



Your ref: SSD-86969958
Our ref: DOC26/105809

Alexander Scott
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

11 March 2026

**Subject: Environmental Impact Statement – St George Private Hospital Expansion
(SSD- 86969958)**

Dear Alexander,

Thank you for your referral received 9 February 2026 requesting advice from the Conservation Programs, Heritage and Regulation (CPHR) Group on the Environmental Impact Statement (EIS) for this State significant development located at 119 Princes Highway, 129 Princes Highway, 2 Hogben Street and 1 South Street, Kogarah.

CPHR has reviewed the *Environmental Impact Statement St George Private Hospital* (Patch Planning, 21 November 2025) (EIS) and supporting documentation and provides comments and recommendations at Attachment A. In summary:

- Flooding – the *Flood Impact and Risk Assessment - St George Private Hospital Expansion at 119 – 129 Princes Highway and 2 Hogben Street, Kogarah, and 1 South Street, Kogarah* (ACOR Consultants, 7 November 2025) (FIRA) does not adequately address key risks related to emergency management, flood-related impacts on critical hospital functions, or the safety of basement car parks. Several assumptions are unsupported, site-specific modelling is missing, and vital evacuation and flood behaviour considerations have not been fully analysed. Updated hydraulic modelling and a revised FIRA are recommended.
- Biodiversity – the development is consistent with the biodiversity development assessment report (BDAR) waiver granted by CPHR on 29 September 2025. If the proposed development is changed prior to determination so that it is no longer as described in Schedule 1 of the BDAR waiver determination, the applicant will need to lodge a new BDAR waiver request or prepare a BDAR.

Should you have any queries regarding this matter, please contact Peter Braga, Senior Conservation Planning Officer at peter.braga@dcceew.nsw.gov.au.

Yours sincerely,

Susan Harrison
**Senior Team Leader, Central Metropolitan
Conservation Planning and Assessment
Conservation Programs, Heritage and Regulation Group**

CPHR advice on EIS - St George Private Hospital Expansion (SSD-86969958)

In preparing this advice, CPHR has reviewed the following documents:

- *Environmental Impact Statement St George Private Hospital* (Patch Planning, 21 November 2025) (EIS)
- *Flood Impact and Risk Assessment - St George Private Hospital Expansion at 119 – 129 Princes Highway and 2 Hogben Street, Kogarah, and 1 South Street, Kogarah* (ACOR Consultants, 7 November 2025) (FIRA)
- *Architectural Plans – St George Private Hospital Expansion* (Fitzpatrick & Partners, 20 October 2025).

Flooding

Key Assessment Issues

1	<i>Emergency management</i>	The FIRA does not adequately consider whether the proposed development incorporates sufficient measures to minimise risk to life or ensure safe evacuation during a flood event, as required by Clause 5.21(3)(c) of the Georges River Local Environmental Plan 2021. The FIRA states that the Main Hospital Campus is subject to overland flow in both the 1% annual exceedance probability (AEP) and that the ground floor will likely be inundated in floods exceeding the 1% AEP. The Draft Blakehurst and Kograh Bay Wards Overland Flow Flood Study (Kellog Brown & Root Pty Ltd, 25 June 2025)(Draft Flood Study) identifies the site as Flood Planning Constraint Category 4, indicating the need for enhanced emergency procedures for vulnerable populations. While the FIRA concludes that the risk to life is “very low” due to the availability of vertical evacuation, it does not evaluate whether vertical evacuation is actually feasible. Key omissions include: • available flood warning time • staff resourcing, patient mobility constraints, and the number of patients that could be relocated within the available warning time • how evacuation could be disrupted by loss of power • where evacuated patients would be accommodated and what ongoing care requirements would be needed during a flood emergency. Additionally, the development replaces lower-risk, easily evacuated ground floor uses, for example café, reception, security and so on, with a 24/7 emergency department (ED). This change introduces: • a significantly more vulnerable population with limited ability to self-evacuate • increased operational dependency, noting that any loss of ED function during or after a major flood event would impact emergency care for the broader region • greater potential property loss due to the high-value medical equipment. Recommended action: Update the FIRA to: • assess the feasibility of vertical evacuation
---	-----------------------------	--

		demonstrate that the ED can remain operational for the full range of relevant flood events, including the probable maximum flood (PMF).
	<i>Extent and timing</i>	Pre-determination

2	<i>Fit for purpose Flood Impact and Risk Assessment (FIRA)</i>	The proponent has not satisfactorily addressed the SEARs requirements to identify: - flood planning levels (FPLs), - on-site flood risks, and - potential effects of climate change. The FIRA relies on mapping from the Draft Flood Study rather than undertaking project-specific modelling. Given the scale of the proposed hospital expansion and the fact that the Main Hospital Campus is located within a high-risk flood precinct for critical uses, this reliance is not considered fit-for-purpose. In particular, it does not adequately: - set accurate FPLs for the Main Hospital Campus ground floor or for the crest of the Clinical Tower basement carpark - assess the potential impacts of blocking the overland flow path between Bank Lane and Princes Highway - estimate warning times and response times required to inform emergency management planning. If the proponent intends to continue relying on the Draft Flood Study, they must first verify that site-specific hydraulic features, such as pits, pipes, kerb and gutter profiles, and other key flow controls, are accurately represented. Recommended action: Prepare a fit-for-purpose hydraulic model and submit an updated FIRA in accordance with the Flood Impact and Risk Assessment Flood Risk Management Guideline LU01 (NSW DPE, 30 June 2023).
	<i>Extent and timing</i>	Pre-determination

3	<i>Basement Carparks</i>	The FIRA does not adequately assess the risks to people associated with the potential inundation of the Clinical Tower's multi-level basement carpark. While the FIRA states that the proposed basement ramp crest will prevent overland flow entering the basement up to the 1% AEP event, it also confirms that no mitigation is proposed for rarer events. The FIRA further contends that the risk is acceptable because the driveway crest complies with Georges River Development Control Plan 2021 (GR-DCP). However, compliance with the GR-DCP does not necessarily demonstrate that life-safety risks have been adequately mitigated, particularly for critical-use developments such as hospitals. This is especially relevant given that: there is no adopted Flood Risk Management Study and Plan for the locality to confirm whether the GR-DCP provisions are adequate
---	------------------------------	--

		- human behaviour during flooding is a known risk factor. Experience shows that people attempt to access or retrieve vehicles from underground car parks during flood events, which can result in life-threatening situations - the estimated PMF depth at the carpark entry is less than 150mm, indicating that achieving a crest level at or above the PMF would likely be feasible for this site. Recommended action: Prepare a fit-for-purpose hydraulic model and submit an updated FIRA in accordance with the <i>Flood Impact and Risk Assessment Flood Risk Management Guideline LU01</i>.
	<i>Extent and timing</i>	Pre-determination

End of Submission