

9 June 2021

Mr Jim Betts
 Secretary
 Department of Planning, Industry and Environment
 GPO Box 39, Sydney NSW 2001

Section 4.55(1A) Modification to SSDA 9036 – Concord Hospital Redevelopment – MOD 6

Architecture
 Urban Design
 Planning
 Interior Architecture

Dear Mr Betts,

This letter provides an addendum to planning assessment for proposed modifications at Concord Repatriation General Hospital on behalf of Health Infrastructure NSW (the Principal). Specifically, a Section 4.55(1A) Modification is sought to the approved State Significant Development Application (SSD No. 9036) for Concord Hospital Redevelopment.

2.0 Proposed Modification and Justification

A Modification application (MOD 6) is sought under Section 4.55(1A) of the Environmental Planning and Assessment Act 1979 (EP&A Act) to amend SSD No. 9036 to the Clinical Services Building (CSB) at Concord Repatriation General Hospital for the internal fitout of the basement shell space for use as a radiation oncology and molecular imaging unit. The CSB is currently under construction, being undertaken by Roberts Pizzarotti (the lead contractor).

Architectus Sydney
 Level 18 MLC Centre
 19 Martin Place
 Sydney NSW 2000 Australia
 T +61 2 8252 8400
 F +61 2 8252 8600
 sydney@architectus.com.au
 www.architectus.com.au

3.0 Background

3.1 Approved development

SSD No. 9036 was approved by the Minister for Planning on 28/02/2019 for the following development:

Adelaide
 Auckland
 Brisbane
 Christchurch
 Melbourne
 Perth
 Sydney

Concord Repatriation General Hospital redevelopment (Concept and Stage 1), comprising:

- *Stage 1 development:*
 - *Demolition of buildings and structures*
 - *New 44,000 sqm, six storey Clinical Service Building*
 - *New five storey car park accommodating 590 cars*
 - *Temporary 300 space on-grade car park*
 - *Landscaping*
- *Stage 2 Concept:*
 - *New 38,000sqm, eight storey Acute Services Building*
 - *New five storey car park for approximately 520 cars*

Subsequent Section 4.55 modifications were approved or withdrawn as follows:

Modification	Description	Date approved
Modification 1	Correct minor administrative errors	11/04/2019
Modification 2	Deletion of condition	N/A - withdrawn
Modification 3	Staging of construction	19/12/2019

Architectus Group Pty Ltd
 ABN 90 131 245 684

Nominated Architect
 Managing Director
 Ray Brown
 NSWARB 6359

Modification 4	Cooling tower relocation and minor design refinements	27/04/2020
Modification 5	Minor Design Changes	21/09/2020

4.0. Proposed Modifications & Justification

The scope of the proposed modification is for the internal fitout of the basement shell space into two tenancies for use as a radiation oncology unit and molecular imaging unit (positron emission tomography (PET) and computerized tomography (CT) suite).

A modification is required for the works as the proposed fit-out will occupy an area nominated as Future Radiation Oncology Shell, including Shell for Future Radiation Therapy Bunkers, on the approved plans.

All proposed works are internal.

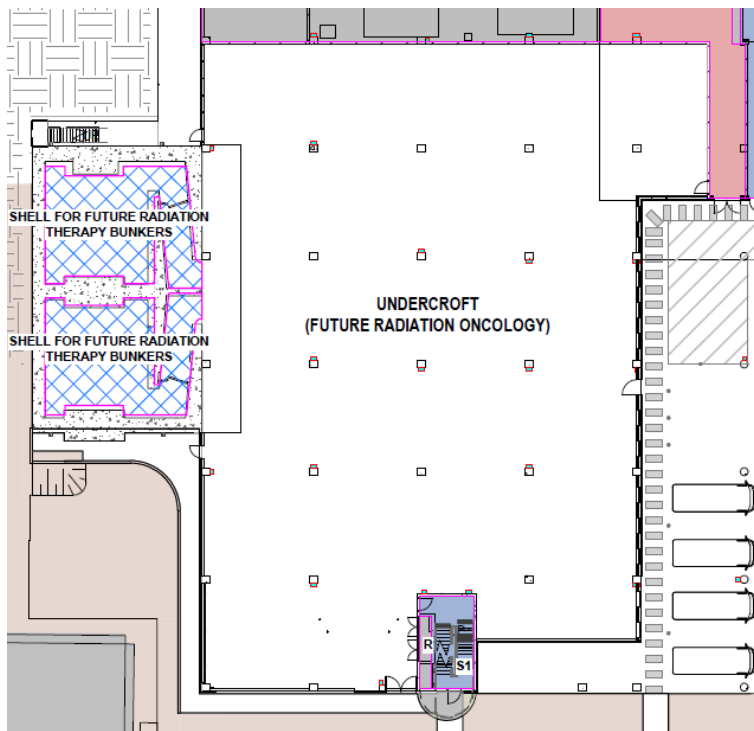


Figure 1 Overall Plan – Basement (Approved Modification 5 Plan)

Source: Jacobs Architects

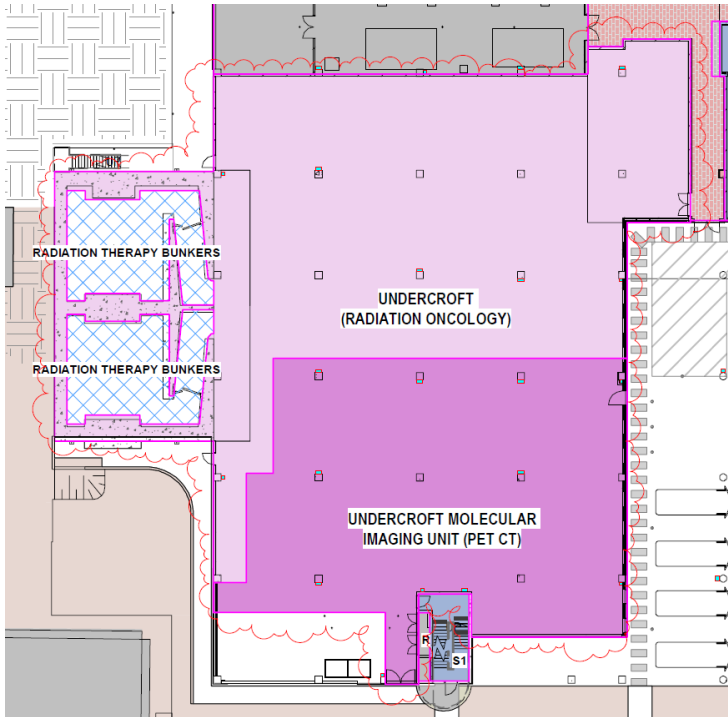


Figure 2 Overall Plan – Basement (Proposed Modification 6 Plan)
Source: Jacobs Architects

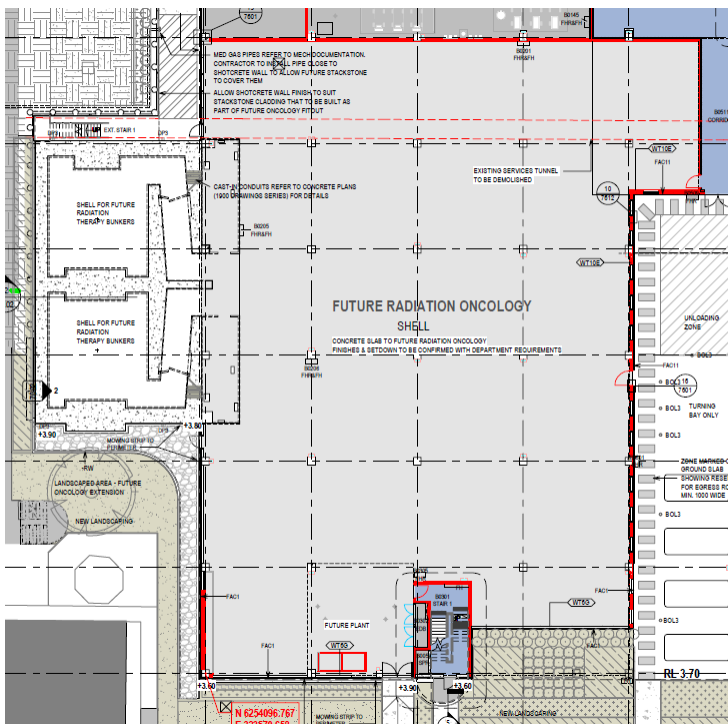


Figure 3 GA- BASEMENT LEVEL ZONE 2 RL 4.0 (Approved Modification 5 Plan)
Source: Jacobs Architects

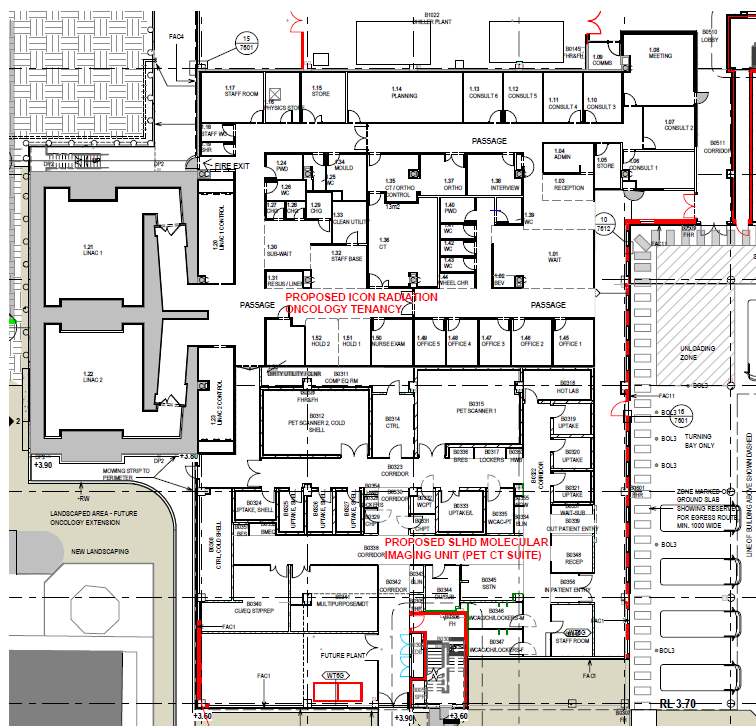


Figure 4 GA- BASEMENT LEVEL ZONE 2 RL 4.0 (Proposed Modification 6 Plan)
Source: Jacobs Architects

The proposed radiation oncology unit will comprise the following spaces:

- Reception and Administration office;
- Waiting area;
- 6 Consulting rooms;
- 5 Medical offices;
- Meeting room;
- Planning facilities;
- Fitout of the 2 bunkers with Linear Accelerations;
- 2 Linac control rooms;
- CT scanner facility with associated control rooms;
- Ortho room;
- Nurse exam room;
- Staff base and sub-waiting area;
- 2 Hold bays;
- Physics and general store rooms;
- Mould room;
- Staff room;
- Comms room; and
- Associated amenities and change rooms.

The proposed molecular imaging unit will comprise the following spaces:

- Uptake Room – patients will receive isotope injection;
- PET Scanner – patients are scanned by the clinical specialists; and
- the rest of the rooms are all support services for the molecular imaging unit e.g. meeting rooms, receptions, bathrooms etc.

The location of the works is at basement Level 1 of Concord Repatriation General Hospital, south east of Buildings 3 and 5, adjacent to the loading docks and 'back of house' services.

Modifications have been made to architectural plans arising from changes, shown within red 'clouds' and with associated notation in red text (refer to **Attachment A** for proposed architectural plans).

Rationale / Justification

The rationale for the proposed internal fitout of the basement shell for use as radiation oncology and molecular imaging unit, and outcomes and benefits, are outlined below:

The proposed modification is generally about improving clinical services and achieving the clinical output of Concord Repatriation General Hospital.

Radiation Oncology is a Tertiary Level health service which involves, on average, an over 5-week course of daily treatments on weekdays. The choice of having treatments away from people's homes, families and support networks often finds patients lacking best practice care, and potentially leads to more aggressive surgeries or not accessing health care at all.

The proposed modification to Concord Repatriation General Hospital allows for greater health benefits for the community, as radiation oncology and molecular imaging services will be made more accessible to those within the Sydney Local Health District (SLHD). In addition, the proposed modification will facilitate the establishment of cancer centres, allowing the community to access radiation therapy services, essentially leading to improved cancer patient outcomes.

Moreover, the proposed modification will foster improved partnerships with Government, local health services, primary care, and the community.

5.0 Community Engagement

Given the scope of the proposed modification is minor, community engagement prior to lodgment of the Modification application was deemed unnecessary.

6.0 Assessment

6.1 Section 4.55(1A) of EP&A Act

This Modification application is made under Section 4.55(1A) of the EP&A Act for a modification involving minimal environmental impact.

The consent authority can be satisfied with the proposed modifications because they are of *minimal environmental impact*. They are about maximising the functionality of the building and improving the clinical output of Concord Repatriation General Hospital.

The proposed use of the building was contemplated under the approved SSD application with the exception of the molecular imaging unit, which is not inconsistent with the type of use expected in a hospital. The proposed works comprise internal fit-out only and therefore will only have marginal environmental impacts above that contemplated under SSD-9036.

The consent authority can be satisfied that the development to which the consent as modified relates is *substantially the same development* as it is only a minor internal fitout within the approved shell space. They are only improving the functionality of the building under SSD 9036. They are relatively minimal works considering the large scale of the development that was originally granted consent (including originally granted modifications).

Section 4.55(3) of the EP&A Act provides that modifications must take into consideration the matters referred to at Section 4.15(1) of the EP&A Act. Refer response below.

6.2 Section 4.15(1) of EP&A Act

Section 4.15(1) of the EP&A Act provides for matters for consideration in determining a development application.

Provision	Compliance / comment
<i>any environmental planning instrument</i>	<p>The modification will not alter any pre-existing compliance with any State Environmental Planning Policy (SEPP) or Local Environmental Plan (LEP) relevant to the development. However, note separate discussion on SEPP 33 in below table.</p> <p>No changes are being made to approved building height or GFA.</p> <p>Notwithstanding the whole site is a local heritage item, the changes are not directly affecting any building cited under the heritage listing.</p>
<i>any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Planning Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved),</i>	<p>The modification does not affect any draft or proposed instruments.</p>
<i>any development control plan</i>	<p>DCPs do not apply to SSD.</p>
<i>any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4</i>	<p>N/A.</p>
<i>the regulations (to the extent that they prescribe matters for the purposes of this paragraph)</i>	<p>N/A.</p>
<i>the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality</i>	<p>The proposed modification generally increases benefits to the Concord Hospital development and does not impose any additional significant environmental impacts. <i>See commentary on impacts further below.</i></p>
<i>the suitability of the site for the development</i>	<p>The modification does not affect the approved development's suitability to the site.</p>
<i>any submissions made in accordance with this Act or the regulations</i>	<p>N/A. This relates to the DPIE's consideration of any submissions it may receive.</p>
<i>the public interest</i>	<p>The modification will not detrimentally affect the public interest in relation to this development. The proposed modification enables the practice of radiation oncology and molecular imaging services, allowing for improved health outcomes to cancer patients within the SLHD. Also, this modification improves use of the CSB by ensuring space is used optimally.</p>

6.3 State Environmental Planning Policy No. 33 – Hazardous and Offensive Development (SEPP 33)

SEPP 33 was considered in the approved SSD-9036 and a Hazardous Chemicals Report dated June 2018 prepared by Premier Engineering Services Pty Ltd. SEPP 33 requires consideration of Department guidelines to determine whether development is hazardous or offensive development. The Hazardous Chemicals Report is a SEPP 33 assessment in which inventories of the various classes of chemicals are compared to the threshold requirements set out in SEPP33.

The Hazardous Chemicals Report prepared for SSD-9036 included an inventory of existing hazardous chemical stored, and found:

- “In all cases these inventories and/or their locations are less than the threshold quantities or distances and therefore it is concluded that the development should be assessed as not hazardous under the SEPP”.
- “The proposed development has no impact on the storage location and usage of these chemicals, with the exceptions of liquid oxygen and diesel fuel”.
- “Class 7 radioactive materials in the form of medical isotopes are used in accordance with the Hospital’s storage and handling procedures. Inventories are very low. There are no implications for SEPP33 assessment.”

The proposed fit-out of the two tenancies will not increase quantities of hazardous chemicals above SEPP 33 thresholds, or change storage locations. The SLHD have reviewed the hazardous chemicals as detailed in the Hazardous Chemicals Report dated June 2018 under the approved SSD 9036, and confirm that the quantities “don’t differ from the report”.

6.4 Heritage impacts

Notwithstanding the whole site is a local heritage item, the changes are primarily internal, and not directly affecting any building cited under the heritage listing.

6.5 Radiation

Notwithstanding the Secretary Environmental Assessment Requirements (SEARs) issued for SSD-9036 did not require it, the application included a ‘Radiation Shielding Report’ prepared by Gammasonics. The scope of this report included the Linear Accelerator Bunkers 1 and 2. It provides recommendations for the construction of the linear accelerators in order for people adjoining them not to receiving radiation dosage exceeding the NSW EPA Regulations, and references requirements of separate Shielding Design report.

6.6 Traffic

The proposed tenancies will result in the following increases in staff and patients at the hospital:

- Radiation oncology: 13 staff and 8 patients/carers at any one time; and
- PET suite: 10 staff at any one time and 10 patients throughout the day.

Using this data, the following updates were made to the traffic model by traffic consultant, Arup, for the Concord Repatriation Hospital Stage 1 redevelopment (refer **Table 1** below).

Table 1 Updates to Traffic Model from Proposed Tenancies – Concord Repatriation Hospital Stage 1 Redevelopment

Source: Traffic Statement prepared by Arup

		SSD (Stage 1)	Updated (Stage 1)	Change
AM Peak	Arrivals	858	864	+6
	Departures	234	237	+3
PM Peak	Arrivals	282	284	+2
	Departures	903	907	+4

This found the maximum parking accumulation for Stage 1 increases from 2,347 to 2,355, an increase of 8 vehicles.

Arup conclude, noting the current plan for the completion of Stage 1 is to have 2,539 parking spaces within the hospital, the increase in parking demand can be accommodated within the parking proposed for Stage 1.

7.0 Changes to Conditions of Consent

The following table sets out the changes required to conditions of consent as a result of the proposed modification works. The only affected conditions are architectural plans at Condition A2 of SSD-9036-Mod-5. There are no other conditions requiring modification. Changes are shown in red.

Architectural Drawings prepared by Jacobs

Dwg No.	Rev	Name of Plan	Date
IA064700-NEWB-AR-DRG-00	6	Cover Sheet	10/08/18
	7		18/05/21
IA064700-NEWB-AR-DRG-0002	4	Demolition Plan	11/07/18
IA064700-NEWB-AR-DRG-0005	24	Proposed Site Plan	10/08/20
	25		18/05/21
IA064700-NEWB-AR-DRG-0050	42	Overall Plan—Basement	10/08/20
	13		18/05/21
IA064700-NEWB-AR-DRG-0051	9	Overall Plan—Lower Ground	22/06/18
IA064700-NEWB-AR-DRG-0052	9	Overall Plan—Ground Level	22/06/18
IA064700-NEWB-AR-DRG-0053	10	Overall Plan—Level 1	10/08/20
IA064700-NEWB-AR-DRG-0054	10	Overall Plan—Level 2	10/08/20
IA064700-NEWB-AR-DRG-0055	10	Overall Plan—Level 3	10/08/20
IA064700-NEWB-AR-DRG-0056	10	Overall Plan—Level 4	10/08/20
IA064700-NEWB-AR-DRG-0057	10	Overall Plan—Level 5	10/08/20
IA064700-NEWB-AR-DRG-0058	11	Overall Plan—Level 6	10/08/20
IA064700-NEWB-AR-DRG - 0059	6	Overall Plan—Level 7	22/06/18
IA064700-NEWB-AR-DRG-7001	M	Elevation—North & South	27/07/20
IA064700-NEWB-AR-DRG-7002	K	Elevation—East & West	27/07/20
IA064700-NEWB-AR-DRG-7003	F	Elevation—IPU 1 East & IPU 2 West	20/02/20
IA064700-NEWB-AR-DRG-7004	14	Elevation—IPU 2 East & IPU 3 West	13/07/18
IA064700-NEWB-AR-DRG-7101	F	Section Sheet 1	20/02/20
IA064700-NEWB-AR-DRG-7102	H	Section Sheet 2	27/07/20
	K		18/05/21

IA064700-NEWB-AR-DRG-7103	6	Section Sheet 3	13/07/18
IA064700-NEWB-AR-DRG-7104	6	Section Sheet 4	13/07/18
IA064700-NEWB-AR-9030	V08	Section 3.9 Material Selection	17/04/20
IA064700-NEWB-AR-DRG-15B2	↓ N	GA—Basement Level Zone 2 RL 4.0	27/07/20 18/05/21
IA064700-NEWB-AR-DRG-15G2	E	GA—Ground Level Zone 2	20/02/20
IA064700-NEWB-AR-DRG-15L2	F	GA—Lower Ground Level Zone 2	20/02/20
IA064700-NEWB-AR-DRG-1512	E	GA – Level 1 Zone 2	27/07/20
IA064700-NEWB-AR-DRG-1522	F	GA—Level 2 Zone 2	27/07/20
IA064700-NEWB-AR-DRG-1532	F	GA – Level 3 Zone 2	27/07/20
IA064700-NEWB-AR-DRG-1542	D	GA – Level 4 Zone 2	27/07/20
IA064700-NEWB-AR-DRG-1552	D	GA – Level 5 Zone 2	27/07/20
IA064700-NEWB-AR-DRG-1562	D	GA—Level 6 Zone 2	14/08/20
IA064700-NEWB-AR-DRG-1572	D	GA—Roof Zone 2	27/07/20
Multistorey Car Park			
IA064700-MSCP-AR-DRG-0101	5	Proposed Site Plan	12/04/18
IA064700-MSCP-AR-DRG-1500	5	Floor Plan—Ground level	12/04/18
IA064700-MSCP-AR-DRG-1501	4	Floor Plan—Level 1	12/04/18
IA064700-MSCP-AR-DRG-1502	4	Floor Plan—Level 2	12/04/18
IA064700-MSCP-AR-DRG-1503	5	Floor Plan—Level 3	12/04/18
IA064700-MSCP-AR-DRG-1504	4	Floor Plan—Level 4	12/04/18
IA064700-MSCP-AR-DRG-1505	4	Floor Plan—Level 5	12/04/18
IA064700-MSCP-AR-DRG-4001	4	Elevation—North & South	12/04/18
IA064700-MSCP-AR-DRG-4002	4	Elevation—East & West	12/04/18
IA064700-MSCP-AR-DRG-4011	4	Section Sheet 1	12/04/18
IA064700-MSCP-AR-DRG-4012	4	Section Sheet 2	12/04/18

8.0 Conclusion

Based on the above assessment it is recommended this modification be approved by DPIE. The modification is substantially the same development to that approved under SSD 9036 and results in minimal environmental impact, and accordingly, can be approved as a Section 4.55(1A) application.

Overall, the modification enables optimal functional use of the Clinical Services Building within Concord Repatriation General Hospital.

Should you have any queries on the above matters, please contact the undersigned on 02 8252 8400.

Regards,

A handwritten signature in black ink, appearing to read 'Jane Fielding', written in a cursive style.

Jane Fielding
Senior Associate, Urban Planning
Architectus Australia Pty Ltd

Attachments:

- Attachment A: Revised Architectural Plans, prepared by Jacobs Architects
- Attachment B: Traffic Statement, prepared by Arup