

HEALTH INFRASTRUCTURE

Addendum Review of Environmental Factors

Alterations and Additions to the Medical Gas Compound in the
Royal Prince Alfred Hospital – West Campus

29/04/2025

Version Number: 1



Declaration

This Addendum Review of Environmental Factors (Addendum REF) has been prepared by NSW Health Infrastructure (HI) Planning Advisory and assesses the potential environmental impacts which could arise from proposed amendments to the approved medical gas compound at the Royal Prince Alfred Hospital (RPA Hospital) – West Campus.

This Addendum 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 Addendum REF provides a true and fair review of the activity in relation to its likely impact on the environment. 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 *Guidelines for Division 5.1 Assessments – Consideration of environmental factors for health services facilities and schools* (DPHI, October 2024), the EP&A Regulation and the *Commonwealth Environmental Protection and Biodiversity Conservation Act 1999* (EPBC ACT).

Based upon the information presented in this Addendum REF, it is concluded that, subject to adopting the recommended mitigation measures (as amended), it is unlikely there would be any (additional) significant environmental impacts associated with the activity. Consequently, an Environmental Impact Statement (EIS) is not required.

Declaration	
Author:	Rithy Ang
Qualification:	Bachelor of Town Planning (BTP)
Position:	Town Planning Advisor
Company:	Health Infrastructure
Date:	26 March 2025

Document Management, Tracking and Revision History

Version	Date	Author	Description	Reviewed by	Approved by
Draft	26 March 2025	Rithy Ang	Addendum Review of Environmental Factors	Kathryn Saunders	
Draft Version 2	16 April 2025	Rithy Ang	Addendum Review of Environmental Factors	Kathryn Saunders	
Draft Version 3	29 April 2025	Rithy Ang	Addendum Review of Environmental Factors	Kathryn Saunders	

Contents

Declaration.....	2
Document Management, Tracking and Revision History	2
Contents.....	3
Tables	4
Figures	4
Appendices	4
Abbreviations	5
Executive Summary	6
The Amended Proposal Overview	6
Need for the Amended Proposal and Objectives	6
Site Details.....	6
Planning Approval Pathway.....	6
Statutory Consultation	7
Environmental Impacts	7
Justification and Conclusion	7
1. Introduction	8
Approved Proposal overview	8
2. Site Analysis and Description	10
2.1 The Site and Locality	10
2.1.1 Existing Development	10
2.1.2 Site Considerations and Constraints.....	11
3. Proposed Amended Activity.....	13
3.1 Proposal Overview	13
3.2 Construction Activities	15
3.3 Operational Activities.....	16
4. Statutory Framework.....	17
4.1 Activity Description under TI SEPP	17
4.2 Environmental Protection and Biodiversity Conservation Act 1999	18
4.3 Environmental Planning and Assessment Act 1979	19
4.4 Environmental Planning and Assessment Regulation 2021	19
4.5 Other NSW Legislation.....	20
5. Consultation	22
5.1 Statutory Consultation	22
5.2 Non-Statutory Engagement.....	23
6. Environmental Impact Assessment.....	24
6.1 Environmental Planning and Assessment Regulation 2021 – Assessment Considerations	24
6.2 Summary of Impacts.....	26
7. Summary of Mitigation Measure	28

7.1	Summary of Impacts.....	28
8.	Justification and Conclusion	29

Tables

Table 1	Description of the site	10
Table 2	Section 10.7 Planning Certificate.....	11
Table 3:	Project Timeframes and Construction Activities	15
Table 4:	Description of proposed activities	17
Table 5:	EPBC Checklist.....	18
Table 6:	Matters for consideration under Subsection 3, Section 5.5 of the EP&A Act.....	19
Table 7:	Other Possible Legislative Requirements.....	20
Table 8	Outcome of consultation	22
Table 9:	Summary of Environmental Factors Reviewed in Relation to the Activity	24
Table 10:	Summary of Impacts relating to the activity (as amended)	26

Figures

Figure 1:	Approved Level 1 Plan – Western Campus (source: Jacobs, dated 19 February 2024)	9
Figure 2:	Approved Ground Floor Plan – Western Campus (source: Jacobs, dated 19 February 2024)	9
Figure 3:	Approved Elevation 1 - Western Campus (source: Jacobs, dated 19 February 2024)	9
Figure 4:	Aerial view of site (red dot indicates location of proposed activity). Source: Original REF	10
Figure 5:	External view to B28 from Susan Street (Source: Google Street View).....	11
Figure 6:	External view to the rear of B28 from Rochester Street (Source: Google Street View)	11
Figure 7:	Amended Proposal - Level 1 Plan (source: Jacobs dated 21 February 2025)	13
Figure 8:	Amended Proposal - Roof Plan (source: Jacobs dated 21 February 2025)	14
Figure 9:	Amended Proposal - Elevation 1 (source: Jacobs dated 21 February 2025.....	14
Figure 10:	Notification mapping of adjoining properties identified in red.	22

Appendices

Appendix	Description	Author	Rev/Ref/Date
A	Section 10.7 Planning Certificate	City of Sydney	10 August 2022
B	Heritage Impact Addendum Letter	Heritage 21	26 February 2025
C	Amended Architectural Plans	Jacobs	21 February 2025
D	Recommended Amended Mitigation Measures	Health Infrastructure	29 April 2025
E	Dangerous Goods Design Report	Riskcon Engineering	25 February 2025

Abbreviations

Abbreviation	Description
BC Act 2016	<i>Biodiversity Conservation Act 2016</i>
B28	Building 28
CE	Chief Executive
CI&E	Capital Infrastructure and Engineering Building
CM Act	<i>Coastal Management Act 2016</i>
CMP	Construction Management Plan
Council	City of Sydney
CWC	Connecting with Country
EIS	Environmental Impact Statement
EMP	Environmental Management Plan
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
Ha	Hectares
HI	Health Infrastructure
LEP	Local Environmental Plan
LGA	Local Government Area
MGC	Medical Gas Compound
PCMP	Preliminary Construction Management Plan
Planning Systems SEPP	State Environmental Planning Policy (Planning Systems) 2021
Proponent	NSW Health Infrastructure
REF	Review of Environmental Factors
Resilience and Hazards SEPP	State Environmental Planning Policy (Resilience and Hazards) 2021
RPA	Royal Prince Alfred
SEPP	State Environmental Planning Policy
SLEP 2012	Sydney Local Environmental Plan 2012
SLHD	Sydney Local Health District
TI SEPP	State Environmental Planning Policy (Transport and Infrastructure) 2021
WM Act	<i>Water Management Act 2000</i>

Executive Summary

The Amended Proposal Overview

A REF for reconfiguration and expansion of a medical gas compound (MGC) located on the RPA Hospital West Campus at 22-33 Carillon Avenue, Camperdown, was determined on 5 June 2024, and included the removal of 9 trees, demolition and site preparation works and construction/installation of a 30kL oxygen tank, new vaporisers, new slab and fire rated enclosure, new pedestrian/trolley ramp, security fencing and access gate, new flammable gas cylinder storage bays and planting of nine (9) replacement trees.

Since the approval of this original REF, and as a result of further design refinement, the layout and design of the MGC is proposed to be amended to meet the needs of the Sydney Local Health District (SLHD) and to ensure ongoing compliance with applicable Australian Standards and National Construction Code (NCC) requirements.

NSW Health Infrastructure (HI) propose to amend the approved MGC layout. This Addendum REF proposes the following:

- Installation of two new 32kL primary tanks (Original REF approved one 30kL primary tank);
- Two new vaporisers with existing two vaporisers to be removed;
- New galvanised steel handrail, balustrade and two new steel stairs;
- Amended fire rated walls;
- Amended Flammable Major Store 500l plus;
- Amended ramps, landing, slab, and access store area; and
- New and amended bollards, security fencing and access gates.

Need for the Amended Proposal and Objectives

The approved design of the MGC is required to be amended to meet the design and storage needs of Sydney Local Health District (SLHD) and to ensure compliance is maintained with current Australian Standards and applicable sections of the NCC, informed also by further analysis and recommendations made by mechanical engineers. The Addendum REF is made to improve operational efficiency, reliability, and continuity of service for the hospital.

Site Details

The site forms part of the RPA Hospital located at 22-33 Carillon Avenue, Camperdown NSW 2050 within the City of Sydney Local Government Area (LGA). The proposed activity is located within the western campus of the hospital.

The land subject to the proposed activity is formally known as Lot 4 in DP 880430.

Planning Approval Pathway

Section 4.1 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) states that if an Environmental Planning Instrument (EPI) provides that specified development may be carried out without the need for development consent, a person may carry out the development in accordance with the Instrument, on land to which the provision applies. However, the environmental assessment of the development is required under Division 5.1 of the Act.

The site is zoned SP2 Infrastructure for the purpose of Health Services Facility under the Sydney Local Environmental Plan 2012 (SLEP 2012).

The proposed activity involves alterations and additions to the existing Medical Gas Compound (MGC) on the RPA Hospital West Campus at 22-33 Carillon Avenue, Camperdown NSW 2050. These works are considered 'development without consent' under Chapter 2, Part 2.3, Division 10 of State Environmental Planning Policy (Transport and Infrastructure) 2021 [TISEPP]. **Division 10** outlines the approval requirements for "health services facilities". A "hospital" is defined as a health services facility under this Division.

“The erection or alteration of, or addition to, a building that is a health services facility” is permitted without consent under Section 2.61 of TISEPP subject to requirements under section 2.61(2) being that the public authority must be satisfied that appropriate consultation has been undertaken; that consideration has been had of the design guide, and that the development will not involve more than 30,000sqm of gross floor area being created or affected (further discussion is provided below in relation to each of these requirements).

The proposal is considered an ‘activity’ in accordance with Part 5, Division 5.1 of the EP&A Act because it includes the use of land and the carrying out of a work. Since the approval of the Original REF, planning reforms to Part 5 of the EP&A Act came into effect which amended planning legislation through changes to the TISEPP. It is noted that the Amended Proposal remains consistent with post reform provisions and does not alter the planning approval pathway outlined within the Original REF.

Statutory Consultation

Notification of the proposed activity under Sections 2.10, 2.61 and 2.62 of TISEPP was given to the City of Sydney (Council) and adjoining occupiers of land for 21 calendar days. Notification letters were delivered to adjoining occupiers on 20 March 2025, and to City of Sydney Council on 18 February 2025. The notification period, therefore, closed on 10 April 2025 and 8 April 2025, respectively. No objections to the Addendum REF were received – refer to **Section 5.1** for further details.

Environmental Impacts

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

- The extent and nature of potential impacts will not have significant adverse effects on the locality, community, or the environment;
- The identified impacts do not vary substantially from those presented with the Original REF. Where impacts vary, changes to mitigation measures have been proposed.
- Potential impacts can be appropriately mitigated or managed to ensure that there is minimal effect on the locality, community.

Given the above, it is determined that an Environmental Impact Statement (EIS) is not required for the proposed activity.

Justification and Conclusion

This Addendum REF describes the Amended Proposal and examines, to the fullest extent possible, all matters affecting or likely to affect the environment by reason of the proposed amendments.

Potential impacts can be reasonably mitigated and where necessary managed through the adoption of suitable site practices and adherence to accepted industry standards.

Therefore, the Amended Proposal is justified as it continues to satisfy the following grounds:

- It responds to an existing need within the community;
- It generally complies with, or is consistent with all relevant legislation, standards, plans and policies;
- It has considered all potential impacts (changed from those identified within the original REF) and has minimal environmental impacts; and
- Adequate mitigation measures are adopted an/or have been proposed to address these impacts.

1. Introduction

REF No 04/2024, for the reconfiguration and expansion of the Medical Gas Compound (MGC) was determined on 5 June 2024. NSW Health Infrastructure (HI) propose to amend the approved layout of the MGC (the 'Approved Proposal') at the Royal Prince Alfred Hospital (RPA Hospital) – West Campus (the 'Site') as part of their delivery of infrastructure solutions and services to support the healthcare needs of the NSW communities. The additional works to be undertaken as part of the Addendum REF are as follows (the 'Amended Proposal'):

- Installation of two new 32kL primary tanks (Original REF approved one 30kL primary tank);
- Two new vaporisers with existing two vaporisers to be removed;
- New galvanised steel handrail, balustrade and two new steel stairs;
- Amended fire rated walls;
- Amended Flammable Major Store 500l plus;
- Amended ramps, landing, slab, and access store area; and
- New and amended bollards, security fencing and access gates.

This Addendum Review of Environmental Factors (REF) has been prepared by HI Planning Advisory to determine any changes to the environmental impacts as identified within the REF 04/2024 dated 5 June 2024 (the Original REF). 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 Addendum REF is to describe the amended proposal, to document the likely altered impacts of the amended proposal on the environment and to detail any changes to the protective measures, identified in the REF, to be implemented to mitigate impacts.

The description of the additional proposed works and associated altered environmental impacts have been undertaken in the context of the *Guidelines for Division 5.1 Assessments (June 2022)*, and the *Guidelines for Division 5.1 Assessments: Consideration of environmental factors for health services facilities and schools* (DPHI, October 2024), 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 Addendum REF has been prepared having regard to:

- Whether the amended proposed activity (the amended proposal) 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 Homes under Part 5 of the EP&A Act; and
- The potential for the amended proposed activity (the amended 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 Addendum 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.

Approved Proposal overview

The Approved development presented in the Original REF related to the alterations and additions to the Capital Infrastructure and Engineering (CI&E) building loading dock off Rochester Street in the RPA Hospital West Campus. Specifically, the works are to establish a reconfigured and expanded Medical Gas Compound (MGC) comprising the following works:

- Demolish/removal of nine (9) trees, fencing, walls and door, a 20,000L diesel tank, railings and landscaping and site preparation works; and
- Construction/installation of a 30kL oxygen tank, new vaporisers, new slab, fire rated enclosure, new pedestrian/trolley ramp, security fencing and access gate, new flammable gas cylinder storage bays and planting of nine (9) replacement trees.

Since the approval of the Original REF and as a result of further design refinement the layout and design of the MGC is proposed to be amended to meet the needs of the Sydney Local Health District (SLHD) and to ensure ongoing compliance with applicable Australian Standards and NCC requirements.

A plan of the approved development under the Original REF, showing the approved Level 1 (ground) and Roof Plan, are provided at **Figure 1**, **Figure 2** and **Figure 3** below.

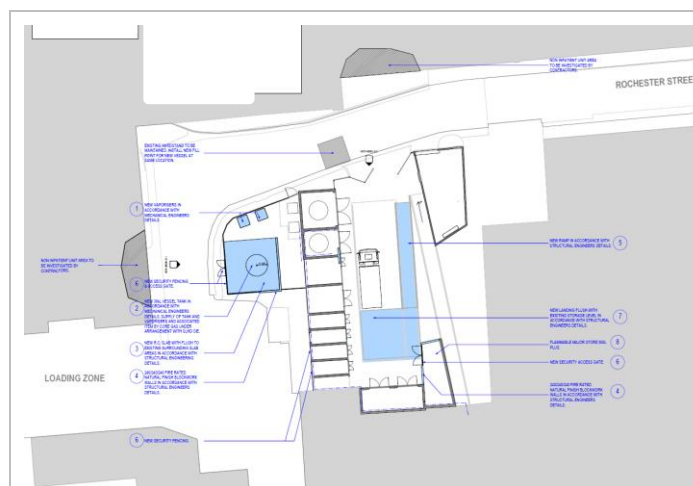


Figure 1: Approved Level 1 Plan – Western Campus (source: Jacobs, dated 19 February 2024)

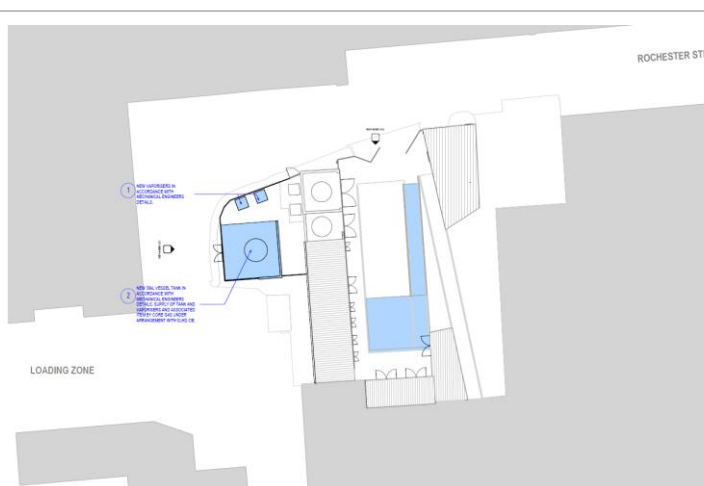


Figure 2: Approved Ground Floor Plan – Western Campus (source: Jacobs, dated 19 February 2024)

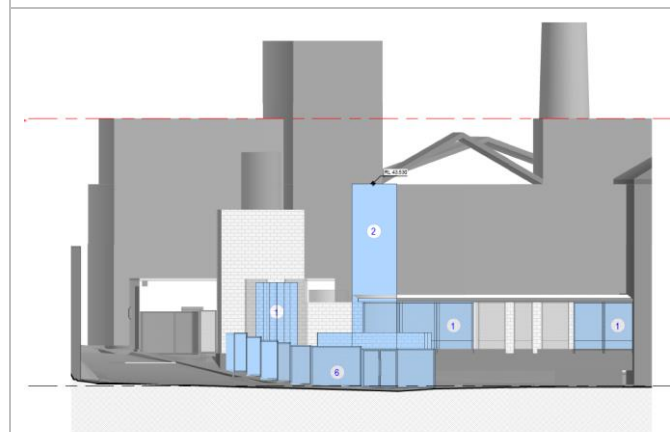


Figure 3: Approved Elevation 1 - Western Campus (source: Jacobs, dated 19 February 2024)

2. Site Analysis and Description

2.1 The Site and Locality

Table 1 Description of the site

Details	Proposal (endorsed REF)	Amended proposal (this Addendum REF)
Address	22-23 Carillon Avenue, Camperdown	No change
Legal Description	Lot 4 in DP 880430	No change
Owners	HAC	No change
Heritage	Several local and state heritage items as well as a heritage conservation area affected the RPA Hospital.	No change



Figure 4: Aerial view of site (red dot indicates location of proposed activity). Source: Original REF

2.1.1 Existing Development

The RPA Hospital Campus includes multiple buildings across both the eastern and western campuses, varying in height. Building 28 (B28), where the activity is to be undertaken, is located within the western campus between Susan Street, Brown Street and Rochester Street. The building does not form part of the local or state statutory heritage listings for RPA Hospital, however, it is listed under the Section 170 Health Register under ‘Boiler House’.

B28 is used for SLHD capital infrastructure and engineering purposes as well as for maintenance. The building includes offices, workshops, space for incoming deliveries and storage.

Street view images of the building are shown in **Figure 5** and **Figure 6** below.



Figure 5: External view to B28 from Susan Street (Source: Google Street View)



Figure 6: External view to the rear of B28 from Rochester Street (Source: Google Street View)

2.1.2 Site Considerations and Constraints

Section 10.7 Planning Certificate No. 2022305853 dated 10 August 2022, identifies that the site is located within the SP2 Infrastructure zone under Sydney Local Environmental Plan 2012, and is provided at Appendix A.

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		✓
Affected by a policy that restricts development of land due to the likelihood of landslip		✓
Affected by bushfire, tidal inundation, subsidence, acid sulphate or any other risk	✓ (Note 1)	
Affected by any acquisition of land provision		✓
Biodiversity certified land or subject to any bio-banking agreement or property vegetation plan		✓
Significantly contaminated		✓
Subject to flood related development controls	✓ (Note 2)	

Note 1: The lot is identified as being affected by Class 5 Acid Sulphate Soils (ASS). It is noted that ASS are not typically found in Class 5 areas. Areas classified as Class 5 denotes land within 500 metres of Class 1, 2, 3 or 4 areas – where the presence of ASS is considered to occur.

Note 2: The subject site is identified as flood prone land. A Civil Report was prepared by TTW under the Original REF and found that the MGC utility infrastructure works fall outside of the flood affected parts of the wider hospital site and

will not impact upon existing flood behaviour. In this regard, no further flood assessment is required resulting from the Amended Proposal is warranted.

3. Proposed Amended Activity

3.1 Proposal Overview

This Addendum REF proposes the following amendments to the original Approved REF in response to further engineering recommendations and as a result of further consultation with SLHD:

- Installation of two new 32kL primary tanks (Original REF approved one 30kL primary tank);
- Two new vaporisers with existing two vaporisers to be removed;
- New galvanised steel handrail, balustrade and two new steel stairs;
- Amended fire rated walls;
- Amended Flammable Major Store 500l plus;
- Amended ramps, landing, slab, and access store area; and
- New and amended bollards, security fencing and access gates.

No increase in height (above approved RL 43.530) is proposed for the new 32kL primary tanks. The original approved MGC layout included the removal of an existing 20,000L diesel tank. Removal of the tank remains part of the scope of works.

Figure 7, Figure 8 and Figure 9 below illustrate the Ground Floor Plan, Roof Plan and Elevation 1 Plan for the Amended Proposal.

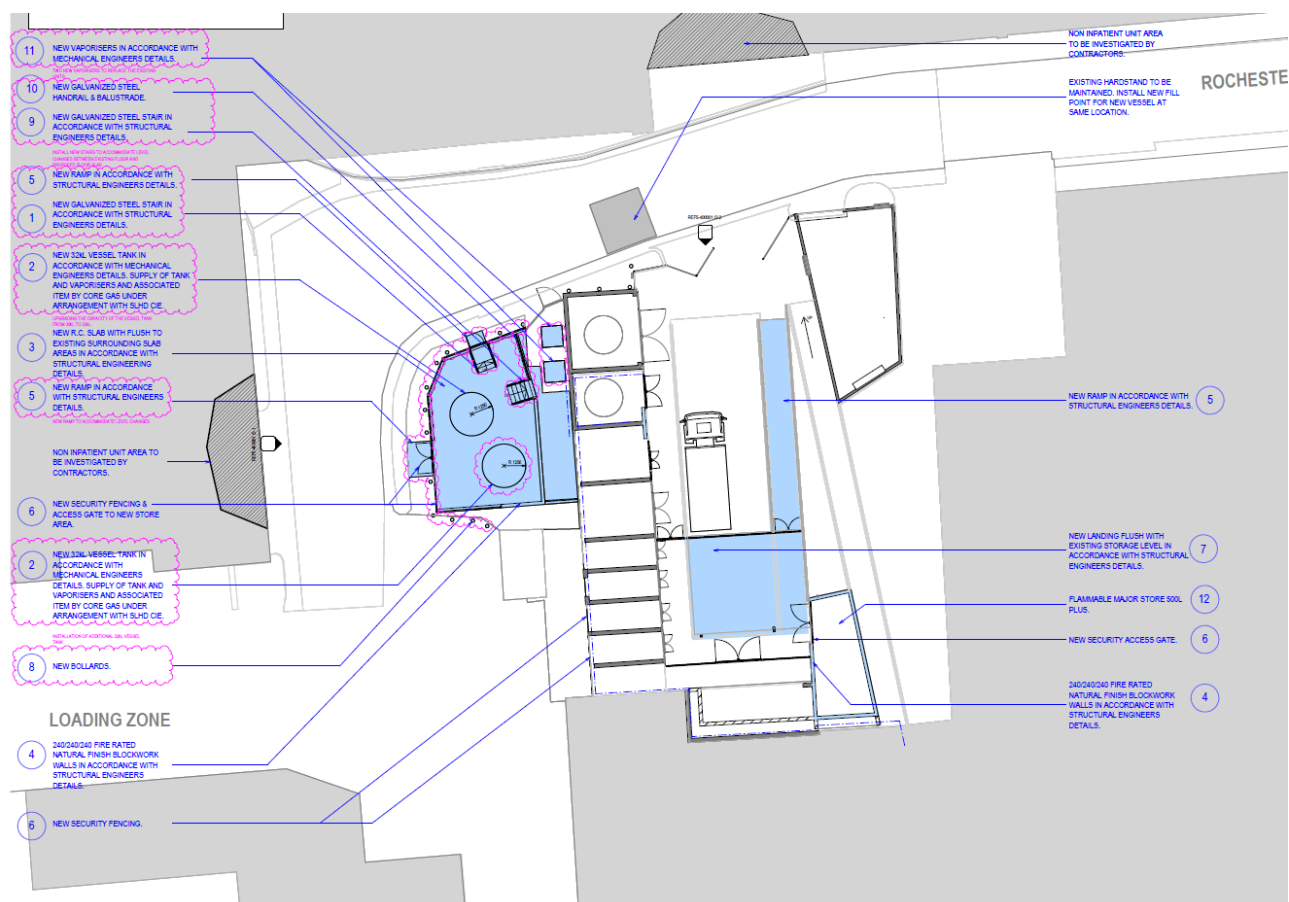


Figure 7: Amended Proposal - Level 1 Plan (source: Jacobs dated 21 February 2025)

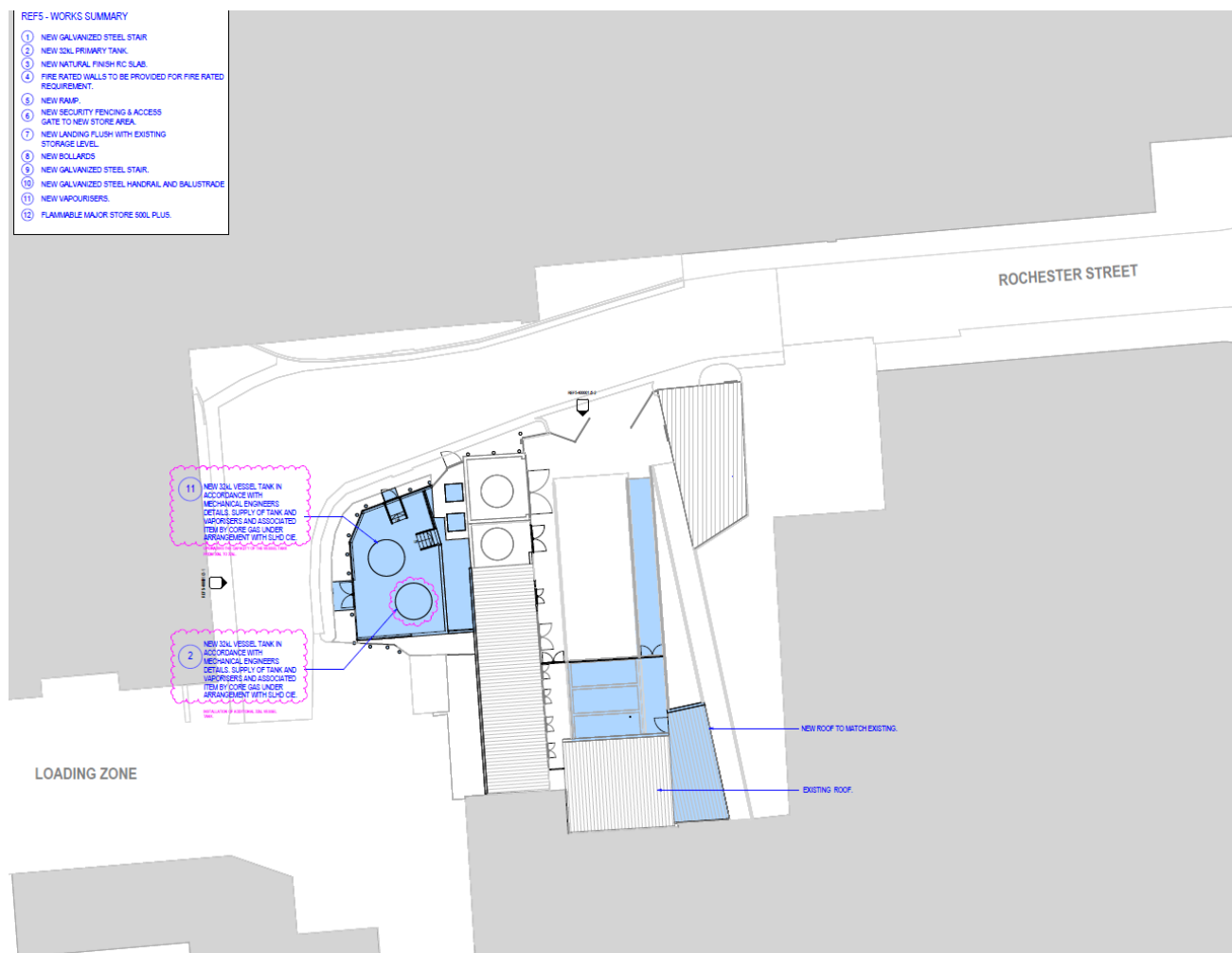


Figure 8: Amended Proposal - Roof Plan (source: Jacobs dated 21 February 2025)

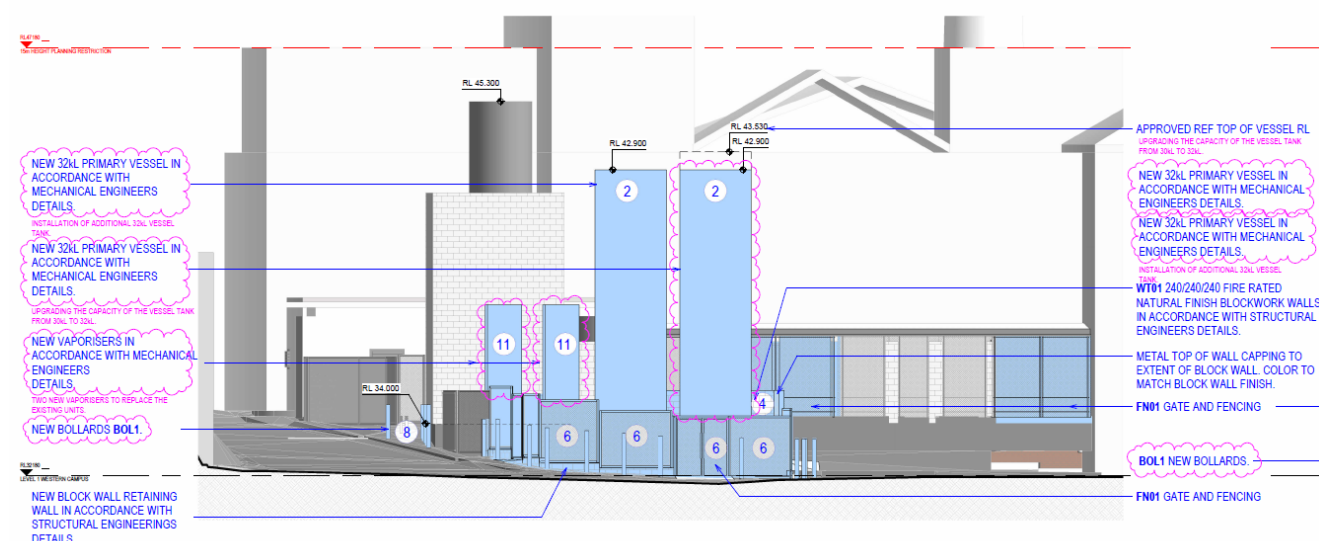


Figure 9: Amended Proposal - Elevation 1 (source: Jacobs dated 21 February 2025)

3.2 Construction Activities

Table 3: Project Timeframes and Construction Activities

Construction Activity	Proposal (endorsed REF)	Amended proposal (this REF)
Commencement Date	May 2024	An updated detailed Construction Management Plan will be prepared and provided prior to the commencement of construction works.
Work Duration/Methodology	20 weeks (May 2024 – September 2024)	The overall work duration not expected to change.
Work Hours and Duration/Construction	Due to the nature of the scope, the work is proposed to be completed with extended working hours as below: <ul style="list-style-type: none"> • Monday to Friday – 7am to 6pm; • Saturday – 7am to 1pm; and • Sunday and Public Holiday – No work. 	No change
Ancillary Facilities	Not applicable. The proposed activity does not involve the construction of any ancillary facilities.	No change
Plant Equipment	Details of plant equipment will be further detailed at the time of contract award for the works to ensure alignment with the proposed methodologies and construction staging of the contractor.	No change
Construction Waste	<ul style="list-style-type: none"> • Hard material – 1.8 cubic metres (2.2 tonnes). • Timber – 1.2 cubic metres (0.4 tonnes). • Plastics – 0.8 cubic metres (0.1 tonnes). • Cement sheet – 0.5 cubic metres (0.3 tonnes). • Gypsum material – 0.3 cubic metres (0.1 tonnes). • Metals – 0.3 cubic metres (0.3 tonnes). • Paper/card – 0.2 cubic metres (0.02 tonnes). • Soil – 0.05 cubic metres (0.1 tonnes). • Other – 0.05 cubic metres (0.1 tonnes). 	No change
Traffic Management and Access	<p>Access for construction vehicles will be via Susan Street. All vehicles accessing the work site shall be limited to a suitable size for the road geometry.</p> <p>Given the constrained road conditions and pedestrian activity in the area, Traffic Control personnel shall be in place to assist construction vehicle access and egress and manage any potential conflicts that may arise.</p> <p>Existing pedestrian movements and access shall be retained throughout the hospital site.</p> <p>Construction vehicle activity shall be monitored by the principal contractor to ensure no interruptions to the ongoing operation of surrounding roads.</p> <p>It is expected that construction vehicles shall typically travel to and from the work site outside of the peak morning and afternoon commuter hours to reduce impact and minimise risk to pedestrians and vehicles.</p>	No change

3.3 Operational Activities

The Amended Proposal will not alter the approved operational activities. Specifically, the use, operational hours and construction traffic and parking are expected to remain unchanged.

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. Chapter 2, Part 2.3, Division 10 of the TI SEPP outlines the approval requirements for 'health services facilities'. A hospital is defined as a health services facility under this division.

The site is zoned SP2 Infrastructure under the *Sydney Local Environmental Plan 2012*. The SP2 Infrastructure is a prescribed zone under the TI SEPP.

The original approved development was considered an 'activity' for the purposes of Part 5 of the EP&A Act and was subject to an environmental assessment (REF). The amended proposal does not alter this pathway and continues to be considered an 'activity' in accordance with Section 5.1 of the EP&A Act.

Pursuant to Section 2.61(1)(a) of the TISEPP, the erection or demolition of a building that is a 'health services facility' may be carried out without consent by or on behalf of a public authority, if the development is carried out within the boundaries of an existing health services facility.

The proposal involves utility infrastructure works for an existing 'health services facility' by HI (a public authority) within the boundaries of the existing RPA Hospital. Accordingly, pursuant to Section 2.61(1)(a) of the TISEPP, the approved works were classified as development which may be carried out without consent.

The provisions of the TI SEPP, as they relate to the proposed amended activity are addressed in Table 4 below (TI SEPP consultation is discussed within section 5).

Table 4: Description of proposed activities

Division and Section within TI SEPP	Provision	Amended proposal (this REF)
Section 2.61(1)	Any of the following development may be carried out by or on behalf of a public authority without consent on any land if the development is carried out within the boundaries of an existing health services facility— (a) the erection or alteration of, or addition to, a building that is a health services facility, (c) demolition of buildings carried out for the purposes of a health services facility.	The amended proposal seeks alterations and additions to the MGC at RPA Hospital. The Site is an existing health services facility.
Section 2.61(2)(a)	Development must not be carried out under this section unless— (a) the public authority is satisfied that appropriate consultation has been undertaken having regard to— (i) the SCPP—new health services facilities and schools, and (ii) the community participation plan, and	Appropriate consultation has been undertaken having regard to the SCPP and HI's CPP. Due to the nature of the proposed works and noting that a previous submission was received in relation to the original REF, 21-day notification was given to occupiers of adjoining land and to Council. Refer to Section 5.1 for further details. Exhibition of the REF addendum was not determined to be required as the amendments proposed are considered to be relatively minor and the notification undertaken is proportionate with the scale and likely impacts of the project in the locality.
Section 2.61(2)(b)	(b) the public authority has considered the design guide, and	Although the Addendum REF involves utility infrastructure works and is relatively minor in nature, the amended proposal proceeded through HI's Design Assurance Process and a review of the proposal by HI's Design Advisor confirmed that the Addendum REF works do not highlight any issues of concern.

Division and Section within TI SEPP	Provision	Amended proposal (this REF)
		Consideration of the Design Guide for Health has been undertaken as part of the Design Assurance Review. The Amended REF scope of works is not contrary to the Guide.
Section 2.61(2)(c)	(c) the development will not involve more than 30,000m ² of gross floor area on the site being created or affected.	The proposed activity does not involve more than 30,000sqm of gross floor area.
Section 2.62	<p>Section 2.62 applies to development carried out by or on behalf of a public authority under section 2.61(1) (other than section 2.61(1)(b) or (c).</p> <p>Before development to which this section applies is carried out, the person carrying out the development or the public authority concerned must –</p> <ul style="list-style-type: none"> (a) give written notice of the intention to carry out the development to each of the following— <ul style="list-style-type: none"> (i) the council for the area in which the relevant land is located (unless the public authority is the council), (ii) the occupiers of any adjoining land, and (b) take into consideration any response to the notice that is received within 21 days after the notice is given. <p>In this section, <i>relevant land</i> means the land on which the development is proposed to be carried out.</p>	Written notification of the proposal was given to the occupiers of adjoining land and to Council. Consideration was given to responses received within 21 days. Refer to Section 5.1 for details.

Note that the 'SCPP—new health services facilities and schools' means the *Stakeholder and Community Participation Plan for New Health Services Facilities and Schools* published by the Department in October 2024. The 'community participation plan' means the *Community Participation Plan* published by Health Infrastructure in October 2024, and the 'design guide' means the *Design Guide for Health* published by the Government Architect in April 2023.

4.2 Environmental Protection and Biodiversity Conservation Act 1999

The provisions of the *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act) did not affect the original proposal as it was not development that takes place on or affects Commonwealth land or waters. Further, it is not development carried out by a Commonwealth agency, nor does the proposed development affect any matters of national significance. An assessment against the EPBC Act checklist is provided at Table 9 of the Original REF.

The amended proposal does not trigger any additional aspects of the EPBC Act. An assessment of the amended proposal against the EPBC Act checklist is provided at Table 6 below.

Table 5: EPBC Checklist

Consideration	Yes/No	
	Proposal	Amended proposal
Will the activity have, or likely to have, a significant impact on a declared World Heritage Property?	No	No
Will the activity have, or likely to have, a significant impact on a National Heritage place?	No	No
Will the activity have, or likely to have, a significant impact on a declared Ramsar wetland?	No	No
Will the activity have, or likely to have, a significant impact on Commonwealth listed threatened species or endangered community?	No	No
Will the activity have, or likely to have, a significant impact on listed migratory species?	No	No

Consideration	Yes/No	
Will the activity involve any nuclear actions?	No	No
Will the activity have, or likely to have, a significant impact on Commonwealth marine areas?	No	No
Will the activity have any significant impact on Commonwealth land?	No	No
Would the activity affect a water resource, with respect to a coal seam gas development or large coal mining development?	No	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 proposal.

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.

Table 8 of the Original REF demonstrated the effect of the proposed activity on the matters listed for consideration in Subsection 3 of Section 5.5 of the EP&A Act.

Table 6 below identifies any altered impacts identified as part of the amended proposal.

Table 6: Matters for consideration under Subsection 3, Section 5.5 of the EP&A Act

Matter for Consideration	Impacts of Amended Activity (altered from the Proposal)
<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>The site is not located within a wilderness area, nor in proximity to a wilderness area. Therefore, the Amended Proposal will not impact wilderness areas – no change.</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 Assessments (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 were considered in Section 6.1 of the Original REF for the proposal and are considered (as relevant) for the amended proposal at Section 6 of this Addendum REF. In addition, the recently-released *Guidelines for Division 5.1 Assessments – Addendum October 2024* were considered with regard to this Amended Proposal.

In addition, Section 171A of the EP&A Regulation requires the consideration of the impact an activity in a defined catchment. As the site is not located within a regulated water catchment as defined in Chapter 6 of State Environmental Planning Policy (Biodiversity and Conservation) 2021, the provisions of this Section do not apply.

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 7: Other Possible Legislative Requirements

Legislation	Comment	Relevant? Yes/No
State Legislation		
<i>Heritage Act 1977</i>	<p>The site of the proposed activity is not identified as a heritage item and is not within a heritage conservation area, however the subject building is listed under the s.170 Health Register under 'Boiler House' (Heritage Item ID 3540544). Heritage impacts were addressed in Sections 2.1.2.1 and 6.2.8 under the Original REF, accompanied by Heritage Impact Assessment Letter which concludes that, <i>"the works would not engender a negative impact upon the Boiler House structure or its heritage significance in the context of the RPA Hospital Precinct"</i>.</p> <p>The subject Addendum REF is accompanied by a Heritage Impact Assessment Addendum Letter prepared by Heritage 21 (Appendix B). The Addendum Letter considers that the proposed amended scope of works would not impact upon any identified significant fabric and as such, would not engender a negative impact upon the Boiler House structure or its heritage significance in the context of the RPA Hospital Precinct.</p>	Yes
State Environmental Planning Policy (Resilience and Hazards) 2021	<p>Chapter 3 of the State Environmental Planning Policy (Resilience and Hazards) 2021 (Resilience & Hazards SEPP) aims include:</p> <ul style="list-style-type: none"> - <i>'to ensure that in determining whether a development is a hazardous or offensive industry, any measures proposed to be employed to reduce the impact of the development are taken into account'</i>, and - <i>'to ensure that in considering any application to carry out potentially hazardous or offensive development, the consent authority has sufficient information to assess whether the development is hazardous or offensive and to impose conditions to reduce or minimise any adverse impact'</i>. <p>It is noted that Chapter 3, section 3.11 <i>Preparation of preliminary hazard analysis</i>, and section 3.12 <i>Matters for consideration by consent authorities</i>, of the Resilience & Hazards SEPP applies to a person who proposes to make a development application, and consent authorities in determining an application, respectively, and hence do not apply to public authorities undertaking an assessment of an activity under Part 5, Division 5.1 of the EP&A Act. Further, the subject activity and land use are not defined as a hazardous or offensive development and are not defined as potentially hazardous or potentially offensive development to which Chapter 3 of the Policy applies.</p> <p>Notwithstanding the above, Section 2.3 of the NSW Government's Hazardous Industry Planning Advisory Paper No 3 Risk Assessment, (January 2011), (the Guideline) includes (in relation to Part 5 determining authorities) that <i>... 'If the authority [determining authority under Division 5.1] considers that an assessment of the hazards issues is relevant to its environmental considerations, it could use the assessment procedure included in SEPP 33 [now Resilience and Hazards SEPP] to assess these issues as well as the advice in this document'</i>.</p> <p>Having regard to the above Guideline and Policy, it is determined that a Preliminary Hazards Analysis (PHA) is not required for the following reasons:</p> <ul style="list-style-type: none"> • A Dangerous Goods Design Report was prepared by Riskcon Engineering under the Original REF which assessed the risks and storage of dangerous goods within the gas compound, and compliance with the Work Health Safety Regulation 2017 and all relevant design standards. It is noted that an assessment of whether the proposed activity exceeds established thresholds for dangerous chemicals/goods was not undertaken. Rather, the design has been made to comply from the outset with AS 1894-1997 	Yes

Legislation	Comment	Relevant? Yes/No
	<p>(liquid oxygen / nitrogen) and AS 4332-2004 (gas cylinders) and the Work Health and Safety Regulation 2017, as set out in the Report.</p> <ul style="list-style-type: none"> The subject Addendum REF is accompanied by an updated Dangerous Goods Design Report also prepared by Riskcon Engineering to reflect the proposed additional oxygen tanks (32kL (x2) primary gas tank) within the site. The Report's assessment approach remains unchanged, with minor amendments to the design requirements and recommendations made in the report to comply with the relevant standards and Work Health and Safety Regulation 2017. The Report includes two areas of non-conformance with storage location criteria (separation distances) under AS 1894-1997. The first relates to the new liquid oxygen tank (identified as H1, being the new 32,000L tank closest to the street). The Report notes that an adjacent MRI waiting area in the oncology department is within minimum distance. An assessment has been conducted in Section 4.2.4 & section 4.3.4 of the Report and identifies that the distance is considered adequate from a risk perspective and would therefore comply with the WHS Regulation. The separation distance required is 13m where the general public may assemble, although only 11m is provided. The Report includes that: <p><i>Due to the presence of the building wall, it is considered that this would provide a greater level of protection than an addition 2 m of separation. Subsequently, it is considered that the risks posed by the oxygen tank on the MRI waiting are considered to be as low as what would be afforded by strict adherence to the separation distances or lower as required by the WHS Regulation 2017 (Ref. [1]).</i></p> <p>The second area of non-conformance is the separation distance required between the nitrogen tank and other storage areas including the liquid oxygen tank. The nitrogen tank is an existing facility, and the Report finds no additional or unacceptable risks owing to the separation distance. Compliance required by the WHS Regulation 2017 is found to be achieved (refer sections 4.4.3 & 4.5.3 and Table 4-14 of the Report).</p> In relation to the Guideline, risks related to gas storage are not considered such that approval should not be granted, noting the existing and proposed amended Mitigation Measures require compliance with relevant Australia Standards and compliance with applicable NCC provisions. As the land use is not defined as hazardous, offensive, or potentially hazardous or offensive, ongoing auditing measures or the application of hazards related conditions of consent/mitigation measures are not considered required (as set out in the Guideline). In alignment with the content of a Hazards Analysis, Mitigation Measures include the requirement to ensure a Dangerous Goods Register inclusive of Safety Data Sheet is maintained, a manifest if kept, a Dangerous Goods Risk Assessment is undertaken of the storage and handling area and an Emergency Response Plan is produced, amongst other requirements (refer Draft Addendum REF Mitigation Measure 11). <p>Draft Mitigation Measures provided at Appendix D include updated measures as part of this Addendum REF to incorporate the Report's recommendations.</p>	
Sydney Local Environmental Plan 2012		
Flood Planning	<p>The site is identified as flood prone land and is therefore subject to flood related development controls.</p> <p>A Civil Report was prepared for the proposed works by TTW under the Original REF. The report found that the works fall outside of the flood affected parts of the wider hospital site and will not impact existing flood behaviour. Civil works are minor in nature and will not involve modification to any stormwater layouts and the Amended Proposal is considered to be consistent with this assessment.</p>	No. This REF Addendum does not trigger additional considerations.

5. Consultation

5.1 Statutory Consultation

The Original REF scope of works was notified for 21 calendar days to Council and adjoining occupiers of the site. One (1) submission was received from a nearby resident, raising general truck noise and road noise associated with deliveries. The following response under the Original REF notes:

- The Traffic Impact Statement prepared by PTC finds that the works will result in only a negligible increase in the frequency of service vehicle volumes
- The Acoustic Assessment prepared by Arup concludes that building services noise emissions, vehicular movements and traffic noise levels will not increase as a result of the proposed works.

In accordance with Section 2.62 of the TI SEPP, written notice of the amended proposal was given to Council and adjoining occupiers identified in the Notification Map in **Figure 10**. Notification letters were delivered to adjoining occupiers on 20 March 2025 and to City of Sydney Council on 18 February 2025. The notification period of 21 days closed on 10 April 2025 and 8 April 2025, respectively.

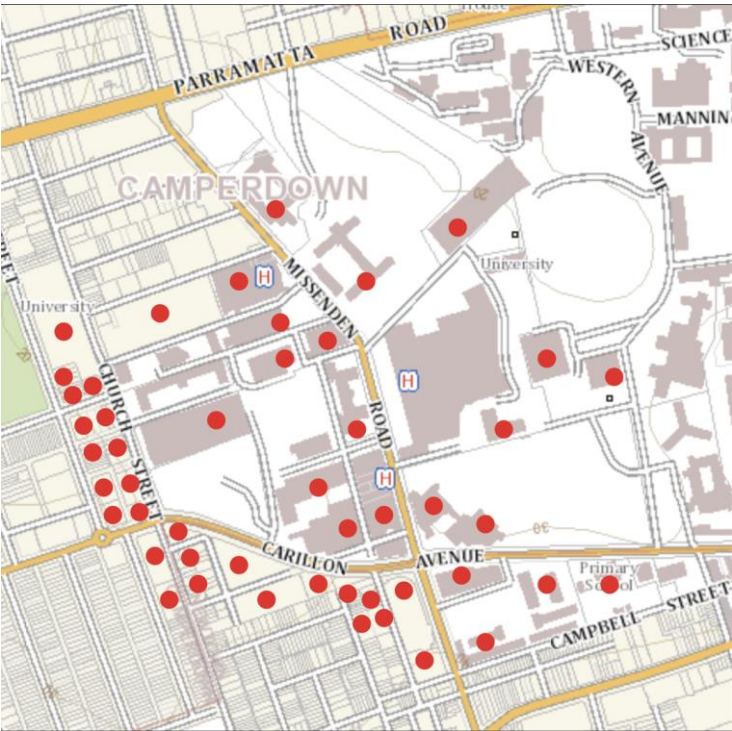


Figure 10: Notification mapping of adjoining properties identified in red.

One (1) comment was received during the notification period from City of Sydney Council and no submissions from adjoining properties were received during this time. An overview of the comment received for the amended proposal is outlined and responded to in **Table 8** below.

Table 8 Outcome of consultation

Issue raised	Date received	Response	Reference
Council requested a copy of the proposed plans and the draft REF including any hazardous development assessment/advice for our consideration.	18 March 2025 and 7 April 2025	Response provided with attached plans and dangerous goods report as requested. Council then responded with no further comments.	Closed out – no further action required.

5.2 Non-Statutory Engagement

The project's existing Communications and Engagement Report has been updated to reflect the consultation process undertaken for this REF Addendum and includes all non-statutory engagement undertaken. The Report includes details of extensive consultation undertaken in relation to the project and includes website updates, media releases, posters, surveys, briefing sessions, pop up sessions engaging staff and community, social media posts, door knocks, letter box drops, newsletters, internal staff updates and Internal EDMs.

In relation to the overall Redevelopment of Royal Prince Alfred Hospital, the project has held more than 100 project user group (PUG) meetings.

6. Environmental Impact 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)* and *Guidelines for Division 5.1 Assessments - Consideration of environmental factors for health services facilities and schools (DPHI, October 2024 – Guideline addendum)* apply to the activity. A comparison of the impacts of the Approved Proposal and the Amended Proposal against Section 3 of these Guidelines and Table A1 of the Guideline Addendum is provided below in Table 12.

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

Relevant Consideration	Response/Assessment	Impact	Proposal	Amended proposal
(a) Any environmental impact on a community	The Amended Proposal does not present any new or significant environmental impacts for the community. As outlined in Section 6.2 , the proposal will result in changes to the building's appearance when compared to the Approved Plans, however, these changes are minor. Similar to the approved oxygen tank, the new gas cylinder will be of the same height and location and will be predominately screened by existing buildings from most surrounding vantage points. The Amended proposal will not affect the operational hours or use of the Approved Development. Post-construction the proposal will continue to provide an improved health service to the broader community. On balance, any environmental impacts on the community from the Amended Proposal are anticipated to be positive.	-ve		
		Nil	✓	✓
		+ve		
(b) Any transformation of a locality	The works will not result in the transformation of the locality. The Amended Proposal remains confined within the Western Campus of RPA Hospital to support the overall functional use of the hospital and improve utility service infrastructure for RPA Hospital.	-ve		
		Nil	✓	✓
		+ve		
(c) Any environmental impact on the ecosystem of the locality	The Amended Proposal will result in negligible impacts on the environment and its ecosystems within the immediate surrounds. No changes to tree removal or vegetation impacts are proposed as part of the amended activity.	-ve		
		Nil	✓	✓
		+ve		
(d) Any reduction of the aesthetic, recreational, scientific or other environmental quality or value of a locality	The existing locality is a highly urbanised environment. The works are wholly consistent with the zone and will allow for the continued operation and	-ve		
		Nil	✓	✓
		+ve		

Relevant Consideration	Response/Assessment	Impact	Proposal	Amended proposal
	progressive development of the hospital campus.			
(e) Any 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	A Heritage Impact Assessment Letter undertaken for the Approved Proposal concluded that the development is acceptable and would not adversely impact the heritage significance of the subject site (refer to the Original REF). The proposed amendments do not create any new impacts with regard to non-Aboriginal heritage. An Aboriginal Due Diligence Assessment prepared for the Approved Proposal concluded that there are no Aboriginal sites or objects found. The proposed amendments do not create any new impacts with regard to Aboriginal heritage.	-ve		
		Nil	✓	✓
		+ve		
(f) Any impact on the habitat of protected animals (within the meaning of the <i>Biodiversity Conservation Act 2016</i>)	The existing locality is a highly urbanised environment. The amended proposal will not have a significant impact on the habitats of fauna. The Flora and Fauna Assessment under the Original REF, indicates the activity will not impact fauna under the <i>Biodiversity Conservation Act 2016</i> .	-ve		
		Nil	✓	✓
		+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	The existing locality is a highly urbanised environment. The Flora and Fauna Assessment under the Original REF, indicates the activity will not result in the endangering of any species.	-ve		
		Nil	✓	✓
		+ve		
(h) Any long-term effects on the environment	There are no anticipated long-term effects upon the environment given the low scale nature of the works.	-ve		
		Nil	✓	✓
		+ve		
(i) Any degradation of the quality of the environment	There will be no degradation to the environment as a result of the construction works. Mitigation measures will manage any potential impacts. The site is located in a largely modified urban environment. The amended proposal will result in negligible impacts to the surrounding environment.	-ve		
		Nil	✓	✓
		+ve		
(j) Any risk to the safety of the environment	There is no presented risk to the safety of the environment.	-ve		
		Nil	✓	✓
		+ve		
(k) Any reduction in the range of beneficial uses of the environment	The works will result in the ongoing use of the site for health services facility purposes.	-ve		
		Nil	✓	✓
		+ve		
(l) Any pollution of the environment	The Amended Proposal will not result in any additional pollution to the environment. Mitigation measures will	-ve		
		Nil	✓	✓

Relevant Consideration	Response/Assessment	Impact	Proposal	Amended proposal
	be incorporated to minimise any potential pollution of the environment (e.g. erosion control, water quality, contamination).	+ve		
(m) Any environmental problems associated with the disposal of waste	Disposal of any waste material will need to be appropriately classified and disposed of. No unusual circumstances are envisaged in this respect and typical waste handling policies will apply. Waste management is addressed in the Original REF and still applies.	-ve		
		Nil	✓	✓
		+ve		
(n) Any increased demands on resources (natural or otherwise) that are, or are likely to become, in short supply	There is no impact of the works upon any natural resources in short supply.	-ve		
		Nil	✓	✓
		+ve		
(o) Any cumulative environmental effect with other existing or likely future activities.	The proposed works will not result in any cumulative impacts on any existing or future activities.	-ve		
		Nil	✓	✓
		+ve		
(p) Any impact on coastal processes and coastal hazards, including those under projected climate change conditions	Given the location of the site, the works will have no impact upon coastal process or contribute to coastal hazards.	-ve		
		Nil	✓	✓
		+ve		
(q) Any applicable local strategic planning statements, regional strategic plans or district strategic plans made under the Act, Division 3.1	The Amended Proposal remains consistent with all relevant strategic framework and policies.	-ve		
		Nil	✓	✓
		+ve		

6.2 Summary of Impacts

Any likely impacts relating to the amended proposal from those presented for the proposed activity (within the REF) have been considered and are discussed in **Table 10** below. All issues relating to the amended proposal are 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 D**.

Table 10: Summary of Impacts relating to the activity (as amended)

Issue	Discussion
Visual Amenity	<p>The Amended Proposal will result in some visual changes from the Original REF. The primary change involves the removal of two existing vaporisers, installation of two new vaporisers, and installation of a total of two 32kL vessel tanks, each up to 14.78 metres in height. The site's exiting 30kL tank will remain. No change is proposed to the removal of an existing 20,000L diesel tank. While this represents an increase in visual changes, the gas cylinders are located within the MGC site, which is well set back from the public domain, and are generally screened by existing buildings and structures.</p> <p>Due to their positioning and the surrounding built form, the cylinders are not readily visible from most public residential vantage points. There is a limited view from Carillon Avenue and Missenden Road; however, this is mitigated by the substantial separation distance, existing vegetation, and intervening development that provides visual buffering. As such, the visual impact of the Amended Proposal is considered to be relatively minor and acceptable within the context of the site and its surrounds.</p> <p>In addition, the updated Heritage 21 advice, dated 26 February 2025, includes that '...The proposed new 32kL Vessel Tank would have a neutral impact to Building 28 and would be in keeping with the industrial character and utilitarian function of the area'.</p>

Heritage

The subject building is listed under the s.170 Health Register known as the 'Boiler House' (Heritage Item ID 3540544) and is also known as the Capital Infrastructure and Engineering building. Heritage impacts were addressed in under the Original REF, concludes that, "the works would not engender a negative impact upon the Boiler House structure or its heritage significance in the context of the RPA Hospital Precinct" and that *"no services or structures within the gas compound are considered to possess heritage value"*.

The subject Addendum REF is accompanied by a Heritage Impact Assessment Addendum Letter prepared by Heritage 21 (**Appendix B**). The Addendum Letter considers that the proposed amended scope of works would not impact upon any identified significant fabric and as such, would not engender a negative impact upon the Boiler House structure or its heritage significance in the context of the RPA Hospital Precinct.

Hazardous Materials

The proposed development involves the storage of hazardous materials, specifically additional oxygen tanks within the site. The storage, transport, and management of hazardous substances triggers consideration under Chapter 3 of the State Environmental Planning Policy (Resilience and Hazards) 2021 (Resilience & Hazards SEPP) via the NSW Government's Hazardous Industry Planning Advisory Paper No 3 Risk Assessment, (January 2011), which includes (in relation to Part 5 determining authorities) that *"...If the authority [determining authority under Division 5.1] considers that an assessment of the hazards issues is relevant to its environmental considerations, it could use the assessment procedure included in SEPP 33 [now Resilience and Hazards SEPP] to assess these issues as well as the advice in this document"*.

A Dangerous Goods Design Report was previously prepared by Riskcon Engineering under the Original REF to assess risks associated with dangerous goods at the site's gas compound. A Preliminary Hazard Analysis (PHA) was not undertaken as from the outset, as the design was developed to comply with AS 1894-1997 and the Work Health and Safety Regulation 2017 and specific mitigation measures are included to ensure compliance with the Regulation and application Australian Standards is achieved. Refer to additional discussion under Resilience & Hazards SEPP in **Table 7** above.

An updated Dangerous Goods Design Report has been prepared in support of this Addendum REF to reflect the proposed installation of two additional 32kL oxygen tanks and various other minor additions and amendments to the approved MGC layout. The updated report confirms that the original assessment approach remains valid, with amendments to the design requirements and recommendations to ensure continued compliance with applicable standards and safety regulations. It is therefore considered that with the adoption of the updated mitigation measures identified in **Appendix D**, the potential impacts associated with hazardous materials can be appropriately managed, and the risk to the environment is considered low.

7. Summary of Mitigation Measure

No additional mitigation measures are proposed in addition to the existing measures in the Original REF, apart from reference to the plan numbers and documents being updated. One mitigation measure (mitigation measure no. 11) will be updated to reflect the recommendations made in the Dangerous Goods Design Report. This is a minor amendment and does not constitute a new measure but rather ensures consistency with the proposed design changes. An amended set of mitigation measures is provided at **Appendix D**.

7.1 Summary of Impacts

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

- The extent and nature of potential impacts are low and will not have significant adverse effects on the locality, community and the environment;
- These identified impacts do not vary from those presented with the REF. Where these impacts vary changes to mitigation measures have been proposed.
- 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.

8. Justification and Conclusion

The Amended layout of the medical gas compound at 22-23 Carillon Avenue, Camperdown, is subject to assessment under Part 5 of the EP&A Act. The Original REF for the Approved Proposal was endorsed by HI on 5 June 2024. This Addendum 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 amended proposed activity.

As detailed in this REF Addendum report, the amended proposal will not result in any significant or long-term impacts. 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. Existing mitigation measures remain relevant and unchanged with the exception of administrative changes and Mitigation Measure No. 11 which makes reference to the updated Dangerous Goods Design Report prepared by Riskon Engineering.

As outlined in this Addendum REF, the amended 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 considered all potential impacts (changed from those identified within the REF) and has minimal environmental impacts; and
- Adequate mitigation measures have been proposed to address these impacts.

The environmental impacts of the amended proposal are not 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 under Part 5 of the EP&A Act. On this basis, it is recommended that HI determine the amended proposed activity in accordance with Part 5 of the EP&A Act and subject to the adoption and implementation of mitigation measures identified In **Appendix D**.