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Major Projects / State Significant Development
Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124
Via: Major Projects Portal

Cc: Alexander Scott via alexander.scott@planning.nsw.gov.au

Georges River Council Advice on EIS – St George Private Hospital (your reference: SSD-86969958)

Georges River Council welcomes the opportunity to comment on the Environmental Impact Statement (EIS) for the State Significant Development application (SSDA) associated with the proposed St George Private Hospital Expansion in Kogarah.

Council has reviewed the SSDA documentation and identified several issues requiring rectification, and as such is not currently in a position to support the proposal. These include:

- the absence of the mandatory 1.5 m Bank Lane land dedication, which results in non-compliance with GRDCP and failure to ensure long-term public access;
- unresolved lane geometry and pedestrian safety concerns;
- the lack of a Voluntary Planning Agreement to deliver essential public domain upgrades;
- key technical gaps in access, swept paths, stormwater and asset protection; incomplete Waste Management Plans; and
- a non-compliant Section 7.12 cost estimate thereby requiring a Quantity Surveyor's assessment.

Council requests that all issues and recommended conditions outlined in this submission be addressed prior to the determination of the SSDA.

Should you require any further information, please contact Harkirat Singh, Senior Strategic Planner, via email at hsingh@georgesriver.nsw.gov.au.



Joseph Hill
Director Environment and Planning



Georges River Council Submission

This submission consolidates specialist technical comments and conditions from relevant Council sections, including Strategic Planning, Contributions / Planning Agreement, Traffic and Parking, Assets and Infrastructure, Stormwater, and Waste Services.

1. Strategic Planning Comments

1.1 GRDCP – Bank Lane Dedication & Pedestrian Connectivity

The EIS does not address the mandatory 1.5m land dedication required by the Georges River Development Control Plan 2021 (GRDCP), nor does the EIS propose alternative mechanisms such as an easement for public access.

Key DCP objectives:

- Improve pedestrian connectivity between health, education, and commercial precincts.
- Improve legibility and wayfinding in the Hospital Precinct.
- Facilitate active transport and safer pedestrian links.

The plans show the footpath, basement car park, and drop-off zone built entirely within the private site boundary, contrary to the intent of DCP controls. Private land pedestrian treatments, while beneficial, do not meet the requirements for public dedication, nor do they provide long-term certainty for public access.

Consistent with GRDCP objectives, Bank Lane (refer Figure 1) must deliver both pedestrian priority and safe lane geometry for essential hospital servicing vehicles.

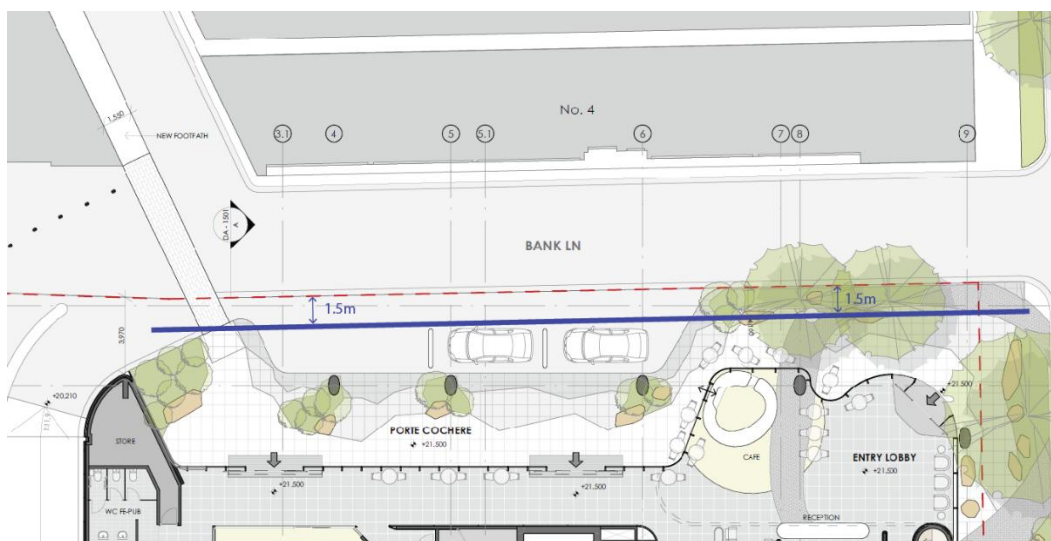


Figure 1: Bank Lane



1.2 Public Benefits and VPA

No Voluntary Planning Agreement (VPA) offer was submitted. A VPA would be appropriate given the scale and impacts of the proposal, particularly:

- The increased pedestrian and vehicular activity generated by the expanded hospital.
- The need for public domain upgrades beyond what is covered by contribution plans.
- GRDCP objectives requiring improved access and connections.

To support these outcomes, the SSDA could consider upgrading the end of Hogben Street into a pocket park to better enhance the broader public domain. This could involve a reconfiguration of the hospital entrance or, alternatively, be achieved through paving treatments and bollards that maintain necessary vehicular access while prioritising pedestrian amenity.

Council further encourages the SSDA to appropriately integrate Edith Blake Reserve, located adjacent to 2 South Street, into the design of the Private Hospital Extension. The Reserve is a highly utilised park and an important pedestrian connection within the precinct. Incorporating its role into the design of Bank Lane would enable better frontages and built edges that engage with the Reserve, supporting an enhanced pedestrian experience rather than treating Bank Lane as a service- oriented environment.

These opportunities are consistent with the direction and priorities identified in the draft Kogarah Strategic Centre Master Plan. See below.

1.3 Draft Kogarah Strategic Centre Master Plan

Council is currently preparing a draft Master Plan for the Kogarah Strategic Centre to guide job creation, housing diversity, and the revitalisation of the public domain. The draft Master Plan establishes a clear vision for the Centre's future growth, supported by integrated planning across transport, infrastructure, sustainability and urban design. It also includes a draft public domain plan that proposes new open spaces, enhanced through-site links, and streetscape upgrades to deliver a more connected, accessible and high-quality public realm.



2. Traffic and Parking Comments

2.1 Clinical Tower (2 Hogben Street and 119–129 Princes Highway)

Council maintains that a 1.5m wide land dedication along Bank Lane is required in accordance with GRDCP 2021 Part 8.1.5(3). The dedication will support safe access to the hospital for emergency vehicles, pedestrians, and service vehicles.

2.2 Existing Hospital 1 South Street, Kogarah

Council recommends creating a new exit driveway east of the current exit as:

- Current exit regularly queues back into the car park.
- Right-turn movements into South Street result in delays and blockages.
- Ambulances and service vehicles require an unobstructed exit.
- A left-turn-only exit option could significantly improve vehicle flow.

2.3 Lane Geometry

Bank Lane must operate as a one-way corridor with controlled, predictable vehicle movements. A widened cross-section is essential to:

- Prevent vehicle encroachment into pedestrian areas
- Accommodate the increased servicing demand generated by the expansion
- Provide emergency and waste vehicle access
- Maintain safe passing and circulation where necessary

Additionally, the following are requested:

- Demonstration of emergency access to adjoining property and substations via the bollarded section to be shown.
- Clear line-marking to reinforce one-way flow of Bank Lane is to be included to prevent illegal U-turns from the Porte Cochere area.
- Parking controls that are proposed for the Porte Cochere area must be defined and enforceable. The controls need to be indicated e.g. short-term parking, no parking.

2.4 Swept Path Assessment

Swept path assessment needs to be provided for Council's waste truck (Medium Rigid Vehicle) and Oxygen AV Tankers. There is concern that impacts to Council's Kerb and footpath assets have not been considered.



3. Development Contributions

A Section 7.12 Contribution levy applies under the Georges River Council Local Infrastructure Contributions Plan 2021, and the applicant must provide a Quantity Surveyor's cost estimate prepared in accordance with Section 208 of the EP&A Regulation, as the current EDC is not suitable for levy calculations.

For the purpose of this submission, an estimated levy of \$1,956,424.97 has been calculated based on the EDC. All contributions will be indexed quarterly using the CPI (All Groups, Sydney), with the final amount calculated at payment based on the adjusted cost of development. Payment timing depends on the type of development (e.g., before issuing a construction or subdivision certificate), and the Contributions Plan is available at Council offices or on the GRC website. Please refer to **Appendix 1** for further detail.

4. Stormwater Assessment

Council reviewed the following documents:

1. Integrated water management plan and civil design SSDA report document No. ACR-CIV-SSDA-RPT-001 Revision No. B prepared by ACOR consultants.
2. Civil services drawings dated 30.09.25 prepared by ACOR consultants
3. Flood Impact and Risk assessment document No. NA243339-ACR-CIV-SSDA-RPT-010 Rev. E prepared by ACOR consultants.

The SSDA generally meets stormwater objectives, subject to detailed design and conditions. Key requirements include:

- Gravity drainage to Council's upgraded stormwater pit/pipe is proposed and supported.
- Extension of Council stormwater infrastructure requires a Section 68 application.
- On-Site Detention (OSD) is required and provided; detailed design must comply with Council's Stormwater Management Policy.
- Flood impact provisions must be implemented, including minimum floor levels and overland flow management.
- Basement must be protected from inundation in accordance with hydraulic engineer recommendations.
- Works-as-executed stormwater plans required prior to Occupation Certificate.

Full recommended stormwater conditions are included in **Appendix 1**.



5. Waste Management

5.1 Adequacy of Waste Management Plans

Both the Construction & Demolition Waste Management Plan and Operational Waste Management Plan are incomplete and do not meet GRDCP requirements.

Key deficiencies:

- No nominated waste contractors for demolition.
- No landfill or processing facilities specified.
- Waste storage areas too constrained for operational circulation.
- Bin wash area referenced but not shown on architectural plans.
- No provision of litter bins for public/common areas.
- Private waste collection must occur on-site and within permissible hours.

5.2 Required Amendments

- Provide revised waste storage layouts with adequate manoeuvring space.
- Include a compliant 3m² bin wash area with sewer connection.
- Provide litter bins in all public and common areas with source-separated streams.
- Update WMPs to align with NSW EPA guidelines and Council requirements.

For further details, refer to **Appendix 1**.

6. Summary and Council recommendation

- Council cannot support the progression of the SSDA in its current because it does not provide the mandatory 1.5 m land dedication along Bank Lane, nor an equivalent legally secure public access easement, which is a fundamental GRDCP requirement.
- This dedication is essential to achieve compliant lane geometry, pedestrian priority, and long-term public access, all of which are critical for safe and functional operation of the Hospital Precinct.
- Other technical matters including traffic, stormwater, waste, and contributions remain unresolved.



APPENDIX 1

Sec 7.12 Contributions

Provided below is the condition for the application of s7.12 levies. Please note that GRC standard conditions usually include the provision of a table of all fees to be paid to Council (e.g. inspection fees, damage bond etc.) and contributions are only one line in this table.

The calculation has been prepared using the Estimated Development Cost (EDC) provided, which is not the same method for calculating the estimated costs for the purpose of section s7.12 levies. The applicant should provide an estimate prepared by a registered quantity surveyor with an estimate of costs in accordance with S208 of the *Environmental Planning and Assessment Regulation 2021*.

Section 7.12 Levy

Pursuant to the Georges River Council Local Infrastructure Contributions Plan 2021, a Section 7.12 levy of \$1,956,424.97 is required to be paid for this development to be applied towards the provision, extension or augmentation of public amenities or public services.

Indexation

The proposed cost of carrying out the development to which this consent relates is to be adjusted quarterly to reflect inflation in the CPI for All Groups (Sydney), in accordance with Section 208 of the *Environmental Planning and Assessment Regulation 2021* and Section 5.2.6 of the Georges River Council Local Infrastructure Contributions Plan 2021.

The levy payable at the time of payment is found by multiplying the levy rate by the adjusted proposed cost of carrying out the development.

Timing of Payment

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The contribution must be paid and receipted by Council [CHOOSE FROM THE FOLLOWING]:

- 1) Development applications involving subdivision but not building work - prior to the release of the subdivision certificate.
- 2) Development applications involving building work but not subdivision - prior to the release of a construction certificate as specified in the development consent.
- 3) Development applications involving subdivision and building work – prior to the release of construction certificate.
- 4) Development applications where no subdivision or building approval is required – prior to the issue of development consent or release of the occupation certificate.
- 5) Further Information



A copy of the current Development Contributions Plan may be inspected or a copy purchased at Council's offices (Georges River Civic Centre, MacMahon Street, Hurstville and Kogarah Library and Service Centre, Kogarah Town Square, Belgrave Street, Kogarah) or viewed on Council's website.

Stormwater Assessment

Stormwater Assessment	
Existing Primary Stormwater Drainage System	Select one ☐ Gravity to street gutter ☐ Charged to street gutter ☒ Gravity to Council pit/pipe ☐ Absorption trench ☐ Inter-allotment Easement ☐ Spreader ☐ Pump-out ☐ Head wall ☐ Rock / retaining wall surface ☐ On site
Proposed Primary Stormwater Drainage System	Select one ☐ Gravity drainage to street gutter ☐ Charged line to a boundary pit and gravity line to street gutter from the boundary pit ☒ Gravity to Council proposed pit/pipe ☐ Absorption trench ☐ Easement, ☐ Spreader ☐ Headwall ☐ Rock / retaining wall surface at bay
Property fall	☐ Slopes to the rear – entire site ☒ Slopes to the street



	☒ Portion of the site falls to the street and other portion falls to rear ☐ Has a cross fall
Stormwater objectives for development type met?	☒ Yes ☐ No
Discharge into same catchment?	☒ Yes ☐ No
Easement required? Extension of Council infra-structure is required? Any interference with existing Council stormwater drainage infra-structure	☐ Yes, obtained. ☒ No ☒ Yes, proposed. In this regard, the developer shall obtain approval through a section 68 application. ☐ No ☒ Yes ☐ No

On-site Stormwater Detention System	☒ Required ☐ Not required ☒ Provided ☐ As above ground basin ☒ As an underground tank ☐ combination of aboveground and underground ☐ composite OSD/OSR
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Rainwater tank larger than 5000 litres	☐ Yes ☒ No
OSD concession on rainwater tank	☐ Yes ☐ No ☒ N/A
More than 80% of the site drains to the OSD system	☒ Yes ☐ No, only the roof area, ☐ N/A
OSD volume calculations satisfactory	☒ Yes, must be in accordance with table 3 of Council's Stormwater Management Policy. ☐ No ☐ N/A

Property affected by Flood/Overland flow	☒ Yes ☐ No
If the answer to above is "yes," Flood impact report or/and flood study provided	☐ Yes ☐ No
Proposal satisfies the requirements for flood/overland flow management	☒ Yes

	☐ No
Note to the planner	I have not addressed any traffic and parking related issues.

Recommended conditions:

1. Section 138 Roads Act 1993 and Section 68 Local Government Act 1993

Unless otherwise specified by a condition of this consent, this Development Consent does not give any approval to undertake works on public infrastructure.

Separate approval is required under Section 138 of the [Roads Act 1993](#) and/or Section 68 of the [Local Government Act 1993](#) for any of the following activities carried out in, on or over a public road (including the footpath) listed below.

An application is required to be lodged and approved prior to the commencement of any of the following works or activities;

- (a) Placing or storing materials or equipment;
- (b) Placing or storing waste containers or skip bins;
- (c) Erecting a structure or carrying out work
- (d) Swinging or hoisting goods over any part of a public road by means of a lift, crane or the like;
- (e) Pumping concrete from a public road;
- (f) Pumping water from the site into the public road;
- (g) Constructing a vehicular crossing or footpath;
- (h) Establishing a “works zone”;
- (i) Digging up or disturbing the surface of a public road (e.g. Opening the road for the purpose of connections to utility providers);



- (j) Stormwater & ancillary works in the road reserve; and
- (k) Stormwater & ancillary to public infrastructure on private land
- (l) If any excavation is to be supported by the use of below ground (cable) anchors that are constructed under Council's roadways/footways.

These separate activity approvals must be obtained and evidence of the approval provided to the Certifying Authority prior to the issue of the Construction Certificate.

2. Road Opening Permit

A Road Opening Permit must be obtained from Council, in the case of local or regional roads, or from the RMS, in the case of State roads, for every opening of a public road reserve to access services including sewer, stormwater drains, water mains, gas mains, and telecommunications before the commencement of work in the road.

3. Erosion & Sedimentation Control

Erosion and sediment controls must be provided to ensure:

- (a) Compliance with the approved Erosion & Sediment Control Plan
- (b) Removal or disturbance of vegetation and topsoil is confined to within 3m of the approved building area (no trees to be removed without approval)
- (c) All clean water run-off is diverted around cleared or exposed areas.
- (d) Silt fences, stabilised entry/exit points or other devices are installed to prevent sediment from entering drainage systems or waterways.
- (e) All erosion and sediment controls are fully maintained for the duration of demolition, excavation and/or development works.
- (f) Controls are put into place to prevent tracking of sediment by vehicles onto adjoining roadway.
- (g) All disturbed areas are rendered erosion-resistant by turfing, mulching, paving or similar.

4. Sydney Water – Tap in TM

The approved plans must be submitted to a Sydney Water Tap inTM to determine whether the development application will affect Sydney Water's sewer and water mains, stormwater drains and/or easements, and if further requirements need to be met. The approved plans will be appropriately endorsed. For details please refer to 'Plumbing, building and developing' section of Sydney Water's web site



at www.sydneywater.com.au then see 'Building', or telephone 13000 TAP IN (1300 082 746). The Certifying Authority must ensure that a Tap in™ agent has appropriately stamped the plans prior to the issue of the Construction Certificate.

5. Damage Deposit – Major Works

In order to insure against damage to Council property the following is required:

(a) Pay Council, before the issue of the Construction Certificate, a damage deposit for the cost of making good any damage caused to any Council property as a result of the development: \$[Insert]

(b) Pay Council, before the issue of the Construction Certificate, a non-refundable inspection fee to enable assessment of any damage and repairs where required: \$[Insert]

(c) Submit to Council, before the commencement of work, a dilapidation report of the condition of the Council nature strip, footpath and driveway crossing, or any area likely to be affected by the proposal.

At the completion of work Council will review the dilapidation report and the Works-As-Executed Drawings (if applicable) and inspect the public works.

The damage deposit will be refunded in full upon completion of work where no damage occurs and where Council is satisfied with the completion of works.

Alternatively, the damage deposit will be forfeited or partly refunded based on the damage incurred.

6. Site Management Plan Major Development

A Site Management Plan must be submitted with the application for a Construction Certificate, and include the following:

- (a) location of protective site fencing;
- (b) location of site storage areas/sheds/equipment;
- (c) location of building materials for construction, e.g. stockpiles
- (d) provisions for public safety;
- (e) dust control measures;
- (f) method used to provide site access location and materials used;
- (g) details of methods of disposal of demolition materials;
- (h) method used to provide protective measures for tree preservation;
- (i) provisions for temporary sanitary facilities;
- (j) location and size of waste containers/skip bins;
- (k) details of proposed sediment and erosion control measures;



- (l) method used to provide construction noise and vibration management;
- (m) construction and demolition traffic management details.

The site management measures are to be implemented prior to the commencement of any works including demolition and excavation. The site management measures are to be maintained throughout the works, to maintain reasonable levels of public health, safety and amenity. A copy of the Site Management Plan must be kept on site and is to be made available upon request.

7. Stormwater System

The submitted stormwater plan has been assessed as a concept plan only. Final detailed plans of the drainage system, prepared by a professional engineer specialising in hydraulic engineering, shall be submitted for approval with the Construction Certificate.

- (a)** All stormwater shall drain by gravity to the upper level of proposed Kerb inlet pit located within the property frontage of Princes highway in accordance with the Australian/New Zealand Standard AS/NZS 3500.3: 2015 (as amended).

Prior approval must be obtained from RMS for all the works along and within Princes Highway.

- (b) Stormwater Systems with Basement**

The underground basement car park must pump to and all other stormwater must drain by gravity to:

- The proposed OSD system

The design of the proposed drainage system must be prepared by a professional engineer who specialises in hydraulic engineering and be submitted for approval with the Construction Certificate application.

- (c) Protection of basement from inundation of stormwater waters**

The construction of the building shall be designed to conform to the recommendations and conclusions of the stormwater consulting engineer, in regard to the protection of the underground basement from possible inundation by surface waters.

Evidence from a professional engineer who specialises in hydraulic engineering that this design requirement has been adhered to shall be submitted with the Construction Certificate application.

- (d)** The proposed stormwater drainage infra-structure works are to be submitted to the approval of RMS.



8. On Site Detention

An onsite detention (OSD) facility designed by a professional engineer who specialises in Hydraulic engineering must be designed, approved and installed.

The required OSD storage requirements and permissible discharge are to be calculated in accordance with Table 3 of Council's Stormwater Management Policy.

The OSD facility shall be designed to meet all legislated safety requirements and child proof safety fencing around the facility must be provided where the OSD facility is open or above ground when the design peak storage depth is greater than 300mm. A durable metal plate or similar sign is to be placed at the OSD facility and must bear the words:

"BEWARE: This is an on-site detention basin/tank for rainwater which could overflow during heavy storms."

Full details shall accompany the application for the Construction Certificate.

9. Stormwater Drainage Plan Details

Stormwater drainage plans including pipe sizes, type, grade, length, invert levels, dimensions and types of drainage pits prepared by a professional engineering specialising in hydraulic engineering shall be submitted with the Construction Certificate application.

These plans shall be prepared in accordance with the Australian Institute of Engineers Australian Rainfall and Runoff (2016) and stormwater drainage guide lines.

10. Pump-Out System Design for Stormwater Disposal (CC9.42)

The design of the pump-out system for storm water disposal will be permitted for drainage of basement areas only, and must be designed in accordance with the following criteria:

The pump system shall consist of two pumps, connected in parallel, with each pump being capable of emptying the holding tank at the rate equal to the rate of inflow for the one-hour duration storm. The holding tank shall be capable of holding one hour's runoff from a one-hour duration storm of the 1 in 20 year storm;

The pump system shall be regularly maintained and serviced, every six (6) months; and

Any drainage disposal to the street gutter from a pump system must have a stilling sump provided at the property line, connected to the street gutter by a suitable gravity line.

Details and certification of compliance from a professional engineer specialising in civil engineering shall be provided for approval with the Construction Certificate application.



11. Compliance with Flood Study

The development shall be designed to conform to the recommendations and conclusions of the submitted Flood Impact and Risk assessment document No. NA243339-ACR-CIV-SSDA-RPT-010 Rev. E prepared by ACOR consultants.

This shall include, but not be limited to, any recommendations for the following:

- (a) Minimum floor levels
- (b) Fencing
- (c) Site regrading
- (d) Overland flow path construction
- (e) Protection of the basement from inundation of surface waters
- (f) Structural adequacy
- (g) Evacuation method.
- (h) Any other recommendation

12. Cost of work to be borne by the applicant

The applicant shall bear the cost of all works associated with the construction of the development that occurs on Council property. Care must be taken to protect Council's roads, including the made footway, kerbs, etc., and, where plant and vehicles enter the site, the footway shall be protected against damage by deep-sectioned timber members laid crosswise, held together by hoop iron straps and chamfered at their ends. This construction shall be maintained in a state of good repair and condition throughout the course of construction.

13. Obstruction of Road or Footpath

The use of the road or footpath for the storage of any building materials, waste materials, temporary toilets, waste or skip bins, or any other matter is not permitted unless separately approved by Council under Section 138 of the [Roads Act 1993](#) and/or under Section 68 of the [Local Government Act 1993](#). Penalty infringement Notices may be issued for any offences and severe penalties apply.

14. Council Property Shoring

Prior to the issue of the Construction Certificate, plans and specifications prepared by a professional engineer specialising in practising structural engineering must detail how Council's property shall be supported at all times.

Where any shoring is to be supporting, or located on Council's property, certified structural engineering drawings detailing; the extent of the encroachment, the type



of shoring and the method of removal, shall be included on the plans. Where the shoring cannot be removed, the plans must detail that the shoring will be cut to 150mm below footpath level and the gap between the shoring and any building shall be filled with a 5MPa lean concrete mix.

15. Dilapidation Report on Public Land – Major Development Only

Prior to the commencement of works (including demolition and excavation), a dilapidation report must be prepared for the Council infrastructure adjoining the development site, including:

The report must include the following:

- (a) Photographs showing the existing condition of the road pavement fronting the site,
- (b) Photographs showing the existing condition of the kerb and gutter fronting the site,
- (c) Photographs showing the existing condition of the footpath pavement fronting the site,
- (d) Photographs showing the existing condition of any retaining walls within the footway or road, and
- (e) Photographs showing the existing conditions of the Council's existing drainage infra-structure in the vicinity of the site.
- (f) The full name and signature of the structural engineer.
- (g) The Dilapidation Report must be prepared by a qualified structural engineer.
The report must be provided to the PCA and a copy provided to the Council.

The Dilapidation Report must be prepared by a professional engineer. The report must be provided to the PCA and a copy provided to the Council.

The report is to be supplied in electronic format in Word or PDF. Photographs are to be in colour, digital and date stamped.

Note: Council will use this report to determine whether to refund the damage deposit after the completion of works.

16. Requirements prior to the issue of the Occupation Certificate

The following shall be completed and or submitted to the PCA prior to the issue of the Occupation Certificate:

- (a) All the stormwater/drainage works shall be completed in accordance with the approved Construction Certificate plans prior to the issue of the Occupation Certificate.



17. Restriction to User and Positive Covenant for On-Site Detention Facility

A Restriction on Use of the Land and Positive Covenant shall be created and registered on the title of the property, which places the responsibility for the maintenance of the on-site stormwater management system on the owners of the land. The terms of the instrument are to be in accordance with Council's standard terms and restrictions which are as follows;

Restrictions on Use of Land

The registered proprietor shall not make or permit or suffer the making of any alterations to any on-site stormwater management system which is, or shall be, constructed on the lot(s) burdened without the prior consent in writing of Georges River Council. The expression "on-site stormwater management system" shall include all ancillary gutters, pipes, drains, walls, kerbs, pits, grates, tanks, chambers, basins and surfaces designed to manage stormwater quantity or quality including the temporary detention or permanent retention of stormwater storages. Any on-site stormwater management system constructed on the lot(s) burdened is hereafter referred to as "the system."

Name of Authority having the power to release, vary or modify the Restriction referred to is Georges River Council."

Positive Covenants

1. The registered proprietor of the lot(s) hereby burdened will in respect of the system:

- a) keep the system clean and free from silt, rubbish and debris*
- b) maintain and repair at the sole expense of the registered proprietors the whole of the system so that it functions in a safe and efficient manner*
- c) permit the Council or its authorised agents from time to time and upon giving reasonable notice (but at any time and without notice in the case of an emergency) to enter and inspect the land for the compliance with the requirements of this covenant*
- d) comply with the terms of any written notice issued by the Council in respect of the requirements of this covenant within the time stated in the notice.*

2. Pursuant to Section 88F(3) of the Conveyancing Act 1919 the Council shall have the following additional powers:

- a) in the event that the registered proprietor fails to comply with the terms of any written notice issued by the Council as set out above the Council or its authorised agents may enter the land with all necessary materials and equipment and carry out*



any work which the Council in its discretion considers reasonable to comply with the said notice referred to in part 1(d) above

b) the Council may recover from the registered proprietor in a Court of competent jurisdiction:

i. any expense reasonably incurred by it in exercising its powers under subparagraph (i) hereof. Such expense shall include reasonable wages for the Council's employees engaged in effecting the work referred to in (i) above, supervising and administering the said work together with costs, reasonably estimated by the Council, for the use of materials, machinery, tools and equipment in conjunction with the said work.

ii. legal costs on an indemnity basis for issue of the said notices and recovery of the said costs and expenses together with the costs and expenses of registration of a covenant charge pursuant to section 88F of the Act or providing any certificate required pursuant to section 88G of the Act or obtaining any injunction pursuant to section 88H of the Act. Name of Authority having the power to release vary or modify the Positive Covenant referred to is Georges River Council.

18. Maintenance Schedule – On-site Stormwater Management

A Maintenance Schedule for the proposed on-site stormwater management measures is to be prepared and submitted to Council. The Maintenance Schedule shall outline the required maintenance works, how and when these will be done and who will be carrying out these maintenance works.

19. Stormwater drainage works – Works As Executed

Prior to the issue of the Occupation Certificate, storm water drainage works are to be certified by a professional engineer specialising in hydraulic engineering, with Works-As-Executed drawings supplied to Council detailing

- (a) Compliance with conditions of development consent relating to stormwater;
- (b) The structural adequacy of the On-Site Detention system (OSD);
- (c) That the works have been constructed in accordance with the approved design and will provide the detention storage volume and attenuation in accordance with the submitted calculations;
- (d) Pipe invert levels and surface levels to Australian Height Datum;
- (e) Contours indicating the direction in which water will flow over land should the capacity of the pit be exceeded in a storm event exceeding design limits.

Council must advise in writing that they are satisfied with the Works-As-Executed prior to the issue of an Occupation Certificate.

20. Requirements prior to the issue of the Occupation Certificate



The following shall be completed and or submitted to the PCA prior to the issue of the Occupation Certificate:

- (b) All the stormwater/drainage works shall be completed in accordance with the approved Construction Certificate plans prior to the issue of the Occupation Certificate.
- (c) The internal driveway construction works, together with the provision for all services (conduits and pipes laid) shall be completed in accordance with the approved Construction Certificate plans prior to the issue of the Occupation Certificate.
- (d) Construct any new vehicle crossings required.
- (e) Replace all redundant vehicle crossing laybacks with kerb and guttering and replace redundant concrete with turf.
- (f) A Section 73 (Sydney Water) Compliance Certificate for the Subdivision shall be issued and submitted to the PCA prior to the issue of the Occupation Certificate.
- (g) Work as Executed Plans prepared by a Chartered Professional Engineer or a Registered Surveyor when all the site engineering works are complete shall be submitted to the PCA prior to the issue of the Occupation Certificate.

21. Stormwater & Ancillary Works – Applications under Section 138 Roads Act and/or Section 68 Local Government Act 1993 (ADV17.6)

To apply for approval under Section 138 of the [Roads Act 1993](#) and/or Section 68 Local Government Act 1993:

- (a) Complete the 'Stormwater Drainage Application Form' which can be downloaded from Georges River Council's website at www.georgesriver.nsw.gov.au.
- (b) In the Application Form, quote the Development Consent No. (e.g. DA2018/****) and reference this condition number (e.g. Condition 23)
- (c) Lodge the application form, together with the associated fees at Council's Customer Service Centre, during business hours. Refer to Council's adopted Fees and Charges for the administrative and inspection charges associated with stormwater applications.

The developer must meet all costs of the extension, relocation, or reconstruction of any part of Council's drainage system (including design drawings and easements) required to carry out the approved development.

The preparation of all engineering drawings (site layout plans, cross sections, longitudinal sections, elevation views together with a hydraulic grade analysis) and



specifications for the new storm water drainage system to be arranged by the applicant. The design plans must be lodged and approved by Council prior to the issue of a Construction Certificate.

NOTE: A minimum of four weeks should be allowed for assessment.

6.0 Waste Management Assessment Outcome

☒ Supported subject to conditions – refer to section 6

6.1 Proposal

Council has received a request from DPHI to provide advice on the Environmental Impact Statement (EIS) for the State Significant Development application (SSDA) for the St George Private Hospital Expansion (SSD-86969958) in Kogarah.

6.2 Documents & Plans Reviewed – Supplied by Applicant

Description	Date	Rev	Prepared by
Demolition & Construction Waste Management Plan – State Significant Development, App Num SSD-86969958	Oct 2025		Waste Audit and Management Group Pty Ltd
Operational Waste Management Plan - State Significant Development, App Num SSD-86969958	Oct 2025		Waste Audit and Management Group Pty Ltd
D26 37082 (Appendix 4) Architectural Plans – Fitpatrick & Partners.pdf - DA2025 0545	20/10/25		Fitpatrick & Partners
Environmental Impact Statement SSD-86969958 – 119 - 129 Princes Highway, Kogarah, 2 Hogben Street, Kogarah, 1 South Street, Kogarah.	20/11/25		Patch Planners Pty Ltd

6.3 Documents Reviewed – Council & Relevant Legislation

GRCDP2021
Council website – waste management planning
Council waste collection service specifications
NSW EPA Better Practice Guidelines for Waste Management and Recycling in Commercial and Industrial Facilities

6.4 Background



Council has received a request from DPHI to provide advice on the Environmental Impact Statement (EIS) for the State Significant Development application (SSDA) for the St George Private Hospital Expansion (SSD-86969958) in Kogarah. The EIS has progressed beyond the SEARs stage and is currently on public exhibition. The SSDA seeks consent for two components:

1. Main Hospital Campus (1 South Street, Kogarah) – internal reconfiguration to create a new Emergency Department) and external alterations
2. Clinical tower (119-129 Princes Highway and 2 Hogben Street, Kogarah) – new inpatient and support services building (7 storeys)

The Waste team did not provide advice on the pre-lodgement application in July 2025.

6.5 Assessment

The following includes a Waste Management assessment of the proposal.

6.5.1 Waste Management Plan and design

- a. The applicant has provided a Waste Management Plan but is incomplete and inadequate.
 - The development must comply with all requirements of the Waste Management Plan except where amended by the following:

6.5.2 Construction and Demolition Waste

- a. Construction and Demolition.

Applicant has stated that a Waste demolition company has not been engaged at the time of the Operational Waste management plan application being submitted.

 - *The applicant must provide details of the proposed contractors used for managing demolition/construction wastes to Council prior to the issue of a Construction Certificate. The applicant must maintain records of licensed waste management disposal for up to 7 years as evidence of correct management of wastes from the development.*
- b. *No Proposed landfill destination for waste products*



- *The WMP does not provide details of disposal facilities proposed for use during the demolition stage. The applicant must provide at the Development Application stage a list of proposed disposal facilities.*

6.6 Ongoing Operational Waste Management

a. Waste Storage

- Bin storage area not sufficiently dimensioned to allow easy movement of bins. Architectural plans indicate bins stored up to four in a row, making the rotation of bins difficult for maintenance staff to utilise all bins. All bin storage areas are to be sufficiently dimensioned to allow for the easy movement of bins to and from interim storage area during collection.

b. Bin wash facilities

- A Bin wash area is mentioned in the Waste Management plan (Part 10 – Storage & Loading Areas - page 16), however, is not shown on Architectural Plans (Page 28)
- A bin wash area of at least 3m² must be provided inside commercial bin rooms to allow for the mobile garbage bins to be maintained in hygienic conditions to prevent odour and vermin issues. The bin wash area must allow for hot and cold-water access, with suitable drainage to the sewer and be constructed as per Sydney Water requirements and other applicable regulations.

c. Private waste services

- Private waste collection services provided for waste are restricted to within the hours of 6am – 10pm, due to residential properties located in adjoining streets. Private waste collection services are to occur entirely within the confines of private property with bins or waste originating from the property prohibited from being placed on Council land.

d. Litter in common areas.

- Architectural plans indicate an entry lobby, Café, and seated area within the property boundaries. No litter bins have been mentioned in the Waste Management Plan or shown on architectural plans.



- Receptacles for the management of any litter from communal areas must be contained in bins with lids. Bins enabling the source separation of general waste, commingled recycling and organics are to be provided in all common areas and will be the responsibility of the Owner's Corporation/Building Manager to rotate and empty as required. The bins must be secured to prevent the dispersal of litter by wind or animals.

