12 January 2018

Ms Carolyn McNally
Secretary
Department of Planning and Environment
GPO Box 39
SYDNEY
NSW 2001

Dear Ms McNally

RE: Request for Secretary’s Environmental Assessment Requirements – Concord Repatriation General Hospital Stage 1 Redevelopment Comprising the Construction of a New Clinical Services Building, Multi Storey Car Park and Associated Works

In accordance with Clause 3 of Schedule 2 of the Environmental Planning and Assessment Regulation 2000 (EP&A Regulation) and Schedule 1 of State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP), Health Infrastructure request the issue of Secretary’s Environmental Assessment Requirements (SEARs) for the State Significant Development (SSD) application for the proposed Concord Repatriation General Hospital (Concord Hospital) ‘Stage 1’ redevelopment, comprising the construction of a new Clinical Services Building (CSB), multi storey car park and associated works.

Funding for the broader redevelopment of Concord Hospital ($341 million) was announced by the Premier in June 2017.

The purpose of this letter is to provide a preliminary environmental assessment and other supporting documentation to allow for the SEARs to be issued for this application.

1 Background

The Sydney Local Health District (SLHD) is responsible for providing and managing all public health care within the six (6) Local Government Areas (LGAs) of Burwood, Canada Bay, Canterbury, the City of Sydney, Inner West and Strathfield.

The District is located in a growing population corridor within Sydney. The proposed redevelopment is required to improve and replace outmoded facilities to meet the substantial growth in clinical service demand from across the hospital’s catchment that has occurred and will occur over the next 10 years.

A masterplan for Concord Hospital was developed in 2015. This report was reviewed and optimised as part of the final business case in 2017 and was endorsed through project governance in November. This masterplan has been prepared to inform the future development and utilisation of Concord Hospital, to ensure it can respond to current and future needs of the population whilst providing appropriate clinical and education services.

The proposed new CSB, multi storey car park and associated works is part of the first stage in the proposed broader redevelopment of the Concord Hospital precinct. The Stage 1 project will provide new aged, chronic care and rehabilitation facilities.
The new facility will significantly improve connections to existing services as well as increase services to the community. The new building will provide inpatient accommodation, rehabilitation and ambulatory care services, addressing the short-term pressures to predominantly meet Concord Hospital’s 2021 demand.

The Stage 1 project will also collocate cancer care facilities from several locations across the broader Concord Hospital site and provide a base for the ANZAC Clinical Research Centre.

![Figure 1. Extract of the CRGH Masterplan/ Concept Design Optimisation Report Stage 1 (December 2017)](image)

Source: NSW Health Infrastructure/Capital Insight (2017)

2 The Locality

The Concord Hospital Precinct is located approximately 11 kilometres west of the Sydney CBD and 8 kilometres east of the Parramatta CBD. Rhodes railway station is located approximately 900 metres north west of the main entrance to Concord Hospital. Concord West railway station is located approximately 1.4 kilometres south west of this main entrance.

The site is located to the northern part of the suburb of Concord West, occupying a large area along Hospital Road and takes up much of the Rocky Point Peninsula, located between Brays Bay and Yaralla Bay and along the Parramatta River. Parramatta River is approximately 400 metres north-east of the existing Concord Hospital precinct.

By virtue of the site’s peninsula setting, it is uniquely positioned in a precinct comprising almost entirely of health services facilities. The Rivendell School and associated lands comprises the majority of the north-eastern end of the peninsula and these lands are jointly owned by NSW Health and the NSW Department of Education.

Development to the south consists of the Dame Eadith Walker Estate which occupies the entirety of the Yaralla Bay/Majors Bay peninsula. These lands are also owned by NSW Health. Surrounding development to the north-west through south-west of the site consists predominantly of established low density residential development. Refer to an aerial view of the site and location plan at Figures 2 and 3 below.
Figure 2. Aerial View of Locality
Source: Nearmap.com.au

Figure 3. Location Plan of Concord Hospital Precinct
Source: Nearmap.com.au
3 The Site

Legal Description

The site is located at 1H Hospital Road, Concord, NSW and is located within the Canada Bay LGA. The site includes a total of nine (9) lots (including one untitled parcel) as described in Table 1 below, which comprises the broader Concord Hospital precinct.

Table 1. Legal description of site

<table>
<thead>
<tr>
<th>Legal Description</th>
<th>Ownership</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lot 20 DP 1139098</td>
<td>Health Administration Corporation</td>
</tr>
<tr>
<td>Lot 1 DP 455866</td>
<td>Health Administration Corporation</td>
</tr>
<tr>
<td>Lot 2 DP 535257</td>
<td>Health Administration Corporation</td>
</tr>
<tr>
<td>Lot 117 DP 752023</td>
<td>Health Administration Corporation</td>
</tr>
<tr>
<td>Lot 7310 DP 1159928</td>
<td>The State of New South Wales</td>
</tr>
<tr>
<td>Lot 1 DP 166721*</td>
<td>New South Wales Health Foundation</td>
</tr>
<tr>
<td>Lot 2 DP 231732*</td>
<td>The Prince Alfred Hospital</td>
</tr>
<tr>
<td>Lot 21 DP 1139098*</td>
<td>Health Administration Corporation</td>
</tr>
<tr>
<td>Untitled Land</td>
<td>NSW Roads and Maritime Services (RMS)</td>
</tr>
</tbody>
</table>

*Note: these lots fall within the bounds of the broader Concord Hospital precinct, however are located away from, and are unaffected by, the proposed works

Figure 4. Lot Plan of Concord Hospital Precinct
Source: Nearmap.com.au
The site includes an area of untitled land located to the south, noted as being reclaimed land from Yaralla Bay. This land is owned by RMS. It is understood that reclamation occurred in the 1940s and has been used solely for hospital purposes since reclamation. This land is understood to be untitled, on the basis that it previously formed part of the Parramatta River and that upon reclamation the Mean High-Water Mark (MHWM) was not adjusted. As such, this land technically forms part of the Parramatta River and Sydney Harbour (refer Figure 4).

**Built Form Context**

The site accommodates eighty-eight (88) documented buildings associated with the operation of Concord Hospital. The site is largely developed with numerous hospital buildings spread across the site varying in height and scale. The main public Concord Hospital building located at the intersection of Hospital Road and Fremont Street to the south-west corner of the site. The main entrance to Concord Hospital (including Emergency) is located on Hospital Road, Concord, which intersects with Concord Road approximately 500 metres south-west of the site. The site also accommodates a large at-grade car park, accessible from Hospital Road.

There is no development surrounding the site to the north or south. The Rivendell School and associated lands comprises the majority of the northern end of the peninsula and is jointly owned by NSW Health and the NSW Department of Education. Development to the west consists of established low density residential dwellings.
Transport and Access

The main entrance to Concord Hospital (including Emergency) is located to the southern side of Hospital Road, Concord. All visitor car parking is located within the existing large at-grade car park, located to the north of Hospital Road and adjacent to the main hospital entrance. Across the Precinct, there are over 1,957 off street car parking spaces.

Rhodes railway station is located approximately 900 metres north-west of the main entrance to Concord Hospital. Concord West railway station is located approximately 1.4 kilometres south-west of this main entrance.

A number of bus stops are also located along Hospital Road, serviced by routes numbered 458 (Ryde to Burwood via Rhodes), 460 (Five Dock - Concord Hospital via Canada Bay) and M41 (Macquarie Park to Hurstville).

Existing Services

Concord Repatriation General Hospital (CRGH), also known as Concord Hospital, is a Group A1-Principal Referral Hospital, managed by the SLHD. The Hospital has 452 inpatient beds and provides a wide range of tertiary and quaternary services to its local community, as well as veterans across NSW who choose to continue receiving their care at the Hospital.

Topography

The natural topography of the precinct slopes gently downwards from the north-east to the south-east. Surface levels vary from about RL9.5m AHD in the western corner of the site (main Public Hospital Building and existing tennis/basketball courts) to approximately RL3.5m AHD to the south-eastern side of the proposed building, adjacent to the banks of the Parramatta River.
Vegetation & Ecology

The main Concord Hospital precinct is largely developed and is generally devoid of areas of significant vegetation, however there are a number of mature trees and areas of landscaping throughout the site.

Given the peninsula setting of the site, there are areas of vegetation located to the site’s coastal edges that are identified as a ‘Wetlands Protection Area’ under the Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005 (SREP) (a deemed SEPP). These areas are also identified as areas of terrestrial biodiversity under the Canada Bay Local Environmental Plan 2013 (LEP).

These areas are understood to comprise areas of mangroves, trees, native coastal shrubbery and vegetation.

Zoning

The site is predominantly zoned SP2 - Infrastructure (Hospital) pursuant to the Canada Bay LEP 2013. Part of the RMS land is zoned E2 - Environmental Conservation, generally comprising areas of coastal vegetation and wetlands along the coastal edges of the site under the LEP 2013.

Another part of the RMS land is zoned W2 – Environmental Protection pursuant to the SREP 2005. Refer to an extract of the Canada Bay LEP 2013 and SREP 2005 zoning maps below.
Figure 5. Extract of LEP 2013 Zoning Map
Source: LEP 2013

Figure 6. Extract of SREP 2005 Zoning Map
Source: SREP 2005
Heritage

Aboriginal Heritage

The site is not known to contain any items of Aboriginal Heritage.

European Heritage

The main Concord Hospital site (Lot 2 DP 89877) is identified as a local heritage item (I256) under the LEP 2013, being the ‘Concord Repatriation Hospital - original main building, grounds and layout’. The site is not within any Heritage Conservation Area under the LEP 2013. No elements of the site are heritage listed under the SREP 2005. There are no items of national heritage significance nor any World Heritage Sites (‘WHS’) located within proximity to the site.

It is however noted that a portion of the site to the south, being the car park and loading dock associated with existing hospital buildings numbered 79 and 80 within Lot 2 DP 231732, is part of a state heritage item (LEP Ref. I444, State Heritage Register Ref. SHR00119). This portion is located outside of the scope of physical works and comprises the ‘Dame Eadith Walker Hospital Group: dairy, gatehouse, coach house, “Boronia” cottage, timber garages, “Woodbine” cottage, stables, Prince of Wales Squash Courts, “Yaralla House”, “Jonquil” cottage, garages, “Magnolia” cottage, hospital grounds’.

A Conservation Management Plan (CMP) was prepared for the site by Conybeare Morrison in 2015. The heritage impact of the proposed works will be detailed in a Heritage Impact Assessment (HIA) prepared for the project.

Figure 7. Extract of LEP 2013 Heritage Map
Source: LEP 2013
**Aviation**

The site accommodates a grassed helipad located to the south of the site (within the portion of untitled RMS land). The proposed development does not seek any alteration to this existing helipad. No new helipads or other aviation-related facilities are proposed.

**Flooding & Tidal Inundation**

Section 149 (2)&(5) Planning Certificates were obtained for representative lots of the main hospital grounds (and not the untitled RMS land) which provide that the site is not flood affected and is not subject to tidal inundation.

**Contamination**

A Preliminary Site Contamination Investigation (PSI) (undertaken by Douglas Partners, June 2016) indicates that the site has a history of potentially contaminating uses including the former incinerator as well as instances of possible illegal dumping.

Nevertheless, the site is considered suitable for the proposed development subject to the identification of and supplementary soil testing in proximity to any areas of localised dumping, underground fuel or waste tanks. Geotechnical and contamination assessments are ongoing.

**Groundwater**

A Geotechnical Investigation (undertaken by Douglas Partners, April 2016) noted no groundwater observations during augering (i.e. within the filling and clays) and “it is considered likely that the permanent groundwater level is within the rock, some seepage should be expected through the soils, particularly at interfaces between layers ... particularly following periods of rainfall.”

4 The Project

4.1 Proposed development under SSD application

This Request for SEARs seeks environmental assessment requirements for an SSD application for the construction of a new a CSB, multi storey car park and associated works.

The scope of proposed works includes:

- **Clinical Services Building:**

  A CSB providing new and expanded clinical services for Aged Complex Care and Rehabilitation (ACC&R), an integrated Cancer Care Centre and Defence Force Centre of Excellence. These services will be provided in a new building comprising:

  - basement level connecting new support services with existing support service lifts in the Multi-Block building on the lower ground floor.

  - A one (1) storey podium level for the provision of outpatient clinics with dedicated drop off and entry areas.

  - Two six (6) storey wings and one three (3) storey wing connected by a ‘Support Bar’ (plus rooftop plant) including ground floor day treatment centres and inpatients units. At ground level a link via a three (3) storey atrium to the existing Multi-Block building is created. On levels one and two overhead bridge links, within the atrium, are provided for patient movements between the new and existing Multi-Block building.
• Car Parking:
  • Construction of a five (5) storey multi-storey car on the existing public at grade car park adjacent (north) of the existing main public hospital building, to the north of Hospital Road. Note car park capacity is to be confirmed.
  • Construction of an at grade car park adjacent (north east) of the existing main public hospital building, to the south of Hospital Road. Note car park capacity is yet to be confirmed, however this at grade car park will provide for overflow parking whilst the multi-storey car park is under construction, and will provide for construction vehicle parking and management ongoing.

• Associated Works:
  • Associated works are likely to include, however are not limited to:
    o Minor alterations and additions to the existing public hospital building to facilitate connection to the proposed CSB works;
    o Construction of a new loading dock, minor internal road realignment and widening to facilitate service access to the proposed CSB;
    o Excavation, earthworks, site grading and preparation;
    o Tree removal; and
    o Landscaping works.

Figure 8. Indicative photomontage of proposed CSB when viewed to the North West
Source: NSW Health Infrastructure/Jacobs (2017)

4.2 Staff and Patient Projections

Clinical Services Building

The proposed CSB will both provide for new health services as well as re-house and expand services currently provided elsewhere within Concord Hospital. This means the new facility will see a transfer of existing bed and staff numbers for these services, and will also accommodate an increase in capacity of these services.

The current and projected staff and bed (patient) numbers to be accommodated in the new CSB are presented in the following tables.
Table 2. Summary of bed capacity current and future development – Concord Hospital Stage 1 Redevelopment
Source: NSW Health Infrastructure

<table>
<thead>
<tr>
<th></th>
<th>Acute inpatient beds (all ages, excludes sub-acute beds/spaces/chairs/suites)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing (December 2017) beds</td>
<td>452</td>
</tr>
<tr>
<td>(Acute and Sub-Acute)</td>
<td></td>
</tr>
<tr>
<td>Additional beds from redevelopment</td>
<td>111</td>
</tr>
<tr>
<td>Beds at conclusion of redevelopment</td>
<td>563</td>
</tr>
</tbody>
</table>

Table 3. Summary of current and projected staff profile (FTEs) – Concord Hospital Stage 1 Redevelopment
Source: NSW Health Infrastructure

<table>
<thead>
<tr>
<th>FTEs</th>
<th>Staff FTE</th>
</tr>
</thead>
<tbody>
<tr>
<td>September 2017 (base case)</td>
<td>2,903</td>
</tr>
<tr>
<td>Additional staff</td>
<td>414</td>
</tr>
<tr>
<td>Staff at conclusion of redevelopment</td>
<td>3,317</td>
</tr>
</tbody>
</table>

4.3 Proposed activity under Part 5 of the EP&A Act

Other construction early/enabling works across the hospital precinct are proposed to be undertaken by means of Part 5 of the EP&A Act in a Review of Environmental Factors (REF).

5 Planning Issues

5.1 Strategic Planning Context

A Plan for Growing Sydney

The Sydney metropolitan strategy, A Plan for Growing Sydney, was released in December 2014 and is the NSW Government’s 20-year plan. It provides direction for Sydney’s productivity, environmental management, and liveability; and for the location of housing, employment, infrastructure and open space. The Plan identifies that by 2031 there is a need to create an additional 664,000 new dwellings and 689,000 new jobs.

The Strategy’s vision for Sydney is “a strong global city, a great place to live”. The Strategy identifies goals, directions and principles which inform the future growth and development of Sydney. The key matters which relate to the proposed development are as follows:

Goal 1: A competitive economy with world-class services and transport

- Direction 1.7: Grow strategic centres – providing more jobs closer to home;
- Direction 1.10: Plan for education and health services to meet Sydney’s growing needs; and
- Direction 1.11: Deliver infrastructure.

The proposed development supports these directions via expanding Concord Hospital within proximity to Rhodes, which is identified as a strategic centre.

Priorities for Rhodes as a strategic centre include to:

- “Work with council to protect capacity for long-term employment growth in Rhodes”; and
- “Support health-related land uses and infrastructure around Concord Hospital.”

Draft Greater Sydney Region Plan

The draft Greater Sydney Region Plan, released in October 2017 by the Greater Sydney Commission, is the NSW Government’s 40-year regional and land use plan for Greater Sydney and provides ten
Directions to guide this growth. It expands on A Plan for Growing Sydney through the identification of three cities, being Eastern Harbour City, Central River City and Western Parkland City.

Of relevance to the proposed development include the Plan’s objectives for Infrastructure and collaboration:

- Objective 1. Infrastructure supports the three cities;
- Objective 2. Infrastructure aligns with forecast growth – growth infrastructure compact; and
- Objective 3. Infrastructure adapts to meet future needs.

Objectives for Productivity are of relevance to the proposed development. Objective 21 “Internationally competitive health, education, research and innovation precincts” identifies Rhodes as one of Greater Sydney’s Health and Education Precincts, and includes the Concord Hospital Redevelopment within planned Major Hospital infrastructure. Funding for the broader redevelopment of Concord Hospital ($341 million) was announced by the Premier in June 2017.

**Revised Draft Eastern City District Plan**

The revised draft Eastern City District Plan was released in October 2017 by the Greater Sydney Commission. The Plan contains four key themes, being: infrastructure and collaboration, liveability, productivity and sustainability.

Planning Priority E11 Growing investment, business opportunities and jobs in strategic centres states that hospitals and community health centres should be located within or directly adjacent to centres, ideally being co-located with supporting transport infrastructure. Specific planning priorities for Rhodes identify that the area has “attracted significant new housing and employment and has a strong health care presence.” Rhodes is identified as part of a group of strategic centres in the Harbour CBD that contribute considerably to Sydney’s jobs, and has an identified job target of 22,000 – 25,500 additional jobs by 2036.

**State Infrastructure Strategy Update**

The State Infrastructure Strategy Update, released in 2014 by Infrastructure NSW is the revision to the initial 2012 Strategy, ‘First things First’. It comprises recommendations to the NSW Government on the highest value and most effective infrastructure priority projects in Greater Sydney and Regional NSW.

The strategic objective for Health under the Strategy is to “Support the health, wellbeing and economic participation of our growing population and contribute to the attractiveness of NSW as a place to live and do business”.

Of relevance to the proposed development, the Strategy identifies that “demand for acute services will grow by 48 per cent” by 2031, which is “nearly double the rate of population growth”. As such, the Strategy states that substantial investment in health infrastructure is required over the next 20 years. The Strategy recommended a reservation of $600m from the Rebuilding NSW Initiative for a Hospitals Growth Program towards funding new health facilities.

**5.2 Statutory Planning**

**Legislation**

*Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)*

The Commonwealth EPBC Act legislates the provisions for the assessment of actions likely to have a significant impact on Matters of National Environmental Significance (MNES) listed under the Act. Refer to Ecology at Section 3 above.
**Biodiversity Conservation Act 2016**

The Biodiversity Conservation Act 2016 (BC Act) identifies threatened species, populations and ecological communities in NSW and provides mechanisms for their conservation and recovery. Refer to Ecology at Section 3 above.

**Contaminated Land Management Act 1997**

The subject land is not subject to any declarations, orders, or voluntary management proposals as defined in the Contaminated Land Management Act 1997.

**Water Management Act 2000**

The site is located along the Parramatta River on the Rock Point Peninsula and between Brays Bay and Yaralla Bay. Public authorities are exempt from controlled activity approval on waterfront land under the Water Management Act 2000.

**Heritage Act 1977**

Refer to Heritage matters at Section 3 above.

**State Environmental Planning Policies**

The following table identifies the key State Environmental Planning Policies (SEPPs) that apply to this proposal:

<table>
<thead>
<tr>
<th>SEPP No.</th>
<th>Name</th>
<th>Applies</th>
<th>Capable of Complying*</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Development standards</td>
<td>No</td>
<td>N/A</td>
</tr>
<tr>
<td>33</td>
<td>Hazardous and offensive development</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>55</td>
<td>Remediation of land</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Infrastructure 2007</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>State and Regional Development 2011</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Sydney Region Environmental Plan 2005 (a deemed SEPP)</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Draft</td>
<td>(Draft) Environment SEPP</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>(Draft) Infrastructure SEPP</td>
<td>Yes</td>
<td>Yes</td>
</tr>
</tbody>
</table>

*Subject to future detailed design processes

**Local Environmental Plan**

**Permissibility**

The site is located within Zone SP2 – Infrastructure (Hospital) and is applicable to the provisions of the LEP 2013. Development for the purposes of a Hospital is permitted within Zone SP2 – Infrastructure under the land use table of the LEP 2013.

Clause 57(1) of the State Environmental Planning Policy (Infrastructure) 2007 (ISEPP) establishes that development for the purpose of health services facilities may be carried out by any person with consent on land in a prescribed zone. The proposed hospital redevelopment is permitted with consent as it is within a prescribed zone (SP2 Infrastructure – Health Services Facility).

**Development Standards & Other Provisions**

The site is not subject to a maximum height of buildings control pursuant to Clause 4.3 or any Floor Space Ratio (FSR) restriction pursuant to Clause 4.4 of the LEP 2013.
Notwithstanding, a number of provisions of the LEP 2013 do apply to the site which provide matters for consideration and must be incorporated in the assessment of any development, including, however not limited to, Clause 5.10 (Heritage Conservation), Clause 6.1 (Acid Sulphate Soils), Clause 6.2 (Earthworks) and Clause 6.3 (Terrestrial Biodiversity).

These clauses will be adequately addressed in any SSDA submitted for the development.

6 Consultation Undertaken

Significant consultation has been undertaken to date by the Project Manager and consultant team members for the proposed redevelopment of Concord Hospital including the proposed Stage 1 redevelopment comprising the CSB, multi-storey car park and associated works. This consultation has included (although was not limited to):

- NSW Ministry of Health staff
- Canada Bay City Council
- Sydney Local Health District
- Department of Planning and Environment
- Roads and Maritime Services
- NSW Treasury
- NSW Health Infrastructure
- Aboriginal community and Aboriginal stakeholders
- The local community
- The Defence Force

7 Preliminary Impact Identification and Risk Assessment

Based on our preliminary environmental assessment, the potential impacts associated with the proposal are summarised below and will be addressed in detail in the EIS.

Traffic and Parking

A preliminary Transport Impact Assessment is being undertaken to determine the anticipated transport conditions in the vicinity of Concord Hospital and provide strategic design advice to ensure an appropriate transport network. This includes consideration of the following:

- A detailed review of existing traffic and parking conditions both on-site and surrounding the site.
- Provision of adequate parking supply to meet any such future demands.
- Traffic generation of future demands.
- Site accessibility.
- Service vehicle requirements.
- Pedestrian and bicycle considerations.
- Identification of the transport related constraints and opportunities.
A traffic and parking study will accompany the EIS. It will assess the parking requirements for the Concord Hospital Stage 1 Redevelopment, the feasibility and impacts of the proposed circulation and parking changes on the surrounding road network, as well as nearby intersections.

**Noise and Vibration**

An analysis of the construction and operation noise will require careful consideration of impacts upon the amenity of residential uses nearby. An acoustic and vibration assessment will be submitted with the future SSD Application.

**Biodiversity**

Section 7.9 of the *Biodiversity Conservation Act 2016* requires that an EIS submitted with an SSD application be accompanied by a *biodiversity development assessment report* unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values.

To the extent required by state legislation, biodiversity impacts will be addressed in the EIS.

**Geotechnical, Contamination and Hazardous Materials**

A Preliminary Site Contamination Investigation indicates that the site has a history of potentially contaminating uses. The EIS will give consideration to any further investigations required prior to, and following the demolition of the buildings and any validation requirements relating to ground conditions to ensure the site is suitable for its intended use.

A geotechnical investigation of the site will be undertaken where the works are proposed. Recommendations for the substructure of the buildings will be considered in the detailed design of the buildings and will be addressed and any validation requirements relating to ground conditions to ensure the site is suitable for the intended use.

Relevant investigations will be undertaken in accordance with SEPP 55 – Remediation of Land, Managing Land Contamination – Planning Guidelines, and SEPP 33 – Hazardous and Offensive Development. The assessment against the SEPPs will be submitted with the SSD Application.

**Heritage**

The proposed new building will be designed taking into consideration the heritage listed items on the site. The EIS will be accompanied by a detailed Heritage Impact Statement to assess the impact of the proposal on the heritage significance of the site, and any potential impacts associated with the proposed development (including visual impacts).

**Built Form and Visual Impact**

Whilst the site has no maximum building height control, the surrounding development is adjacent to predominantly a low density residential environment. The proposed scheme will be the subject of a merit assessment with regard given to the siting, height and massing of the proposed development in the context of the surrounding landscape.
Infrastructure and servicing

The site is adequately serviced with potable water, sewer, stormwater, electricity and telecommunications services. Consultation will be undertaken with all relevant service providers in relation to any required capacity augmentation of existing services to the site.

8  Request for SEARs

On the basis that the proposal meets the criteria identified in Schedule 1 Clause 14 of the State and Regional Development SEPP, Health Infrastructure formally request that the Department of Planning and Environment issue the Secretary’s Environmental Assessment Requirements to facilitate the preparation of the Environmental Impact Statement for the proposed redevelopment of Concord Hospital including the proposed Stage 1 redevelopment comprising the CSB, multi-storey car park and associated works.

If you require any additional information please contact Rachel Mitchell on 0438 220 252.

We would be happy to meet with your Department to discuss the proposal at any time.

Yours sincerely

Sam Sangster
Chief Executive