

HEALTH INFRASTRUCTURE

Review of Environmental Factors

Shoalhaven Hospital Temporary Helipad Project

Prepared by _planning Pty Ltd

Version Number v2 - FINAL



REF Template Version: February 2023.

Declaration

This Review of Environmental Factors (REF) has been prepared for Health Infrastructure (HI) and assesses the potential environmental impacts which could arise from the temporary use of an existing helipad by the NSW Ambulance / Toll Ambulance Rescue Helicopter Service at 92 Albatross Road, South Nowra (the Shoalhaven Emergency Management Centre (EMC)), along with its minor ancillary works.

This REF has been prepared in accordance with the relevant provisions of the *Environmental Planning and Assessment Act 1979* (EP&A Act), the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation) and *State Environmental Planning Policy (Transport and Infrastructure) 2021* (TI SEPP).

This REF provides a true and fair review of the activity in relation to its likely impact on the environment and the information it contains is neither false nor misleading. It addresses to the fullest extent possible all the factors listed in Section 3 of the *Guidelines for Division 5.1 Assessments* (June 2022), the EP&A Regulation and the *Commonwealth Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act).

Based upon the information presented in this REF, it is concluded that, subject to adopting the recommended mitigation measures, it is unlikely there would be any significant environmental impacts associated with the activity. Consequently, an *Environmental Impact Statement* (EIS) is not required. Further, a Species Impact Statement (SIS) and Biodiversity Development Assessment Report (BDAR) are each also not required.

Declaration

| | |
|----------------------|--|
| Author: | Oliver Klein |
| Qualification | BA MURP MPIA Reg. Planner |
| REAP Number | Registered Environmental Assessment Practitioner No. 10696 (PIA) |
| Position: | Director |
| Company: | _planning Pty Ltd – ABN 25 620 516 583 |
| Date: | 24 May 2023 |

Document Management, Tracking and Revision History

| Version | Date | Author | Description | Reviewed by | Approved by |
|------------|-------------|--------------|---------------------------------|-------------------------|------------------|
| Draft v1 | 4 May 2023 | Oliver Klein | Review of Environmental Factors | Lynn Walker (Johnstaff) | Jeremy Hart (HI) |
| Draft v1.1 | 4 May 2023 | Oliver Klein | Review of Environmental Factors | Lynn Walker (Johnstaff) | Jeremy Hart (HI) |
| Final v2 | 24 May 2023 | Oliver Klein | Review of Environmental Factors | Lynn Walker (Johnstaff) | Jeremy Hart (HI) |

Contents

| | |
|---|----|
| Declaration | 3 |
| Document Management, Tracking and Revision History | 3 |
| Contents | 4 |
| Tables..... | 4 |
| Figures | 5 |
| Appendices..... | 5 |
| Abbreviations | 6 |
| Executive Summary..... | 8 |
| 1. Introduction | 11 |
| 1.1 Proposal need and Alternatives..... | 11 |
| 2. Site Analysis and Description | 13 |
| 2.1 The Site and Locality | 13 |
| 2.2 Existing Development..... | 13 |
| 2.3 Site Considerations and Constraints | 17 |
| 3. Proposed Activity..... | 19 |
| 3.1 Proposal Overview | 19 |
| 3.2 Operational Activities | 21 |
| 4. Statutory Framework | 24 |
| 4.1 Activity Description under TI SEPP | 24 |
| 4.2 Environmental Protection and Biodiversity Conservation Act 1999 | 25 |
| 4.3 Environmental Planning and Assessment Act 1979..... | 26 |
| 4.4 Environmental Planning and Assessment Regulation 2021 | 26 |
| 4.5 Other NSW Legislation | 27 |
| 5. Consultation | 29 |
| 5.1 Statutory Consultation..... | 29 |
| 5.2 Community and Stakeholder Engagement | 31 |
| 6. Environmental Assessment..... | 32 |
| 6.1 Environmental Planning and Assessment Regulation 2021 – Assessment Considerations | 32 |
| 7. Summary of Impacts..... | 35 |
| 8. Summary of Mitigation Measures..... | 37 |
| 8.1 Summary of Impacts | 37 |
| 9. Justification and Conclusion..... | 38 |

Tables

| | |
|---|----|
| Table 1: Description of the site | 13 |
| Table 2: Section 10.7 Planning Certificate | 17 |
| Table 3: Description of proposed activities | 25 |
| Table 4: EPBC Checklist | 26 |
| Table 5: Matters for consideration under Sub-Section, Section 5.5 of the EP&A Act | 26 |

| | |
|---|----|
| Table 6: Other Possible Legislative Requirements | 27 |
| Table 7: Agencies and stakeholders notified | 29 |
| Table 8: Outcomes of consultation | 30 |
| Table 9: Summary of Environmental Factors Reviewed in Relation to the Activity | 32 |
| Table 10: Summary of Impacts relating to the Activity | 35 |

Figures

| | |
|--|----|
| Figure 1 – The Shoalhaven EMC’s main entrance as seen from Albatross Road | 14 |
| Figure 2 – The Shoalhaven EMC south of the main entrance with view to the helipad | 14 |
| Figure 3 – Lot 1 DP 860791 | 14 |
| Figure 4 – Location of the Shoalhaven EMC to that of Nowra generally and the hospital | 15 |
| Figure 5 – The recently completed, relocated, and expanded helipad at the Shoalhaven EMC | 15 |
| Figure 6 – Shoalhaven EMC helipad, expanded car park, and cluster of sheds looking towards Albatross | 16 |
| Figure 7 – Shoalhaven EMC helipad and recent tree clearing | 16 |
| Figure 8 - Existing tree at corner of Albatross Road and Coral Sea Drive | 17 |
| Figure 9 – Site Plan | 19 |
| Figure 10 - Tree proposed for separate removal as marked by Council’s Tree Management Officer | 20 |
| Figure 11 – Assumed approach and departure flight paths..... | 22 |
| Figure 12 – Zoning Map | 25 |
| Figure 13 – Extent of statutory notification | 29 |

Appendices

| Appendix | Description | Author | Rev/Ref/Date |
|----------|---|-------------------------|---|
| A | Council Resolution Letter | Shoalhaven City Council | Ref 42550E (D23/113508) dated 24 March 2023 |
| B | Formal Landowner’s Consent | Shoalhaven City Council | 23 March 2023 |
| C | Planning Certificate | Shoalhaven City Council | No. 2023/01171 dated 22 March 2023 |
| D | Temporary Helicopter Landing Site (HLS) Operating Procedure | AviPro | V1.2 (undated) |
| E | Site Plan | Johnstaff | SK001 Rev 0 dated 22 May 2023 |
| F | Traffic Statement | TTW | Rev 2 dated 13 April 2023 |
| G | Statutory Notification Letters | HI | 5 April 2023 and 2 May 2023 |
| H | Council Response to notification of activity | Shoalhaven City Council | 27 April 2023 |
| I | Non-Statutory Notification Letters | HI | 3 April 2023 |
| J | Noise Impact Assessment | Acoustic Logic | 3 March 2023 |
| K | Community Complaints Protocol | HI | April 2023 |
| L | Mitigation Measures | HI | May 2023 |
| M | AHIMS Search | NSW Government | 21 March 2023 |

Abbreviations

| Abbreviation | Description |
|-----------------|--|
| AEC | Area of Environmental Concern |
| AHD | Australian Height Datum |
| AHIP | Aboriginal Heritage Impact Permit |
| AHIMS | Aboriginal Heritage Information Management System BC Regulation |
| AMG | Australian Map Grid |
| BC Act 2016 | <i>Biodiversity Conservation Act 2016</i> |
| BC Act 2017 | <i>Biodiversity Conservation Act 2017</i> |
| BC Regulation | Biodiversity Conservation Regulation 2017 |
| BAM | Biodiversity Assessment Method |
| CA | Certifying Authority |
| CE | Chief Executive |
| CM Act | <i>Coastal Management Act 2016</i> |
| CMP | Construction Management Plan |
| CWC | Connecting with Country |
| CRA | Conservation Risk Assessment |
| DPC | Department of Premier and Cabinet |
| DPE | Department of Planning and Environment |
| EIS | Environmental Impact Statement |
| EMP | Environmental Management Plan |
| EES | Environment, Energy and Science |
| EPA | Environment Protection Authority |
| EP&A Act | <i>Environmental Planning and Assessment Act 1979</i> |
| EP&A Regulation | Environmental Planning and Assessment Regulation 2021 |
| EPBC Act (Cwth) | <i>Environment Protection and Biodiversity Conservation Act 1999</i> |
| EPI | Environmental Planning Instrument |
| EPL | Environment Protection License |
| FM Act | <i>Fisheries Management Act 1994</i> |
| Ha | Hectares |
| HHIMS | Historic Heritage Information Management System |
| HI | Health Infrastructure |
| LEP | Local Environmental Plan |
| LGA | Local Government Area |
| MPS | Multipurpose Service |
| MNES | Matters of National Environmental Significance |

| Abbreviation | Description |
|-----------------------------|---|
| NorBE | Neutral or Beneficial Effect on Water Quality Assessment Guideline (2022) |
| NPW Act | <i>National Parks and Wildlife Act 1974</i> |
| NPW Regulation | National Parks and Wildlife Regulation 2009 |
| NPWS | National Parks and Wildlife Service (part of EES) |
| NT Act (Cth) | <i>Commonwealth Native Title Act 1993</i> |
| OEH | (Former) Office of Environment and Heritage |
| PCMP | Preliminary Construction Management Plan |
| Planning Systems SEPP | State Environmental Planning Policy (Planning Systems) 2021 |
| POEO Act | <i>Protection of the Environment Operations Act 1997</i> |
| Proponent | Health Infrastructure |
| REF | Review of Environmental Factors |
| RF Act | <i>Rural Fires Act 1997</i> |
| RFS | Rural Fire Service |
| Resilience and Hazards SEPP | State Environmental Planning Policy (Resilience and Hazards) 2021 |
| SEPP | State Environmental Planning Policy |
| SIS | Species Impact Statement |
| TI SEPP | State Environmental Planning Policy (Transport and Infrastructure) 2021 |
| WM Act | <i>Water Management Act 2000</i> |

Executive Summary

The Proposal

The proposal involves the temporary use of an existing helipad at the Shoalhaven Emergency Management Centre (EMC) at 92 Albatross Road, South Nowra by the NSW Ambulance / Toll Ambulance Rescue Helicopter Service for a period of up to 3 years to June 2026. Minor ancillary works are also proposed to install a windsock, light pole, and fire firefighting equipment in the vicinity of the helipad. The service will be supported by NSW Ambulance Service road-based ambulances which will traffic / ferry patients relying upon the helicopter to/from the nearby Shoalhaven Hospital. Up to some 10-15 helicopters are anticipated per month. A single tree outside of the Shoalhaven EMC is also subject to removal related to the proposed additional use but is outside of this REF process.

Need for the Proposal

The need for the proposal arises directly from the demolition of the existing Shoalhaven Hospital helipad due to the recently approved State Significant Development DA (SSD-35999468) for the redevelopment of the existing hospital site. The existing helipad will be removed to allow for the new Acute Services Building which will span the site and land parcel currently accommodated by the helipad.

Proposal Objectives

A temporary helipad is required to continue to service the hospital until such time as the hospital's new helipad is in place on the rooftop of the new Acute Services Building.

Options Considered

More than 10 potential locations were evaluated with the assistance of the specialist aviation consultant AviPro. These included a range of government-owned and non-government-owned sites in and around Nowra which were considered and evaluated prior to the selection of the Shoalhaven EMC. The Shoalhaven EMC site provides the optimum temporary relocation opportunity for the helipad from aviation, clinical, and environmental planning perspectives. The assessment was carried out through both a desktop study and physical on-site inspections. The assessment took into consideration a number of factors which included:

- Site proximity to the hospital.
- Patient safety during transport.
- Wind analysis in the area.
- Approach and departure paths into/from the site including assessment of obstructions.
- Touchdown and Lift-off Area (TLOF) availability.
- A number of site conditions and impact on surrounds.
- Current uses.
- Works required to the site to operate a safe helipad.

Whilst HMAS Albatross was considered suitable from an aerospace operations perspective, it was determined to be unsuitable for full time use (during the course of the temporary relocation) due to travel time considerations. The Shoalhaven EMC's helipad provides the optimum available temporary option.

Site Details

The Shoalhaven EMC is located at 92 Albatross Road, South Nowra (Lot 1, DP 860791). Radially, the site is some 2.5km to 3.0km from the Nowra CBD and the hospital, respectively.

The Shoalhaven EMC accommodates a range of emergency services agencies including the NSW Rural Fire Service (RFS) headquarters for the region; the NSW State Emergency Service (SES) unit headquarters for the region; and the

South Coast Branch of Surf Lifesaving. These entities are clustered in self-contained separate accommodation across the Shoalhaven EMC. The existing and recently upgraded helipad accommodates helicopter movements from each or any of these entities, however its focus is primarily to serve the RFS with daytime flights as may be required during any bushfire emergencies.

The site is generally developed, urbanised and modified to meet the operational requirements of the emergency organisations stationed there. This includes the clearing of vegetation within and around the perimeter of the site to accommodate helicopter movements. Residential uses are located to the west of Albatross Road in the suburb of West Nowra. To the south and east of the site are a range of recreational land uses including sports grounds and greyhound and motor racing / trots racetracks. Remnant bushland links the site to the Princes Highway about 1km to the east.

Shoalhaven City Council is the landowner of the Shoalhaven EMC. Council provided its conditional in-principle support to temporarily use the helipad at its meeting of 13 March 2023 (Item CL23.87) subject to:

- a. Appropriate operational procedures being put in place to manage access and use.
- b. Clarification and conformation of the planning pathway.
- c. Engagement with adjoining residents and establishment of a process to manage any future feedback received from neighbours, so that complaints or similar do not fall to Council or the Rural Fire Service to respond to.

Council officers have since agreed that the Development without consent / REF process is the relevant and most appropriate planning approval pathway in the circumstances and that HI acting at the relevant determining authority is also appropriate. The balance of these matters are otherwise addressed as part of this REF.

Planning Approval Pathway

The planning approval pathway for the temporary use of the Shoalhaven EMC helipad is Development without consent through section 2.52(3) of *State Environmental Planning Policy (Transport and Infrastructure) 2021* (TISEPP) as development carried out by or on behalf of an emergency services organisation on any land for the addition to an existing emergency services facility. The addition in this scenario is for the additional use of the helipad (with only minor ancillary works required to support the additional temporary use such as a windsock, lighting trained upon the helipad, and firefighting equipment at the helipad's perimeter). A single tree outside of the Shoalhaven EMC which poses a risk to safe night-time flying in the north-westerly direction out of the Shoalhaven EMC is also subject to removal, but this is outside of this REF process as discussed in further detail in this REF.

The NSW Ambulance / Toll Ambulance Rescue Helicopter Service is defined as an emergency services organisation and the Shoalhaven EMC and its helipad is defined as an existing emergency services facility. Accordingly, this REF is able to be prepared, assessed and determined applying Part 5 of the EP&A Act. Details are set out further within this REF.

Statutory Consultation

Under section 2.52(7) of the TISEPP written notice of the intention to carry out the development must be provided to Council and to the occupiers of adjoining land. The notification period is 21 calendar days. Additionally, sections 2.10 to 2.15 provide for consultation and notification to Council and a range of public agencies based on a selection of likely impacts. None of these additional notification requirements are triggered in this instance.

Notwithstanding the above, and as per Council's resolution to support the use in-principle, engagement with adjoining residents was undertaken ahead of the formal notification process. The results of these notification and engagement processes are set out in detail in Section 5 of this REF.

Environmental Impacts

The likely environmental impacts are few and can be defined as additional (albeit sporadic and temporary) noise from helicopters and ambulances to a lesser degree, and a general but minor increase in traffic movements associated with ambulances coming to, and leaving from, the Shoalhaven ECM site. Generally there will be no other impacts of any significance associated with the additional use of the existing helipad and the minor ancillary works.

Justification and Conclusion

The REF has examined and taken into account to the fullest extent possible all matters affecting, or likely to affect, the environment by reason of the proposed activity.

As discussed in detail in this report, the proposal will not result in any significant or long-term impact. The potential impacts identified can be reasonably mitigated and where necessary managed through the adoption of suitable site practices and adherence to accepted industry standards.

As outlined in this REF, the proposed activity can be justified on the following grounds:

- It responds to an existing need within the community;
- It generally complies with, or is consistent with all relevant legislation, plans and policies;
- It has minimal environmental impacts; and
- Adequate mitigation measures have been proposed to address these impacts.

The environmental impacts of the proposal are not likely to be significant and therefore it is not necessary for an EIS to be prepared and approval to be sought for the proposal from the Minister for Planning and Public Spaces under Part 5 of the EP&A Act. Further, a Species Impact Statement (SIS) and Biodiversity Development Assessment Report (BDAR) are each also not required.

On this basis, it is recommended that HI determine the proposed activity in accordance with Part 5 of the EP&A Act and subject to the adoption and implementation of mitigation measures identified within this report.

1. Introduction

Health Infrastructure (HI) proposes to temporarily (for a period of up to 3 years to June 2026) use the Shoalhaven EMC helipad for NSW Ambulance / Toll Ambulance Rescue Helicopter Service helicopter movements (the Proposal) at the Shoalhaven EMC site at 92 Albatross Road, South Nowra (the site) as part of their delivery of infrastructure solutions and services to support the healthcare needs of the NSW communities.

This Review of Environmental Factors (REF) has been prepared by _planning Pty Ltd on behalf of HI to determine the environmental impacts of the proposed additional use of the helipad at the Shoalhaven EMC. For the purposes of these works, HI is the proponent and the determining authority under Part 5 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The purpose of this REF is to describe the proposal, to document the likely impacts of the proposal on the environment and to detail protective measures to be implemented to mitigate impacts.

The description of the proposed works and associated environmental impacts have been undertaken in the context of the *Guidelines for Division 5.1 Assessments* (June 2022), the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation) and the Australian Government's *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

The assessment contained within the REF has been prepared having regard to:

- Whether the proposed activity is likely to have a significant impact on the environment and therefore the necessity for an EIS to be prepared and approval to be sought from the Minister for Planning and Public Spaces under Part 5 of the EP&A Act; and
- The potential for the proposal to significantly impact Matters of National Environmental Significance (MNES) on Commonwealth land and the need to make a referral to the Australian Government Department of Environment and Energy for a decision by the Commonwealth Minister for the Environment on whether assessment and approval is required under the EPBC Act.

The REF helps to fulfil the requirements of Section 5.5 of the EP&A Act, which requires that HI examine, and take into account to the fullest extent possible, all matters affecting, or likely to affect, the environment by reason of the proposed activity.

1.1 Proposal need and Alternatives

An overview of the alternatives, and an identification of the preferred alternative, for the Proposal is set out below.

Need for the Proposal

The need for the proposal arises directly from the demolition of the existing Shoalhaven Hospital helipad due to the recently approved State Significant Development DA (SSD-35999468) for the redevelopment of the existing hospital site. The existing helipad will be removed to allow for the new Acute Services Building which will span the site and land parcel currently accommodated by the helipad.

Proposal Objectives

A temporary helipad is required to continue to service the hospital until such time as the hospital's new helipad is in place on the rooftop of the new Acute Services Building.

Options Considered

More than 10 potential locations were evaluated with the assistance of the specialist aviation consultant AviPro. These included a range of government-owned and non-government-owned sites in and around Nowra which were considered and evaluated prior to the selection of the Shoalhaven EMC. The Shoalhaven EMC site provides the optimum temporary relocation opportunity for the helipad from aviation, clinical, and environmental planning perspectives. The assessment was carried out through both a desktop study and physical on-site inspections. The assessment took into consideration a number of factors which included:

- Site proximity to the hospital.
- Patient safety during transport.
- Wind analysis in the area.
- Approach and departure paths into/from the site including assessment of obstructions.
- Touchdown and Lift-off Area (TLOF) availability.
- A number of site conditions and impact on surrounds.
- Current uses.
- Works required to the site to operate a safe helipad.

Whilst HMAS Albatross was considered suitable from an aerospace operations perspective, it was determined to be unsuitable for full time use (during the course of the temporary relocation) due to travel time considerations. The Shoalhaven EMC's helipad provides the optimum available temporary option.

2. Site Analysis and Description

2.1 The Site and Locality

Table 1: Description of the site

| Site Description | |
|-------------------|---|
| Address | 92 Albatross Road, South Nowra |
| Legal Description | Lot 1 DP 860791 |
| Site Area | Approx. 6.5 hectares |
| Owners | Shoalhaven City Council |
| Heritage | No – the site is not heritage listed as either a State or local item and does not sit within a Conservation Area. |

Shoalhaven City Council is the landowner of the Shoalhaven EMC. Council provided its conditional in-principle support to temporarily use the helipad (see **Appendix A**) at its meeting of 13 March 2023 (Item CL23.87) subject to:

- Appropriate operational procedures being put in place to manage access and use.
- Clarification and conformation of the planning pathway.
- Engagement with adjoining residents and establishment of a process to manage any future feedback received from neighbours, so that complaints or similar do not fall to Council or the Rural Fire Service to respond to.

Council officers have since agreed that the Development without consent / REF process is the relevant and most appropriate planning approval pathway in the circumstances and that HI acting at the relevant determining authority is also appropriate.

Operational procedures to manage access and use of the facility are part of the assessment and mitigation measures arising from this REF. Section 5 of this REF sets out in detail the engagement undertaken and the results of the engagement and statutory notification process. A complaints handling process also forms part of this REF.

Council has also provided formal landowner's consent to the proposed activity – see **Appendix B**.

2.2 Existing Development

The Shoalhaven EMC is located at 92 Albatross Road, South Nowra (Lot 1, DP 860791). Radially, the site is some 2.5km to 3.0km from the Nowra CBD and the hospital, respectively.

The Shoalhaven EMC accommodates a range of emergency services agencies including the NSW Rural Fire Service (RFS) headquarters for the region; the NSW State Emergency Service (SES) unit headquarters the region; and the South Coast Branch of Surf Lifesaving. These entities are clustered in self-contained separate accommodation across the Shoalhaven EMC. The existing and recently upgraded helipad accommodates helicopter movements from each or any of these entities, however its focus is primarily to serve the RFS with daytime flights as may be required during any bushfire emergencies.

The site is generally developed, urbanised and modified to meet the operational requirements of the emergency organisations stationed there. This includes the clearing of vegetation within and around the perimeter of the site to accommodate helicopter movements. Residential uses are located to the west of Albatross Road in the suburb of West Nowra. To the south and east of the site are a range of recreational land uses including sports grounds and a racetrack. Remnant bushland links the site to the Princes Highway about 1km to the east.

Figures 1 to 7 show the general arrangement of the buildings at the site as seen from Albatross Road and from within the site; the site's location; and the recently completed expanded and relocated helipad and other car park works, as approved by Shoalhaven City Council via a REF in June 2021. **Figure 8** shows the existing single tree outside of the Shoalhaven EMC at the corner of Albatross Road and Coral Sea Drive which is subject to separate approval for removal outside of this REF's assessment and process.



Figure 1 – The Shoalhaven EMC’s main entrance as seen from Albatross Road (google)



Figure 2 – The Shoalhaven EMC south of the main entrance with view to the clearing at the site accommodating the helipad (google)



Figure 3 – Lot 1 DP 860791 (SixMaps)

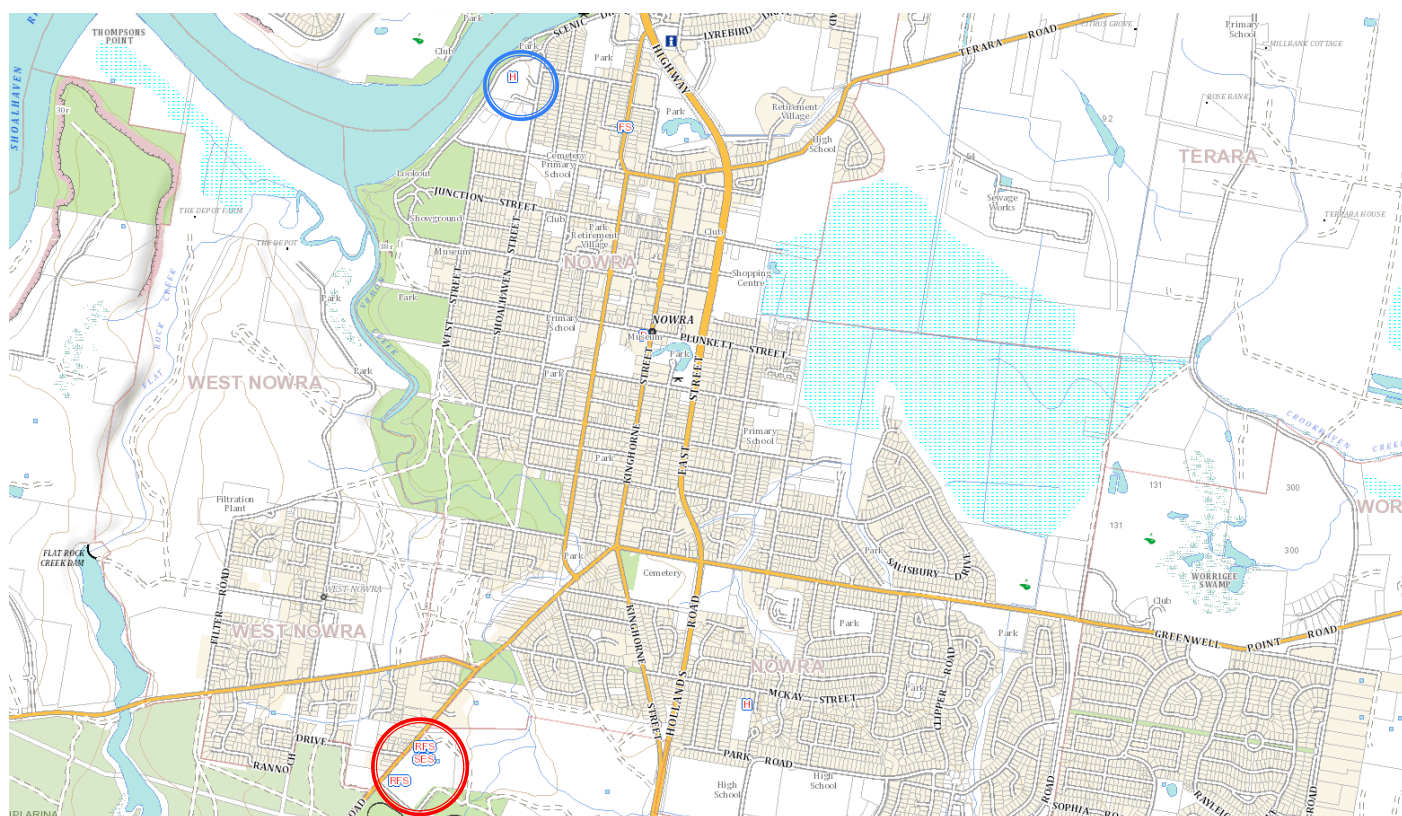


Figure 4 – Location of the Shoalhaven EMC (circled in red) to that of Nowra generally and the hospital (circled in blue) (SixMaps)



Figure 5 – The recently completed, relocated, and expanded helipad at the Shoalhaven EMC



Figure 6 – Shoalhaven EMC helipad, expanded car park, and cluster of sheds looking towards Albatross Road



Figure 7 – Shoalhaven EMC helipad and recent tree clearing



Figure 8 – Existing tree at corner of Albatross Road and Coral Sea Drive (AviPro)

2.3 Site Considerations and Constraints

Section 10.7 Planning Certificate No. 2023/01171 dated 22 March 2023 identifies that the site is located within the 'SP2 – Communications Facility including Emergency Services Facility' (SP2 – Infrastructure) zone under *Shoalhaven Local Environmental Plan 2014*, and is provided at **Appendix C**.

Table 2: Section 10.7 Planning Certificate

| Affectation | Yes | No |
|---|-----|----|
| Critical habitat | | ✓ |
| Conservation area | | ✓ |
| Item of environmental heritage | | ✓ |
| Affected by coastal hazards | | ✓ |
| Proclaimed to be in a mine subsidence district | | ✓ |
| Affected by a road widening or road realignment | | ✓ |
| Affected by a planning agreement | | ✓ |

Review of Environmental Factors: Shoalhaven Hospital Temporary Helipad Project

| Affectation | Yes | No |
|--|--|--------------------------------------|
| Affected by a policy that restricts development of land due to the likelihood of landslip | | ✓ |
| Affected by bushfire, tidal inundation, subsidence, acid sulfate or any other risk | ✓ Bushfire and acid sulfate soils | ✓ Subsidence or any other risk |
| Affected by any acquisition of land provision | | ✓ |
| Biodiversity certified land or subject to any biobanking agreement or property vegetation plan | | ✓ |
| Significantly contaminated | | ✓ |
| Subject to flood related development controls | | ✓ |

3. Proposed Activity

3.1 Proposal Overview

The proposal involves the temporary use of an existing helipad at the Shoalhaven EMC at 92 Albatross Road, South Nowra by the NSW Ambulance / Toll Ambulance Rescue Helicopter Service for a period of up to 3 years to June 2026. Minor ancillary works are also proposed to install a windsock, light pole, and fire firefighting equipment in the vicinity of the helipad.

The service will be supported by NSW Ambulance Service road-based ambulances which will traffic / ferry patients relying upon the helicopter to/from the nearby Shoalhaven Hospital. Up to some 10-15 helicopters are anticipated per month.

The existing helicopter movements in and out of Shoalhaven Hospital equate to an average of 9.75 movements per month over the past 12-13 months. About 46% of these movements have occurred between 10:00pm and 6:00am during this time span. Relevantly, these helicopter movements already exist within the locality. The proposal temporarily relocates the landing and take-off locations of these movements from Shoalhaven Hospital to the Shoalhaven EMC.

Detailed discussion on the operational and site management matters of the use are set out in the AviPro Operating Procedure report – See **Appendix D**. This includes:

- An overview of the Shoalhaven EMC precinct,
- Description of proposed landing area,
- Details of relevant stakeholders,
- Patient transfer activity detail,
- Responsibility Matrix,
- Risk Matrix, and
- Communications Plan and points of contact.

Figure 9 provides a Site Plan of the proposal and reference to operational matters set out in the AviPro report. See also further discussion in Section 3.2 over.



Figure 9 – Site Plan (AviPro)

Only minor physical works are required or proposed. These amount to the installation of a windsock, light pole for lighting trained upon the helipad for night-time movements, and firefighting equipment in the proximity of the helipad – see a Site Plan at **Appendix E**.

A single tree outside of the Shoalhaven EMC at the corner of Albatross Road and Coral Sea Drive poses a risk to safe night-time flying in the north-westerly direction out of the Shoalhaven EMC. Note, given only day-time flights and helicopter movements are expected at the current facility (primarily by the RFS), the prior identification of the tree as a risk has not arisen, given its general prominence during daylight hours.

Based on advice from AviPro (the project's aviation consultant), the tree must either be removed, or otherwise marked or lit during night-time hours to ensure it is visible to pilots. The options of marking or lighting the tree have been explored and no reasonable practical solution is available in the context of the works, the site, and impacts upon its environs and neighbours, particularly with stray light and potential for additional amenity impacts from lighting.

Consultation with Council's Tree Management Officer on the potential to remove the tree has resulted in emailed conditional approval to do so outside of this REF process. On 3 May 2023, Council's Tree Management Officer advised as follows:

I am willing to give Council's consent to your organisation for the removal of this Corymbia maculata (Spotted Gum Tree). In this regard I will mark it with a yellow 'X' later today as confirmation of this consent and for your tree contractor's ease of identification.

This consent is conditional on you;

- *Notifying the adjacent property owners 7 days prior to its removal.*
- *Advise Shoalhaven Council of the date of its removal and the contractors involved in the work 48 hours prior to commencement.*
- *Liaise with Endeavour Energy in regard to the protection of their adjacent high and low voltage electricity assets.*
- *Use suitably skilled, and qualified arborists with current CAVC qualifications.*
- *Obtain and implement an appropriate Traffic Control Plan and associated road permits as appropriate.*

Figure 10 shows the tree proposed for separate removal as marked by Council's Tree Management Officer.



Figure 10 – Tree proposed for separate removal as marked by Council's Tree Management Officer

3.2 Operational Activities

Use

The proposed temporary use of the existing Shoalhaven helipad involves an additional estimated 10-15 helicopter flights per month for a period of up to 3 years. This further includes up to 40-60 additional road trips per month by an ambulance to the Shoalhaven EMC to/from Shoalhaven Hospital. As noted, these helicopter movements already exist within the locality. The proposal temporarily relocates the landing and take-off locations of these movements from Shoalhaven Hospital to the Shoalhaven EMC. Further, only minor ancillary works are proposed to support the use, including installation of a windsock, light pole, and fire firefighting equipment in the vicinity of the helipad.

Based on the AviPro report, the key operational matters in relation to patient handing and transfer are set out below, segregated between outbound transfers and inbound transfers.

Following is the process to conduct a patient **outbound** transfer from the Final Approach and Takeoff Area (FATO) and Touchdown and Liftoff Area (TLOF):

- The Hospital will contact the Aeromedical Control Centre (ACC) to request a helicopter transfer of a patient from the hospital. In some cases, the NSW Ambulance road crew will transfer a patient from a primary site direct to the HLS. The helicopter will subsequently be activated and an estimated arrival time will be provided.
- The ACC will inform RFS, during working hours (0900 – 1700, Mon – Fri) on the designated duty phone number of an inbound helicopter.
- The NSW Ambulance road vehicle will access the RFS Base and position in the ambulance waiting area to meet the helicopter.
- The NSW Ambulance road vehicle crew, if they arrive at the HLS prior to the helicopter, will carry out HLS preparation tasks. This involves unlocking the HLS gate and crew facilities.
- The NSW Ambulance helicopter will approach the FATO/TLOF, normally flying into the prevailing wind. The approach direction may be modified for noise abatement purposes.
- The NSW Ambulance helicopter will land on the FATO/TLOF, land and shut down.
- The helicopter crew will switch on the floodlight.
- After the helicopter lands the NSW Ambulance road vehicle will depart the waiting area and move through Gate 3 to the HLS.
- The NSW Ambulance road vehicle will transport the helicopter medical crew to the hospital.
- At the hospital, the medical crew will complete the patient acceptance procedure and will use the ambulance to transfer the patient and the medical crew back to the helicopter.
- The patient will be loaded into the helicopter and the helicopter will depart for the tertiary hospital location. The helicopter will normally depart into the prevailing wind.
- Prior to departure, the helicopter crew will switch off the floodlight.
- Once the helicopter has departed, the NSW Ambulance road vehicle crew will lock the HLS gate and depart the RFS base.

Following is the process to conduct a patient **inbound** transfer to the hospital:

- The ACC will contact the hospital to advise of a helicopter transfer of a patient to the hospital. An estimated arrival time for the helicopter will be provided.
- The ACC will inform RFS on the designated duty phone number of an inbound helicopter.
- The NSW Ambulance road vehicle will access the RFS Base and position in the ambulance waiting area to meet the helicopter.
- The NSW Ambulance road vehicle crew, if they arrive at the HLS prior to the helicopter, will carry out HLS preparation tasks. This involves unlocking the HLS gate and crew facilities.
- The NSW Ambulance helicopter will approach the FATO/TLOF, normally flying into the prevailing wind. The approach direction may be modified for noise abatement purposes.
- The NSW Ambulance helicopter will land on the FATO/TLOF, land and shut down.
- The helicopter crew will switch on the floodlight.
- After the helicopter lands the NSW Ambulance road vehicle will depart the waiting area and move through Gate 3 to the HLS.
- After the helicopter shuts down, the patient will be loaded into the NSW Ambulance road vehicle and the patient and helicopter medical crew will be transported to the hospital.

- Once the hospital has completed the patient acceptance procedure the NSW Ambulance road crew will transport the helicopter medical crew back to the helicopter.
- Once the medical crew is back aboard the helicopter, it will depart for its base location. The helicopter will normally depart into the prevailing wind.
- Prior to departure, the helicopter crew will switch off the floodlight.
- Once the helicopter has departed, the NSW Ambulance road vehicle crew will lock the HLS gate and depart the RFS base.

AviPro advises that:

The helicopter will always approach to the FATO/TLOF. The parking area will only be used by an aircraft repositioning (by hover-taxying) from the FATO/TLOF. Likewise, for departures, the helicopter will reposition to the FATO/TLOF. NSW Ambulance helicopters will be the predominant users of HLS by night, noting that RFS or SES owned/contracted helicopters may operate from the HLS by night at some time in the future. Unless an RFS or SES owned/contracted helicopter is unserviceable, the FATO/TLOF should almost always be available to NSW Ambulance helicopters by night.

If the Shoalhaven EMC HLS is unavailable to NSW Ambulance helicopters, they will revert to using the alternate temporary HLS at HMAS Albatross. Approval to use HMAS Albatross remains extant and this requirement is most likely to be realised during a heavy flood or fire season.

There are possible approach and departure directions to account for most wind directions. For noise abatement, easterly/south-easterly paths are preferred for all approaches and departures where possible.

If aircraft performance permits, it is highly desirable that approaches and departures by night are conducted in the easterly/south-easterly direction.

Figure 11 indicates the likely helicopter flight paths, dependent upon weather and atmospheric conditions.

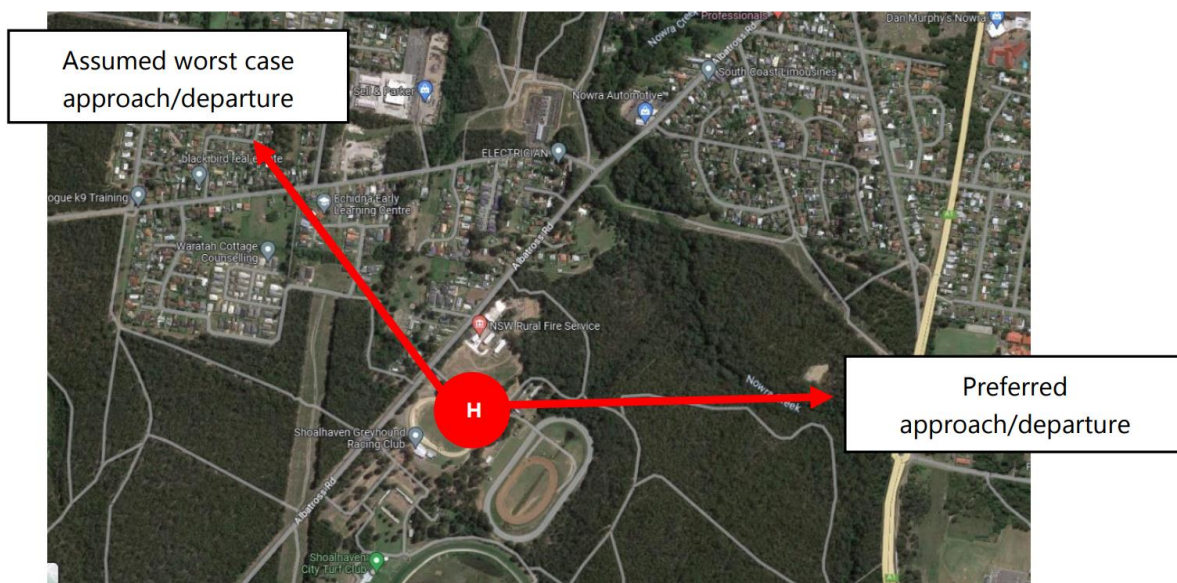


Figure 11 – Assumed approach and departure flight paths (AviPro / Acoustic Logic)

Operation Hours

As emergency services cannot be confined to normal business hours or nominated extended hours, the operation at the site will be 24 hours per day, 365 days per year. The operation of security gates and fencing at the Shoalhaven EMC and helipad will be carried out by ambulance staff, as set out by AviPro's report.

To that extent the Shoalhaven EMC's general hours of operation (to cater for emergencies as they may arise) are maintained and the existing hours of operation of the current helicopter and/or ambulance movements within the locality are also maintained as far as this can be predicted or determined.

Staff/Patients

No new or additional staff and/or patients are related to the operation of the helipad or the Shoalhaven EMC itself. All staff related to the movement of patients by helicopter or ambulance will be related to those vehicles only.

Traffic and Parking

No increase in parking demand or supply arises at the Shoalhaven EMC. All ambulance movements will be accommodated solely and directly at or near the helipad's perimeter. There is ample capacity at the site to cater for the required ambulance set down and parking needs.

As noted by AviPro's operational procedure report, the outbound and inbound movement of patients to and from the hospital to the helipad generates four (4) ambulance trips per patient / helicopter movement to the helipad. Therefore, up to 40-60 additional traffic movements per month will be able to be suitably accommodated within the existing road system. TTW has provided commentary on parking, traffic volumes, and road capacity - see **Appendix F**.

No change is required to parking at the site, or traffic and road arrangements at Albatross Road or en-route along the existing road network to and from Shoalhaven Hospital.

4. Statutory Framework

4.1 Activity Description under TI SEPP

Section 4.1 of the EP&A Act states that if an EPI provides that development may be carried out without the need for development consent, a person may carry out the development, in accordance with the EPI, on land to which the provision applies. However, an environmental assessment of the development is required under Part 5 of the Act.

State Environmental Planning Policy (Transport and Infrastructure) 2021 (TI SEPP) aims to facilitate the effective delivery of infrastructure across the State. Division 6 of the TI SEPP outlines the approval requirements for emergency services facilities. An *emergency services facility* is defined as a *building or place (including a helipad) used in connection with the provision of services by an emergency services organisation, including a police station and related training facilities* under this division. An *emergency services organisation* means the following under section 3(1) of the *State Emergency and Rescue Management Act 1989* (as well as a similar definition under the Standard Template LEP Dictionary, where each include the Ambulance Service of NSW):

emergency services organisation means the following—

- (a) Ambulance Service of NSW,*
- (b) Fire and Rescue NSW,*
- (c) a fire brigade within the meaning of the Fire and Rescue NSW Act 1989,*
- (d) NSW Police Force,*
- (e) NSW Rural Fire Service,*
- (f) State Emergency Service,*
- (g) Surf Life Saving New South Wales,*
- (h) New South Wales Volunteer Rescue Association Inc,*
- (i) Volunteer Marine Rescue NSW,*
- (j) an agency that manages or controls an accredited rescue unit,*
- (k) a non-government agency that is prescribed by the regulations for the purposes of this definition.*

The use of the helipad is for the Ambulance Service of NSW who will transport patients to and from Shoalhaven Hospital and will treat and/or transfer patients whilst being transported within the helicopters.

Under section 2.52(1) of the TISEPP, *development for the purpose of an emergency services facility may be carried out by or on behalf of a public authority (other than the NSW Rural Fire Service) without consent in a prescribed zone.*

Under section 2.52(3) of the TISEPP, *development for any of the following purposes may be carried out by or on behalf of an emergency services organisation without consent on any land—*

- (a) the replacement or alteration of, or an addition to, an existing emergency services facility,*
- (b) the restoration of an emergency services facility due to damage,*
- (c) the demolition of an emergency services facility.*

In this instance the most relevant provision to the proposed additional use of the existing helipad is section 2.52(3)(a).

The Shoalhaven EMC site is zoned 'SP2 – Communication Facility and Emergency Services Facility' under the *Shoalhaven Local Environmental Plan 2014*. The SP2 zone is a prescribed zone under the TI SEPP, noting also that

additions to an existing emergency services facility may be carried out on any land. See the zoning map at **Figure 12** below.

Therefore, the proposal is considered an ‘activity’ for the purposes of Part 5 of the EP&A Act and is subject to an environmental assessment (REF). The proposal is considered an ‘activity’ in accordance with Section 5.1 of the EP&A Act because it involves the carrying out of a work, the demolition of a building or a work, and the use of land, that is not Exempt Development or prohibited under an environmental planning instrument.

TI SEPP consultation is discussed within Section 5 of this REF.

Table 3: Description of proposed activities

| Division and Section within TI SEPP | Description of Works |
|-------------------------------------|---|
| Division 6 – section 2.52(3)(a) | Additional use of the existing helipad / emergency services facility by NSW Ambulance, including its minor ancillary works to install a windsock, light pole, and firefighting equipment in the proximity of the helipad. |

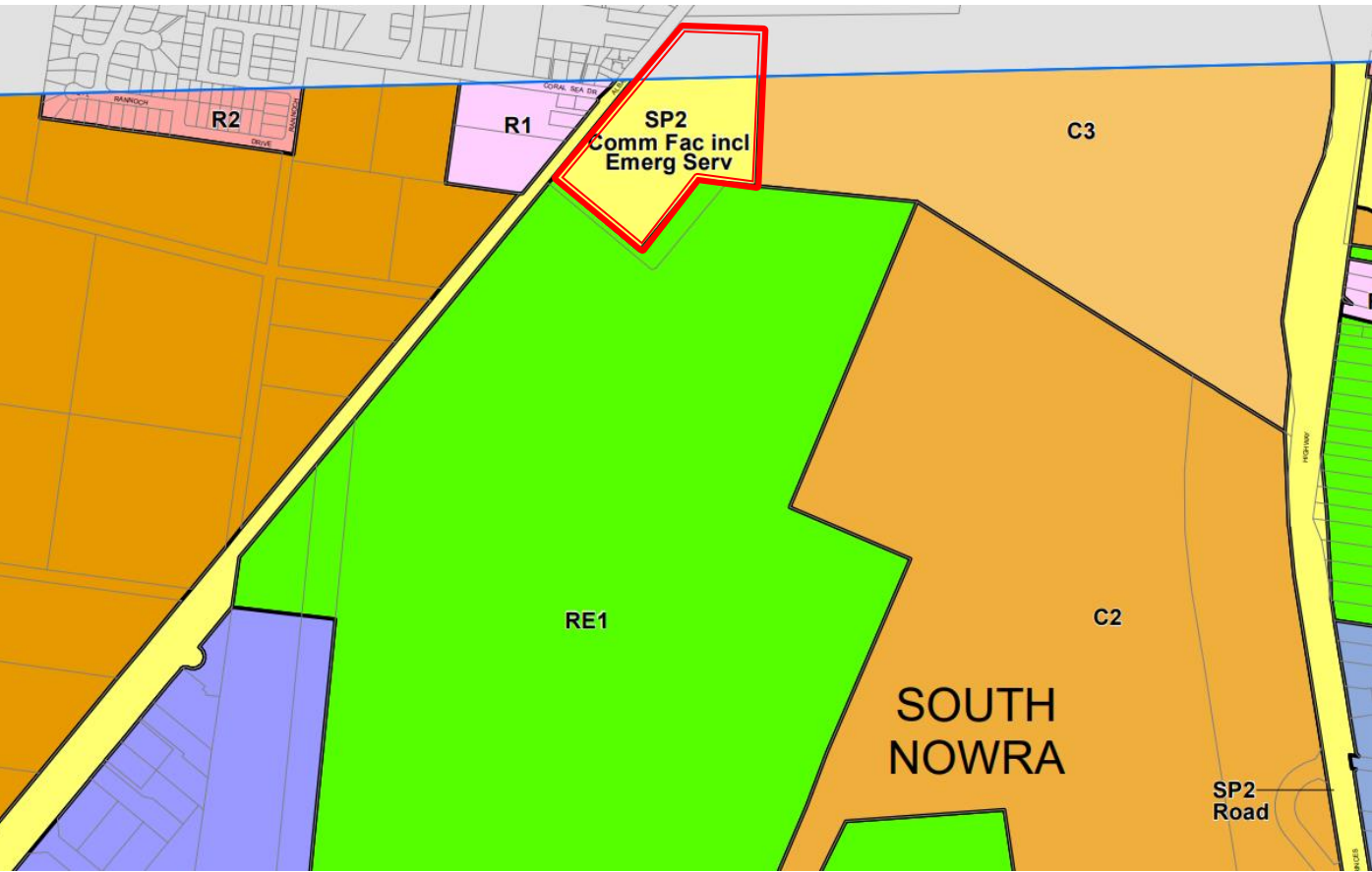


Figure 12 – Zoning Map (Shoalhaven LEP 2014)

4.2 Environmental Protection and Biodiversity Conservation Act 1999

The provisions of the *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act) do not affect the proposal as it is not development that takes place on or affects Commonwealth land or waters. Further, it is not development carried out by a Commonwealth agency or development on Commonwealth land, nor does the proposed development affect any matters of national significance. An assessment against the EPBC Act checklist is provided at Table 4.

Table 4: EPBC Checklist

| Consideration | Yes/No |
|--|--------|
| Will the activity have, or likely to have, a significant impact on a declared World Heritage Property? | No |
| Will the activity have, or likely to have, a significant impact on a National Heritage place? | No |
| Will the activity have, or likely to have, a significant impact on a declared Ramsar wetland? | No |
| Will the activity have, or likely to have, a significant impact on Commonwealth listed threatened species or endangered community? | No |
| Will the activity have, or likely to have, a significant impact on listed migratory species? | No |
| Will the activity involve nuclear actions? | No |
| Will the activity have, or likely to have, a significant impact on Commonwealth marine areas? | No |
| Will the activity have any significant impact on Commonwealth land? | No |
| Will the activity affect a water resource, with respect to a coal seam gas development or large coal mining development? | No |

4.3 Environmental Planning and Assessment Act 1979

Duty to Consider Environmental Impact

Part 5 of the EP&A Act applies to activities that are permissible without consent and are generally carried out by a public authority. Activities under Part 5 of the EP&A Act are assessed and determined by a public authority, referred to as the determining authority. HI is a public authority and is the proponent and determining authority for the proposed works.

For the purpose of satisfying the objects of the EP&A Act relating to the protection and enhancement of the environment, a determining authority, in its consideration of an activity shall, notwithstanding any other provisions of the Act or the provisions of any other Act or of any instrument made under the EP&A Act or any other Act, examine and take into account to the fullest extent possible all matters affecting or likely to affect the environment by reason of that activity (refer to Subsection 1 of Section 5.5 of the EP&A Act).

Section 171 of the EP&A Regulation defines the factors which must be considered when assessing the likely impact of an activity on the environment under Part 5 of the EP&A Act. Section 6 of this REF specifically responds to the factors for consideration for the activity.

Table 5 below demonstrates the effect of the proposed development activity on the matters listed for consideration in Subsection 3 of Section 5.5 of the EP&A Act.

Table 5: Matters for consideration under Subsection 3, Section 5.5 of the EP&A Act

| Matter for Consideration | Impacts of Activity |
|---|---|
| <p><i>Subsection 3:</i></p> <p>Without limiting subsection 1, a determining authority shall consider the effect of any activity on any wilderness area (within the meaning of the <i>Wilderness Act 1987</i>) in the locality in which the activity is intended to be carried on.</p> | <p>No effect, as there is no wilderness area (within the meaning of the <i>Wilderness Act 1987</i>) in the locality in which the activity is intended to be carried on.</p> |
| <p>Note: If a biobanking statement has been issued in respect of a development under Part 7A of the <i>Threatened Species Conservation Act 1995</i>, the determining authority is not required to consider the impact of the activity on biodiversity values.</p> | |

4.4 Environmental Planning and Assessment Regulation 2021

The *Guidelines for Division 5.1 Assessment* (DPE June 2022) provides a list of environmental factors that must be taken into account for an environmental assessment of the activity under Part 5 of the EP&A Act. These factors are considered at Section 6 of this REF.

In addition, Section 171A of the Environmental Planning and Assessment Regulation (2021) requires the consideration of the impact an activity in a defined catchment. This is considered further below under Table 10 of this REF.

Relevantly, the proposed additional use of the helipad is not Designated Development under Schedule 3 Part 2 Section 4(3) of the Regulation. The helipad would not be classed as an *aircraft facility* for the purposes of the provisions, and in any event the number of helicopter flights anticipated are lesser than the thresholds set by this provisions, and most pertinently, an aircraft facility for helicopters *does not apply to a facility used exclusively for emergency aeromedical evacuation, retrieval or rescue*.

4.5 Other NSW Legislation

The following table lists any additional legislation that is required to be considered if it is applicable to the proposed activity.

Table 6: Other Possible Legislative Requirements

| Legislation | Comment | Relevant? Yes/No |
|--|---|------------------|
| State Legislation | | |
| <i>Rural Fires Act 1997</i> | <p>The helipad itself is not on bushfire prone land despite other parts of the wider 6.5ha site being mapped as such. The site is subject to a range of Asset Protection Zones and recent perimeter tree clearing to accommodate not only the helipad but the various buildings at the site. Given the recent clearing of further trees at the site under Council's 2021 REF, the pre-existing bushfire prone land map, which may yet to be updated, may not correctly present the current scenario.</p> <p>In any case, during a bushfire event the NSW Ambulance / Toll Ambulance Rescue Helicopter Service would not use the site, instead flying into and out of HMAS Albatross for the duration of that risk.</p> | No |
| <i>Biodiversity Conservation Act 2016</i> | The helipad site and its developed environs each do not contain any critical habitat, threatened species or ecological population or community. The site has been cleared to provide for the helipad's use and the wider Shoalhaven EMC. | No |
| <i>Water Management Act 2000</i> | The works are not within 40 metres of a watercourse | No |
| <i>Contaminated Land Management Act 1997</i> | <p>The site is not listed on the EPA register of contaminated sites, and is not significantly contaminated, subject of a management order, subject to an approved voluntary management proposal or an ongoing maintenance order, or a site audit statement, within the meaning of the <i>Contaminated Land Management Act 1997</i>. See the Planning Certificate at Appendix C.</p> <p>In any case, the recent 2021 Council-assessed and determined REF would have considered the relevant contamination-related considerations in the relocation and expansion of the helipad. No concerns were raised by Council.</p> <p>This subject REF is solely concerned with the additional temporary use of the helipad. The minor and limited ancillary works to install a windsock, light pole, and firefighting equipment do not result in any substantive earthworks. The helipad itself is designed to cater for the weight of the Toll helicopters and there is no risk of exposure to any contaminants, should any be present at the site under the helipad and any sealed and recently sealed surfaces at the site.</p> | No |
| <i>Heritage Act 1977</i> | As the site is neither a listed or mapped State or local heritage item, there are no impacts on local or state heritage. The site is also not a National item as listed by the EPBC Act. | No |
| <i>Roads Act 1993</i> | No road works or other works subject to s138 of this Act are proposed. | No |
| <i>Protection of the Environment Operations Act 1997</i> | The use of the helipad is not subject to any Environment Protection Licence under this Act as the use is not a scheduled activity under Schedule 1 Part 1 Section 20. Whilst the anticipated number of flight movements is lesser than or at the threshold of 30 flight movements per week (with take-off and landing considered separate flight movements) and the helipad is within 1 km of a dwelling not associated with the site, an activity that is carried out exclusively for the purposes of emergency aeromedical evacuation, retrieval or rescue is excluded from being deemed a Scheduled Activity. | No |
| <i>Section 171 A Environmental Planning and Assessment Regulation 2021</i> | No impacts to catchments as defined for consideration under Section 171 A of the EP&A Regulation. | No |
| Other Acts as required | No other Acts are relevant to the temporary use of the helipad. | No |

| Legislation | Comment | Relevant? Yes/No |
|---|--|---|
| State Environmental Planning Policies | | |
| State Environmental Planning Policy (Transport and Infrastructure) 2021 | In addition to the Division 6 provisions being relied upon under this SEPP, the use is also not traffic-generating development for the purposes of section 2.122 and Schedule 3 of the SEPP, noting a helipad is not a heliport (this being the only relevant trigger to referral to TfNSW). The up to 40-60 ambulance movements per month are also not traffic-generating development under Schedule 3 of the SEPP in relation to 'any other purpose' whether considering the 50 or more motor vehicles per hour or the 200 or more motor vehicles per hour thresholds. | No |
| No other SEPPs apply or are applicable | | |
| Shoalhaven Local Environmental Plan 2014 | | |
| Zone | SP2 – Communications Facility and Emergency Services Facility | No, as the temporary additional usage (and minor ancillary works) of the helipad the subject of this REF can be undertaken on any land in relation to an existing emergency services facility, notwithstanding the SP2 is also a prescribed zone to permit such activities under other provisions of this Division of the TISEPP. |
| Height of Buildings | 11m in any area of the LGA without a mapped height control. This site is unmapped in relation to building height controls. | No. The use does not affect building height noting the helipad is located at ground level and no works are proposed to increase its height under this REF. The new windsock and light pole would not extend to 11m in any case and would not be considered development to which the definition of building height applies. |
| Floor Space Ratio | N/A | No |
| Heritage | N/A | No |
| Flood Planning | N/A | No |
| Coastal Planning | N/A – the site sits outside of the mapped areas of Coastal Use Area and Coastal Environment Area in the LGA. | No |

5. Consultation

5.1 Statutory Consultation

The REF scope of works was notified for at least 21 calendar days, as required by legislation, to the stakeholders outlined in Table 7.

Table 7: Agencies and stakeholders notified

| Stakeholder | Relevant section |
|-----------------------------|--------------------------------|
| Shoalhaven City Council | Section 2.52(7) of the TI SEPP |
| Occupiers of adjoining land | Section 2.52(7) of the TI SEPP |

The notification was carried out consistent with Council's notification policy and commenced on 5 April 2023 and concluded after 27 April 2023 up to the end of April 2023. Copies of the notification letters, as well as responses received, are provided at **Appendix G**. Note, due to a typographical error with respect to the HI response email address, a supplementary notification / re-notification was carried out to the same agencies and stakeholders for a further 21 calendar days from 2 May 2023 to 23 May 2023.

The extent of notification across both notification phases is shown in **Figure 13** below. This included some 170 residential, business-related, and recreational-related properties.



Figure 13 – Extent of statutory notification (SixMaps)

None of the notification triggers under sections 2.10 to 2.15 of the TISEPP, inclusive, relate to the site and/or the scope of works, and no additional agencies were required to be notified.

HMAS Albatross is also aware of the proposed temporary usage, noting the existing helipad and its anticipated use already falls within each of that facility's Military Aircraft Operating Area and the Military Aircraft Operating Area – Airfield Circuit Area. HMAS Albatross is already receiving helicopter movements in relation to hospital in the interim until this REF has been approved.

An overview of the comments received are outlined and responded to in the table below.

Only Shoalhaven City Council responded (during the initial statutory notification process). No public submissions were received across the two notification periods.

The Shoalhaven City Council response is found at **Appendix H**.

Table 8: Outcomes of consultation

| Issue raised | Date received | Response | Reference |
|---|---------------|--|--|
| Shoalhaven City Council | | | |
| 1. Operational Constraints a) How will the use of the helipad be managed between the emergency services at the site. Furthermore, how will the use of the helipad be managed between the emergency services and in periods of natural disaster. | 27 April 2023 | <p>The AviPro operational procedure has been prepared with the occupants of the Shoalhaven EMC and with Council and RFS input to ensure acceptance of the extent and nature of the use.</p> <p>The incoming temporary use will be subordinate to the existing uses, and introduce a supplementary use, that whilst it brings up to 10-15 additional helicopter movements per month, will revert to the EMC's helipad in the event of flood and fire-related disasters. In that event (as is presently the case) HMAS Albatross will be used for aeromedical retrievals in the interim.</p> | See AviPro Operational Procedure at Appendix D . |
| 2. Noise a) The noise generated by the helicopters taking off and landing can be disruptive to nearby residents and businesses. The proponent should consider the level of noise that will be produced and whether there are any mitigation measures that can be implemented. | | <p>Acoustic Logic has assessed the likely noise impacts upon nearby sensitive receivers. Assessment is found in the Acoustic Logic report and further within this REF.</p> <p>Note also that aeromedical helicopter movements are exempted / excluded from consideration as an offensive activity under Designated Development provisions of the EP&A Act, as well as similarly being excluded from the need for an Environment Protection Licence for Scheduled Activities under the PoEO Act.</p> | <p>See the Acoustic Logic Noise Impact Assessment at Appendix J.</p> <p>Further, to satisfy the Council's in-principle conditional support for the proposed use, see also HI's Community Complaints Protocol at Appendix K.</p> <p>A mitigation measure is included to, as far as will be practically possible, seek to ensure the easterly / south-easterly flight path is used, particularly at night – see Appendix L.</p> |
| 3. Safety a) Helicopter operations can pose a safety risk to people and property. b) There is no record of an approval for the helipad, thus the proponent should ensure that the helipad meets the relevant safety and construction standards. | | <p>Safety signage and procedures are in place at the existing helipad and are proposed to be augmented through signage as proposed by AviPro – see the 'Helicopter Safety and Safety Around Helicopters' section of that report.</p> <p>The existing helipad does have planning approval having been approved by Council in 2021 via a REF / Part 5 assessment for its relocation and expansion and provided to HI. As above, relevant additional safety measures will be introduced to augment existing measures currently used on-site.</p> | See AviPro's Operational Procedure at Appendix D as well as the proposed mitigation measures at Appendix L . |
| 4. Traffic & Transport a) The operations of ambulances when ingressing and egressing can generate traffic on nearby roads. | | <p>The addition of between 40-60 additional vehicle movements per month by ambulance is not a significant increase in traffic compared to existing daily peak hour counts for Albatross Road – see</p> | See the TTW assessment at Appendix F . |

| Issue raised | Date received | Response | Reference |
|---|---------------|--|--|
| b) The proponent should consider the potential impacts when ambulances ingress and egress the site. | | <p>Traffic Volumes in the TTW assessment. This is effectively 2 additional movements per day which will be minimal additional traffic.</p> <p>Ambulance drivers will take due and appropriate care when driving, including when it may be necessary to egress the site with the assistance of one or both of lights and sirens.</p> | |
| 5. Environmental Impact a) The proponent should consider the potential environmental impacts of intensifying the helipad's operation, including the impact on local fauna, and air quality. | | <p>No additional impacts upon local fauna is anticipated to arise from the additional and temporary use. The site is well clear of any trees and the area is generally managed and cleared land.</p> <p>Air quality issues arising from downdraft is addressed by the Council-approved design of the helipad including its generous sealed perimeter area as seen in earlier figures in this REF, as well as a grassed / turf edge to prevent loose particular matter being loosened by downdraft.</p> | See mitigation measures to this REF at Appendix L . |

5.2 Community and Stakeholder Engagement

In addition to, and preceding the statutory notification, HI Communications issued a letterbox drop consultation of the proposal and forthcoming statutory notification process. This letter is found at **Appendix I**. The spatial extent for the statutory notification mirrored that of this non-statutory letterbox drop. These letters were delivered in the weekend of 1-2 April 2023.

No enquiries, submissions or responses were received in relation to that non-statutory consultation.

6. Environmental Assessment

6.1 Environmental Planning and Assessment Regulation 2021 – Assessment Considerations

Section 171 (1) of the *Environmental Planning and Assessment Regulation* (2021) notes that when considering the likely impact of an activity of the environment, the determining authority must take into account the environmental factors specified in the environmental factors guidelines that apply to the activity.

The *Guidelines for Division 5.1 assessments* (June 2022) apply to the activity. The relevant assessment considerations under Section 3 of these Guidelines are provided below.

Table 9: Summary of Environmental Factors Reviewed in Relation to the Activity

| Relevant Consideration | Response/Assessment | | |
|--|---|-----|---|
| (a) Any environmental impact on a community? | <p>There are no construction-related impacts upon the community. The minor ancillary works will be short in duration, not involve significantly intrusive works, and be generally isolated from sensitive receivers.</p> <p>The only operational impacts related to the net change in noise impacts will be from helicopter (and to a lesser degree ambulance) movements. The use is however temporary with the likelihood of movements sporadic, but up to 10-15 helicopter visits to the site per month, over a 3 year period (to June 2026). Some of these visits are likely to occur at night. The access to the helipad will be 24 hours per day, 365 days per year.</p> <p>Recent data over the past 12-13 months indicates that an average of 9.75 movements occur per month, and of these some 46% of these movements have occurred between 10:00pm and 6:00am during this time span.</p> <p>Acoustic Logic has assessed the likely noise impacts in its report at Appendix J. The key findings and conclusions are that:</p> <ul style="list-style-type: none"> • There are generally no guidelines or noise control measures that apply to emergency vehicles (including helicopters). • Guidance is available from some precedent projects. • The RFS helicopters (Bell 139) whilst similar in noise output to the ambulance helicopters (AW139) are slightly louder (by 2dBA). • The proposed flight paths must be used in response to weather conditions, but the preferred route will be to the east away from sensitive uses in West Nowra (whether day or night). • Noise will be experienced by sensitive users for either flight path, but will be most affected by the north-west flight path. • Whilst there is a potential for some residential receivers to be awoken during night time movements, this is not likely to significantly affect health and well-being. The noise levels with closed facades are similar to noise levels identified by NSW Road Noise Policy which states maximum internal noise levels of 65-70 dBA are not likely to affect health and wellbeing significantly. Acoustic Logic has assessed the likely internal noise of those nearest / most affected to be about 71 dBA. The difference of 1dBA is not likely to be discernible. • Acoustic Logic advises that the noise impacts for individual movements will be similar to those that would already be experienced at the site. • Opportunities for noise abatement are limited since the movements are needed for critical care and emergencies. The most effective noise mitigation would be to seek to use the eastern flight path as often as possible, particularly at night. <p>As noted above, aeromedical helicopter movements are exempted / excluded from consideration as an offensive activity under Designated Development provisions of the EP&A Act, as well as similarly being excluded from the need for an Environment Protection Licence for Scheduled Activities under the PoEO Act.</p> <p>In terms of road ambulance movements these will be few relative to existing road traffic movement numbers on Albatross Road – see the TTW traffic impact assessment at Appendix F. NSW Ambulance maintains a good neighbour practice to ensure that lights, sirens and warning devices are used appropriately with minimum</p> | -ve | X |
| | | Nil | |
| | | +ve | |

| Relevant Consideration | Response/Assessment | | |
|---|--|-----|---|
| | <p>impact on residents living within vicinity of traffic movements, including the helipad, hospital, and the ambulance station. Lights and/or sirens are only used if required to assist paramedics navigate through traffic when either responding to a Triple Zero (000) call or transporting a critically ill patient. This is currently in practice in the Shoalhaven area. Paramedics, when driving an ambulance, are also required to drive in a professional manner and at a speed and manner method appropriate to traffic, road and prevailing weather conditions.</p> <p>As discussed earlier, the likely increase in ambulance movements is minimal in the context of Albatross Road's existing daily peak movements.</p> | | |
| (b) Any transformation of a locality? | There will be no transformation of the locality as the development will remain as approved and constructed. The additional use of the facility is temporary and following the completion of the new Shoalhaven Hospital Acute Services Building with its rooftop helipad, the use of the Shoalhaven EMC and the Shoalhaven Hospital will revert to existing usage and scenarios. It is anticipated that the new windsock, lighting, and firefighting equipment would stay in place. | -ve | |
| | | Nil | X |
| | | +ve | |
| (c) Any environmental impact on the ecosystems of the locality? | There will be no impact upon ecosystems based on the additional usage of the existing helipad. | -ve | |
| | | Nil | X |
| | | +ve | |
| (d) Any reduction of the aesthetic, recreational, scientific or other environmental quality or value of a locality? | There will be no significant or discernible reduction of the aesthetic, recreational, scientific or other environmental quality or value of the locality. Noise impacts are separately considered in this context. | -ve | |
| | | Nil | X |
| | | +ve | |
| (e) Any effect on locality, place or building having aesthetic, anthropological, archaeological, architectural, cultural, historical, scientific or social significance or other special value for present or future generations? | There will be no effect on a locality, place or building having aesthetic, anthropological, archaeological, architectural, cultural, historical, scientific or social significance or other special value for present or future generations. | -ve | |
| | | Nil | X |
| | | +ve | |
| (f) Any impact on the habitat of protected animals (within the meaning of the <i>Biodiversity Conservation Act 2016</i>)? | There will be no impact on the habitat of protected animals, given the works are minimal and the area is managed and cleared as an APZ and otherwise to facilitate helicopter movements. | -ve | |
| | | Nil | X |
| | | +ve | |
| (g) Any endangering of any species of animal, plant or other form of life, whether living on land, in water or in the air? | There will be no endangering of any species of animal, plant or other form of life, whether living on land, in water or in the air as a result of the temporary use. | -ve | |
| | | Nil | X |
| | | +ve | |
| (h) Any long-term effects on the environment? | The proposed additional usage of the existing helipad is temporary and accordingly there are no long-term impacts. | -ve | |
| | | Nil | X |
| | | +ve | |
| (i) Any degradation of the quality of the environment? | The change to the quality of environment near the site is solely in relation to noise impacts. The impact is temporary in relation to a site already established to receive helicopter movements. There is an established understanding in the locality that there will be helicopters using the site sporadically in the event of emergencies in the locality and region, and that with that comes noise impacts. The net change in helicopter movements will be some 10-15 additional movements per month over a temporary 3-year period (to June 2026). Additional noise would be expected upon some residential / sensitive receivers dependent upon the time of day / night and the climatic and wind conditions which will influence arrival and departure movements and flight paths. | -ve | X |
| | | Nil | |
| | | +ve | |

Review of Environmental Factors: Shoalhaven Hospital Temporary Helipad Project

| Relevant Consideration | | Response/Assessment | | |
|------------------------|---|--|-----|---|
| (j) | Any risk to the safety of the environment? | There is no risk to the safety of the environment. Aside from noise impacts the use is benign to a range of considerations. | -ve | |
| | | | Nil | X |
| | | | +ve | |
| (k) | Any reduction in the range of beneficial uses of the environment? | There will be no reduction in the range of beneficial uses of the environment. | -ve | |
| | | | Nil | X |
| | | | +ve | |
| (l) | Any pollution of the environment? | There will be no additional pollution to the environment, noting noise is assessed elsewhere within this REF. Air quality is unlikely to be significantly affected by the additional movements, and air-borne particulate matter loosened by downdraft of the helicopter is unlikely to be a significant issue due to the generous sealed perimeter of the newly expanded helipad and the grass / turfing at the helipad's fringe. | -ve | |
| | | | Nil | X |
| | | | +ve | |
| (m) | Any environmental problems associated with the disposal of waste? | There will be no environmental problems associated with the disposal of waste through this additional use of the helipad. Existing waste handling protocols and procedures, whether in relation to the Shoalhaven EMC or the helicopter usage itself will be maintained. | -ve | |
| | | | Nil | X |
| | | | +ve | |
| (n) | Any increased demands on resources (natural or otherwise) that are, or are likely to become, in short supply? | There are no increased demands on resources (natural or otherwise) that are, or are likely to become, in short supply. | -ve | |
| | | | Nil | X |
| | | | +ve | |
| (o) | Any cumulative environmental effect with other existing or likely future activities? | There are no cumulative environmental impacts likely to arise with existing or other future activities. The use is the temporary transfer of an existing essential public service from one existing helipad (soon to be demolished and replaced) to another designed to cater for emergency helicopter movements to support the Shoalhaven community. | -ve | |
| | | | Nil | X |
| | | | +ve | |
| (p) | Any impact on coastal processes and coastal hazards, including those under projected climate change conditions? | The temporary use of the helipad will have no impact on coastal processes and coastal hazards, including those under projected climate change conditions. | -ve | |
| | | | Nil | X |
| | | | +ve | |
| (q) | Any applicable local strategic planning statement, regional strategic plan or district strategic plan made under the Act, Division 3.1? | The use of the helipad is consistent with the overall and general strategic planning objectives tied to the improvement of health service provision in the region. The temporary relocation maintains existing levels of ambulance services to the hospital until such time as its new helipad is in place and operational. | -ve | |
| | | | Nil | X |
| | | | +ve | |
| (r) | Any other relevant environmental factors? | No other environmental factors are relevant. An AHIMS Search has been carried out (as per Appendix M). No Aboriginal sites are recorded in or near the site and no Aboriginal places have been declared in or near the site. | -ve | |
| | | | Nil | X |
| | | | +ve | |

7. Summary of Impacts

Any likely impacts relating to the proposed activity have been considered and are discussed in Table 10 below. All issues relating to the project are largely minor and will not cause significant impact as a result of the proposed activity. All mitigation measures relating to the project are provided in **Appendix L**.

Table 10: Summary of impacts relating to the activity

| Issue | Discussion |
|---------------------------------------|--|
| Traffic access and parking | <p>The proposed temporary use of the helipad will not alter any existing car parking demand or supply at the Shoalhaven EMC.</p> <p>Traffic movements associated with the helicopter's movements will be minimal, that is some additional 40-60 ambulance movements by road per month along Albatross Road and to and from the Shoalhaven EMC and Shoalhaven Hospital.</p> <p>The Traffic Impact Assessment at Appendix F confirms this concluding the traffic impact of the additional ambulance movements will be minimal, as the use of the Shoalhaven EMC helipad generates low traffic volumes which are widely dispersed throughout the day and night.</p> |
| Noise and vibration | <p>There are generally no guidelines or noise control measures that apply to emergency vehicles (including helicopters). Guidance is available from some precedent projects.</p> <p>The RFS helicopters (Bell 139) whilst similar in noise output to the ambulance helicopters (AW139) are slightly louder (by 2dBA).</p> <p>The proposed flight paths must be used in response to weather conditions, but the preferred route will be to the east away from sensitive uses in West Nowra.</p> <p>Noise will be experienced by sensitive users for either flight path, but will be most affected by the north-west flight path.</p> <p>Whilst there is a potential for some residential receivers to be awoken during night time movements, this is not likely to significantly affect health and well-being. The noise levels with closed facades are similar to noise levels identified by NSW Road Noise Policy which states maximum internal noise levels of 65-70 dBA are likely to affect health and wellbeing significantly. Acoustic Logic has assessed the likely internal noise of those nearest / most affected to be about 71 dBA.</p> <p>Acoustic Logic advises that the noise impacts for individual movements will be similar to those that would already be experienced at the site.</p> <p>Opportunities for noise abatement are limited since the movements are needed for critical care and emergencies. The most effective noise mitigation would be to seek to use the eastern flight path as often as possible, particularly at night.</p> |
| Air quality and environment | The temporary use of the existing helipad will not have any significant air quality issues. |
| Soils and geology | Not relevant. The temporary use of the existing helipad will not have any significant ground disturbance, other than in relation to minor works to install a windsock, lighting, and firefighting equipment enclosure within already sealed and/or disturbed parts of the site. |
| Coastal risks | Not relevant. The temporary use of the existing helipad will not have any impact upon an area of coastal risks and/or hazards. |
| Hydrology, flooding and water quality | Not relevant. The temporary use of the existing helipad will not have any impact upon or be impacted by stormwater or affect stormwater. |
| Visual amenity | Not relevant. The temporary use of the existing helipad will have no visual impact. The windsock, lighting, and firefighting equipment enclosure will each be appropriately scaled relative to purpose, need, and safety codes. Their addition to the Shoalhaven EMC and helipad is entirely as would be expected for a facility of this type. |
| Aboriginal heritage | The site is not affected by any Aboriginal Heritage by review of the AHIMS database – see Appendix M . |
| Non-Aboriginal heritage | The site is not located in a heritage conservation area, and is not a mapped or listed local, State or National heritage item. |
| Ecology | Not relevant. The temporary use of the existing helipad will have no impact to flora and fauna, or other natural matters. |
| Bushfire | Not relevant as the helipad is located outside of mapped bushfire prone land and the Shoalhaven EMC is subject to recent tree clearing to assist with navigation for helicopters and which in itself improves the site's |

| Issue | Discussion |
|---------------------------------------|--|
| | asset protection zones and reduced bushfire risk. In any case, the helipad would not be in use by NSW Ambulance in the event of a bushfire emergency at this site. |
| Land uses and services | The temporary use of the existing helipad does not impact (change) land use activities or services at the site, instead confirming and supporting the use of the helipad (and facility as a hub) as designed and located for emergencies for the locality and region. |
| Waste generation | The temporary use of the existing helipad does not impact on current Shoalhaven EMC waste generation and therefore has no impact. All waste will be removed from the site either within the ambulance and/or the helicopter. |
| Hazardous materials and contamination | The site does not comprise any contaminated material nor introduce any new hazardous material (eg related to refuelling), and therefore the temporary use of the existing helipad has no impact. |
| Sustainability and climate resilience | The temporary use of the existing helipad has no impact upon the sustainability credentials of the existing development and does not impact the site's response to climate resilience. |
| Community and social impact | The temporary use of the existing helipad supports the ongoing operation of the nearby Shoalhaven Hospital, therefore broader positive social and community impacts are maintained rather than diminished by the proposal. |
| Cumulative impacts | The temporary use of the existing helipad is minor in scale and frequency and therefore not substantial to have, or result in, a cumulative impact, noting it is in effect replacing existing helicopter movements elsewhere in Nowra and hence no net change occurs within the wider context of helicopter operations in Nowra. |

8. Summary of Mitigation Measures

Mitigation measures are to be implemented for the proposal to reduce impacts on the environment. The mitigation measures are provided at **Appendix L**.

8.1 Summary of Impacts

Based on the identification of potential issues, and an assessment of the nature and extent of the impacts of the proposed development, it is determined that:

- The extent and nature of potential impacts of the use of the helipad are temporary and sporadic in nature, and will not have significant adverse effects on the locality, community and the environment;
- Potential impacts can be appropriately mitigated or managed to ensure that there is minimal effect on the locality, community; and
- Given the above, it is determined that an EIS is not required for the proposed development activity. Further, a Species Impact Statement (SIS) and Biodiversity Development Assessment Report (BDAR) are each also not required.

9. Justification and Conclusion

The proposed temporary use of an existing helipad by NSW Ambulance / Toll Ambulance Rescue Helicopter Service at 92 Albatross Road, South Nowra (the Shoalhaven EMC) is subject to assessment under Part 5 of the EP&A Act. The REF has examined and taken into account to the fullest extent possible all matters affecting, or likely to affect, the environment by reason of the proposed activity.

As discussed in detail in this report, the proposal will not result in any significant or long-term impact. The potential impacts identified can be reasonably mitigated and where necessary managed through the adoption of suitable site practices and adherence to accepted industry standards.

As outlined in this REF, the proposed activity can be justified on the following grounds:

- It responds to an existing need within the community;
- It generally complies with, or is consistent with all relevant legislation, plans and policies;
- It has minimal environmental impacts; and
- Adequate mitigation measures have been proposed to address these impacts.

The environmental impacts of the proposal are not likely to be significant and therefore it is not necessary for an EIS to be prepared and approval to be sought for the proposal from the Minister for Planning and Public Spaces under Part 5 of the EP&A Act. Further, a Species Impact Statement (SIS) and Biodiversity Development Assessment Report (BDAR) are each also not required.

On this basis, it is recommended that HI determine the proposed activity in accordance with Part 5 of the EP&A Act and subject to the adoption and implementation of mitigation measures identified within this report.