

Jensen Hughes Pty Limited
ABN 29 077 183 192

To	Raphael Pullin	Akalan Projects Pty Ltd	rpullin@akalan.com.au
Cc	David Duffy	Akalan Projects Pty Ltd	dduffy@akalan.com.au
Date	22 October 2025	Job no	251965
		Revision	1.1
Project	St George Private Hospital expansion at 119-129 Princes Highway and 2 Hogben Street, Kogarah, and 1 South Street, Kogarah – Fire safety response to SEARs		

Dear Raphael

1.0 Introduction

1.1 Purpose of this report

This fire safety report has been prepared on behalf of Akalan Projects Pty Ltd in support of a state significant development application (SSDA) submitted to the Department of Planning, Housing and Infrastructure (DPHI) under Part 4 of the Environmental Planning and Assessment Act 1979 (EP&A Act 1979).

The SSDA seeks approval for the expansion of the St George Private Hospital. Specifically, the SSDA seeks consent for two components: the first being the erection of a health services facility (hospital), and the second relating to upgrades to the main hospital campus, including a new emergency department.

For reporting purposes, the site subject to the new health services facility (hospital) is referred to herein as the 'clinical tower site' and the main hospital campus is referred to as such.

This report provides an assessment of fire safety and responds to the secretary's environmental assessment requirements (SEARs) issued by DPHI on 30 June 2025 in relation to the project.

1.2 Site location and context

The sites are in the Georges River local government area (LGA), within the Kogarah town centre.

The clinical tower site is adjoined to the south by an existing multi-storey health services facility, which forms part of the St George Private Hospital campus. South Street separates this facility from the main hospital campus, though a connecting sky-bridge provides pedestrian access between the buildings. Further west is the St George Public Hospital, and other surrounding development comprises a mix of commercial premises (typically at ground floor) and medium and high-density residential premises.

On the opposite (eastern) side of Princes Highway is a mix of educational premises including Moorfield Girls High School, James Cook Boys Technology High School, St George High School and a TAFE NSW campus. Surrounding development on this side of Princes Highway primarily constitutes low density residential premises.

Kogarah Train Station is south-west of the site, approximately 500m away. There is a pedestrian bridge that extends from Hogben Street over the Princes Highway, which provides direct access to the eastern side of the highway.

The sites are approximately 1.7 km from Brighton Le Sands Beach and approximately 3.5 km from Sydney Airport.

Refer to Figure 1 for a site context map.

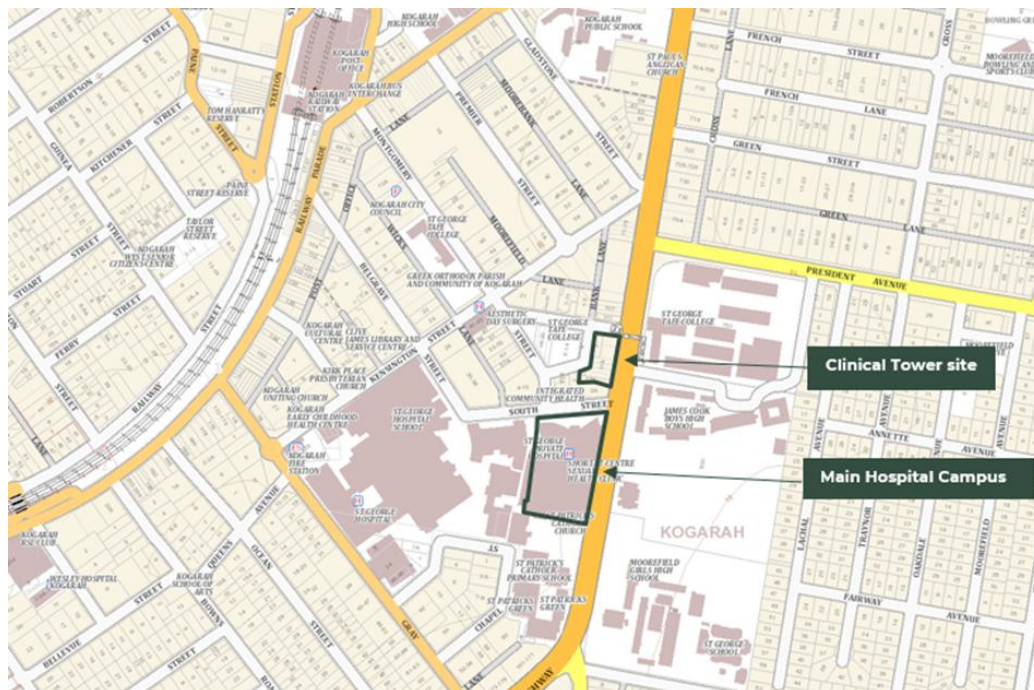


Figure 1 Site context map

1.3 Site description

1.3.1 Clinical Tower Site

The proposed new health services facility (hospital) will be located on land that is bound by three road frontages, being Princes Highway to the east (a classified road), Hogben Street to the north, and Bank Lane to the west. This site comprises eight adjoining allotments of land, known as 119-129 Princes Highway, Kogarah, and 2 Hogben Street, Kogarah.

The site currently accommodates a hard-stand parking lot, providing approximately 76 car parking spaces and a two-storey commercial premises (subject to separate demolition), which is attached to the existing multi-storey health services facility at 2 South Street, Kogarah.

Refer to Figure 2 for a site aerial excerpt.



Figure 2 Site aerial extract

1.3.2 Main Hospital Campus

The existing hospital is located at 1 South Street, Kogarah which is also known as 1A South Street, Kogarah. This site is bound by two road frontages, being South Street to the north and Princes Highway (a classified road) to the east.

The site accommodates the St George Private Hospital's main campus, with vehicular access provided off South Street. Refer to Figure 3 for a site aerial excerpt.



Figure 3 Main hospital site aerial extract¹

¹ Source: Metro Map, modified by Patch Planning.

1.4 Overview of proposed development

The SSDA seeks approval for the expansion of the St George Private Hospital. Specifically, the SSDA seeks consent for two components: the first being the erection of a health services facility (hospital), and the second relating to upgrades to the main hospital campus, including a new emergency department.

In summary, approval for the following is sought for the clinical tower site:

- + site preparation works and bulk earthworks, including tree clearing
- + construction of a seven storey health services facility (hospital) equating to a total GFA of 9,952 m²
- + construction of a five level basement carpark including a radiation oncology unit, providing a total of 241 parking spaces
- + ancillary office, amenities and loading dock provisions
- + basement storage and a substation
- + landscaping works.

The proposed development is depicted in Figure 4, with full architectural details provided within the EIS, of which this report also forms an appendix.



Figure 4 Proposed render

In addition, approval for the following is sought for the main hospital campus:

- + construction of an emergency department at the northern end of the existing hospital, to be operated 24 hours a day, seven days a week
- + alterations to the South Street frontage, to facilitate ambulance bays and access requirements
- + associated internal re-configurations.

The proposed development is depicted in Figure 5, with full architectural details provided within the EIS, of which this report also forms an Appendix.

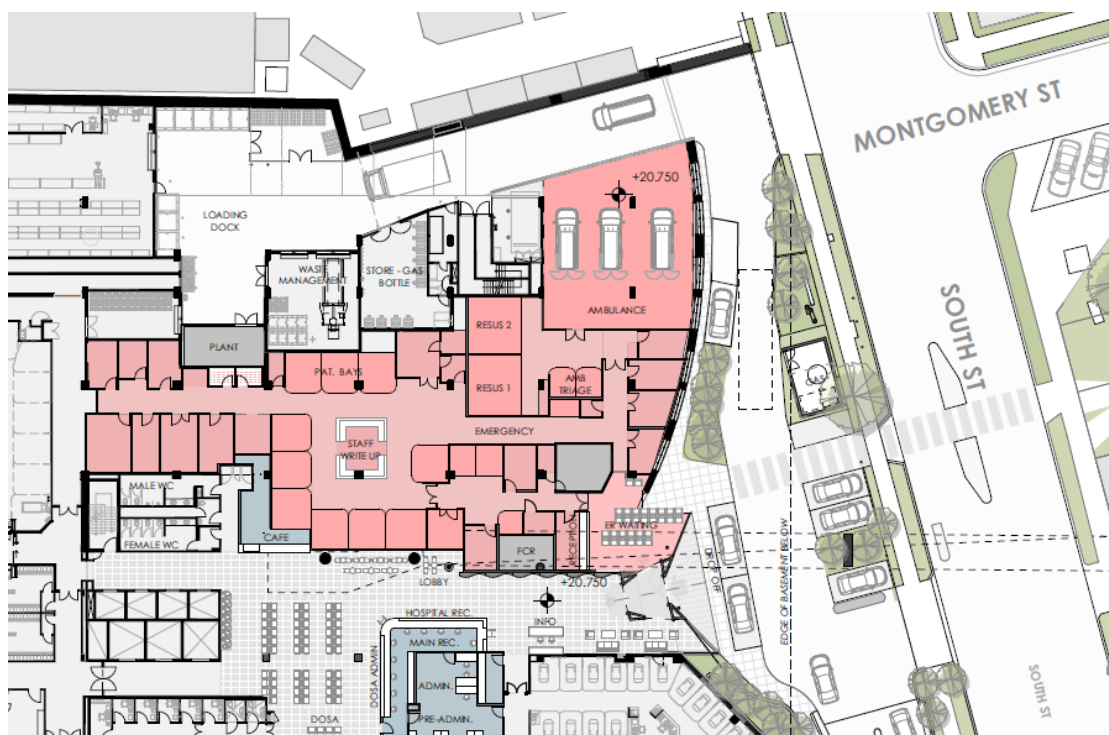


Figure 5 Alterations to the main hospital campus

1.5 SEARs relevant to this report

This fire safety report has been prepared to respond to the SEARs issued for the St George Private Hospital expansion project. The SEARs that are relevant to this fire safety assessment, and where they are addressed within this report, are detailed below. Note that there is only a single SEAR relating to fire safety.

Table 1 Fire safety SEAR

Issue and assessment requirements	Documentation	Response
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.	The assessment requirement related to fire safety states that a report is required detailing compliance with Fire and Rescue NSW (FRNSW) fire safety guidelines, position statements and any other relevant requirements.	This report has been prepared by Jensen Hughes in response to the fire safety requirement in the industry specific Planning Secretary's environmental assessment requirements (SEARs) for the St George Private Hospital expansion project.

2.0 Assessment methodology – relevant legislation and policies

FRNSW guidelines and position statements provide supplementary information intended to assist designers, engineers, planners and consent authorities when assessing a proposed development. These guidelines are not regulatory documents. Table 2 provides a list of all of the FRNSW guidelines, technical information and position statements, and identifies whether each document is relevant to the proposed development.

Table 2 FRNSW documents

FRNSW guidelines, technical information and position statements	Relevance to the proposed building design
Fire safety guidelines	
Access for fire brigade vehicles and firefighters	Not applicable. The development is not defined as a large isolated building pursuant to National Construction Code (NCC) clause C3D4.
Emergency services information package and tactical fire plans	Not applicable. The FRNSW guideline only applies to any premises that: a) contains a fire control centre (FCC) or fire control room (FCR) b) contains a facility emergency control centre (FECC) c) is a major hazard facility (MHF) as determined under the Work Health and Safety Regulation 2017 (WHS Reg.) d) is a manifest quantity workplace (MQW) as prescribed in Schedule 11 of the WHS Reg. e) is an explosives site as defined by the Explosives Regulation 2013 f) has been determined applicable by a consent or regulatory authority.
Fire hydrants for minor residential development	Not applicable. Residential use does not form part of the development.
Fire safety in waste facilities	Not applicable. A waste facility does not form part of the development.
Guidelines for bulk storage of rubber tyres	Not applicable. Bulk storage of rubber tyres does not form part of the development.
Impulse fans in car parks	To be considered in the design of the new building – capable of complying.
Technical information sheets	
Large-scale external lithium-ion battery energy storage systems – Fire safety study considerations	Not applicable. Large-scale external lithium-ion battery energy storage systems do not form part of the development.
Hazardous chemicals manifest	To be considered in the design – capable of complying. It is noted that this only applies to a workplace using, handling or storing hazardous chemicals in quantities that exceed the manifest quantities prescribed in Schedule 11 of the Work Health and Safety Regulation 2017 (WHS Reg.).
Fire brigade booster connection with inlet insert	To be considered in the design of the fire hydrant system – capable of complying.
Fire hydrant concessions for existing buildings	To be considered in the design of the fire hydrant system for the alterations to the existing building – capable of complying.

FRNSW guidelines, technical information and position statements	Relevance to the proposed building design
FRNSW compatible Storz hose connections	To be considered in the design of the fire hydrant system – capable of complying.
Initial fire safety report (IFSR) process	A fire engineering report will be prepared by the fire engineer. The report will be submitted to FRNSW by the certifier for consideration.
Final fire safety report (FFSR) process	To be considered by FRNSW whether a FFSR will be provided.
Fire safety system report process	Not applicable. There are no class 2 or 3 residential areas proposed.
Position statements	
Accessibility of fire hydrants	To be considered in the design of the fire hydrant system – capable of complying.
Applicable Building Code of Australia (BCA)	As required, the certifier will be responsible for determining the applicable edition of the BCA.
Application of fire sprinkler concessions under Specification 18 of the NCC	Not applicable. There are no class 2 or 3 residential areas proposed.
Automated vehicle parking system/s (AVPS)	Not applicable. An AVPS is not proposed for the development.
Automatic storage and retrieval systems (ASRS)	Not applicable. An ASRS is not proposed for the development.
Consultation on the performance-based design brief (PBDB)	FEBQ to be submitted to FRNSW for review.
Consultation with the relevant fire brigade, fire service or fire authority	FEBQ to be submitted to FRNSW for review.
Dry fire hydrant system	Not applicable. A dry fire hydrant system is not proposed for the development.
Electric vehicles (EV) and EV charging equipment	To be considered in the design in the event that EVs or EV charging equipment is included– capable of complying. It is noted that FRNSW endorses the position on Electric Vehicles (EV) and EV charging equipment in the built environment as published by AFAC.
Emergency plan requirements at sites having lithium batteries	Not applicable. The site will not accommodate a combined total of 25,000 kg or more of lithium batteries being used, handled, stored or installed.
Exemption from fire safety standards	Not applicable. An exemption from fire safety standards will not be sought.
Extended fire hydrant coverage	Not applicable. Extended fire hydrant coverage is not proposed as part of the design.
External combustible cladding	Not applicable. Combustible cladding is not proposed as part of the external façade design.
Fire brigade booster operating pressure	To be considered in the design of the fire hydrant and fire sprinkler systems – capable of complying.

FRNSW guidelines, technical information and position statements	Relevance to the proposed building design
Fire doors with fire activated retaining devices (e.g. bolts)	To be considered in the design with respect to FRNSW's concern involving the use of fire doors with fire-activated bolts. Doors requiring fire-activated bolts are typically double fire doors or any door with an FRL exceeding 1 hour. Design team to consider minimising the use of doors with fire-activated bolts or, in the case that they cannot be avoided, discussions will need to be held with the certifier to determine the approvals strategy.
Fire engineering for existing buildings	To be considered in the design for the alteration to the existing building – capable of complying. Any fire safety non-compliance with the NCC deemed to satisfy (DTS) provisions for the new works to be subject to a performance solution process
Fire hydrant system - single vs multiple	Not applicable. Each building will not be served by more than one fire hydrant system.
Fire hydrant system in existing building or premises	To be considered in the design of the fire hydrant system for the alterations to the existing building – capable of complying.
Fire hydrant system in new building or premises	To be considered in the design of the fire hydrant system – capable of complying. The new building will be designed in accordance with AS 2419.1:2021, subject to any performance solutions where applicable. This will be documented in an FEBQ for FRNSW review.
Fire hydrant system signage	To be considered in the design of the fire hydrant system – capable of complying.
Fire safety in early childhood centres	Not applicable. An early childcare centre is not proposed for the development.
Fire safety study (FSS) process	Not applicable. A FSS is not proposed for the development.
Fire sprinkler system in existing building or premises	Not applicable. The existing building is not sprinkler-protected and a fire sprinkler system is not proposed for the alterations.
Fire sprinklers in class 1 buildings (i.e. homes)	Not applicable. Class 1 residential use does not form part of the development.
Fire sprinklers in class 2 and 3 buildings	Not applicable. Class 2 / 3 residential use does not form part of the development.
Fixed suction connection for below ground water supply	Not applicable. A fixed suction provided for a fire brigade pumping appliance to draught from a below ground water supply is not proposed as part of the development.

FRNSW guidelines, technical information and position statements	Relevance to the proposed building design
FRNSW hose connections	To be considered in the design of the fire hydrant system – capable of complying. The following FRNSW requirements from the position statement are noted: (a) Fire brigade booster inlets and valve outlets should comprise an AS 2419.4 Storz hose connection (b) The Storz hose connection can be either forged aluminium or copper alloy. Cast aluminium Storz hose connections are not permissible under any circumstance, as they are not rated for fire-fighting pressures.
FRNSW pump performance for high rise buildings	Not applicable. The building is less than 50 metres in height.
Hydraulic fire safety system design	To be considered in the design of the fire hydrant system – capable of complying.
Light wall steel pipe in fire hydrant systems	Not applicable. Light wall steel fire hydrant pipework is not proposed as part of the development.
Massive timber building systems	Not applicable. Massive timber construction is not proposed as part of the development.
Open yard storage of battery energy storage systems (BESS)	Not applicable. Open yard storage of BESS does not form part of the development.
Pilot-operated pressure reduction valve (PO-PRV) installation	To be considered in the design of the fire hydrant and fire sprinkler systems – capable of complying. It is noted that FRNSW requires that for any pilot-operated pressure reduction valve, the pilot tube must not include any isolating valve that could be left closed and prevent the valve from operating during fire.
Plastic pipe in combined fire hydrant and sprinkler systems	Not applicable. Plastic pipe in a combined fire hydrant and sprinkler system is not proposed as part of the development.
Pressure reducing fire hydrant valve (PRFHV)	To be considered in the design of the fire hydrant system – capable of complying. It is noted that FRNSW may conditionally support the installation of PRFHVs under special circumstances only, such as infrastructure, where maintenance and anti-tampering can be specifically addressed.
Road tunnels	Not applicable. A road tunnel does not form part of the development.
Security / screen doors fitted to sole-occupancy units (SOUs)	Not applicable. Class 2 / 3 residential use does not form part of the development.
Self-storage facilities	Not applicable. A self-storage facility does not form part of the development.
Small-bore suction connections	Not applicable. The development is not in Rural Fire Service area.

3.0 Conclusion

The process that is to be undertaken on this project involves demonstrating compliance of the development with the NCC. This involves complying with the DTS provisions of the NCC and – where any DTS departures exist – preparing performance solutions to demonstrate compliance with the performance requirements of the NCC.

Where a performance solution is required, the NCC stipulates that a performance-based design brief be prepared for facilitation of stakeholder consultation. All performance solutions will be presented to stakeholders – including FRNSW – via a fire engineering brief questionnaire (FEBQ). The FEBQ will be submitted to FRNSW by the fire engineer on behalf of the client, which will provide FRNSW an opportunity to provide comment and require compliance with any specific guidelines or position statements.

Please contact me on 02 9211 4360 if you have any questions regarding this information.

Yours sincerely

Dominguez, James

Registered fire safety engineer

Jensen Hughes