a significant health services facility to address a defined need within the Cumberland LGA.
- The proposed development will provide approximately 60 jobs during the construction phase and approximately 23 full time employees once operational.
- The proposed development will contribute positively to energy efficiency and environmental sustainability. The proposed development has adopted and incorporated a variety of ESD features to reduce energy consumption during the life of the proposed development.

Based on the findings of this EIS, it is concluded that the proposed development supports the continued

development of jobs and increase the support of mental health services in the Cumberland LGA. The proposal will expand the existing clinic and generate additional spatial capacity to provide vocational training and education platforms for prospective medical graduates.

The proposed development is therefore considered suitable from both a local and regional context and is both orderly and appropriate, based on social, cultural, economic and environmental considerations. It also satisfies all requisite regulatory requirements for flooding, biodiversity, bushfire, traffic, air quality emissions, risk and hazards and noise and vibration impacts.

Given all of the above reasons and the satisfaction of both of the Objects of the Act and the aims of CLEP2021, it is recommended that the proposed development, for the purposes of a health services facility, be supported by the NSW DPIE, as appropriate and orderly employment-generating development.