

Our ref: St George Private Hospital Expansion (SSD-86969958)

Mr Julian Gadd
Project Manager
Akan Projects Pty Ltd
Suite 202
84 Alexander Street
Crows Nest NSW 2065

30 June 2025

Subject: Planning Secretary's Environmental Assessment Requirements – Industry Specific

Dear Mr Gadd

Please find attached a copy of the Planning Secretary's environmental assessment requirements (SEARs) for the St George Private Hospital Expansion (SSD-86969958).

Based on the information provided in your application, industry-specific SEARs have been issued for your project.

Please contact the department as soon as possible if your project changes, such that consultation is required with public authorities (under Part 8 of the EP&A Regulation). Your SEARs may need to be reissued and a scoping report may also be required.

If required, the Planning Secretary may modify your SEARs to ensure the environmental assessment of the project covers all relevant matters and is consistent with contemporary assessment practice.

Your SEARs will expire two years from the date of issue (or the date they were last modified) unless the Planning Secretary has granted an extension. If you would like to seek an extension, you should contact the department at least three months prior to the expiry date.

If your application is not submitted within two years (or by the agreed extension date), you will need to make a new application for SEARs to progress your project.

Additional assessment requirements

The department has identified assessment requirements additional to those attached. These requirements, in addition to the industry-specific SEARs, are provided below and should be taken to be the collective SEARs for the project.

Contamination

- In relation to Contamination and Remediation, if required, provide a Remediation Action Plan (RAP) including Interim Audit Advice from an EPA-accredited Site Auditor certifying the RAP as appropriate.

Flooding

- Where the development could alter flood behaviour, affect flood risk to the existing community or expose its users and occupants to flood risk, provide a flood impact and risk assessment (FIRA) prepared in accordance with the Flood Impact and Risk Assessment –

Flood Risk Management Guide LU01 and the Flood Risk Management Manual 2023. The scope of the FIRA should be confirmed with the Department prior to undertaking the assessment and must have regard to Council and Government studies and guidance.

- Detail design solutions and operational procedures to mitigate flood risk where required. Where relevant, prepare and submit detailed management measures required to minimise the impacts of flooding on the development and minimise flood risk to the community, including an Emergency Management Plan (prepared in consultation with SES). The plan must consider access to and from the site, and evacuation issues during significant flood events (including the PMF) from both local catchments and/or regional catchments.

Hazards and Risk

- If the development is adjacent to or on land in a pipeline corridor, report on consultation outcomes with the operator of the pipeline and prepare a hazard analysis (pipeline).

Bush Fire Risk

- If the development is on mapped bush fire prone land, or a bush fire threat is identified on or adjoining the site, provide a bush fire assessment that details proposed bush fire protection measures and demonstrates compliance with Planning for Bush Fire Protection.

Fire Safety

- Provide a report detailing compliance with Fire & Rescue NSW Fire Safety Guidelines, Position Statements (available at <https://www.fire.nsw.gov.au/page.php?id=9145>), and any other relevant requirements. Please contact Fire & Rescue NSW at firesafety@fire.nsw.gov.au for details of the applicable requirements.

Riparian Zone Management

- Where applicable, provide a Riparian Zone Management Assessment prepared by a suitably qualified professional, to determine the presence of mapped and potential unmapped waterways across the site and where relevant to map the top of bank of waterways to determine appropriate Vegetated Riparian Zones (VRZ) and riparian zone management as required by *NSW Water Management Act 2000*.

Community Engagement Appendix

- Provide a detailed community engagement table, identifying where the issues raised by the community during engagement have been addressed in the EIS.

Consultation Appendix

- Provide a consolidated list of consultation activities with relevant public agencies, authorities and Council including the following details:
 - dates of consultation.
 - the contact representative's details including name and title.
 - information provided by the Applicant as part of the consultation.

- details of the information provided to the Applicant in response to the consultation.

Detailed Mitigation Appendix

- Provide a consolidated table of all detailed mitigation measures for the project (excluding any mitigation measures that are built into the physical layout and design of the project and captured in the project description). The detailed mitigation measures must include a reference to the technical or other source of the mitigation measure commitment.

Preparing your EIS

Your environmental impact statement (EIS) must be prepared having regard to the department's *State Significant Development Guidelines* including the *Preparing an Environmental Impact Statement Guideline*. All relevant guides for State significant projects that are referenced in the SEARs are available at <https://www.planning.nsw.gov.au/policy-and-legislation/planning-reforms/rapid-assessment-framework/improving-assessment-guidance>.

During the preparation of your EIS, you are required to consult with various parties, including the department and any relevant agencies, in accordance with the *Undertaking Engagement Guidelines for State Significant Projects*. For more information, please visit the [Prepare EIS page](#) on the NSW planning portal. Agency contact details can be found at <https://www.planningportal.nsw.gov.au/major-projects/assessment/guide-agency-directory>.

You will need a Registered Environmental Assessment Practitioner (REAP) to declare that your EIS meets certain standards in relation to its completeness, accuracy, quality and clarity before it is submitted to the department, as per Division 5 of Part 8 of the Environmental Planning and Assessment Regulation 2021. A pro forma declaration can be found in [Appendix B of the *Preparing an Environmental Impact Statement Guideline*](#).

Biodiversity Development Assessment Report

Any development application that is required to be submitted with a Biodiversity Development Assessment Report must use the template available at: <https://www.environment.nsw.gov.au/research-and-publications/publications-search/guidance-for-the-biodiversity-development-assessment-report-template>.

Lodging your development application (DA)

Once you submit your EIS, we will check it for completeness to confirm it addresses the requirements in Part 8 of the Environmental Planning and Assessment Regulation 2021 (EP&A Regulation). We will also notify you of the DA fee for your project.

Please note that **your DA is not taken to be lodged until the DA fee has been paid**.

To minimise delays, **please contact the department at least two weeks before you submit your EIS** to confirm fee determination information and payment arrangements. This will give us sufficient time to ensure your DA fee can be determined quickly.

Information needed to determine the DA fee

Your application will need to be accompanied by an Estimated Development Cost (EDC) Report supporting the estimated development cost for your project. You must ensure that the information in the report is consistent with the information provided in your DA form.

Once you submit your EDC Report, we will check it for completeness against the requirements of the EP&A Regulation and the relevant Planning Circular.

If your project involves marinas, extractive industries or any subdivision of land, you must also ensure that your report includes a breakdown of estimated costs for any other component of your project.

Public exhibition requirements

When you contact us regarding the applicable DA fee, we will also advise whether hard and/or electronic copies of the DA and EIS will be required for public exhibition.

Matters of National Environmental Significance

Any development likely to have a significant impact on matters of National Environmental Significance will require approval under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). This approval is in addition to approvals required under NSW legislation.

It is your responsibility to contact the Australian Government Department of Climate Change, Energy, the Environment and Water to determine if you need approval under the EPBC Act (<https://www.dcceew.gov.au/> or 6274 1111).

If you have any questions, please contact Thomas Dales on 02 9274 6235 or via email at thomas.dales@dphi.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read "KH", with a long horizontal flourish extending to the right.

Karen Harragon
Director
Social Infrastructure Assessments
as delegate for the Planning Secretary

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Development details

Application number	SSD-86969958
Project name	St George Private Hospital Expansion
Location	119-129 Princes Highway, 2 Hogben Street and 1 South Street, Kogarah
Applicant	Akalan Projects Pty Ltd
Date of issue	30 June 2025

Content and guidance

Any Environmental Impact Statement (EIS) must meet the minimum form and content requirements as prescribed by Part 8 of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation) and the *State Significant Development Guidelines*.

Relevant policies and guidelines can be found at <https://www.planningportal.nsw.gov.au/major-projects/assessment/policies-and-guidelines>.

Key issues and documentation

Issue and Assessment Requirements	Documentation
1. Statutory Context - Address all relevant legislation, environmental planning instruments (EPIs) (including drafts), plans, policies, guidelines and planning circulars. - Identify compliance with applicable development standards and provide a detailed justification for any non-compliances. - Provide an explanation of how the development as described in the EIS is consistent with the development as was described in the request for SEARs (including any components that were not SSD) and provide a justification for any differences. - Address the requirements of any approvals applying to the site, including any concept approval, any endorsed or draft master plan, precinct plan or any recommendation from a Gateway determination. - Provide an accurate summary of the detailed assessment of the impacts of the project and integrate the findings and recommendations of technical reports into the justification and evaluation of the project as a whole.	Address in EIS
2. Estimated Development Cost and Employment	EDC Report

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Issue and Assessment Requirements	Documentation
• Provide the estimated development cost (EDC) of the development prepared in accordance with the relevant planning circular using the Standard Form of EDC Report. • Provide an estimate of the retained and new jobs that would be created during the construction and operational phases of the development, including details of the methodology to determine the figures provided.	
3. Design Quality • Demonstrate how the development will achieve: ○ design excellence in accordance with any applicable EPI provisions. ○ good design in accordance with the seven objectives for good design in <i>Better Placed</i>. • Demonstrate that the development: ○ where required by an EPI or concept approval, or where proposed, has been subject to a competitive design process, carried out in accordance with an endorsed brief and Design Excellence Strategy; or ○ in all other instances, has been reviewed by the State Design Review Panel (SDRP) where required under the <i>NSW SDRP: Guidelines for Project Teams</i>. • Recommendations of the jury and Design Integrity Panel (where a competitive design process has been held) or the SDRP are to be addressed prior to lodgement.	• Design Excellence Strategy (where design excellence is required by an EPI) • Competition Report (where a competitive design process has been held) • Design Review Report (where the project has been reviewed by the SDRP)
4. Built Form and Urban Design • Explain and illustrate the proposed built form, including a detailed site and context analysis to justify the proposed site planning and design approach. • Demonstrate how the proposed built form (layout, height, bulk, scale, separation, setbacks, interface and articulation) addresses and responds to the context, site characteristics, streetscape and existing and future character of the locality. • Demonstrate how the building design will deliver a high-quality development, including consideration of façade design, articulation, roof design, materials, finishes, colours, any signage and integration of services. • Assess how the development complies with the relevant accessibility requirements.	• Architectural drawings • Design Report • Survey Plan • Building Code of Australia Compliance Report • Accessibility Report
5. Environmental Amenity • Address how good internal and external environmental amenity is achieved,	• Shadow Diagrams • View Analysis

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including access to natural daylight and ventilation, pedestrian movement throughout the site, access to landscape and outdoor spaces. - Assess amenity impacts on the surrounding locality, including lighting impacts, solar access, visual privacy, visual amenity, view loss and view sharing, overshadowing and wind impacts. A high level of environmental amenity for any surrounding residential or other sensitive land uses must be demonstrated. - Provide a solar access analysis of the overshadowing impacts of the development within the site, on surrounding properties and public spaces (during summer and winter) at hourly intervals between 9am and 3pm, when compared to the existing situation and a compliant development (if relevant).	Pedestrian Wind Environment Assessment
6. Visual Impact - Provide a visual analysis of the development from key viewpoints, including photomontages or perspectives showing the proposed and likely future development. - Where the visual analysis has identified potential for significant visual impact, provide a visual impact assessment that addresses the impacts of the development on the existing catchment.	- Visual Analysis - Visual Impact Assessment
7. Public Space - Demonstrate how the development maximises the amount, access to and quality of public spaces (including open space, public facilities and streets/plazas within and surrounding the site), reflecting relevant design guidelines and advice from the local council and the Department. - Demonstrate how the development: - ensures that public space is welcoming, attractive and accessible for all. - maximises permeability and connectivity. - maximises the amenity of public spaces in line with their intended use, such as through adequate facilities, solar access, shade and wind protection. - minimises potential vehicle, bicycle and pedestrian conflicts. - Address how Crime Prevention through Environmental Design (CPTED) principles are to be integrated into the development, in accordance with <i>Crime Prevention and the Assessment of Development Applications Guidelines</i>.	- Public Space Plan (as part of the Design Report) - CPTED Report
8. Trees and Landscaping Assess the number, location, condition and significance of trees to be	Arboricultural Impact Assessment

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removed and retained and note any existing canopy coverage to be retained on-site. - Provide a detailed site-wide landscape plan, that: - details the proposed site planting, including location, number and species of plantings, heights of trees at maturity and proposed canopy coverage (as a percentage of the site area). - 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 streetscape. - mitigate the urban heat island effect and ensure appropriate comfort levels on-site. - contribute to the objective of increased urban tree canopy cover. - maximise opportunities for green infrastructure, consistent with <i>Greener Places</i> and having regard to any bush fire risk.	Landscape Plan
9. Ecologically Sustainable Development (ESD) - Identify how ESD principles (as defined in section 193 of the EP&A Regulation) are incorporated in the design and ongoing operation of the development. - Demonstrate how the development will meet or exceed the relevant industry recognised building sustainability and environmental performance standards. - Demonstrate how the development minimises greenhouse gas emissions (reflecting the Government's goal of net zero emissions by 2050) and consumption of energy, water (including water sensitive urban design) and material resources. - If Chapter 3 of SEPP (Sustainable Buildings) 2022 applies: - demonstrate how the development has been designed to address the provisions set out in Chapter 3.2(1). - provide a NABERS Embodied Emissions Material Form to disclose the amount of embodied emissions attributable to the development in accordance with section 35BA of the EP&A Regulation. - provide a net zero statement (as defined in section 35C of the EP&A Regulation) that includes: - evidence of how the development will either be fossil fuel-free after the occupation of the development commences or transition	- ESD Report - NABERS Embodied Emissions Materials Form - Net Zero Statement

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to be fossil fuel-free by 1 January 2035. • details of any renewable energy generation and storage infrastructure implemented and any passive and technical design features that minimise energy consumption. • estimations of annual energy consumption for the building and amount of emissions relating to energy use in the building (if information is available).	
10. Traffic, Transport and Accessibility • Provide a transport and accessibility impact assessment, which includes: ○ an analysis of the existing transport network, including the road hierarchy and any pedestrian, bicycle or public transport infrastructure, current daily and peak hour vehicle movements, and existing performance levels of nearby intersections. ○ details of the proposed development, including pedestrian and vehicular access arrangements (including swept path analysis of the largest vehicle and height clearances), parking arrangements and rates (including bicycle and end-of-trip facilities), drop-off/pick-up-zone(s) and bus bays (if applicable), and provisions for servicing and loading/unloading. ○ analysis of the impacts of the proposed development during construction and operation (including justification for the methodology used), including predicted modal split, a forecast of additional daily and peak hour multimodal network flows as a result of the development (using industry standard modelling), identification of potential traffic impacts on road capacity, intersection performance and road safety (including pedestrian and cyclist conflict) and any cumulative impact from surrounding approved developments. ○ measures to mitigate any traffic impacts, including details of any new or upgraded infrastructure to achieve acceptable performance and safety, and the timing, viability and mechanisms of delivery (including proposed arrangements with local councils or government agencies) of any infrastructure improvements in accordance with the relevant standards. ○ measures to promote sustainable travel choices for employees and visitors, such as connections into existing walking and cycling networks, minimising car parking provision, encouraging car share and public transport, providing adequate bicycle parking and high quality end-of-trip facilities, and implementing a Green Travel Plan. • Provide a Construction Traffic Management Plan detailing construction vehicle routes, access and parking arrangements, coordination with other construction occurring in the area, and how impacts on existing traffic,	• Transport and Accessibility Impact Assessment • Construction Traffic Management Plan • Green Travel Plan or equivalent

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pedestrian and bicycle networks would be managed and mitigated.	
11. Biodiversity - Assess any biodiversity impacts associated with the development in accordance with the <i>Biodiversity Conservation Act 2016</i> and the <i>Biodiversity Assessment Method 2020</i>, including the preparation of a Biodiversity Development Assessment Report (BDAR), unless a waiver is granted, or the development is on biodiversity certified land. - If the development is on biodiversity certified land, provide information to identify the site (using associated mapping) and demonstrate the proposed development is consistent with the relevant biodiversity measure conferred by the biodiversity certification.	Biodiversity Development Assessment Report or BDAR Waiver
12. Noise and Vibration Provide a noise and vibration assessment prepared in accordance with the relevant NSW Environment Protection Authority (EPA) guidelines. The assessment must detail construction and operational noise and vibration impacts on nearby sensitive receivers and structures and outline the proposed management and mitigation measures that would be implemented.	Noise and Vibration Impact Assessment
13. Ground and Water Conditions - Assess potential impacts on soil resources and related infrastructure and riparian lands on and near the site, including soil erosion, salinity and acid sulfate soils. - Provide a Surface and Groundwater Impact Assessment that assesses potential impacts on: - surface water resources (quality and quantity) including related infrastructure, hydrology, dependent ecosystems, drainage lines, downstream assets and watercourses. - groundwater resources in accordance with the <i>Groundwater Guidelines</i>.	- Geotechnical Assessment - Surface and Groundwater Impact Assessment - Salinity Management Plan and/or Acid Sulfate Soils Management Plan
14. Water Management - Provide an Integrated Water Management Plan for the development that: - is prepared in consultation with the local council and any other relevant drainage or water authority. - outlines the water-related servicing infrastructure required by the development (informed by the anticipated annual and ultimate increase in servicing demand) and evaluates opportunities to reduce water demand (such as recycled water provision).	Water Management Plan

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○ details the proposed drainage design (stormwater and wastewater) for the site including any on-site treatment, reuse and detention facilities, water quality management measures, and nominated discharge points. ○ demonstrates compliance with the local council or other drainage or water authority requirements and avoids adverse downstream impacts. • Where water and drainage infrastructure works are required that would be handed over to the local council, or other drainage or water authority, provide full hydraulic details and detailed plans and specification of proposed works that have been prepared in consultation with, and comply with the relevant standards of, the local council or other drainage or water authority.	
15. Flood Risk • Identify the flood planning level as set out in the relevant council LEP or SEPP and identify any: ○ flood risks on site having regard to adopted flood studies ○ the potential effects of climate change, and ○ any relevant provisions of the <i>NSW Flood Risk Management Manual</i>. • Where the development is occurring on flood prone land a flood impact and risk assessment (FIRA) must be prepared having regard to the <i>Flood Impact and Risk Assessment Guideline - LU01</i> (FIRA guide). When determining the scope and category of the FIRA the requirements outlined in the FIRA guide must be considered. • Detail any flood risk management measures that are to be incorporated as part of the development having regard to relevant guidelines (including any design solutions, flood modification measures, property modification measures, operational procedures or Flood Emergency Response Plan).	• Flood Impact Risk Assessment
16. Hazards and Risks • Where there are dangerous goods and hazardous materials associated with the development provide a preliminary risk screening in accordance with Chapter 3 of SEPP (Resilience and Hazards) 2021. • Where required by SEPP (Resilience and Hazards) 2021, provide a Preliminary Hazard Analysis prepared in accordance with <i>Hazardous Industry Planning Advisory Paper No.6 – Guidelines for Hazard Analysis and Multi-Level Risk Assessment</i>. • If the development is adjacent to or on land in a pipeline corridor, report on consultation outcomes with the operator of the pipeline, and prepare a hazard analysis.	• Preliminary Hazard Analysis If required: • Hazard Analysis (Pipeline)

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17. Contamination and Remediation In accordance with Chapter 4 of SEPP (Resilience and Hazards) 2021, assess and quantify any soil and groundwater contamination and demonstrate that the site is suitable (or will be suitable, after remediation) for the development.	- Preliminary Site Investigation If required: - Detailed Site Investigation - Remedial Action Plan - Preliminary Long-term Environmental Management Plan
18. Waste Management - 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 waste in accordance with any council waste management requirements. - Identify appropriately sited waste storage areas, collection access paths/roads, and appropriate servicing arrangements for the site. - If buildings are proposed to be demolished or altered, provide a hazardous material survey.	- Waste Management Plan - Hazardous Material Survey
19. Aboriginal Cultural Heritage Provide an Aboriginal Cultural Heritage Assessment Report (ACHAR) prepared in accordance with relevant guidelines, identifying, describing and assessing any impacts to any Aboriginal cultural heritage sites or values associated with the site.	Aboriginal Cultural Heritage Assessment Report
20. Environmental Heritage Where there is potential for direct or indirect impacts on the heritage significance of environmental heritage, provide a Statement of Heritage Impact and Archaeological Assessment (if potential impacts to archaeological resources are identified), prepared in accordance with the relevant guidelines, which assesses any impacts and outlines measures to ensure they are minimised and mitigated.	- Statement of Heritage Impact - Archaeological Assessment
21. Social Impact Provide a Social Impact Assessment that:	Social Impact Assessment

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○ is prepared in accordance with the <i>Social Impact Assessment Guidelines for State Significant Projects</i>. ○ is targeted and proportionate to the project's context and likely impacts.	
22. Infrastructure Requirements and Utilities • In consultation with relevant service providers: ○ assess the impacts of the development on existing utility infrastructure and service provider assets surrounding the site. ○ identify any infrastructure required on-site and off-site to facilitate the development and any arrangements to ensure that the upgrades will be implemented on time and be maintained. ○ provide an infrastructure delivery and staging plan, including a description of how infrastructure requirements would be co-ordinated, funded and delivered to facilitate the development.	• Infrastructure Delivery, Management and Staging Plan
23. Bush Fire Risk • If the development is on mapped bush fire prone land, or a bush fire threat is identified on or adjoining the site, provide a bush fire assessment that details proposed bush fire protection measures and demonstrates compliance with <i>Planning for Bush Fire Protection</i>.	• Bush Fire Assessment
24. Aviation • If the development proposes a helicopter landing site (HLS), assess its potential impacts on the flight paths of any nearby airport, airfield or HLS. • If the site contains or is adjacent to a HLS, assess the impacts of the development on that HLS.	• Aviation Report
25. Construction, Operation and Staging • If staging is proposed, provide details of how construction and operation would be managed and any impacts mitigated.	• Address in EIS
26. Contributions and Public Benefit • Address the requirements of any relevant contribution plan(s), planning agreement or EPI requiring a monetary contribution, dedication of land and/or works-in-kind and include details of any proposal for further material public benefit. • Where the development proposes alternative public benefits or a departure from an existing contributions framework, the local council, the Department	• Address in EIS

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and relevant State agencies are to be consulted prior to lodgement and details, including how comments have been addressed, are to be provided.	
27. Engagement - Detail engagement undertaken and demonstrate how it was consistent with the <i>Undertaking Engagement Guidelines for State Significant Projects</i>. Detail how issues raised and feedback provided have been considered and responded to in the project. In particular, applicants must consult with: - the relevant Department assessment team. - any relevant local councils. - any relevant agencies. - the community. - if the development would have required an approval or authorisation under another Act but for the application of s 4.41 of the EP&A Act or requires an approval or authorisation under another Act to be applied consistently by s 4.42 of the EP&A Act, the agency relevant to that approval or authorisation.	Engagement Report