Concord Repatriation General Hospital Redevelopment (Concept & Stage 1)

State Significant Development Assessment (SSD 9036)
February 2019
February 2019

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Cover photo

View from Southern foreshore - Clinical Services Building, Concord Repatriation General Hospital (Source: Jacobs).

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<td>AHD</td>
<td>Australian Height Datum</td>
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<tr>
<td>BCA</td>
<td>Building Code of Australia</td>
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<td>Capital Investment Value</td>
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<td>Community Involvement Plan</td>
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<td>Concord Repatriation General Hospital</td>
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<td>EIS</td>
<td>Environmental Impact Statement</td>
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<td>EPA</td>
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<td>Environmental Planning and Assessment Regulation 2000</td>
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<td>EPI</td>
<td>Environmental Planning Instrument</td>
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<td>ESD</td>
<td>Ecologically Sustainable Development</td>
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<td>Minister</td>
<td>Minister for Planning</td>
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<td>OEH</td>
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<td>RMS</td>
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<td>Secretary</td>
<td>Secretary of the Department of Planning and Environment</td>
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<td>SEPP</td>
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<td>SRD SEPP</td>
<td>State Environmental Planning Policy (State and Regional Development) 2011</td>
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<td>SSD</td>
<td>State Significant Development</td>
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Executive Summary

This report provides an assessment of a State significant development (SSD) application for the redevelopment of the Concord Repatriation General Hospital (Concept and Stage 1) (SSD 9036). The Concord Repatriation General Hospital, is located at 1H Hospital Road, Concord West. The Applicant is Health Infrastructure on behalf of Health Administration Corporation and the proposal is located within the Canada Bay local government area.

The proposal seeks approval for the Concept and Stage 1 Redevelopment of Concord Repatriation General Hospital, including an indicative 82,000sqm of additional Gross Floor Area (GFA) across the development site consisting of the following:

- Stage 1, detailed approval for a new six storey Clinical Service Building (CSB) located towards the centre of the development site and comprising 44,000sqm GFA. The CSB would be attached to the rear of the existing main Multiblock hospital building. A new five storey car park accommodating 590 cars to the north of Hospital Road and landscaping are also proposed.
- Stage 2, concept approval for a new eight storey Acute Services Building (ASB) with 38,000sqm GFA adjacent to the existing Multiblock (north eastern side). A new five storey car park for approximately 520 cars is also proposed to form an extension of the Stage 1 car park to the immediate north east. Stage 2 would only progress subject to the approval of a further detailed application.

The proposal has a total estimated Capital Investment Value (CIV) of $968,272,531 million (Stage 1 $357,603,191 and Stage 2 $610,669,340) and would ultimately generate 433 operational jobs and 727 construction jobs (Stage 1). The proposal is SSD under clause 14 of Schedule 1 of State and Environmental Planning Policy (State and Regional Development) 2011, as it is development for the purposes of a hospital with a CIV of more than $30 million. Therefore, the Minister for Planning is the consent authority.

Engagement

The application was publicly exhibited between 12 September 2018 and 9 October 2018. The Department of Planning and Environment (the Department) received a total of 11 submissions, including nine (9) from public authorities, and two (2) from the public. The two (2) public submissions support the redevelopment of the hospital. An additional seven submissions from public authorities including Canada Bay Council were received in response to the Applicant’s Response to Submissions (RtS).

The key issues raised in the submissions include: loss of some heritage buildings and diminished heritage value, building design and form, Aboriginal culture heritage, construction and operational noise and vibration, traffic and parking and site contamination.
The Department has considered the above issues and the merits of the proposal in accordance with relevant matters under Section 4.15(1), the objects of the *Environmental Planning and Assessment Act 1979*, the principles of Ecologically Sustainable Development, and issues raised in all submissions as well as the Applicant’s response to these.

The matters raised throughout submissions were addressed by the Applicant in the RtS and also by the Department’s detailed assessment which has identified suitable conditions to mitigate potential impacts. Condition B1 relating to the modification of the building envelope of the Stage 2 Acute Services Building is recommended and further detailed landscape plan in Condition B6. ESD is addressed in Conditions C22, C23 and C24, while site contamination is addressed in conditions C6 to C12 and treatment of acid sulfate soils in conditions C13 to C15. Council and OEH issues concerning flooding were addressed by the Applicant and condition C34. Noise matters have been dealt with in conditions E40 and E41. The Department is satisfied that these and other conditions would further reduce any adverse impacts relating to the project.

The Department’s assessment of the project concludes that:

- consultation between the Applicant, RMS, Council and TfNSW has resulted in the submission of further particulars that address the technical traffic infrastructure design issues and clarify operational parking concerns. A preliminary design of the Hospital Road mini roundabout has been prepared by the Applicant and conditions would be imposed requiring further Council and TfNSW approval prior to the roundabouts construction. Additional mobility disability parking is proposed on-site and reducing the use of private vehicles to access the Concord Repatriation General Hospital addressed through the detailed Green Travel Plan.

- staff parking permits would continue to be regulated as a travel demand measure, thereby encouraging the use of other transport modes like rail (Rhodes Station), bicycles (with new end of trip facilities proposed) and local pedestrianisation over the medium term.

- on-site parking would substantially increase from 1957 to 2539 spaces at the completion of Stage 1. This includes the 300 car spaces of the temporary car park. Parking demand following the completion of Stage 1 would be expected to only reach 2381spaces. Should the Stage 2 MSCP eventuate, 2549 car spaces would be available and this figure would be expected to meet demand.

- following detailed investigations into the heritage significance of the site, the Department is satisfied that buildings proposed to be demolished would not detract from the overall heritage significance of the site and the archival recording of those buildings would help meet the objectives of the Conservation Management plan submitted with the EIS.

- construction noise and vibration and longer term operational noise would not likely reach the highly affected noise level and can be managed using conditions.

- a small portion of the adjoining E2 Environmental Conservation zone has traditionally been used for on-grade parking and the use of that land for ongoing parking purposes would be addressed using conditions.
Summary

The proposal would lead to considerably improved medical and health care infrastructure in a densely populated catchment where the need for health care services is increasing. Stage 1 of the proposal involves the replacement of existing outmoded facilities with new aged care, chronic care and rehabilitation facilities. The proposal is consistent with key government strategic plans and policies including, the NSW State Priorities by improving hospital service levels, the State Infrastructure Strategy 2018-2038 by investing in health infrastructure and A Metropolis of Three Cities – The Greater Sydney Region Plan as it aligns infrastructure with forecast population growth. The EIS adequately addresses the impacts of the proposal and can be suitably supplemented using conditions of consent.

The Department concludes the proposal is in the public interest and recommends that the application be approved subject to conditions.
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1. Introduction

This report provides an assessment of a State significant development (SSD) application for the redevelopment of Concord Repatriation General Hospital (Concept and Stage 1) at 1H Hospital Road, Concord West (SSD 9036).

The redevelopment concept is the result of a master planning process undertaken by Sydney Local Health District commencing in 2015. The final endorsed 2017 master plan informed the design, size and scale of the project.

The proposal seeks approval for the Concept and Stage 1 Redevelopment of Concord Hospital, including an indicative 82,000sqm of additional Gross Floor Area (GFA) across the development site as follows:

- Concept component of this application being the redevelopment of Concord Hospital in two Stages.
- Stage 1, approval for a new six storey Clinical Service Building (CSB) located towards the centre of the development site and comprising 44,000sqm GFA. A new five storey car park accommodating 590 spaces to the north of Hospital Road, a temporary 300 space on-grade car park and landscaping are also proposed.
- Stage 2, being in concept form only, with a separate detailed development application to be lodged once the Stage 1 works have been completed. Stage 2 would involve a new eight storey Acute Services Building (ASB) with 38,000sqm GFA to the north east of the existing main hospital building. A new five storey car park for approximately 520 spaces to form an extension of the Stage 1 car park to the immediate north east. Stage 2 will be the subject of a further detailed application.

The application has been lodged by Health Infrastructure on behalf of Health Administration Corporation (the Applicant). The site is located within the Canada Bay local government area (LGA).

1.1 Site description

The site is located on Rocky Point Peninsula on the southern bank of the Parramatta River and is bounded by Brays Bay to the north and Yaralla Bay to the south. The site is located 11km west of the Sydney CBD, approximately eight kilometres south west of the Parramatta CBD and is known as 1H Hospital Road, Concord West. The site is irregular in shape and legally described as Lot 20 DP 1139098, Lot 1 DP 455866, Lot 2 DP 535257, Lot 117 DP 752023, Lot 1 DP 166721, Lot 7310 DP 1159928, Lot 2 DP 231732 and includes an untitled lot at the southern end of the site adjacent to the Parramatta River. The site is elongated in an east to west manner and has an area of approximately 24ha (see Figure 1).

Located on a peninsula, the site is bounded by the Parramatta River to the north east and low-density housing to the south west. Rhodes railway station is located within walking distance approximately 1.4km to the north west, with pedestrian access via local roads or using the Kokoda Track Memorial Walkway. Hospital Road, is predominantly tree lined with seven bus stops providing services to and from the Concord Repatriation General Hospital and its local and surrounding suburbs.
Further north east of the site 300m away towards the outer most point of the peninsula is the Thomas Walker Convalescent Hospital a heritage item listed on the State Heritage Register (SHR 00115) that is currently occupied by Rivendell School. Approximately 50m south of the site is the Dame Eadith Walker Convalescent Hospital also listed on the State Heritage Register (SHR 00119).

Figure 1 | Site Map (Base source: Google earth)

The site is zoned part SP2 – Infrastructure (Hospital) and part E2 – Environmental Conservation under the Canada Bay Local Environmental Plan (LEP) 2013. The E2 – Environmental Conservation zone however, only applies to some of the coastal fringes of the site where coastal vegetation and wetlands can be found (see Figure 2).

Figure 2 | Excerpt of Zoning Map (Source: Department)
The site is dissected by Hospital Road with the main hospital building (the Multiblock) located on the southern side and a large at grade car park located to the north. The northern carpark is generally devoid of any buildings except for a small single storey weather board building occupied by the NSW Institute of Sports Medicine. The main hospital grounds are occupied by many buildings of various size and form. These buildings date back to the early 1940s with many having been constructed, extended and/or refurbished at various times during the relative long history of the site. The original main hospital building, grounds and layout are listed as having local heritage significance under the Canada Bay LEP 2013, but none are of state heritage significance.

The main hospital building known as the ‘Multiblock’ is located central to the site and is accessed via Hospital Road. The Multiblock is close to the intersection of Hospital Road and Fremont Street (north) and some 500m distant from Concord Road to the southwest (see Figure 3). The ‘Ramp Ward’ hospital buildings are located to the immediate north east and are predominantly single storey in nature. The Ramp Wards were also constructed during the 1940s and 1950s, and are connected to the Multiblock by a covered public walkway. Eight of these buildings are proposed to be demolished and have no local or state heritage significance.

![Figure 3](image)

Figure 3 | Main Multiblock building, Hospital Rd and Northern car park (Source: Google earth)

The site contains established trees, pockets of landscaping, garden beds with some larger established open green spaces including the former lawn bowls green fronting Hospital Road next to the Multiblock and open space to the south predominantly used for the landing of emergency helicopters. Coastal wetlands generally encapsulate the peninsula with a large wetland area adjoining the main northern car park to the immediate north. These coastal wetland areas would not be affected by the proposal.
1.2 Previous Approvals

In May 2018, the Applicant undertook a Review of Environmental Factors (REF) pursuant to State Environmental Planning Policy (Infrastructure) 2007 (Infrastructure SEPP) for works to be undertaken as ‘development without consent’ in accordance with Part 5 of the Environmental Planning and Assessment Act 1979 (EP&A Act). The works approved under the REF include the demolition of buildings 1A, 60 through 65 inclusive and 70 through 73 inclusive. The refurbishment of building 69 was also approved. These buildings are all located within the footprint of the proposed Clinical Services Building forming part of Stage 1 and demolition works commenced in June 2018. The removal of 18 trees and construction of a temporary loading dock to the rear of the existing Multiblock catering for deliveries and services during the construction phase was also approved under the REF. At the time of writing this report, demolition works were ongoing.
2. **Project**

The proposed redevelopment of Concord Hospital involves the renewal of outmoded medical facilities to meet increasing demand for clinical and medical services across the central Sydney region. This State Significant project seeks concurrent approval for the Concept and Stage 1 Redevelopment of the hospital, ultimately providing approximately 82,000sqm of additional GFA across the site should Stages 1 and 2 be completed. Stage 1 would result in an additional 111 beds bringing the total to 563 at the completion. Details of the project are contained in Table 1.

![Figure 4 | Detailed Stage 1 Proposal (Source: EIS)](image)

The submission of a further detailed development application would be required for Stage 2. Stage 2 relates to a future Acute Services Building (ASB), setback 40m from the Hospital Road frontage and located to the north east of the existing Multiblock where it would replace the temporary car park (see Table 1 for details). A future five storey car park with approximately 520 spaces is also proposed (see Figure 5).
The key components and features of the proposal (as refined in the RtS) are provided in Table 1 and are shown in Figures 6 and 7.

Table 1 | Main components of the project

<table>
<thead>
<tr>
<th>Aspect</th>
<th>Description</th>
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<tbody>
<tr>
<td>Site Preparation</td>
<td>• Stage 1 works include the demolition of Ramp Ward buildings including aged care wards, rehabilitation ward, aged care day hospital, psychogeriatric ward, centre for education and research on aging and community aged care ward (buildings numbered 10, 11, 14, 15, 16, 17, 18 and 19).</td>
</tr>
<tr>
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<td>• Stage 1 remediation works in preparation for the proposed CSB, areas beneath the former Ramp Wards and part of the land beneath the proposed MSCP (northern side of Hospital Road).</td>
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<td></td>
<td>• Construction of a temporary 300 space on grade car park to assist with the displacement of car parking spaces associated with the Stage 1 works.</td>
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<td>• Nine trees need to be removed and a further four are recommended for removal in the Arborist Report.</td>
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</table>
Stage 1:

- Construction of the CSB comprising of three parallel wings of various heights attached to and accessed from an elongated ‘Support bar’ building that runs in an east to west direction on the northern side of those wings.

- The wings of the CSB vary in height from three to seven levels in an east to west direction that are located above basement and lower ground levels. The Support Bar building increases in height from three to seven levels in an east to west direction.

- The proposed height of the tallest wing of the CSB as measured from Hospital Road is 30m, while the smaller three level wing has an overall height of approximately 17m. This is considerably lower than the height of the existing Multiblock which is approximately 43.5m high.

- The CSB will re-house and expand the Aged Care and Veteran’s Physical and Mental Health and Rehabilitation Services. Construction of a new atrium between the CSB and existing Multiblock.

- Construction of bridge links within the atrium between the CSB and Multiblock to allow patent transfers.

- Construction of a new atrium link below Hospital Road level to accommodate back of house goods and services transfers between the CSB and Multiblock.

- Construction of a new five storey car park, with a maximum overall height of approximately 19m as measured from the Hospital Road frontage (southern elevation) to the lift roof parapet. The predominant height of the car park is 15m as viewed from street level. Sloping down towards the northern boundary of the car park area, the car park structure is approximately 19.5m high as viewed from the rear (northern elevation).

- new lower ground drop-off zone serving the main reception area together with a landscaped traffic island.

- way finding signage, pedestrian linkages, landscaping (including terraces) and associated infrastructure works are proposed.

Stage 2 Concept proposal (future expansion):

- Concurrent concept approval for Stage 2 involving the ASB.

- The ASB concept involves an E-Shaped building with three parallel wings elongated in a north to south direction and attached to a ‘support bar’ building that runs east to west.

- The ASB will be the same height as the CSB (approximately 30m as viewed from Hospital Road) and comprise of seven above ground levels (ground, plus levels 1 to 6), a lower ground level and basement. The rooftop of level
six may eventually be provided with an emergency helipad. The ASB has been stepped down in part to reduce its impact on the existing Multiblock to the south west.

- an additional five storey car park forming an extension to the Stage 1 car park (north eastern side).

<table>
<thead>
<tr>
<th>Heritage</th>
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| • Concord Repatriation Hospital (original main building, grounds and layout)  
  – Heritage item I256 under the Canada Bay LEP 2013.  
  • State Heritage Item SHR00115; Thomas Walker Convalescent Hospital.  
  • State Heritage Item SHR00119; Dame Eadith Walker Convalescent Hospital. |

<table>
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<tr>
<th>Site area</th>
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<tr>
<td>• 24 ha</td>
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<tr>
<th>Gross floor area (GFA)</th>
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| • Total GFA of 82,000sqm comprising:  
  - 44,000sqm GFA for the CSB.  
  - 38,000sqm GFA for the ASB. |

<table>
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<tr>
<th>Uses</th>
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| The primary functions of the Hospital would include:  
- CSB: Veterans Physical and Mental Health Treatment and Rehabilitation Centre, integrated Aged Health and Rehabilitation Services and an integrated Cancer Care Centre.  
- ASB: facilities currently located within the Multiblock would progressively be relocated to the ASB. These services currently include; burns, respiratory, sleep study, orthopedics acute medical/surgical, palliative care, medical imaging and cardiology wards among others. The Multiblock will then be refurbished and used for outpatient and administrative services. |

<table>
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<tr>
<th>Access</th>
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| • **Stage 1**: pedestrian and vehicular access to the site will be maintained from Hospital Road. Internal road changes will allow more direct vehicular access from Hospital Road through to Boronia Street (south-west of the precinct). Dedicated drop-off areas, additional parking (22 spaces) and direct access to loading areas to the rear of the CSB will be provided.  
• **Stage 2**: civil works include a new dual carriageway from Hospital Road to Stage 1 (CSB) to facilitate an access/drop-off area. A ring road around the ASB is proposed, together with improved emergency access and circulation throughout the core area of the hospital precinct.  
• A potential pedestrian bridge linking the MSCP to the new hospital entrance of the ASB may be constructed during Stage 2. |

<table>
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<tr>
<th>Car parking</th>
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<tr>
<td>• Stage 1 MSCP: 590 spaces (approx.)</td>
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- Temporary on grade car park: 300 overflow spaces (to ensure no net loss of parking during Stage 1).
- Stage 2 MSCP: 520 spaces (approx.)
- There are currently 1957 on site car parking spaces.

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<tr>
<th>Bicycle parking</th>
<th>40 secure and covered spaces.</th>
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| Public domain and landscaping | • Additional landscaping throughout the site including: |
|                               |   o landscaped main drop-off / reception. |
|                               |   o new lower ground roof terraces with breakout spaces from the adjacent café. |
|                               |   o new lower ground floor garden as viewed from the patient waiting area. |
|                               |   o landscaping around the perimeter of the temporary car park and Stage 1 MSCP. |
|                               |   o new ground floor terraces with sensory garden and seating. |
|                               |   o landscaped atrium between the Multiblock and CSB. |
|                               |   o additional terraces on levels 1 and 3 attached to lounge spaces with integrated seating and dining furniture. |

<table>
<thead>
<tr>
<th>Hours of operation</th>
<th>24 hours per day, 7 days per week every day of the year.</th>
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<tr>
<th>Signage</th>
<th>• Way finding pylon signs ranging from 2500mm to 4000mm in height.</th>
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<tr>
<th>Jobs</th>
<th>• Construction: 727</th>
</tr>
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<td>• Operational: 414 additional after Stage 1 and a further 333 after Stage 2 (Overall increase from an existing 2284 to 3031).</td>
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<table>
<thead>
<tr>
<th>CIV</th>
<th>$968,272,531 (Stage 1: $357,603,191 plus Stage 2: $610,669,340)</th>
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<tr>
<th>Remediation</th>
<th>• A Remedial Action Plan (RAP) applies to the site and further post demolition investigations are proposed.</th>
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</table>
2.1 Timing of Redevelopment

The Stage 1 Detailed works including the CSB, MSCP and temporary on grade car park are expected to be completed by 2021 should the application be approved (see Figure 6). The temporary car park will cater for car spaces that are displaced because of the CSB (75-100 spaces) and the MSCP (200 spaces).

No approval under the subject application is sought for Stage 2 construction works (ASB and MSCP). The lodgement of a separate development application to the Department will be required for Stage 2 and is likely to be lodged once the Stage 1 works are completed. The EIS suggests that Stage 2 would accommodate for the growth of all hospital services through to 2026 (see Figure 7).
Figure 7 | Project Overview - Concept Proposal (Source: Jacobs EIS)
3. Strategic Context

The Concord Repatriation General Hospital forms part of the Sydney Local Health District (SLHD) and is classified as a Group A1- Principal referral hospital. Concord Repatriation General Hospital is integral in providing health services to central Sydney including the Canada Bay LGA with an expected population growth of 31 per cent by 2026.

In *A Metropolis of Three Cities*, produced by the Greater Sydney Commission, the Eastern District Plan identifies the Canada Bay LGA among others, to be located within Eastern Harbour City where population growth is expected to increase from 2.4 million in 2016 to 3.3 million by 2036. The objectives contained in the District Plan relating to infrastructure like hospitals, seek to support the three cities (Western Parkland City, Central River City and Eastern Harbour City), align infrastructure with forecast growth, adapt infrastructure to meet future needs and ensure infrastructure use is optimised. In the case of Concord Repatriation General Hospital, regional population growth can be directly aligned with the need for additional and expanded medical services. The proposal involves the use of an existing established hospital site that is close to good public transport (Rhodes Station and local bus services). The location and access to transport are attributes that would help ensure the optimisation of health infrastructure, making it readily available to a large growing catchment without significantly changing the character of the surrounding locality.

Other surrounding LGAs including Burwood and Strathfield are also expected to experience significant population growth as shown in the Parramatta Road Urban Transformation Strategy with the Homebush region, potentially providing more housing in Planned Precincts along Parramatta Road and nearby railway stations (see Figure 8).

![Figure 8 | Parramatta Road Development Corridor](image)

(Source: Urban Growth NSW - Parramatta Road Corridor Urban Transformation Design Guide)
The Applicant states that the redevelopment of the Concord Repatriation General Hospital will improve and replace outmoded facilities to meet existing and future growth in clinical service demand from the hospitals catchment over the next 10 years. Under Stage 1, the CSB will provide 111 new inpatient beds, improved rehabilitation, new ambulatory care services and result in the colocation of cancer care facilities from across the precinct to improve operational efficiencies. The future Stage 2 development would further increase inpatient beds by another 110, bringing the hospital total to 673.

The proposed redevelopment will create additional jobs and provide significant social benefits for the large catchment area. A greater range of health services would be provided, that are more efficiently run and in keeping with modern medical practices.

The Department considers that the proposal is appropriate for the site given:

- it is consistent with NSW State Priorities to deliver health infrastructure for both an aging and growing population, improve service levels in hospitals through the construction of new health facilities and the creation of jobs during both the construction and operation phases of the development.
- it is consistent with the Greater Sydney Commission’s A Metropolis of Three Cities, Eastern City District Plan, as it aligns new and improved health care infrastructure with an established and growing population.
- it is consistent with Transport for NSW’s Future Transport Strategy 2056 as it would provide improved modern health facilities in central Sydney that are accessible using established local road networks, and nearby Rhodes station.
- it would provide direct investment in the region of approximately $968,272,531 million across the two development stages, that would support approximately 727 construction jobs during Stage 1 and some 747 new operational jobs once both stages are completed.
4. **Statutory Context**

4.1 **State significant development**

The proposal is SSD under section 4.36 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) as the development has a CV in excess of $30 million ($357,603,191 for Stage 1) and is for the purpose of a hospital under clause 14 of Schedule 1 of State Environmental Planning Policy (State and Regional Development) 2011.

The Minister is the consent authority under section 4.5 of the EP&A Act.

In accordance with the then Minister for Planning’s delegation to determine SSD applications, signed on 11 October 2017, the Executive Director, Priority Projects may determine this application as:

- the relevant Council has not made an objection.
- there are less than 25 public submissions in the nature of objection.
- a political disclosure statement has not been made.

4.2 **Permissibility**

The site is zoned part SP2 – Infrastructure (Hospital) and part E2 – Environmental Conservation under the Canada Bay LEP 2013.

While the E2 zone does not permit hospitals, the proposal involves SSD and Clause 4.38(3) of the EP&A Act applies as follows:

“(3) Development consent may be granted despite the development being partly prohibited by an environmental planning instrument.”

In this instance Section 4.38(3) can be applied to grant development consent because only a relatively small portion of the MSCP (Stages 1 and 2) encroach upon the E2 zone (see **Figure 9**).

![Figure 9](image-url)  
**Figure 9** | Encroachment of MSCP into the E2 – Environmental Conservation

(Source: Jacobs report Land Zoning Overlay)
In addition, the project satisfies the objectives of the E2 which state:

- "To protect, manage and restore areas of high ecological, scientific, cultural or aesthetic values".
- "To prevent development that could destroy, damage or otherwise have an adverse effect on those values".

The objectives are satisfied as the multi-storey car park would be located on land that is already used for car parking purposes and would not require the removal of trees, destroy or degrade the conservation area, nor diminish the aesthetic value of the nearby wetlands (see Figure 10).

Therefore, the Executive Director, Key Sites and Industry Assessment may determine the carrying out of the development.

Figure 10 | Existing Sealed Car Parking Within the E2 zone.

4.3 Other approvals

Under Section 4.41 of the EP&A Act, other approvals are integrated into the State significant development assessment process, and consequently are not required to be separately obtained for the proposal.

Under Section 4.42 of the EP&A Act, several further approvals are required, but must be substantially consistent with any development consent for the proposal (e.g. approvals for any works under the Roads Act 1993).

The Department has consulted with the relevant public authorities responsible for integrated and other approvals, considered their advice in its assessment of the project, and included suitable conditions in the recommended conditions of consent (see Appendix C).

4.4 Mandatory matters for consideration

4.4.1 Environmental planning instruments

Under section 4.15 of the EP&A Act, the consent authority is required to take into consideration any environmental planning instrument (EPI) that is of relevance to the development the subject of the development application. Therefore, the assessment report must include a copy of, or reference to, the provisions of any EPIs that substantially govern the project and that have been considered in the assessment of the project.
The Department has undertaken a detailed assessment of these EPIs in Appendix B and is satisfied the application is consistent with the requirements of the EPIs.

### 4.4.2 Objects of the EP&A Act

The objects of the EP&A Act are the underpinning principles upon which the assessment is conducted. The statutory powers in the EP&A Act (such as the power to grant consent/approval) are to be understood as powers to advance the objects of the legislation, and limits on those powers are set by reference to those objects. Therefore, in making an assessment, the objects should be considered to the extent they are relevant. A response to the objects of the EP&A Act is provided at Table 2.

<table>
<thead>
<tr>
<th>Objects of the EP&amp;A Act</th>
<th>Consideration</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources</td>
<td>The redevelopment of the Concord Repatriation General Hospital would provide necessary and modern health facilities that provide social and economic benefits to the surrounding community. Improved health, more jobs and minimal environmental disturbance would be among the benefits realised.</td>
</tr>
<tr>
<td>(b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment</td>
<td>The proposal includes measures to deliver ecologically sustainable development.</td>
</tr>
<tr>
<td>(c) to promote the orderly and economic use and development of land,</td>
<td>The redevelopment of the existing Concord Repatriation General Hospital site would meet the objectives of the zone to provide new hospital related infrastructure. The redevelopment of the existing hospital precinct and its intensified use would bring economic benefits such as more jobs and infrastructure investment.</td>
</tr>
<tr>
<td>(d) to promote the delivery and maintenance of affordable housing,</td>
<td>N/A</td>
</tr>
<tr>
<td>(e) to protect the environment, including the conservation of threatened and other</td>
<td>The proposal would not result in the loss of any threatened or vulnerable species, populations, communities or significant habitats.</td>
</tr>
</tbody>
</table>
species of native animals and plants, ecological communities and their habitats,

(f) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),

The Multiblock building and grounds of the site are heritage listed under the Canada Bay LEP. This proposal would require the removal of buildings around the Multiblock and the proponents detailed response justifying their removal is considered reasonable. No significant cultural heritage impacts, including Aboriginal cultural heritage are anticipated, particularly as the use of the site for health services would continue.

(g) to promote good design and amenity of the built environment,

The proposal has been reviewed by the Government Architect NSW throughout the assessment of the proposed development.

The Department considers the Stage 1 application would provide a good design outcome that has regard to existing on-site buildings. Subject to the refinement of the building envelope, the concept design of Stage 2 would also be more acceptable (refer to Section 6.2).

(h) to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,

The Department has considered the proposal and has recommended conditions of consent to ensure the construction and maintenance would be in accordance with legislation, guidelines, policies and procedures (see Appendix C).

(i) to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State,

The Department publicly exhibited the proposal, which included consultation with Council and other public authorities and consideration of their responses (see Section 5).

(j) to provide increased opportunity for community participation in environmental planning and assessment.

The Department publicly exhibited the proposal as outlined in Section 5.1, which included notifying adjoining landowners, placing a notice in newspapers and displaying the proposal on the Department’s website and at Council during the exhibition period.
4.4.3 Ecologically sustainable development

The EP&A Act adopts the definition of ESD found in the Protection of the Environment Administration Act 1991. Section 6(2) of that Act states that ESD requires the effective integration of economic and environmental considerations in decision-making processes and that ESD can be achieved through the implementation of:

- the precautionary principle.
- inter-generational equity.
- conservation of biological diversity and ecological integrity.
- improved valuation, pricing and incentive mechanisms.

ESD initiatives and sustainability measures would be applied to the proposal to achieve the equivalent of a 4 Star Green Star rating under the Green Building Council of Australia standard. These initiatives and measures include:

- metering and on-going monitoring of systems for improved operational energy and water efficiency.
- environmental management practices during construction.
- energy efficiency initiatives including LED lighting, automated controls, among other measures.

The Department has considered the proposed development in relation to the ESD principles. The precautionary and inter-generational equity principles have been applied and while the proposal is generally consistent with ESD principles as described in section AH (as revised) of the proponents EIS, conditions have been recommended that require the implementation of ESD initiatives that achieve a minimum 4 Star Green Star rating prior to the commencement of construction of the new CSB. The ESD statement accompanying the EIS has generally been prepared in accordance with the requirements of Schedule 2 of the Environmental Planning and Assessment Regulation 2000 (EP&A Regulation).

Overall, the Stage 1 proposal is consistent with ESD principles and the Department is satisfied the proposed sustainability initiatives would encourage ESD, in accordance with the objects of the EP&A Act subject to conditions.

The Department recommends the Stage 1 and Concept Proposal for Stage 2 demonstrate how the principles of ESD have been incorporated into the future development; provide a framework to address national best practice sustainable building principles to improve environmental performance and reduce ecological impact; and demonstrate how the future development addresses projected climate change impacts.

4.4.4 Environmental Planning and Assessment Regulation 2000

Subject to any other references to compliance with the EP&A Regulation cited in this report, the requirements for Notification (Part 6, Division 6) and Fees (Part 15, Division 1AA) have been complied with.

4.4.5 Planning Secretary’s Environmental Assessment Requirements

The EIS is compliant with the Planning Secretary’s Environmental Assessment Requirements (SEARs) and is sufficient to enable an adequate consideration and assessment of the proposal for determination purposes.
4.4.6 Section 4.15(1) matters for consideration

Table 3 identifies the matters for consideration under section 4.15 of the EP&A Act that apply to SSD in accordance with section 4.40 of the EP&A Act. The table represents a summary for which additional information and consideration is provided for in Section 6 (Assessment) and relevant appendices or other sections of this report and EIS, referenced in the table.

Table 3 | Section 4.15(1) matters for consideration

<table>
<thead>
<tr>
<th>Section 4.15(1) Evaluation</th>
<th>Consideration</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a)(i) any environmental planning instrument</td>
<td>Satisfactorily complies. The Department’s consideration of the relevant EPIs is provided in Appendix B of this report.</td>
</tr>
<tr>
<td>(a)(ii) any proposed instrument</td>
<td>The Department’s consideration of the draft EPIs is provided in Appendix B of this report.</td>
</tr>
<tr>
<td>(a)(iii) any development control plan (DCP)</td>
<td>Under clause 11 of the SRD SEPP, DCPs do not apply to SSD.</td>
</tr>
<tr>
<td>(a)(iia) any planning agreement</td>
<td>Not applicable.</td>
</tr>
<tr>
<td>(a)(iv) the regulations</td>
<td>The application satisfactorily meets the relevant requirements of the EP&amp;A Regulation, including the procedures relating to applications (Part 6 of the EP&amp;A Regulation), public participation procedures for SSD and Schedule 2 of the EP&amp;A Regulation relating to EIS.</td>
</tr>
</tbody>
</table>

Refer Division 8 of the EP&A Regulation

| (a)(v) any coastal zone management plan | Repealed (N/A). |
| (b) the likely impacts of that development including environmental impacts on both the natural and built environments, and social and economic impacts in the locality | Appropriately mitigated or conditioned - refer to Section 6 of this report. |
| (c) the suitability of the site for the development | The site is suitable for the development as discussed in Sections 3, 4 and 6 of this report. |
| (d) any submissions | Consideration has been given to the submissions received during the exhibition period. See Sections 5 and 6 of this report. |
| (e) the public interest | Refer to Sections 6 and 7 of this report. |
4.4.7 Biodiversity Conservation Act 2016

Under section 7.9(2) of the Biodiversity Conservation Act 2016 (BC Act), SSD applications are “to be accompanied by a biodiversity development assessment report (BDAR) 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”.

The proposed works are not likely to have a significant impact on biodiversity values. The Office of Environment and Heritage and the Department have determined that the application for the Concord Repatriation General Hospital Redevelopment (Concept and Stage 1) is not required to be accompanied by a BDAR.
5. Engagement

5.1 Department’s engagement

In accordance with Schedule 1 of the EP&A Act, the Department publicly exhibited the application from 12 September 2018 until 9 October 2018 (28 days).

The application was exhibited at the Department and on its website, at the NSW Service Centre and at Canada Bay Council’s office.

The Department placed a public exhibition notice in the Inner West Courier on 11 September 2018 and notified adjoining landholders and relevant State and local government authorities in writing. The Department representatives visited the site to provide an informed assessment of the development.

The Department has considered the comments raised in the public authority and public submissions during the assessment of the application (Section 6) and/or by way of recommended conditions in the instrument of consent at Appendix C.

5.2 Summary of submissions

The Department received a total of nine submissions, comprising seven submissions from public authorities and two submissions from the general public. A summary of the issues raised in the submissions is provided at Tables 4 and 5 below and copies of the submissions may be viewed at Appendix A.

5.3 Public authority submissions

A summary of the issues raised in the public authority submissions is provided at Table 4 below and copies of the submissions may be viewed at Appendix A.

Table 4 | Summary of public authority submissions to the EIS exhibition

<table>
<thead>
<tr>
<th align="left">Canada Bay Council (Council)</th>
</tr>
</thead>
<tbody>
<tr>
<td align="left">Council does not object to the proposal, however, it provided advice on the following:</td>
</tr>
<tr>
<td align="left">• traffic and parking analysis indicating staff car parking rates were not clearly substantiated, given variable shift times. Matters concerning the limitation placed on staff parking permits considering the 550 staff currently on those waiting lists and the implications of staff using more on-street parking to the detriment of local residents. Similarly, comments were made on the limited number of accessible on-site car parking spaces and the resulting competing use of on-street accessible parking.</td>
</tr>
<tr>
<td align="left">• details of civil works relating to road, footpath and roundabout designs were unclear in the EIS.</td>
</tr>
</tbody>
</table>
the ability of local road intersections such as at Concord Road and Homebush Bay Drive, to cater for increased traffic was originally questioned. Traffic management measures have been suggested by the Applicant rather than changes to local road infrastructure.

there is a view that the use of private vehicles visiting the Concord Repatriation General Hospital should be discouraged and the Green Travel plan consider increasing the cost of on-site staff parking to encourage the use of alternate modes of transport. Council does however, support the conclusions and recommendations made in the Green Travel Plan.

advice on local road repairs, design details concerning mini-roundabouts and footpaths was also received. Design details were unclear in the EIS.

the potential for affordable housing schemes for staff given the majority do not live in the Canada Bay LGA.

stormwater management advice was received in relation to the flood study analysis being based on existing structures and Stage 1 only and not Stage 2. The discharge of stormwater into existing surrounding infrastructure and the need for treatment prior to discharge also raised. Further advice was provided on the need for detailed design documentation dealing with on-site detention and MUSIC modeling in keeping with Council’s DCP.

Council also requested that details of stormwater outlet works be submitted for Council for further consideration prior to works commencing should the application be approved.

the need for the archival recording of historic buildings was emphasised and the submission of a copy of any original plans requested.

Council raised concern that the new CS8 would adversely affect the setting of the heritage listed Multiblock building.

Council also provided recommended conditions, should the application be supported.

Environment Protection Authority (EPA)

The EPA does not object to the proposal but did raise several matters when the EIS was exhibited. Their advice related to:

- the contamination of the site.
- levels of construction noise and vibration given nearby sensitive receivers.
- dust emissions, sediment and erosion control management.
- the management of 'regulated material' (as defined under the Radiation Control Act and Regulation).
- details of the underground petroleum storage system.
- details of preventing the pollution of waters (Parramatta River).
- limited details on ESD and water sensitive urban design.
Conditions of consent were also recommended in the event of an approval.

Office of Environment and Heritage (OEH)

OEH did not object to the proposal however, it provided advice on the following matters:

The Flora and Fauna Assessment (FFA) submitted with the EIS was considered unsatisfactory as it did not discuss matters previously identified in the Secretaries Environmental Assessment Requirements (SEARs) in relation to Aboriginal Cultural Heritage. The EIS had some contradictory information, was unclear and non-descriptive when addressing biodiversity related issues. These matters related to:

- insufficient detail concerning the aquatic ecology of the adjoining Council reserve.
- lack of information concerning changes in hydrology potentially caused by run-off from the new car park.
- potential contaminants entering the waterway and water quality matters during construction.
- lack of details regarding the need to replace hollow-bearing trees used for microbat roosting.
- lack of detail on microbat echolocation recording device (Anabat device) and its location and inaccuracies involving the impacts on hollow-bearing trees and records concerning the presence of White-bellied Sea Eagles, the Powerful Owl and their habitat.
- insufficient information regarding Aboriginal Cultural Heritage and the need for an Aboriginal Cultural Heritage Assessment (ACHA) report to be undertaken.
- insufficient details regarding Endangered Ecological Communities (EECs) including Coastal Saltmarsh among other fauna given the proximity of the Parramatta River.
- ESD and drainage information not being detailed in the EIS. This included stormwater and site drainage and measures to minimize the consumption of water.
- encroachment of the MSCP on land zoned E2 Environmental Conservation and whether the car park is permissible in the E2 zone.
- lack of details in the Soil and Water report regarding stormwater disposal, managing stormwater pollution (potential engine oil from car parks) and the need for a Water Quality management plan.
- insufficient detail on matters broadly relating to water sensitive urban design, green cover, green grid connections and other suggested ideas to improve the sustainability of this project.

Heritage Division of the Office of Environment and Heritage (Heritage)

- OEH (Heritage) raised no objection to the proposal but did advise that the proximity of the proposed CSB and future Stage 2 works would likely compromise solar access and ventilation to the existing Multiblock (Stephen and Turner building). OEH (Heritage) recommended that the building envelope and detailed design of the proposed development allow for the current levels of lighting and ventilation.
• retention of the setting and relationship with surrounding open space is also recommended.

Roads and Maritime Services (RMS)

• RMS did not object to the proposal but recognize the development, following the completion of Stage 2, would likely increase queue lengths to Concord Road and that a detailed travel demand management strategy should be devised to address this issue. Other recommendations included the need for an Independent Road Safety Audit (RSA) to deal with final design and upgrades to Hospital Road, infrastructure including roundabouts, swept paths in car parking areas and car parking spaces be designed to the relevant Australian Standard.

• Further consultation with TfNSW and Council is recommended to ensure travel demand strategies are put in place to deal with increased demand for transport, bus stop locations reviewed, bicycle parking and end of trip facilities provided. The implementation of a construction pedestrian traffic management plan was also recommended to address construction vehicle routes, truck numbers and delivery times.

Transport for NSW (TfNSW)

• TfNSW did not object to the proposal but did provide technical advice on road design matters including the design of the new roundabouts (intersection of Hospital Road and within the MSCP) and laneway design leading to and from the roundabouts.

• the promotion and use of the Kokoda Track Memorial Walkway for walking and cycling by staff was recommended and further consultation with Council encouraged to improve on the access between Concord Repatriation General Hospital and Rhodes Station.

• increased use of bicycles and end of trip facilities were recommended in addition to further consultation with TfNSW to improve access to buses along Hospital Road also recommended.

• advice regarding the need to update the Green Travel Plan (GTP) annually was provided.

• conditions to address these and other issues were recommended should the approval of the application be granted.

Civil Aviation Safety Authority (CASA)

• CASA have advised that the proposed redevelopment of the Concord Repatriation General Hospital would not interfere with the Obstacle Limitation Surfaces for an Aerodrome and have no advice to provide on the proposal.

Airservices Australia

• Airservices Australia did not object to the proposal and advised that with a maximum height of 43.5m AHD, the proposal would not affect any sector or circling altitude, nor impact instrument approach and
departure procedure at Bankstown, Camden, Richmond or Sydney Airport and Westmeade Hospital Helicopter Landing Site.

- the performance of precision and Non-precision navigational aids would also be unaffected by the proposal.

5.4 Public submissions

The Department received two public submissions during the exhibition of the application. The submissions did not object to the proposal and one strongly supports the proposal. The key issues raised in the public submissions are:

- the need to thoroughly record the heritage significance of the hospital site prior to works commencing.
- the need for an on-site museum depicting the history of the hospital site, including but not limited to architectural innovation.

Copies of the submissions may be viewed at Appendix A.

5.5 Response to Submissions and Supplementary Information

Following the exhibition of the application the Department placed copies of all submissions received on its website and requested the Applicant provide a response to the issues raised in the submissions.

On 13 December 2019, the Applicant provided a Response to Submissions (RtS) (Appendix A) on the issues raised during the exhibition of the proposal. Additional information was provided regarding:

- the architectural design of the proposal, visual impact statement and minor changes to select architectural plans.
- biodiversity including, further ecological advice and revised flora and fauna study.
- soil and water matters including contamination, sediment and erosion control.
- ecologically sustainable development.
- the heritage of the hospital precinct.
- civil construction works covering road design, swept path analysis and clearer roundabout details.
- Acoustics during the construction phase and subsequent operational phase of the development.
- traffic study and parking.

The RtS was made publicly available on the Department website and was referred to the relevant public authorities. An additional six submissions were received from public authorities, including Council, OEH, OEH Heritage, EPA, RMS and TfNSW. A summary of the issues raised in the submissions is provided at Table 5 and copies of the submissions may be viewed at Appendix A.
Table 5 | Summary of public authority submissions to the RTS

Council

Council confirmed the RTS has addressed some aspects of its original submission including traffic and parking having confirmed they have no further advice on traffic matters. Similarly, no further advice was received in relation to the supplementary flooding and stormwater information, but Council reiterated that its previous comments on flooding and stormwater matters still apply.

Council provided the following additional comments:

- no objections raised to the removal of trees as identified in the Ecological Australia Flora and Fauna Assessment.
- archival records to be provided to Council.
- various stormwater and drainage design details being addressed in consultation with Council.

Council provided updated recommended conditions should the application be approved.

Environment Protection Authority

The EPA’s comments have largely been addressed with only the following three principal matters reiterated:

- site contamination relating to soil and groundwater has been addressed, however the Remedial Action Plan (RAP) is insufficient in detail and would require conditions to be imposed to address an unexpected finds procedure if the application is approved. Post-demolition investigations are recommended given the limited access to soil beneath the buildings proposed to be demolished and conditions have been recommended. It is recommended that an accredited site auditor be engaged to determine that the site is suitable for its intended hospital use.

- anticipated construction noise levels are likely to disrupt and cause annoyance to nearby residents and ‘intra-day-respite periods’ are achievable and reasonable noise management measures that would assist in reducing the disturbance. The EPA reaffirms the need to impose conditions to ensure adverse noise impacts on the residents are minimised.

- potential disturbance caused by the operational noise of plant and equipment would also need to be addressed using conditions as recommended should the application be approved.

Office of Environment and Heritage

OEH’s comments have been resolved and /or conditions recommended.

- further detailed stormwater management details have been submitted and were forwarded to OEH. Stormwater mitigation measures include stormwater treatment devices to remove gross pollutants, sediment and nutrients before being released into a dispersion trench in the offsite vegetation and surrounding waterways. This would minimise any heavy metals and hydrocarbons from entering the

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waterway. The dispersion trench is also said to reduce the risk of erosion in the bushland by distributing stormwater through the area.

- the location and design of the stormwater trench would be determined as part of subsequent detailed design processes and suitably located so that it will not result in direct impacts to EECs to the north of the study area including Swamp Sclerophyll Forest and Coastal Saltmarsh.

Heritage Division of the Office of Environment and Heritage (Heritage)

- OEH Heritage advice regarding the retention of solar access and ventilation to the existing Stephenson and Turner buildings (main buildings) has been satisfied. The Applicant has provided further details in support of the proposal while the Historical Heritage Assessment, Statement of Heritage Impact and Architectural Design Report would be updated to address solar and ventilation matters as a condition of approval. This condition would allow for design changes to be made to future Stage 2, given that the current design concept (building envelope) would lead to the shadowing of the heritage building.

Roads and Maritime Services

- RMS have advised that the RtS are generally satisfactory subject to several recommended conditions being imposed should the application be approved.

Transport for NSW

- TfNSW reviewed the RtS documents and reaffirmed the need to impose conditions should the application be approved. The recommended conditions include the Applicant consulting with TfNSW and local bus operators to investigate measures to ensure bus services are not adversely affected by the proposed works. Conditions as recommended by TfNSW have been imposed.

In response to submissions to the RtS and the Department’s request for additional information, the Applicant provided an RtS Addendum, that further clarified the following:

- design justification details.
- the impact of the proposal in terms of solar access and ventilation on the Stephenson and Turner buildings.
- floodplain risk management and additional technical details concerning the flood study.
- a final copy of the ACHAR.
- the availability of solar access to the Multiblock using revised shadow diagrams.
- supplementary heritage advice.
6. Assessment

The Department has considered the EIS, the issues raised in submissions and the Applicant's RfS in its assessment of the proposal. The Department considers the key issues associated with the proposal are:

- heritage impacts
- built form and design
- construction and operational noise and vibration
- traffic and parking
- contamination

Each of these issues are discussed in the following sections of this report. Other issues were taken into consideration during the assessment of the application and are discussed at Section 6.6.

6.1 Heritage Impacts

The Concord Repatriation General Hospital complex has local significance and is identified as a heritage item (No. 1256) under the Canada Bay LEP 2013. The existing Multiblock and surrounding main buildings were recognised for their design excellence in 1946 and were subsequently awarded the Sulman Prize for architecture. Designed by prominent Australian Architects Stephenson and Turner, who were renown for pioneering modernism in their design of hospitals, the Multiblock and surrounding buildings are identified in the EIS as a notable example of early modern architecture designed in the Inter-War Functionalist style (refer to Figure 11).

![Figure 11 | Original Stephenson Turner Buildings c.1946 (North east view to Parramatta River)
(Source: Concord Repatriation General Hospital Conservation Management Plan – Conybeare Morrison International)](image-url)
The peninsula site on which the Concord Repatriation General Hospital is located has a long history and once formed part of the estate of Thomas Walker a prominent businessman and philanthropist in Sydney in the mid to late 19th century. According to the Historical Heritage Assessment and Statement of Heritage submitted with the EIS, Thomas Walker later bequeathed the estate for the establishment of the Thomas Walker Hospital (now the Rivendell School), and identified as State Heritage Item SHR00115; Thomas Walker Convalescent Hospital. This heritage item is located towards the north-eastern end of the peninsula away from the main hospital site. The redevelopment works proposed do not impact upon this state heritage item.

In the early 20th century, Thomas Walker’s daughter, Dame Eadith Walker, donated the proceeds of the family estate to public health and “Yaralla Estate” as it become known was purchased from Dame Eadith Walker’s estate by the NSW government. The estate was ultimately sold to the Commonwealth government for the purpose of establishing a Military Hospital that accommodated 2000 beds when completed in 1942. The Dame Eadith Walker Convalescent Hospital for Men was established in the homestead of the estate and known as “Yaralla House”. The convalescent hospital is also a State Heritage Item (SHR00119) and like the Thomas Walker Convalescent Hospital is located near the Concord Repatriation General Hospital complex, but will not be impacted by the current proposal.

While the proposed Stage 1 redevelopment involves the demolition of eight buildings, the main existing Multiblock buildings would be retained. The retention of these buildings conforms with the objectives contained in the Conservation Management Plan (CMP) and Heritage Impact Assessment submitted with the application. The CMP recommends 46 specific conservation principles that can be applied to the use and management of the culturally significant items of the hospital site. Each principle contains specific guidelines and includes, but is not limited to the following:

- general principles (relating to retaining/ repairing external fabric), applying the CMP to all development applications, adaptive reuse, conservation processes for specific spaces and fabrics, development on site criteria such as ensuring the Multiblock retains its assertiveness as a focal point of the hospital.
- specific development criteria for numerous buildings like the Multiblock and Administration building, new building design principles (scale and massing), conservation planning, interpretation and signage, archival photographic recording, dealing with special elements, building codes and standards, unexpected archeological finds and landscape guidelines.

While the heritage and architectural significance of the main hospital buildings has been recognised in the EIS as an exceptional example of early modern Sydney architecture designed in the Inter-War Functionalist style, the central portion of the hospital complex has been extensively modified. Construction and internal refurbishment has been recorded at various times throughout the 1940s, 1950s, 1960s, 1970s, 1980s, 1990s, and 2000s (see Figure 12). Recognising that major changes have occurred to the hospital complex overtime, is important in understanding not only the historical significance of the site, but for gauging whether the proposed redevelopment would compromise the remaining fabric of the heritage buildings and surrounding grounds.
6.1.1 Heritage Impacts Stage 1

The Stage 1 CSB would be constructed close to the Multiblock (Building 5) and associated Administration buildings (Buildings 75 and 76). Stage 1 would involve the CSB being essentially attached to the rear (southern end) of the Multiblock. The future ASB under Stage 2 constructed adjacent to the north east with a variable minimum setback of approximately 22m to 37m.

![Diagram](image)

**Figure 12 |** Existing Building Age and Heritage Significance.
(Source: Jacobs report)

The redevelopment of the Concord Repatriation General Hospital would reduce the availability of solar access to the Multiblock and Administration buildings. The retention of solar access (and ventilation) to these buildings was identified as being of significance to OEH Heritage as these buildings were designed and currently take advantage of the relatively expansive open nature of the site and the unimposing single storey wards buildings located adjacent or nearby.

Buildings 75 and 76 would be overshadowed by the proposed CSB which forms part of Stage 1, and the concept proposal for future Stage 2 which involves the ASB would overshadow the Multiblock (see Figure 13). The information contained within the EIS and RtS confirmed the extent of overshadowing is variable depending on the time of year and is not of such significance to warrant design changes. This is particularly the case when the use of the rooms overshadowed is considered. The overshadowing caused by the CSB would be at its greatest during the early morning hours of mid-winter.
Figure 13 | Indicative Massing Model Stage 1 (Proximity of Proposed CSB to Multiblock)
(Source: Jacobs Architectural Design Report)

The Applicant advised the use of the Administrative building does not cater for patients and as such the need for solar access is less than what it would be for inpatient wards. Rooms with restricted solar access would be used for predominantly clinical and administrative purposes. Similarly, while some rooms at the lower levels of the Multiblock that face into the proposed 13m wide atrium area will not receive direct solar access, the glazing and skylight design of the atrium would still allow daylight to reach the lower levels and provide sufficient natural light needed for the functions carried out in those affected rooms like storage/back-of-house, laundry and linen stores.

The inpatient rooms within the Multiblock would retain solar access and an improved visual outlook into what would become a landscaped space. The EIS indicates the upper inpatient floors of the Multiblock were historically designed during the pre-antibiotics era (1945 to 1970s) where cross-ventilation, open balconies and solariums were provided for more direct physical health benefits. The proposed CSB would improve patient facilities by providing accessible outdoor terraces and rooms with greater privacy that include private ensuites. The introduction of air-conditioning for cooling and heating has reduced the need for natural ventilation and balconies made inaccessible to comply with current safety standards.

The Stage 1 redevelopment of the Concord Repatriation General Hospital gives considerable regard to the CMP prepared by Conybeare Morrison. Design measures have been taken to ensure the on-going use and viability of the site for hospital purposes albeit, that the main hospital building would undergo considerable change. While the Multiblock would be attached to the rear by the new CSB, the contemporary design of the CSB attempts to minimise its physical impact on the heritage structures while retaining the heritage Multiblock as the focal point of the hospital complex. The Department is satisfied that the design is in keeping with the principles of the CMP and would allow the view from Hospital Road towards the Multiblock to be retained.
6.1.2 Heritage Impacts Stage 2

While Stage 2 is currently seeking concept approval for the ASB, regard must be given to the proposed building envelope and its potential impact on the Multiblock building located to the immediate south west. The ASB would have an overall height of approximately 30m from the Hospital Road elevation compared to the Multiblock at 43.5m. The likely impact of overshadowing, the potential loss of view/sight lines to the Multiblock and visual impact are all matters considered acceptable to the Department subject to conditions. These conditions include, the front setback of the ASB not protruding beyond that of the multiblock to ensure the significance of the Multiblock is not reduced. While the future ASB is partly tiered to improve solar access, conditions requiring changes to the building envelope would reduce the shadow cast over the heritage Multiblock. (see Figure 14).

![Indicative Massing Model Stages 1 (green) and 2 (purple) (Proximity of Proposed CSB & ASB to Multiblock)](image)
(Source: Jacobs Architectural Design Report)

Under these circumstances, a condition requiring that the ASB envelope be redesigned in keeping with the following aims has been recommended:

- reduce the impact of overshadowing.
- increase sight lines and outlook to the north east of the Multiblock.
- ensure the ASB remains subsidiary in size and scale to the Multiblock.

Details demonstrating these improvements would need to be submitted with the future Stage 2 application.
6.2 **Built Form and Design**

6.2.1 **Views to and from the Hospital Site**

Both the Canada Bay LEP and objectives contained in the CMP recognise the importance of maintaining views to and from the Concord Repatriation General Hospital. It is partly for this reason that the Multiblock will retain a dominant height over all other new buildings and still be clearly seen from different vantage points. The impact of the proposed Concept Development and Stage 1 works upon views to and from the Concord Repatriation General Hospital have been assessed in the proponent’s Visual Impact Assessment (VIA). See Figure 15 below.

![Diagram](image)

**Figure 15** | Selected View Points to the Concord Repatriation General Hospital Site  
(Source: Jacobs Visual Impact Assessment report)

The VIA assesses the impact of the Concept and Stage 1 proposal at a distance up to approximately 750m to demonstrate short, medium and long-range impacts. Of particular importance, are the views maintained from major approach routes and from public domain areas including nearby parks. Some locations were chosen because of their public prominence and to assess whether the site can be seen from the viewpoint. The VIA noted the most significant view impacts of the proposal are from surrounding headlands, including Brays Bay Reserve to the north and the Dame Eadith Walker Estate to the south (see Figures 16 & 17 respectively). The visual impact of the proposal on views from these locations is assessed as moderate, for the following reasons:

- the existing hospital provide some visual shielding of the proposed CSB and ASB as viewed from residential areas in the north west through to the south.
- existing high density apartments in Rhodes are visually prominent in the skyline (view north).
- the proposed buildings are centrally located within the hospital complex and set at a distance from residential properties and heritage items (Rivendell School to the east and Dame Eadith Walker Estate to the south).

Figure 16 | View from Brays Bay Reserve (Viewpoint 1).
(Source: Jacobs VIA)

Figure 17 | View from Dame Eadith Walker Estate (Viewpoint 9)
(Source: Jacobs VIA)

Apart from the MSCPs, the main redevelopment project focuses on the southern, central portion of the current Hospital complex. In this location, views are maintained to the south towards the helipad and further along to Yaralla Bay. The VIA stated the heavily developed centre of the hospital complex eliminates some views from within the site which are obstructed by existing buildings, particularly views from ground level while views toward the Dame Eadith Walker Estate are obstructed by established vegetation surrounding Yaralla Bay. Furthermore, the VA stated that the topography of the site slopes down from Hospital Road towards the
foreshore areas also impedes views at ground level, but does assist in the Multiblock retaining its sense of presence when viewed from a distance as shown from viewpoint 9 above.

Given the visual analysis undertaken, the Department is satisfied that reasonable efforts have been made to retain the visual significance of the Multiblock and its surrounding buildings. The CSB and ASB are both lower in over height as compared to the Multiblock and previously discussed. Direct views from the Multiblock itself towards the Parramatta River may be reduced, but some outlook would be retained to the south east. More importantly however, views from surrounding vantage points towards the Multiblock would not be significantly adversely affected by the Stage 1 and concept Stage 2 proposals largely owing to already existing dense vegetation around the hospital precinct and its foreshore areas. The screening provided by these trees helps diminish the visual impact of the proposed buildings from public domain. At distances of between 250m to 500m, the proposed buildings form a subtle backdrop.

Similarly, the MSCPs are of a height that is comparable to the existing trees located within the immediate area. The MSCPs would only be seen upon the approach to the Concord Repatriation General Hospital complex and not from prominent public locations like parks and reserves. Designed in this manner, the MSCPs are also unlikely to have a significant visual impact.

### 6.2.2 Design

The Concord Repatriation General Hospital redevelopment was informed by a master planning process that determined the design, size, scale and built form of the project. The Applicant advises the proposed design concept is based on the following key principles:

- patient-focused Models of Care including:
  - operational efficiencies like keeping patient journeys as short as possible.
  - creating a better hospital experience for patients and their families.
  - education and research for improved training.
  - attracting and retaining workers.
  - flexible and adaptable facilities and services.
  - recognizing heritage constraints and opportunities.
  - ESD principles.
  - creating links throughout the hospital complex.
  - encouraging collaboration and integration for shared patient and public spaces.
- creates connections, facilitates interaction, and keeps wayfinding intuitive.
- targets both environmental and social sustainability.
- maintains flexibility for an unpredictable future.

By adopting these objectives, the Applicant has provided a detailed design for the Stage 1 CSB, MSCP and temporary car park, while Stage 2 (ASB and additional MSCP) is conceptual and will require the lodgement of a further detailed development application to the Department.

The Department has formed the view that the Applicant has made considerable effort in designing new hospital facilities that take account of the prominent heritage buildings located on site and nearby and the constraints
associated with the retention of these existing buildings versus the need to provide hospital facilities that are critical in meeting the needs of the central Sydney. The positive attributes of the redevelopment are acknowledged and, advice provided by the Government Architect NSW (GANSW) was supportive of the proposal. Some of the detailed design aspects of the project however, were not considered optimal. The advice provided related to the following:

- **Exterior elements**: the façade articulation being underdeveloped, the MSCP adversely impacting on the streetscape of Hospital Road and the good amenity of the northern portion of the complex with its nearby water front reserve only being used for parking purposes. The carparks were identified as not activating Hospital Road and the potential use of public art to improve the appearance of the blank screened facades of the MSCP was suggested. The walking distance for pedestrians travelling between the MSCP and hospital buildings was considered significant and the use of landscaping for pedestrians to navigate routes limited. Advice on other more subjective design matters including external material finishes (cladding), was also provided.

- **Internal elements**: increasing glazing to the atrium area for better lighting was suggested, while the use of artificial lighting to highlight large enclosed spaces also recommended. The hospital entry area was not considered to be well highlighted and the balcony area seen as undersized and lacking an ability to gain sufficient winter sunlight. Use of solar hot water heating and rainwater systems encouraged, in addition to public art and the suitable acoustic treatment of plant and machinery also identified.

In response to the above, the Applicant provided further information to explain the design rationale and/or, accepted some of the advice provided. Much of the design advice received from government agencies related to the MSCP's proposed on the northern side of Hospital Road. Having considered this advice, the Department holds the view that while the Stage 1 MSCP is a large 15m high structure as viewed from Hospital Road, 19.5m high at the rear (northern elevation) and proposes a variable front setback ranging from approximately 4.5m to 6m wide, the proposed location of the MSCP does have advantages.

Fronting Hospital Road, the MSCP would be partly concealed by large established street trees that characterise the streetscape. Also surrounded by established trees to the south west of the site, is the Kokoda Track Memorial Walkway. When approaching the location of the proposed MSCP from Concord Road, sightlines are currently drawn towards these trees which would in turn help defuse the visual impact of the proposed MSCP located in the background (Refer to Figure 18). The front setback of the MSCP is sufficiently wide enough to accommodate additional street trees and the elongated side of the MSCP, south western elevation, would also include additional screen planting.
Figure 18 | Trees Fronting Hospital Road (view from Concord Road towards Concord Repatriation General Hospital)
(Source: Department)

Figure 19 | Trees along Hospital Road as seen from approximate location of proposed MSCP
(Source: Department)
The material finishes of the MSCP include timber-look aluminium vertical battens on all levels. These battens would further conceal the structure from view (see Figure 21). As the MSCP is relatively imposing, the Department recommends that additional trees capable of achieving a minimum height of 10m at maturity be planted along the south western elongated elevation of the MSCP to help visually blend the building with existing surrounding vegetation, particularly the trees located in the nearby reserve which form a backdrop to the MSCP. The strategic placement of these trees may result in the loss of some on-grade car parking spaces, but any loss of parking would make little difference given the availability of new parking in the adjacent MSCP. Conditions to this effect have been recommended.

The GANSW suggested that the northern portion of the site could be used for purposes in addition to parking given the good amenity of the nearby wetlands. While the adjoining wetlands do provide good amenity in terms
of outlook, there are practical benefits in keeping the MSCP separate to the main grounds of the Concord Repatriation General Hospital as proposed. This does not negate the fact there may be scope in the future for alternate uses of this portion of the site, should the hospital ever need to further expand in the longer term.

The main hospital complex would increasingly become pedestrianised as the density of the Concord Repatriation General Hospital and its facilities expand. Limiting vehicular access to the main hospital site would help create a more pedestrian friendly environment and improve pedestrian/traffic safety. This would also improve the general amenity of the main site as cars become less prevalent overtime.

The Stage 1 CSB, while attached to the south west of the existing Multiblock, would still maintain a good outlook from the upper levels towards Yaralla Bay. Similarly, the Stage 2 ASB would maintain good amenity with a pleasant outlook towards the Parramatta River to the east and south east. Given these positive site attributes, the Department is satisfied that the northern portion of the Concord Repatriation General Hospital is well placed to accommodate hospital parking over the medium to long term. Should the need to expand into the northern portion of the site arise in the future, there would be potential to do so. This would depend however on clinical adjacency commitments as have been considered under the current design scheme.

6.4 Construction and Operational Noise

6.4.1 Construction Noise Stage 1

The EIS was accompanied by an Acoustic Report (AR) that addresses the potential impacts of noise and vibration on surrounding properties and existing hospital buildings during construction and operation. The AR deals with the construction and operational noise of Stage 1 and covers the concept proposal for Stage 2 based on predicted noise levels and monitoring information. The Department acknowledges however, that in response to government agency advice, the Applicant refined the AR to address the methodology of monitoring and logging noise and clarified some of the statements originally made.

The potential impact of construction and operational noise on nearby residential properties located in Fremont Street, Hospital Road, Currawang Street and Nullawarra Avenue was also given greater attention. Information regarding the location and selection of mechanical plant was provided given the project has moved into the detailed design phase. Also identified were the noise sensitive receivers within the hospital grounds that are adjacent to the CSB.

Construction and demolition noise levels are not expected to exceed the Highly Noise Affected threshold level of 75 dB(A) for residential receivers as recommended in the EPA's Noise Policy for Industry (NPfI) 2017 guidelines. While the 75 dB(A) threshold is unlikely to be reached, the extensive use of hydraulic hammers, particularly during demolition resulted in the EPA recommending that the Applicant be required to schedule intra-day 'respite periods' for construction activities in keeping with the EPA's Interim Construction Noise Guide (ICNG) 2009 to protect the amenity of Fremont Street residents. While the 75 dB(A) threshold level is unlikely to be reached, the Department has formed the view that a condition should be imposed for respite periods in circumstances where the construction equipment used on site would likely become annoying to noise sensitive
receivers. This may require the Applicant to monitor construction activity noise throughout the construction period and conditions to this effect have been recommended.

### 6.4.2 Operational Noise Stage 1

In addition to demolition and construction noise, the AR discussed operational noise emissions from the following noise sources:

- Vehicular noise on-site caused by the MSCP, hospital drop-off area and loading dock.
- Noise created on public roads by traffic generated by the hospital complex.
- A preliminary assessment of noise from mechanical plant.

Using the noise monitoring results carried out from the nearest receivers, the AR describes the permitted and predicted noise levels to determine the acceptability or otherwise of potential noise emissions. The AR provides tables that indicate the predicted noise levels for residential receivers and whether they comply with the Noise Policy for Industry (NPfi) 2017 guidelines as produced by the EPA. (see Table 6). The predicted noise levels are shown below:

**Table 6 – Forecast Noise Levels**

<table>
<thead>
<tr>
<th>Noise source</th>
<th>Noise receiver location</th>
<th>Predicted Noise level – dB(A)Leq(15min)</th>
<th>Compliance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cars manoeuvring within the carpark</td>
<td>Fremont Street residences</td>
<td>38 dB(A)Leq(15min)</td>
<td>Complies – day criteria 50 dB(A)Leq *</td>
</tr>
</tbody>
</table>

*Peak period of car park being 7am to 6pm daily.

**Loading Dock Noise Emission Assessment**

<table>
<thead>
<tr>
<th>Noise source</th>
<th>Nearest Noise receiver location</th>
<th>Predicted Noise level – dB(A)Leq(15min)</th>
<th>Compliance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Truck manoeuvring to/from site (via Boronia Street driveway)</td>
<td>Nullawarra Avenue residences.</td>
<td>37 dB(A)Leq(15min)</td>
<td>Complies – day, evening and night criteria 50 dB(A)Leq</td>
</tr>
<tr>
<td>Materials Handling (in loading dock)</td>
<td>Currawang Street residences.</td>
<td>&lt;30 dB(A)Leq(15min)</td>
<td>Complies – day, evening and night criteria 50 dB(A)Leq</td>
</tr>
</tbody>
</table>

**Drop-off Area Noise Impact on Fremont Street Residences**

<table>
<thead>
<tr>
<th>Activity</th>
<th>Criteria</th>
<th>Permitted Level</th>
<th>Noise Predicted Level</th>
<th>Compliance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle noise/conversational</td>
<td>Intrusiveness criteria</td>
<td>46 dB(A)Leq(15min)</td>
<td>&lt;30 dB(A)Leq(15min)</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Amenity criteria</td>
<td>38 dB(A)Leq(15min)</td>
<td>&lt;30 dB(A)Leq(15min)</td>
<td>Yes</td>
</tr>
<tr>
<td>Noise (Cumulative noise level)</td>
<td>Sleep disturbance – 46 dB(A)$_{Leq(15min)}$</td>
<td>&lt;30 dB(A)$_{Leq(15min)}$</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>-------------------------------</td>
<td>---------------------------------------------</td>
<td>-----------------------------</td>
<td>-----</td>
<td></td>
</tr>
<tr>
<td>Average/Leq Noise level</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Based on the AR, it is predicted that the MSCP would comply with NPfI guidelines and not emit noise exceeding 38 dB(A) in an area where 50 dB(A) would be considered reasonable during the peak traffic period.

Truck movements and materials handling noise from the loading dock would also be acceptable having a maximum predicted 37 dB(A) in Nullawarra Avenue and less than 30 dB(A) in Currawang Street. In both cases, noise emissions are predicted to be well below the maximum 50 dB(A) threshold contained in the NPfI. Similarly, vehicular and conversational noise emitted from the main hospital drop-off area would be below 30 dB(A) where noise emissions reaching 46 dB(A) would still comply with the NPfI during the late evening to early morning hours (10pm to 7am) when sleep disturbance would occur.

6.4.3 Noise from mechanical plant Stage 1

The cumulative impact of noise from existing and future mechanical plant was addressed in the AR. Mechanical plant most likely to cause noise disturbances to nearby residences include, roof top cooling towers, basement plant (water cooled chillers) and floor plant rooms. To suppress potential noise emissions, the AR makes several recommendations. Where roof top cooling towers for example, exceed 100 dB(A) and therefore also exceed the requirements of the NPfI, acoustical treatment will be required to protect Fremont Street residences.

Cooling towers would be equipped with variable speed drives to reduce fan speeds by 50 per cent at night time. Basement plant rooms with a potential to reach levels of 85 dB(A) as measured from 1m distance would require acoustic louvres for ventilation and to further reduce the impact of noise on residential receivers, the on-floor plant rooms have also been placed on the southern side of the proposed CSB (Stage 1) away from Fremont and other residential streets.

Emergency power back-up generators located within plant rooms and having a potential to reach 125 dB(A) would need to be provided with air inlet and air discharge attenuators. While the AR indicates that plant rooms and their associated equipment would comply with the NPfI, certainty of compliance would only be achieved following a more detailed acoustic review of the mechanical plant ultimately selected. Given this circumstance, detailed acoustic advice would be required prior to the plant rooms and their equipment becoming operational. This would ensure that potential noise emissions would be reduced to a level that is acceptable to the residential receivers and compliant with the NPfI. Conditions to this effect have been recommended.

6.4.4 Concept Proposal Stage 2 MSCP and Mechanical Plant Noise

Noise generating activities associated with the operation of the future Stage 2 works would include the operation of plant and machinery, traffic relating to the operation of the hospital complex and cars using the MSCP. The Applicant would need to demonstrate that noise generated by the hospital would not adversely impact on surrounding residences and recreation areas.

The concept Stage 2 proposal includes another MSCP forming an addition to the Stage 1 MSCP, attached to the north eastern façade of the Stage 1 MSCP. The AR predicts the MSCP would increase noise levels by 2 dB(A)
elevating the total predicted emissions from 38 dB(A) to 40 dB(A). The increase however, would still be comfortably less than the maximum 50 dB(A) recommended in the NPFI guidelines. While the details of mechanical plant and equipment have not yet been determined for Stage 2, it is reasonable to expect that similar attenuation measures to Stage 1 would be employed in Stage 2. The Applicant does acknowledge however, that the Stage 2 ASB would only be located some 130m away from residences in Fremont Street. Given the proximity of these houses, not only would attenuation measures (acoustic louvres and screens) be required, but plant also need to be located away from the northern side of the ASB to avoid houses in Fremont Street.

The Department considers that Stage 1 plant and equipment noise could be mitigated using standard acoustic measures in the detailed design phase and with similar treatment being required for Stage 2. The Department has recommended a condition requiring a detailed noise and vibration impact assessment to ensure that these issues are properly addressed in the Stage 2 application where plant would need to be suitably located to reduce its impact on nearby houses.

6.5 Traffic and Parking

6.5.1 Local Traffic Congestion

The Concord Repatriation General Hospital is located on a peninsula with direct access via Hospital Road from Concord Road to the west. Nullawarra Avenue provides alternate access to and from Hospital Road, but other local streets between Hospital Road and Homebush Bay Drive (to the north) are restricted to left turn exit only access at Concord Road, limiting traffic access (see Figure 22) This effectively results in traffic congestion being at its greatest at the Hospital Road and Concord Road intersection. Concerns regarding the potential increase in congestion at this intersection was initially raised by Council and RMS.

![](image)

Figure 22 | Local Streets Surrounding the Concord Repatriation General Hospital
(Source: Google Earth)
The Transport and Parking Report (TPR) submitted with the application however, reveals a few existing measures that help manage traffic congestion during the morning and afternoon peak periods (generally 7am-9am and 3pm-5pm respectively). These measures include two right hand lanes from Hospital Road onto Concord Road, the kerbside lane being shared for left turning traffic and a clearway zone during peak times between the Hospital Road and Concord Road intersection and Nullawarra Avenue (see Figure 22). While the right turn movement of traffic from Concord Road onto Hospital Road is shared with northbound through traffic, a right turn phase can be triggered to assist with any queuing of vehicles. South of Hospital Road are several parallel streets that connect to Hospital Road but all have limited capacity for right turn movements given significant traffic volumes along Concord Road.

Traffic counts carried out in February 2018 show that 640 vehicles travelled to the Concord Repatriation General Hospital in the morning peak between 8am-9pm and during the evening, between 3pm-5pm 460 vehicles travelled towards Concord Road. The TPR indicates that 10-15 per cent of these vehicles are not hospital bound and turn left into Fremont Street (before the Concord Repatriation General Hospital) while hospital traffic using Nullawarra Avenue in the afternoon and morning peaks travelling north and south, accounts for only 40 per cent of all vehicles. Reproduced from the TPR, Table 7 shows existing peak hour movements as compared to increases in traffic associated with Stage 1 and those predicted for the future Stage 2 development.

<table>
<thead>
<tr>
<th></th>
<th>AM Peak (7:00am to 8:00am)</th>
<th></th>
<th>PM Peak (4:00pm to 5:00pm)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Arrivals</td>
<td>Departures</td>
<td>Total</td>
<td>Arrivals</td>
</tr>
<tr>
<td>Existing</td>
<td>747</td>
<td>187</td>
<td>934</td>
<td>220</td>
</tr>
<tr>
<td>Stage 1</td>
<td>858</td>
<td>234</td>
<td>1092</td>
<td>310</td>
</tr>
<tr>
<td>Stage 2</td>
<td>905</td>
<td>246</td>
<td>1151</td>
<td>323</td>
</tr>
<tr>
<td>Increase (from existing to Stage 2)</td>
<td>111</td>
<td>47</td>
<td>158</td>
<td>90</td>
</tr>
<tr>
<td>Increase (from existing to Stage 2)</td>
<td>158</td>
<td>59</td>
<td>217</td>
<td>103</td>
</tr>
</tbody>
</table>

The proposed re-development of the Concord Repatriation General Hospital would invariably increase traffic to, within and from the hospital precinct. These increases would be the result of additional employees given an increase in services and more visitors frequenting more patients. Stage 1 traffic would increase by 1-4 per cent during the morning peak and by 2-6 per cent during the evening. Should the concept Stage 2 proposal go ahead in the future, the morning peak along Concord Road would increase from 2-5 per cent and evening peak traffic would likely increase by 3-8 per cent. The use of nearby intersections and roundabouts would also increase as the hospital is redeveloped with intersections including Concord Road and Homebush Bay Drive already at capacity and impacting downstream intersections like the one at Concord Road and Hospital Road.

Despite these increases, existing traffic congestion throughout the surrounding locality is according the TPR, at levels that can best be managed using travel demand management measures as opposed to upgrading nearby...
traffic infrastructure including the Hospital Road and Concord intersection and further north, the intersection of Concord Road and Killolou Street.

Travel demand management measures include those aimed at restricting the number of staff parking permits and encouraging the use of public transport. For this reason, a Green Travel Plan (GTP) has been devised to promote not only public transport, but walking and cycling for staff, visitors and where possible, hospital patients. The car driver mode share would be one of the prime targets with staff commuting trips to be reduced to 79 per cent as opposed to the current 86 per cent, a figure that has remained steady since at least 2006 according to the GTP. The benefits of the GTP were recognised by various agencies including RMS, TfNSW and Councils.

The Concord Repatriation General Hospital benefits from approximately 33 per cent of staff living in nearby suburbs including Canada Bay, Burwood, Strathfield, Ashfield, Ryde and Hunters Hill making travel modes like cycling and walking potential options for transport. Bus services are also available along Hospital Road while Rhodes station is only 1.4km away to the north. These locational attributes increase the potential for a greater split in modal share with vehicular use able to be reduced provided that the GTP is put in place and regularly updated. The Department has considered the availability of alternate transport options and formed the view that while traffic movements are likely to increase based on current trends, the use of travel demand management measures would help reduce the use of private vehicles and potentially reduce local traffic congestion. Conditions relating to the implementation and annual revision of a the GTP are recommended.

6.5.2 Parking Stage 1

The Concord Repatriation General Hospital currently provides 1957 on site car parking spaces which includes 67 accessible spaces. Based on current demand, the TPR estimates that 2008 on-site car parking spaces are required and consequently, parking demand spills over into nearby streets. Should Stage 1 be approved, the temporary car park would accommodate 300 cars until the Stage 1 MSCP is constructed and another 590 car spaces then made available. The temporary car park is intended to alleviate parking demand during the construction of Stage 1 and according to the TPR, the demand for parking following the completion of Stage 1 would reach 2381 spaces. Including the temporary car park, the total number of on-site car parking spaces following the completion of the Stage 1 MSCP would be 2539 spaces.

As a minimum, Stage 1 would provide 2539 parking spaces when complete. The availability of 2539 parking spaces would meet parking demand given there are currently only 1957 car spaces on site and demand for 2008. Once additional employees, patients and visitors are included, parking demand would be expected to increase to 2381 spaces which would be well below the actual number provided (2539). This would mean that 158 residual car parking spaces would be available till 2026 when Stage 1 is completed. The Department is satisfied that the proposed on-site car parking would reach beyond demand and meet the needs of the Concord Repatriation General Hospital. This would assist in reducing the incidence of on-street parking.

6.5.3 Parking Concept Stage 2

Should the Stage 2 concept proposal eventuate, a second MSCP providing an additional 520 parking spaces would be constructed adjacent to the Stage 1 MSCP. The construction of the Stage 2 ASB would necessitate the removal of the temporary car park and some car spaces from the main on-grade car park to accommodate the Stage 2
MSCP. The TPR claims that the total number of on-site car parking spaces would reach approximately 2549 which would be equal to demand following the completion of Stage 2. How these figures were derived is in shown below in Table 8. The table conservatively estimates that in the unlikely event that the GTP does not help reduce the incidence of staff and visitors driving to the site and the figure remains at 86 and 84 per cent respectively, demand would unlikely exceed the 2549 spaces proposed.

**Table 8 | Stage 2 Peak Parking Demand**

<table>
<thead>
<tr>
<th>Group</th>
<th>Daily No.</th>
<th>Staff attendance at peak time</th>
<th>% travelling by car (driver and passenger)</th>
<th>Car Occupancy</th>
<th>Peak Demand</th>
</tr>
</thead>
<tbody>
<tr>
<td>Staff</td>
<td>3561</td>
<td>70</td>
<td>86</td>
<td>1.09</td>
<td>1967</td>
</tr>
<tr>
<td>Outpatients</td>
<td>2356</td>
<td>20</td>
<td>84</td>
<td>1</td>
<td>396</td>
</tr>
<tr>
<td>Inpatients</td>
<td>279</td>
<td>20</td>
<td>84</td>
<td>1</td>
<td>47</td>
</tr>
<tr>
<td>ED presentations</td>
<td>143</td>
<td>20</td>
<td>84</td>
<td>1</td>
<td>24</td>
</tr>
<tr>
<td>Visitors</td>
<td>900</td>
<td>15</td>
<td>84</td>
<td>1.2</td>
<td>95</td>
</tr>
<tr>
<td>LHD vehicles</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>2549</strong></td>
</tr>
</tbody>
</table>

The Department is satisfied that the projected and proposed demand for on-site parking (2549 car spaces) is acceptable and would likely reduce the need for on-street parking to the benefit of residents over the medium to long term. This view is deemed reasonable given that the GTP would likely lead to a further reduction in the demand for on-site parking as staff and visitors driving to the Concord Repatriation General Hospital precinct are increasingly encouraged to use alternate modes of transport like nearby Rhodes Station. As recommended by TfNSW, ongoing consultation between the proponent, TfNSW and local bus operators has also been recommended to improve bus services to and from the hospital precinct. Improved bus services are likely over the medium to long term and would further encourage hospital users not to drive to the Concord Repatriation General Hospital. Conditions requiring ongoing consultation are recommended.

**6.6 Other Issues**

The Department’s consideration of other issues is provided at Table 9.

**Table 9 | Department’s assessment of other issues**

<table>
<thead>
<tr>
<th>Issue</th>
<th>Findings</th>
<th>Recommended Condition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site Contamination</td>
<td>The site would be remediated based on the Remedial Action Plan (RAP) submitted with the EIS.</td>
<td>The Department has recommended a condition requiring further detailed site investigations to be undertaken of soil and groundwater contamination in</td>
</tr>
</tbody>
</table>
The Applicant has acknowledged advice received from the EPA indicating that the investigations undertaken in relation to potential site contamination are insufficient. In their RTGs, the Applicant advised that the presence of existing hospital buildings and underground services has restricted access and that further investigations cannot be undertaken until the current application is determined. If the application is approved, demolition of structures and sealed surfaces would occur thereby allowing excavation and soil testing to occur.

The RAP submitted is designed to ensure that site contamination is appropriately contained and capped on site and/or removed and disposed of to a licensed landfill. Remedial action would be required to render the site suitable for its continued hospital use.

**Construction traffic management.**

The TPR says that construction vehicles would be restricted to state roads and other vehicles stem from those state roads before travelling through local streets. The Stage 1 works would only generate 100 vehicles per day and some parking provide on hospital grounds. Construction vehicles are also likely to arrive before the morning peak period and not interfere with the evening peak.

The Department has recommended a condition requiring the submission of a Construction Traffic Management Plan (CTMP) to address the following criteria prior to the commencement of works:

- The likely construction vehicle numbers and frequency.
- Vehicle approach and departure routes.
- Anticipated special out of hours or escorted deliveries.
- Parking access arrangements during construction.
- Provision of acceptable pedestrian management measures.

Subject to conditions, the Department is satisfied that potential impacts associated with construction traffic can be appropriately managed and mitigated.
While the impact on Aboriginal sites and/or archaeology is considered low, the Department is of the view that there is potential for archaeological finds given the extent of the earthworks associated with the hospital redevelopment. Conditions relating to the potential discovery of Aboriginal objects and ancestral remains are recommended.

The Registered Aboriginal Parties (RAPs) were subsequently invited to provide their advice on the proposal but did not identify the site as having any cultural significance as the site is highly disturbed. It was agreed that the site was most likely traditionally used for resource gathering. Consequently, the impact of the current proposal on Aboriginal sites or areas of archaeological sensitivity would be low.
7. Evaluation

The Department has reviewed the EIS, RTS and assessed the merits of the proposal, taking into consideration advice from public authorities, including Council. Issues raised in public submissions have been considered and all environmental issues associated with the proposal have been thoroughly addressed.

The Department’s assessment of the project concludes that:

- The detailed Stage 1 proposal and Stage 2 concept meet the objectives of relevant statutory requirements contained in the EP&A Act and the Canada Bay LEP 2013.
- The CSB detailed proposal Stage 1, would be constructed close to the Multiblock (Building 5) and associated Administration Buildings (Nos. 75 and 76) and would reduce the availability of solar access to those buildings. The overshadowing would not however impact on inpatient rooms and instead is limited to administrative and clinical uses on lower levels where the need for good solar amenity is not as great.
- The ASB concept proposal Stage 2, would reduce solar access to the Multiblock (building 5) in mid-winter based on the current concept building envelope. The overshadowing would be at its worst during the early morning hours to midday in mid-winter. Views from the Multiblock to the northeast would also be diminished. Provided the building envelope of the ASB is amended however, overshadowing would decrease and views potentially improved. Amendments to this effect are recommended.
- The overall heritage significance of the hospital site would be maintained as the redevelopment involves the continued historic use of the site and therefore its local cultural significance would be maintained.
- The original architecture of the Multiblock and Administration buildings would continue as the focal point of the hospital complex. The new subsidiary structures proposed under Stage 1 are designed having regard to the existing character of the site and to meet modern health care standards and practical operational needs.
- The ACHAR, concludes that the site was likely traditionally used for resource gathering and other activities with no previously recorded finds. The most recent survey concludes no new finds on site and consequently, the impact on Aboriginal sites or areas of archaeological sensitivity caused by the proposal would be low.
- Stage 1 construction and operational noise impacts would not reach the highly affected noise level and can be managed appropriately, in consultation with any impacted sensitive receivers.
- Local traffic congestion would gradually increase, but could best be managed using travel demand management measures (Green Travel Plan) instead of upgrading nearby traffic infrastructure.
- While current demand for on-site parking cannot be immediately met, Stage 1 would result in a 590 space MSCP and temporary car park for 300 cars. The additional parking together with travel demand management measures would result in on-site parking demand being met.

The project is consistent with key government strategic objectives for the state and the region, including the NSW State Priorities, Greater Sydney Commission’s A Metropolis of Three Cities – The Greater Sydney Regional, Eastern District Plan and Transport for NSW’s Future Transport Strategy 2056.
8. Recommendation

It is recommended that the Executive Director, Key Sites & Industry Assessments, as delegate of the Minister for Planning:

- **considers** the findings and recommendations of this report.
- **accepts and adopts** all of the findings and recommendations in this report as the reasons for making the decision to grant approval to the application.
- **agrees** with the key reasons for approval listed in the notice of decision.
- **grants consent** for the application in respect of Concord Repatriation General Hospital Redevelopment (Concept & Stage 1) (SSD 9036).
- **signs** the attached development consent and recommended conditions of approval (see attachment).

Recommended by:

Silvio Falato  
Senior Case Manager  
Coordination & Oversight

Recommended by:

David McNamara  
Director  
Key Sites Assessments
The proposal is in the public interest as the future development would provide public benefits, including:

- delivering modern health facilities capable of supporting current standards for health care.
- replacing existing outmoded facilities with new aged care, chronic care and rehabilitation facilities.
- consolidating and providing further investment in public infrastructure in a strategic area of central Sydney.
- providing additional health facilities to support the growing population of central Sydney and an ageing population and associated increasing demand for public health services.
- delivery of approximately 727 new construction jobs during Stage 1 and an additional 414 fulltime operational jobs when Stage 1 is completed.

Based on its assessment, the Department considers that the project is justified and in the public interest, and that the site is suitable for the proposed development, given the significant social and economic benefits associated with the redevelopment of the future hospital. The project represents a significant investment in health infrastructure for the local health district that will provide an increase and improvement in the quality of health services for the surrounding catchment and address the current limitations of existing services as identified by NSW Health.

The Department concludes the impacts of the Stage 1 development are acceptable and can be appropriately mitigated through the implementation of the recommended conditions of consent. Consequently, the Department considers the development is in the public interest and should be approved subject to conditions.
9. Determination

The recommendation is: Adopted by:

[Signature]
Anthea Sargeant  28/2/19
Executive Director
Key Sites & Industry Assessments
Appendix A - List of Documents

The following supporting documents and supporting information to this assessment report can be found on the Department of Planning and Environment's website as follows.

1. Environmental Impact Statement

2. Submissions

3. Applicant’s Response to Submissions
Appendix B - Statutory Considerations

ENVIRONMENTAL PLANNING INSTRUMENTS (EPIs)

To satisfy the requirements of section 4.15(a)(i) of the EP&A Act, this report includes references to the provisions of the EPIs that govern the carrying out of the project and have been taken into consideration in the Department’s environmental assessment.

Controls considered as part of the assessment of the proposal are:

- State Environmental Planning Policy (State & Regional Development) 2011 (SRD SEPP)
- State Environmental Planning Policy (Infrastructure) 2007 (Infrastructure SEPP)
- State Environmental Planning Policy No. 33 – Hazardous and Offensive Development
- State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55)
- State Environmental Planning Policy No. 64 – Advertising Structures and Signage (SEPP 64)
- State Environmental Planning Policy (Coastal Management) 2018 (Coastal SEPP)
- Draft State Environmental Planning Policy (Remediation of Land) (Draft Remediation SEPP)
- Draft State Environmental Planning Policy (Environment) (Draft Environment SEPP)
- Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005 (SHC SREP)
- Canada Bay Local Environmental Plan (CBLEP) 2013.

COMPLIANCE WITH CONTROLS

State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP)

Table 10 | SRD SEPP compliance table

<table>
<thead>
<tr>
<th>Relevant Sections</th>
<th>Consideration and Comments</th>
<th>Complies</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>3 Aims of Policy</strong> The aims of this Policy are as follows:</td>
<td>The proposed development is identified as SSD.</td>
<td>Yes</td>
</tr>
<tr>
<td>(a) to identify development that is State significant development</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>8 Declaration of State significant development: section 4.36</strong></td>
<td>The proposed development is permissible with development consent. The development is of a type specified in Schedule 1.</td>
<td>Yes</td>
</tr>
<tr>
<td>(1) Development is declared to be State significant development for the purposes of the Act if:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(a) the development on the land concerned is, by the operation of an environmental planning instrument, not permissible without development consent under Part 4 of the Act, and</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(b) the development is specified in Schedule 1 or 2.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Schedule 1 State significant development — general identified sites

(Clause 8 (1))

14 Hospitals, medical centres and health research facilities

Development that has a capital investment value of more than $30 million for any of the following purposes:

(a) hospitals,

(b) medical centres,

(c) health, medical or related research facilities (which may also be associated with the facilities or research activities of a NSW local health district board, a University or an independent medical research institute).

State Environmental Planning Policy (Infrastructure) 2007

The Infrastructure SEPP aims to facilitate the effective delivery of infrastructure across the State by improving regulatory certainty and efficiency, identifying matters to be considered in the assessment of development adjacent to particular types of infrastructure development, and providing for consultation with relevant public authorities about certain development during the assessment process.

The Department has consulted and considered the comments from the relevant public authorities (refer to Sections 5 and 6 of the report). The Department has included suitable conditions in the recommended conditions of consent (see Appendix C).

State Environmental Planning Policy No. 33 – Hazardous and Offensive Development

SEPP 33 provides clear definitions of hazardous and offensive industries and aims to facilitate development defined as such and to ensure that in determining developments of this nature, appropriate measures are employed to reduce the impact of the development and require advertisement of applications proposed to carry out such development.

A preliminary hazard analysis assessment is required if the development is identified as a potentially hazardous or potentially offensive development. The Applicant undertook a review of dangerous goods that would be handled or stored for the operations of the entire Concord Repatriation General Hospital. The Hazardous Chemicals Compliance Report submitted with the EIS indicates that the CSB would involve the use, transport and storage of hazardous chemicals including, oxygen, nitrous oxide and other medical gases, but the quantities would not exceed the threshold quantities stipulated in SEPP 33. The Department is therefore satisfied that no further preliminary hazard analysis assessment is required.
State Environmental Planning Policy No. 55 - Remediation of Land

SEPP 55 is designed to ensure that potential contamination issues are considered in the determination of a development application. The EIS included a Phase 1 and 3 Detailed Site Investigation, an Asbestos in Soils Assessment and a Remedial Action Plan (RAP) to address contamination disposal and/or treatment.

The investigations undertaken have identified contamination to be localised in nature and was deemed by Coffey (the environmental consultants engaged by the proponent) to be capable of being managed using the remedial strategies identified in the RAP. Provision has been made however, for the RAP to be updated should additional contamination streams be identified. This would ensure that any unexpected finds could be assessed and the appropriate treatment or method of disposal applied. Given this approach the Applicant has argued in their RTS that the engagement of a Site Auditor for the project would not be necessary given the likely nature of the remediation. The expense of engaging a site auditor was also raised as a concern given the nature of the contamination so far detected.

In their reply to the RTS, the EPA have recommended that a site auditor be retained because of the sensitive nature of the hospital site and that currently inaccessible hospital areas would require further testing following demolition of structures and sealed surfaces. Considering additional soil testing cannot be carried out until demolition works commence the Department has formed the view that a site auditor should be engaged. The site auditor would ensure appropriate measures are put in place to deal with any unexpected finds and ensure the site is suitable for its continued hospital use.

The Department has recommended a condition requiring a Site Audit Report and Statement be prepared by an accredited site auditor verifying the site has been made suitable for the hospital use prior to commencement of construction.

State Environmental Planning Policy No. 64 – Advertising and Signage

SEPP 64 applies to all signage that under an EPI can be displayed with or without development consent and is visible from any public place or public reserve.

The development includes seven main external signs ranging in height from 1800mm to 4000mm at the main entry to the hospital (see Figure 24). Under clause 8 of SEPP 64, consent must not be granted for any signage application unless the proposal is consistent with the objectives of the SEPP and with the assessment criteria which are contained in Schedule 1. Table 11 below demonstrates the consistency of the proposed signage with these assessment criteria.
Figure 24 | Site Signage (Note: the Entry sign is the largest at 4000mm high x 1290mm wide).
(Source: EIS – Minale Tattersfield / Jacobs)

Table 11 | SEPP 64 compliance table

<table>
<thead>
<tr>
<th>Assessment Criteria</th>
<th>Comments</th>
<th>Compliance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1 Character of the area</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Is the proposal compatible with the existing or desired future character of the area or locality in which it is proposed to be located?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The proposed signage is contemporary in design with aesthetic appeal. The proposed signage would replace outdated signs throughout the existing hospital, be more legible and provide clear directions.</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>Is the proposal consistent with a particular theme for outdoor advertising in the area or locality?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The proposed new signage of the Concord Repatriation General Hospital is consistent with NSW Health’s guideline, Wayfinding for Healthcare Facilities.</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td><strong>2 Special areas</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Does the proposal detract from the amenity or visual quality of any environmentally sensitive areas, heritage areas, natural or other conservation</td>
<td>The signage is compatible with the heritage significance of the site. Signage is simple in design and would not detract from the heritage items.</td>
<td>Yes</td>
</tr>
</tbody>
</table>
areas, open space areas, waterways, rural landscapes or residential areas? particularly when the surrounding landscaping is considered.

### 3 Views and vistas

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Does the proposal obscure or compromise important views?</td>
<td>No views or vistas will be impacted by the proposed signage. Yes</td>
</tr>
<tr>
<td>Does the proposal dominate the skyline and reduce the quality of vistas?</td>
<td>Neither the skyline or any vistas would be compromised by the signs given their relatively modest height. Yes</td>
</tr>
<tr>
<td>Does the proposal respect the viewing rights of other advertisers?</td>
<td>There are no other advertisers signs in the vicinity of the site. Yes</td>
</tr>
</tbody>
</table>

### 4 Streetscape, setting or landscape

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Is the scale, proportion and form of the proposal appropriate for the streetscape, setting or landscape?</td>
<td>The proposed scale and design of the signage would not detract from the streetscape. Larger pylon signs (i.e. 4000mm in height) are proposed at the main entry where vehicles making drop-offs would arrive. The remaining smaller pylon signs are primarily for way finding and suited to pedestrians. Yes</td>
</tr>
<tr>
<td>Does the proposal contribute to the visual interest of the streetscape, setting or landscape?</td>
<td>The relative simple linear design of the pylon sign would ensure they do not adversely affect the streetscape or setting of the hospital precinct. Yes</td>
</tr>
<tr>
<td>Does the proposal reduce clutter by rationalising and simplifying existing advertising?</td>
<td>The signage replaces in part, older outdated signs and does not include advertising. N/A</td>
</tr>
<tr>
<td>Does the proposal screen unsightliness?</td>
<td>The signage proposed is not designed for screening purposes, but would result in the removal of older signage that has largely lost any aesthetic appeal. Yes</td>
</tr>
<tr>
<td>Question</td>
<td>Answer</td>
</tr>
<tr>
<td>------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Does the proposal protrude above buildings, structures or tree canopies in the area or locality?</td>
<td>The signage is relatively modest in height (maximum 4000mm) and would not protrude above any new or existing structures.</td>
</tr>
<tr>
<td>Does the proposal require ongoing vegetation management?</td>
<td>No ongoing vegetation management would be required by the proposed signage.</td>
</tr>
<tr>
<td>5 Site and building</td>
<td>The proposed scale and design of the signage is compatible with the site, the proposed new CSB and future ASB.</td>
</tr>
<tr>
<td>Is the proposal compatible with the scale, proportion and other characteristics of the site or building, or both, on which the proposed signage is to be located?</td>
<td>The proposed scale and design of the signage is compatible with the site, the proposed new CSB and future ASB.</td>
</tr>
<tr>
<td>Does the proposal respect important features of the site or building, or both?</td>
<td>The signage is not proposed to be attached to the facade of the hospital, is relatively low scale and would not detract from the significant architectural features of the site.</td>
</tr>
<tr>
<td>Does the proposal show innovation and imagination in its relationship to the site or building, or both?</td>
<td>The proposed signage has been designed in keeping with NSW Health’s guideline, Wayfinding for Healthcare Facilities that aim at providing a positive experience for patients, visitors and staff at NSW hospitals.</td>
</tr>
<tr>
<td>6 Associated devices and logos with advertisements and advertising structures</td>
<td>The pylons signs are self-supporting and not attached to platforms or the like.</td>
</tr>
<tr>
<td>Have any safety devices, platforms, lighting devices or logos been designed as an integral part of the signage or structure on which it is to be displayed?</td>
<td>The pylons signs are self-supporting and not attached to platforms or the like.</td>
</tr>
<tr>
<td>7 Illumination</td>
<td>Internal illumination would ensure the signs do not emit unacceptable glare or compromise safety.</td>
</tr>
<tr>
<td>Would illumination result in unacceptable glare?</td>
<td>Internal illumination would ensure the signs do not emit unacceptable glare or compromise safety.</td>
</tr>
<tr>
<td>Would illumination affect safety for pedestrians, vehicles or aircraft?</td>
<td>Internal illumination would ensure the signs do not emit unacceptable glare or compromise safety.</td>
</tr>
</tbody>
</table>
Would illumination detract from the amenity of any residence or other form of accommodation?
The proposed intensity of illumination is not designed to result in glare impacts or light spill.

Can the intensity of the illumination be adjusted, if necessary?
The proposed illumination of signage is not at a level that would warrant a curfew. The signs would operate at all times consistent with the 24/7 operation of the hospital.

Is the illumination subject to a curfew?

8 Safety

Would the proposal reduce safety for pedestrians, particularly children, by obscuring sightlines from public areas?
The proposed design and location of signage is not expected to adversely impact on pedestrian safety.

Would the proposal reduce safety for any public road?
The proposed design and location of signage would not likely have an adverse impact on any public road.

State Environmental Planning Policy (Coastal Management) 2018

The Coastal SEPP aims to promote an integrated and co-ordinated approach to land use planning in the coastal zone by managing development in the coastal zone and protecting the environmental assets of the coast, establishing a framework for land use planning to guide decision-making in the coastal zone, and mapping the 4 coastal management areas (the coastal wetlands and littoral rainforests area, the coastal vulnerability area, the coastal environment area and the coastal use area) that comprise the NSW coastal zone for the purpose of the definitions in the Coastal Management Act 2016. The Coastal SEPP replaces SEPPs 14, 26, and 71.

The site is mapped in one of the coastal zones identified by the SEPP. The proposal is consistent with the relevant Planning Principals of the SEPP and will not have any significant adverse impact on the environmental assets of the coast.

Draft State Environmental Planning Policy (Remediation of Land)

The Draft Remediation SEPP will retain the overarching objective of SEPP 55 promoting the remediation of contaminated land to reduce the risk of potential harm to human health or the environment.

Additionally, the provisions of the Draft Remediation SEPP will require all remediation work that is to be carried out without development consent, to be reviewed and certified by a certified contaminated land consultant, categorise remediation work based on the scale, risk and complexity of the work and require environmental management plans relating to post-remediation management of sites or ongoing operation, maintenance and management of on-site remediation measures (such as a containment cell) to be provided to council.
The Department is satisfied that the proposal will be consistent with the objectives of the Draft Remediation SEPP.

**Draft State Environmental Planning Policy (Environment)**

The Draft Environment SEPP is a consolidated SEPP which proposes to simplify the planning rules for a number of water catchments, waterways, urban bushland, and Willandra Lakes World Heritage Property. Once adopted, the Draft Environment SEPP will replace seven existing SEPPs. The proposed SEPP will provide a consistent level of environmental protection to that which is currently delivered under the existing SEPPs. Where existing provisions are outdated, no longer relevant or duplicated by other parts of the planning system, they will be repealed.

Given that the proposal is consistent with the provisions of the existing SEPPs that are applicable, the Department concludes that the proposed development will generally be consistent with the provisions of the Draft Environment SEPP.

**Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005**

SHC SREP provides planning principles for development within the Sydney Harbour catchment. The site is located within the Sydney Harbour Catchment area. Relevant planning principles for land within the Sydney Harbour Catchment include:

- development is to protect and, where practicable, improve the hydrological, ecological and geomorphological processes on which the health of the catchment depends.
- the natural assets of the catchment are to be maintained and, where feasible, restored for their scenic and cultural values and their biodiversity and geodiversity.
- development that is visible from the waterways or foreshores is to maintain, protect and enhance the unique visual qualities of Sydney Harbour.
- development is to improve the water quality of urban run-off, reduce the quantity and frequency of urban run-off, prevent the risk of increased flooding and conserve water.
- development is to avoid or minimise disturbance of acid sulfate soils in accordance with the *Acid Sulfate Soil Manual*, as published in 1988 by the Acid Sulfate Soils Management Advisory Committee.

The proposal is consistent with the relevant Planning Principals of the SHC SREP and would not have any significant adverse impact on the Sydney Harbour Catchment as the wetlands would not be directly impacted by the concept and Stage 1 proposal. While the site is boarded by the council reserve (north of the main car park), no works would take place within an actual wetland area. In their RtS, the Applicant did address issues regarding potential stormwater run-off from the car park, and this has been deemed to be satisfied as appropriate conditions to mitigate run-off can be imposed.
Canada Bay Local Environmental Plan (CBLEP) 2013

The CBLEP 2013 aims to encourage the development of housing, employment, infrastructure and community services to meet the needs of the existing and future residents of the Canada Bay LGA. The CBLEP 2013 also aims to conserve and protect natural resources and foster economic, environmental and social well-being.

The Department has consulted with Council throughout the assessment process and has considered all relevant provisions of the CBLEP 2013 and those matters raised by Council in its assessment of the development (Refer to Section 5). The Department concludes the development is consistent with the relevant provisions of the CBLEP 2013. Consideration of the relevant clauses of the CBLEP 2013 is provided in Table 12.

Table 12 | Consideration of the CBLEP 2013

<table>
<thead>
<tr>
<th>CBLEP 2013</th>
<th>Department Comment/Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Clause 4.3 Building height</td>
<td>The Concord Repatriation General Hospital site is not subject to a height restriction under the CBLEP. However, the proposed CSB and concept ASB have been designed to site below the height of the existing Multiblock building and owing to the peninsula nature of the site, would not have an adverse visual impact, cause the disruption of views, loss of privacy or solar access over surrounding properties. The distance of separation between the proposed Concord Repatriation General Hospital buildings and nearby residential properties to the east further assists in minimising any visual or amenity impacts.</td>
</tr>
<tr>
<td>Clause 4.4 Floor Space Ratio</td>
<td>The Concord Repatriation General Hospital site has no floor space ratio restrictions under the CBLEP. The site has an approximate area of 24ha with the bulk of the proposed works concentrated towards the centre of the site. The bulk and scale of CSB and concept ASB is compatible with the existing Multiblock and associated administration buildings and is considered by the Department to be compatible with the character of the locality. Detailed new landscaping and existing established trees would help screen the new buildings further minimizing their visual impact.</td>
</tr>
<tr>
<td>Clause 5.10 Heritage conservation</td>
<td>The potential heritage impacts of the proposal have been addressed in Section 6.1 of this report. Consideration has been given to the demolition of the wards buildings around existing heritage items and impacts associated with the development of the new CSB being attached to the back of the Multiblock. The proposed redevelopment of Concord Repatriation General Hospital would ensure that the heritage significance of existing buildings is retained and enhanced through the removal</td>
</tr>
</tbody>
</table>
of non-contributory elements and the integration of more respectful built forms adjacent. The Department also acknowledges that the ACHAR confirms the potential impact of the current proposal on Aboriginal sites or areas of archaeological sensitivity would be low.

The Department concludes that the demolition of existing buildings is acceptable and would allow for the redevelopment of the site for the purpose of providing improved healthcare services and facilities for the betterment of the public.

Other policies

In accordance with Clause 11 of the SRD SEPP, Development Control Plans do not apply to State significant development.

Notwithstanding, the objectives of relevant plans and policies that govern the carrying out of the project are appropriate for consideration in this assessment in accordance with the SEARs and are considered below.

Table 13 | Other Policies

Crime Prevention through Environmental Design (CPTED).

The Applicant advises that the proposal has been designed having regard to CPTED principles. These principles have been incorporated into the design as follows:

- clearly defined hospital precincts and facilities including car parking areas, areas of movement and rest across the site.
- landscaping designed for improved patient, staff and visitor safety. This would be achieved using well defined walkways, wayfinding signage and clear sightlines for pedestrians.
- external lighting to new internal roads, car parks pathways and other new areas within the complex. Access control systems would be implemented and CCTV cameras installed in areas of high crime risk.
Appendix C - Recommended Instrument of Consent/Approval
Appendix D – Community views for draft Notice of Decision

<table>
<thead>
<tr>
<th>Issue</th>
<th>Consideration</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recording of heritage significance before works commence</td>
<td>The recommended conditions include requirements for archival recording off all structures to be demolished (Schedule 3, Condition C5) and for the preparation of a heritage interpretation plan prior to occupation of the stage 1 building (Schedule 3, Condition D12, 13).</td>
</tr>
</tbody>
</table>

Need for on-site heritage museum | The provision of an on-site museum did not form part of the application the Department was requested to assess. Standard recording and heritage interpretation procedures are considered adequate to ensure the heritage of the site is recognised. OEH heritage did not raise any objection to the proposal on heritage grounds related to recording or interpretation of the site and its historically significant architecture.