

Review of Environmental Factors

Milton Ulladulla Hospital Upgrades Block A Imaging Unit Alterations and Additions

Version 2

2 June 2025



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Declaration

This Review of Environmental Factors (REF) has been prepared for Health Infrastructure (HI) and assesses the potential environmental impacts which could arise from minor, largely internal, alterations and additions to the existing Block A at Milton Ulladulla Hospital at 106 Princes Highway, Milton.

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)*, *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 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.

Declaration	
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Document Management, Tracking and Revision History

Version	Date	Author	Description	Reviewed by	Approved by
Draft	27 May 2025	Oliver Klein (_planning)	Review of Environmental Factors	Lynn Walker (Johnstaff)	Gilda Barakat (Johnstaff)
Final	2 June 2025	Oliver Klein (_planning)	Review of Environmental Factors	Lynn Walker (Johnstaff)	Gilda Barakat (Johnstaff)

Abbreviations

Abbreviation	Description
AEC	Area of Environmental Concern
AHD	Australian Height Datum
AHIP	Aboriginal Heritage Impact Permit
AHIMS	Aboriginal Heritage Information Management System
BC Act 2016	<i>Biodiversity Conservation Act 2016</i>
BC Regulation	<i>Biodiversity Conservation Regulation 2017</i>
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
DPHI	Department of Planning, Housing & Infrastructure
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	<i>Environmental Planning and Assessment Regulation 2021</i>
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>

Abbreviation	Description
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
NCC	National Construction Code
NorBE	Neutral or Beneficial Effect on Water Quality Assessment Guideline (2022)
NPW Act	<i>National Parks and Wildlife Act 1974</i>
NPW Regulation	<i>National Parks and Wildlife Regulation 2009</i>
NPWS	National Parks and Wildlife Service (part of EES)
NT Act (Cth)	<i>Native Title Act 1993 (Cth)</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	NSW Health Infrastructure
REF	Review of Environmental Factors
RF Act	<i>Rural Fires Act 1997</i>
RFS	Rural Fire Service
Resilience and Hazards SEPP	<i>State Environmental Planning Policy (Resilience and Hazards) 2021</i>
SEPP	State Environmental Planning Policy
SIS	Species Impact Statement
TI SEPP	<i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i>
WM Act	<i>Water Management Act 2000</i>

Executive Summary

The Proposal

The overall proposal generally involves the development of a combined CT scanning and X-ray room expanding within the existing and adjacent spaces within the Block A built envelope. The proposed room includes a dedicated patient changing area and an adjacent control room to ensure efficient workflow and patient privacy.

The works require the fire wall line to be strategically rearranged to accommodate the new layout. This adjustment ensures compliance with safety regulations while optimising the use of space. Two new storage rooms facing the hospital's loading dock have been introduced in place of the current arrangement. This change aims to improve logistical efficiency and accessibility for staff, whilst giving access to the CT scanning arrangement for installation and maintenance. The patient shower area has been rearranged to enhance patient comfort and accessibility. Lastly, a new store room has been incorporated into the design to meet the increased storage needs.

Based on the above, the project involves the following internal works to Block A.

- Demolition of structural and non-structural walls and removal of existing doors within the existing Imaging Department / X-ray room and its general environs.
- Expansion and reconfiguration of the space for an enhanced Imaging Department through removal of a range of existing rooms of various sizes and the replacement of doors accordingly.
- Creation of a new enlarged and rationalised imaging space and new CT scanner.

To proceed with the preferred option:

- A new main electrical distribution board will be required to accommodate the increased demand of the CT scanner, and to bring the Main Switch Board (MSB) up to current standards. This requires works to the MSB room within the lower level of Block A to accommodate the scope of works including structural works to address access to the MSB room.
- Upgrades to existing mechanical services will be required.
- Revision / additional points will need to be added to the existing medical gas services.
- Structural works to strengthen the under slab and roof of the extended Imaging Unit will be required.

Additional hydraulic works are however not anticipated.

The area affected by the works is some 90m².

Need for the Proposal

The works to Block A to provide for a new CT scanner and modernised medical imaging spaces seek to provide enhanced diagnostic capabilities. There is presently no CT service at Milton Ulladulla Hospital, with Emergency Department (ED) patients and inpatients being transferred to either South East Radiology – a private provider in Ulladulla, or to Shoalhaven Hospital, to access CT scanning.

To establish the new CT service, the existing X-ray room will be expanded to enable the CT scanner to be collocated in the same room as the existing X-ray machine. This maintains proximity to the ED and ensures efficiency of the Medical Imaging service through a single-radiographer model.

To accommodate the expanded CT and X-ray room and the CT control room, there will be displacement of some storage rooms, a patient shower and Clinical Support Officer office.

Proposal Objectives

These modifications are intended to create a more functional, safe, and patient-friendly environment within Block A. The improvements are expected to significantly enhance the overall efficiency and quality of care provided.

Options Considered

Along with a 'do nothing' scenario, a range of options including extensions to Block A, demountable accommodation alongside Block A, and other Block A alterations and additions were considered. Compared to the preferred option the subject of this REF, the benefits of establishing a CT service in expanding the existing X-ray room are:

- Timely access to scans, particularly in the case of emergency presentations.
- Reduced burden on patients having to travel to and from Shoalhaven Hospital in Nowra.
- Reduced interhospital transfers and therefore reduced recurrent costs for the hospital.
- Staffing efficiencies in keeping the medical imaging services collocated.

None of the other options considered could achieve this overall set of benefits.

Site Details

Milton Ulladulla Hospital is located at 106 Princes Highway, Milton (Lot 1 in DP 1127802) and was opened in 1967 at this current site having outgrown its previous location. The hospital forms part of the Illawarra Shoalhaven Local Health District (ISLHD).

The 32-bed hospital is a rural acute facility that provides emergency, inpatient and outpatient services for the southern Shoalhaven and is networked with the other hospitals and services in the region.

Milton Ulladulla Hospital maternity service provides local antenatal (before birth) and postnatal (after birth) services by midwives, with birthing services provided at Shoalhaven Hospital, under the care of a midwifery and obstetric team.

Cancer care services were established in 2003 to provide an outpatient oncology clinic for the community. The current Cancer Care House was built in 2008 and current services there commenced the same year.

The main building at the hospital is Block A which is a 1-2 storey building (due to the site's sloping topography towards the north) and which includes various alterations and additions over time. Cancer Care House is a timber / weatherboard single-storey building to the site's western boundary.

The site is understood to be under the ownership of the Health Administration Corporation (HAC). The NSW Government Gazette No.73 of 12 July 2019 identifies a significant number of NSW hospital sites acquired by HAC for the purposes of the *Health Administration Act 1982* as at that date. This includes 'Milton Ulladulla Hospital' under the Lots and DP listed at that time.

The site is generally unaffected by any significant planning or environmental constraints other than its heritage listing and Class 5 Acid Sulfate Soils. The heritage listing is addressed in detail within this REF.

Planning Approval Pathway

The works qualify as Development without consent under Division 10 section 2.61(1)(a). The alterations and additions to Block A provide for the expanded Imaging Unit, enhanced MSB room, and other associated works which affect about 90m² of existing GFA. The works are development carried out by a public authority (HI) within the boundaries of an existing health services facility for the erection or alteration of, or addition to, a building that is a health services facility.

Consultation and Engagement

The REF was notified (concurrently for both the separately proposed Cancer Care House works and these Block A works) to Shoalhaven City Council and occupiers of adjoining land for 21 calendar days from 16 April 2025 to 10 May 2025 inclusive, with late submissions beyond 7 May 2025 accepted. An additional 3 calendar days were added to account for Good Friday 2025 and Easter Monday 2025, as well as Anzac Day 2025.

The notification had regard to HI's Community Participation Plan (October 2024) and DPHI's Stakeholder Community Participation Plan (2024) and involved 70 letters being letterbox dropped across two street blocks around the hospital. In relation to these Block A works, no submissions were received.

Environmental Impacts

The environmental impacts for these limited, predominantly internal works, are few and generally limited to construction-related impacts related to noise, traffic and access, management of hazardous building materials, and general construction management matters.

Justification and Conclusion.

The proposed works to Block A at Milton Ulladulla Hospital (106 Princes Highway, Milton) 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 under Part 5 of the EP&A Act. Further a SIS and a BDAR are each also not required in relation to the proposed works.

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

HI proposes to upgrade Milton Ulladulla Hospital with, largely internal, alterations and additions to Block A (the Proposal) at the Milton Ulladulla Hospital at 106 Princes Highway, Milton (the site) as part of their delivery of infrastructure solutions and services to support the healthcare needs of the NSW communities. The proposal is for a new Computed Tomography (CT) scanner and modernised medical imaging spaces within Block A of the hospital to provide enhanced diagnostic capabilities. The works form part of a wider upgrade project at the hospital worth some \$7.5 million to deliver improved health services and infrastructure to meet the current and future healthcare needs of the local community. The other component of the upgrade includes alterations and additions to Cancer Care House. That component of the project is subject to a separate and concurrent REF assessment.

This Review of Environmental Factors (REF) has been prepared by Oliver Klein of _planning Pty Ltd on behalf of HI to determine the environmental impacts of the proposed alterations and additions to Block A at Milton Ulladulla Hospital. 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 EPBC Act, the EP&A Regulation, the *Guidelines for Division 5.1 Assessments* (DPE June 2022) and the *Guidelines for Division 5.1 Assessments – Consideration of environmental factors for health services facilities and schools* (DPHI, October 2024).

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

- Whether the proposed activity is likely to significantly affect the environment and therefore the necessity for an EIS to be prepared and State Significant Infrastructure 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 is required under the EP&A Regulation, and is prepared 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

The works to Block A to provide for a new CT scanner and modernised medical imaging spaces seek to provide enhanced diagnostic capabilities. There is presently no CT service at Milton Ulladulla Hospital, with Emergency Department (ED) patients and inpatients being transferred to either South East Radiology – a private provider in Ulladulla, or to Shoalhaven Hospital, to access CT scanning.

To establish the new CT service, the existing X-ray room will be expanded to enable the CT scanner to be collocated in the same room as the existing X-ray machine. This maintains proximity to the ED and ensures efficiency of the Medical Imaging service through a single-radiographer model.

To accommodate the expanded CT and X-ray room and the CT control room, there will be displacement of some storage rooms, a patient shower and Clinical Support Officer office.

An overview of the alternatives, and an identification of the preferred alternative, for the Proposal are provided within Table 1, noting the extremely modest scale of the works and limited options available.

Table 1: Alternatives considered for the Proposal

Alternative description	Advantages and disadvantages	Preferred alternative
Preferred option as proposed under this REF.	<p>The anticipated benefits of establishing a CT service in expanding the existing X-ray room are:</p> <ul style="list-style-type: none"> • Timely access to scans, particularly in the case of emergency presentations. • Reduced burden on patients having to travel to and from Shoalhaven Hospital in Nowra. • Reduced interhospital transfers and therefore reduced recurrent costs for the hospital. • Staffing efficiencies in keeping the medical imaging services collocated. 	✓
A range of options including extensions to Block A, demountable accommodation, and other Block A alterations and additions.	None of the alternatives could equally or more directly provide the above listed benefits of the existing X-ray room expansion. Other options also proved to be less cost-effective.	X
Do nothing	No change. Limitation on service provision and inefficiencies in workflow. Inability to meet growing demand.	X

2 Site Analysis and Description

2.1 The Site and Locality

Table 2: Description of the site

Site Description	
Address	Milton Ulladulla Hospital – 106 Princes Highway, Milton NSW 2538
Legal Description	Lot 1 in DP 1127802 – see Figure 1 below.
Site Area	Approximately 8,850m ² or 0.885 ha
Owners	The site is understood to be under the ownership of the Health Administration Corporation (HAC). The NSW Government Gazette No.73 of 12 July 2019 identifies a significant number of NSW hospital sites acquired by HAC for the purposes of the <i>Health Administration Act 1982</i> as at that date. This includes ‘Milton Ulladulla Hospital’ under the Lots and DP listed at that time.
Heritage	The whole of the site is mapped as a local heritage item, with the Shoalhaven LEP’s heritage listing however identifying a Federation-period weatherboard farm house and residence and its well called ‘Garrad House’ - Item I281.

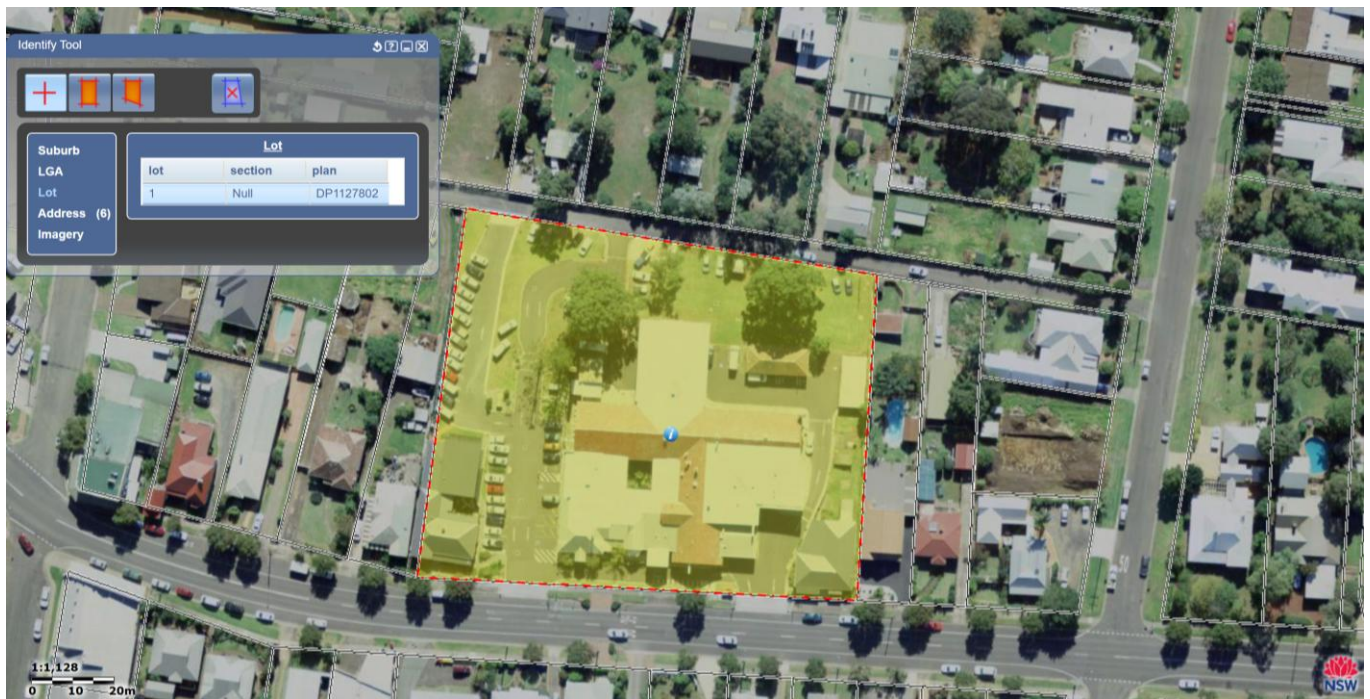


Figure 1 – Lot 1 of DP 1127802 – Milton Ulladulla Hospital (SixMaps)

2.2 Existing Development

Milton Ulladulla Hospital was opened in 1967 at its current site at 106 Princes Highway, Milton having outgrown its previous location. The hospital forms part of the Illawarra Shoalhaven Local Health District (ISLHD).

The 32-bed hospital is a rural acute facility that provides emergency, inpatient and outpatient services for the southern Shoalhaven and is networked with the other hospitals and services in the region.

Milton Ulladulla Hospital maternity service provides local antenatal (before birth) and postnatal (after birth) services by midwives, with birthing services provided at Shoalhaven Hospital, under the care of a midwifery and obstetric team.

Cancer care services were established in 2003 to provide an outpatient oncology clinic for the community. The current Cancer Care House was built in 2008 and current services there commenced the same year.

The main building at the hospital is Block A which is a 1-2 storey building (due to the site’s sloping topography towards the north) and which includes various alterations and additions over time. Cancer Care House is a timber / weatherboard single-storey building to the site’s western boundary. See **Figure 2** setting out the location of buildings at the hospital including Block A and Cancer Care House. External and internal photographs of Block A are provided at **Figures 3** and **4** over.

A survey is provided for reference at **Appendix A**.



Figure 2 - Aerial photograph (SixMaps)

2.3 Site Considerations and Constraints

Section 10.7 Planning Certificate No. 2024/04667 dated 25 November 2024 identifies that the site is located within the Zone SP2 Infrastructure (Health Services Facility) zone under *Shoalhaven Local Environmental Plan 2014* and is provided at **Appendix B**.

Table 3: Section 10.7 Planning Certificate

Affectation	Yes*	No
Critical habitat		✓
Conservation area		✓
Item of environmental heritage	✓	

Affectionation	Yes*	No
	(see discussion elsewhere in this REF)	
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 sulfate or any other risk	✓ Acid Sulfate Soil (class 5) only	✓ All other items
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		✓
List other relevant constraints		✓



Figure 3 – Block A as viewed from the Princes Highway



Figure 4 – Internal view the existing X-ray room in Block A

3 Proposed Activity

3.1 Proposal Overview

The overall proposal generally involves the development of a combined CT scanning and X-ray room expanding within the existing and adjacent spaces within the Block A built envelope. The proposed room includes a dedicated patient changing area and an adjacent control room to ensure efficient workflow and patient privacy.

The works require the fire wall line to be strategically rearranged to accommodate the new layout. This adjustment ensures compliance with safety regulations while optimising the use of space. Two new storage rooms facing the hospital's loading dock have been introduced in place of the current arrangement. This change aims to improve logistical efficiency and accessibility for staff, whilst giving access to the CT scanning arrangement for installation and maintenance. The patient shower area has been rearranged to enhance patient comfort and accessibility. Lastly, a new store room has been incorporated into the design to meet the increased storage needs.

These modifications are intended to create a more functional, safe, and patient-friendly environment within Block A. The improvements are expected to significantly enhance the overall efficiency and quality of care provided.

Based on the above, the project involves the following internal works to Block A.

- Demolition of structural and non-structural walls and removal of existing doors within the existing Imaging Department / X-ray room and its general environs.
- Expansion and reconfiguration of the space for an enhanced Imaging Department through removal of a range of existing rooms of various sizes and the replacement of doors accordingly.
- Creation of a new enlarged and rationalised imaging space and new CT scanner.

To proceed with the preferred option:

- A new main electrical distribution board will be required to accommodate the increased demand of the CT scanner, and to bring the Main Switch Board (MSB) up to current standards. This requires works to the MSB room within the lower level of Block A to accommodate the scope of works including structural works to address access to the MSB room.
- Upgrades to existing mechanical services will be required.
- Revision / additional points will need to be added to the existing medical gas services.
- Structural works to strengthen the under slab and roof of the extended Imaging Unit will be required.

Additional hydraulic works are however not anticipated.

The area affected by the works is some 90m².

The Architectural drawings and design statement are found at **Appendices C** and **D**, respectively. A range of existing, demolition, and proposed plans follow over subsequent pages, as well as a 3D axonometric representation of the final / proposed layout.

Acor has provided a hydraulic services statement which is found at **Appendix E**. See the JHA statement at **Appendix F** in relation to electrical and ICT services. Stantec's statement in relation to mechanical and medical gas services is provided at **Appendix G**.

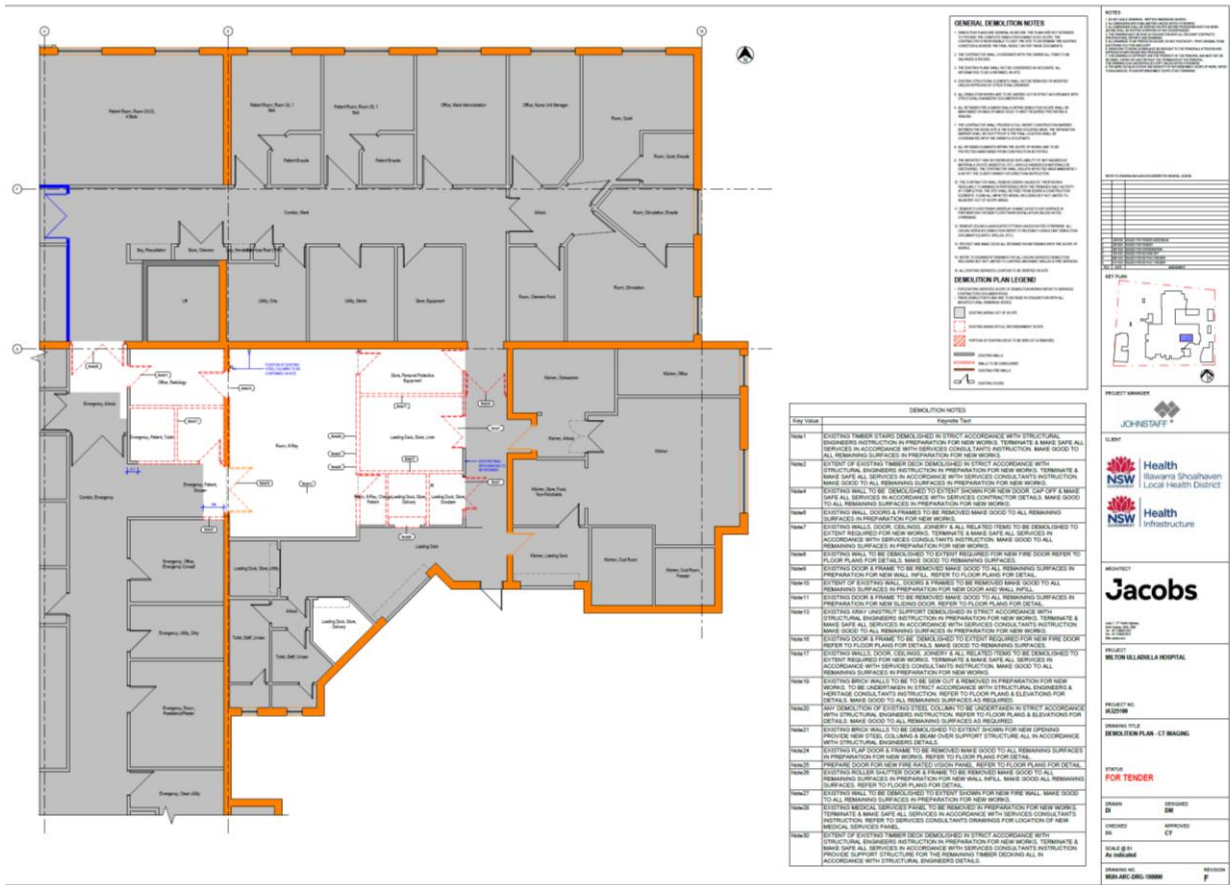


Figure 5 – Existing and Demolition Plan – CT Imaging (Jacobs)

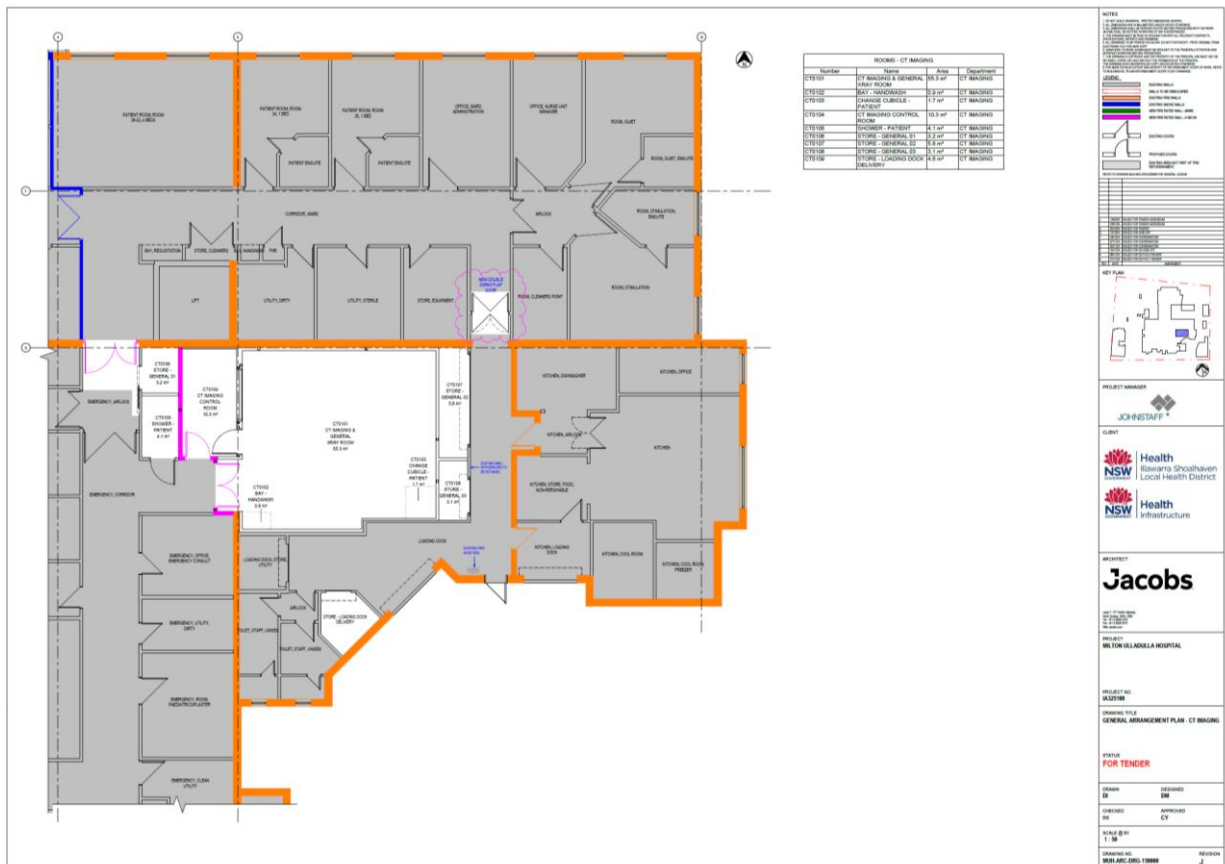


Figure 6 – Proposed General Arrangement Plan – CT Imaging (Jacobs)

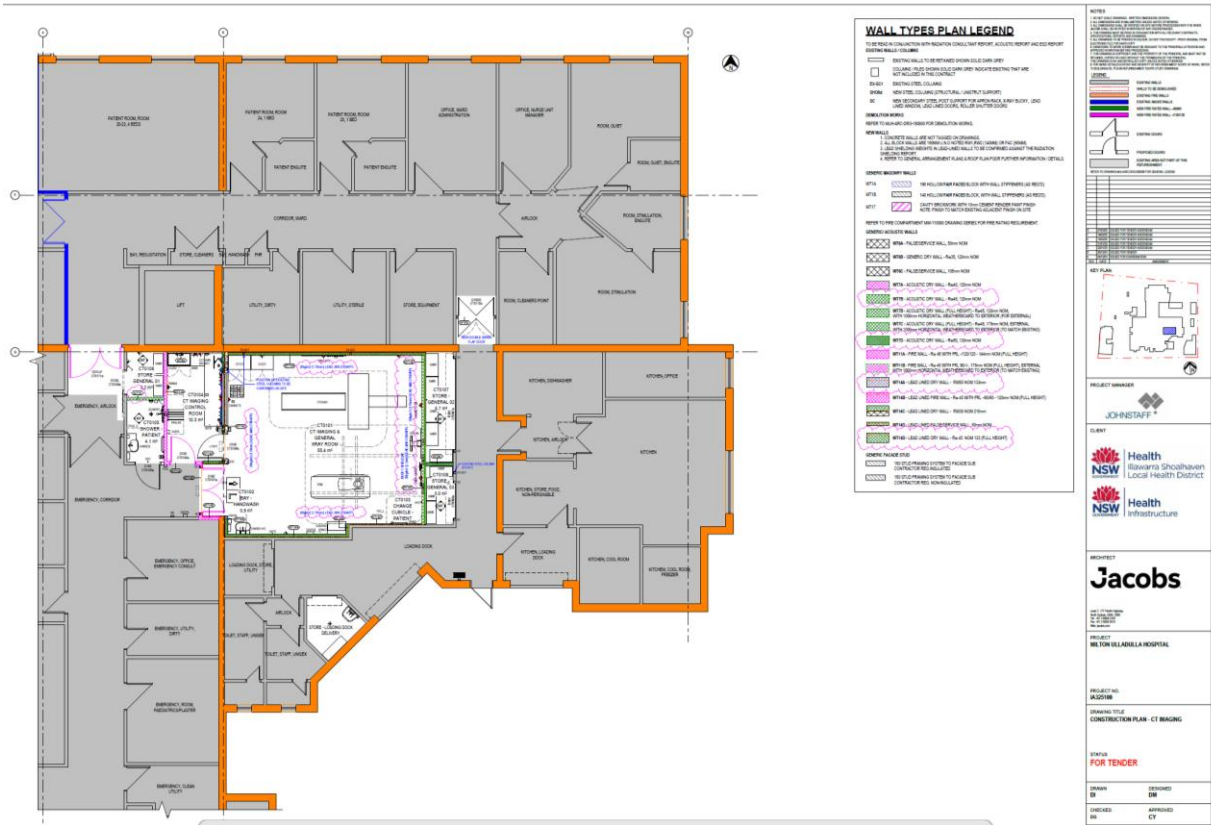


Figure 7 – Construction Plan – CT Imaging (Jacobs)

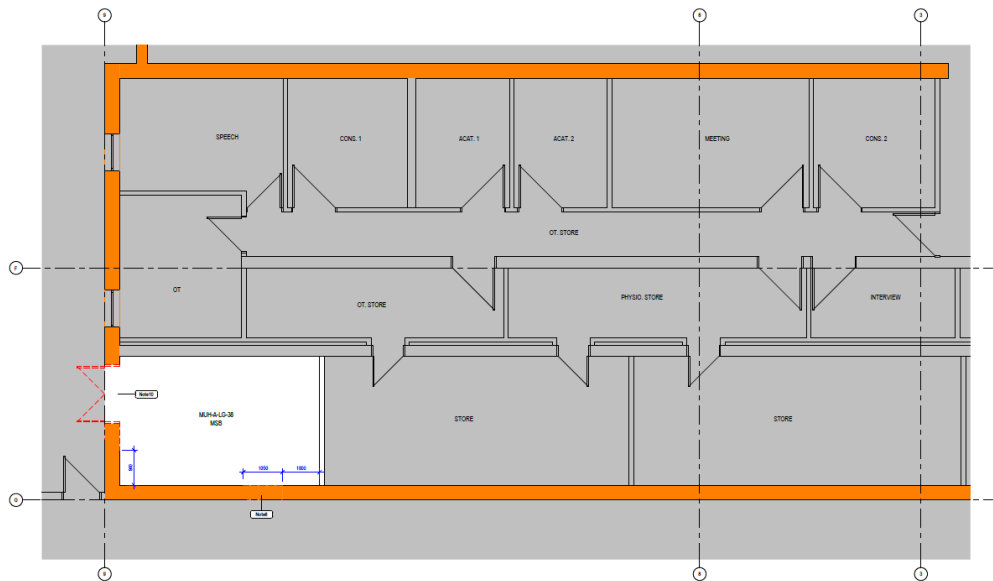


Figure 8 – Existing and Demolition Plan – Main Switch Board (Jacobs)

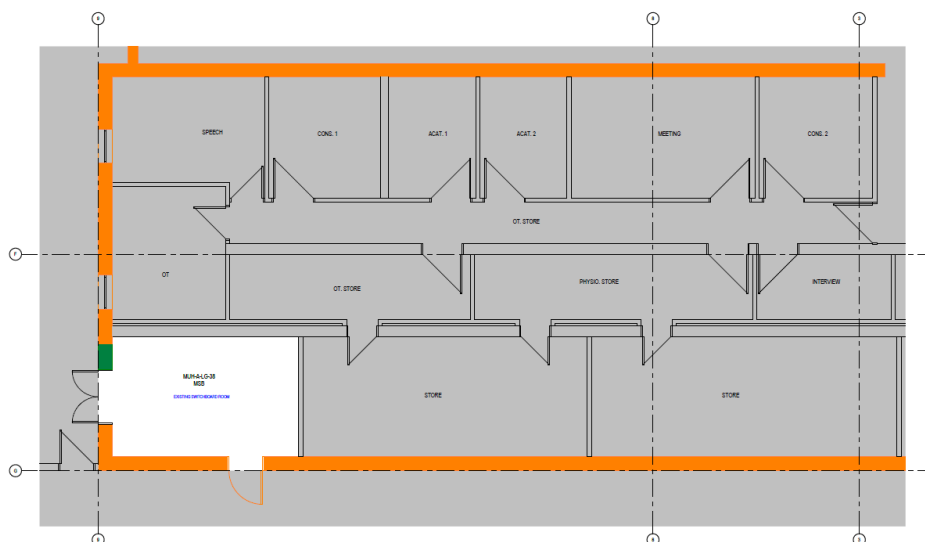


Figure 9 – Proposed General Arrangement Plan – Main Switch Board (Jacobs)

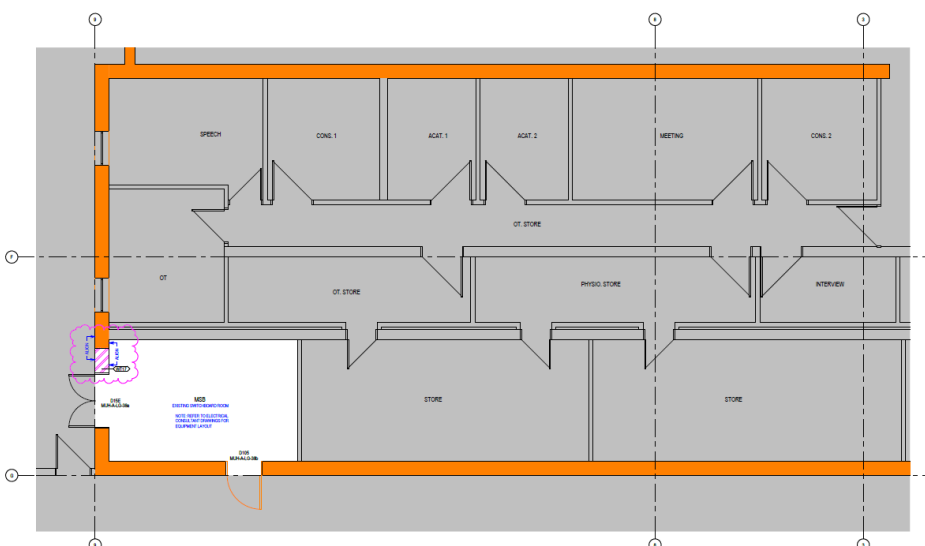


Figure 10 – Construction Plan – Main Switch Board (Jacobs)

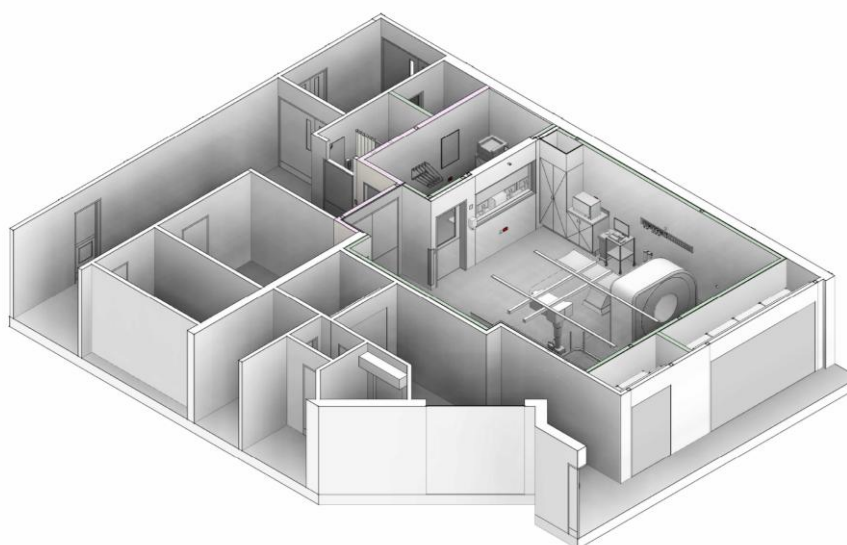


Figure 11 - 3D axonometric representation of the final / proposed CT Imaging layout (Jacobs)

3.2 Construction Activities

The works are generally short term (up to nine months), proposed from June 2025 to February 2026, excluding holiday periods. The Cancer Care House and CT Imaging scopes of works are proposed to be carried out concurrently under a single contract. The modest nature of the works enables continuation of the existing operations of the hospital, albeit in managed circumstances around different stages of demolition, construction and fit out works.

Table 4: Project Timeframes and Construction Activities

Construction activity	Description
Commencement Date	June 2025 to February 2026
Work Duration/Methodology	Up to 9 months
Work Hours and Duration/Construction	7:00 am – 6:00pm Mondays to Fridays 7:00am – 5:00 pm Saturdays No work Sundays or Public Holidays
Ancillary Facilities	The Principal Contractor site amenities will likely include a site office, ablution block and lunch rooms as well as space for laydown of materials and waste bins. These will likely be located in the North East corner of the Hospital site. All Contractor parking will be outside of the Hospital Grounds.
Plant Equipment	Will likely include scissor lifts and mobile cranes but is yet to be determined.
Source and Quantity of Materials	These are to be determined and will vary dependent upon the types of materials chosen and availability.
Traffic Management and Access	Site access for deliveries, internal materials handling, and waste removal will be via Princes Highway and through the hospital loading dock area. All vehicle movements and deliveries entering and exiting Milton Hospital will be carried out in a forward direction to and from the Loading Dock on Princess Highway. The majority of materials handling will occur outside of normal working hours before 7:30am. A traffic management plan will be procured with signage being placed in accordance with its requirements warning motorists of the vehicle movements to and from the sites. This process will be continually monitored and will be adjusted if required to suit the conditions. Any deliveries by trucks will be undertaken in accordance with Milton Hospital requirements. Additionally, the contractor will implement access and egress paths from the site entry and amenities to the construction areas. These will be delineated, and sign posted to ensure there is no risk of workers disrupting the general operations of the Hospital. Typically, all deliveries will be directed to the site compound for drivers to sign in prior to entering the site. All vehicles entering the

Construction activity	Description
	laneway, or the loading dock will be required to adhere to the site rules including access routes on site, demarcation zones and speed limits.

A preliminary Construction Management Plan has been prepared with respect to the works and is found at **Appendix H**.

3.3 Operational Activities

Use

No change to the existing use of the hospital results. Medical imaging services will be enhanced through the provision of the subject CT scanner and improved accommodation.

Operation Hours

No change in the hospital’s operating hours results from this proposal. The hospital will continue to operate 24 hours per day and 7 days per week.

Staff/Patients

No change in staffing numbers results in terms of radiographers or directly to any medical or nursing staff.

Traffic and Parking

No change to parking demand, and therefore parking supply arises. Any changes to traffic generation are likely to be insignificant or imperceptible in light of the modest (yet important) changes to the hospital’s provision of health care services. In fact, external trips to and from Shoalhaven Hospital for Milton Ulladulla Hospital patients will be reduced as a result of these works.

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 activity constituting the development is required under Part 5 of the EP&A Act.

State Environmental Planning Policy (Transport and Infrastructure) 2021 (TI SEPP) aims to facilitate the effective delivery of infrastructure across the State. Division 10 of Part 2.3 or other provision of the TI SEPP outlines the approval requirements for health service facilities or other works. A hospital or other works is defined as a health service facility or other as relevant under this division.

The site is zoned 'SP2 Infrastructure (Health Services Facility)' under the *Shoalhaven Local Environmental Plan 2014*. The 'SP2 Infrastructure (Health Services Facility)' zone is a prescribed zone under the TI SEPP however for existing hospitals, the works are required to be within the boundaries of an existing health services facility (section 2.61).

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 and excludes any Exempt Development.

Under provisions of the TI SEPP, the following activity is to be undertaken.

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

Table 5: Description of proposed activities

Division and Section within TI SEPP	Description of Works
Division 10 section 2.61(1)(a)	<p>The alterations and additions to Block A provide for the expanded Imaging Unit, enhanced MSB room, and other associated works which affect about 90m² of existing GFA.</p> <p>The works are development carried out by a public authority (HI) within the boundaries of an existing health services facility for the erection or alteration of, or addition to, a building that is a health services facility.</p>
Division 10 section 2.61(2)	<p>HI is satisfied that appropriate consultation has been undertaken having regard to—</p> <ul style="list-style-type: none"> (i) the SCPP—new health services facilities and schools, and (ii) the community participation plan, and <p>HI has considered the design guide, and</p> <p>The development will not involve more than 30,000m² of gross floor area on the site being created or affected.</p>
Chapter 2 Part 2.1 section 2.3(3)	<p>The construction works, amongst other things, which may involve: temporary construction yards, temporary structures, investigations (including geotechnical and other testing, surveying and the placement of survey marks, and sampling), demolition, relocation or removal of infrastructure, and extraction of extractive materials at</p>

Division and Section within TI SEPP	Description of Works
	the construction site solely for the purpose of the construction, as ancillary works.

4.2 Environmental Planning and Assessment Act 1979

The proposed activity is consistent with the objectives of the EP&A Act as outlined in the table below.

Table 6: Consideration of the Objects of the EP&A Act

Object	Comment
a. to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,	The works support the efficient and effective operation of Milton Ulladulla Hospital with new and enhanced facilities. This in turn supports and promotes the general welfare of the community.
b. to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,	The development's ESD credentials have been considered as part of the design and ongoing operation of the development. See further detailed ESD considerations addressed within this REF.
c. to promote the orderly and economic use and development of land,	The enhanced medical imaging services promote an orderly and economic use of the site by expanding existing spaces into a much-needed contemporary health service use.
d. to promote the delivery and maintenance of affordable housing,	N/A
e. to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,	The development / activity does not affect the environment, including threatened and other species of native animals and plants, ecological communities and their habitats in any way.
f. to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),	N/A – the hospital does not contain any Aboriginal cultural heritage that may be affected by these works. The works will not impact any of the local and State heritage items on the site as the location is remote from areas of heritage value on the hospital site being the former Garrad House and its well, located to the east of the existing Cancer House House's curtilage. See further discussion within this REF.
g. to promote good design and amenity of the built environment,	The design of the expanded medical imaging space is one limited by the scope of the project. In essence the proposed works operate to maintain the existing bulk and scale of the building. It seeks to promote good and contemporary design

Object	Comment
	internally and at its interfaces externally as well as providing for a higher internal user and patient amenity.
h. to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,	The project is in itself concerned with the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants.
i. to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State,	N/A.
j. to provide increased opportunity for community participation in environmental planning and assessment.	<p>The proposal has been notified, garnering no commentary / submissions from either Council or neighbours of the hospital, as set out in Section 5 of this REF.</p> <p>Given the modest and clinically focussed scope of works, no Aboriginal community representative engagement was carried out into community aspirations for the expanded imaging space. Note a Connecting with Country response will be addressed through a separate Arts in Health process, due to the modest scale, scope and clinically-focussed nature of the works.</p> <p>Notwithstanding, by any measure, ample opportunity for community participation in environmental planning and assessment process has occurred arising from the 21-day notification and wide-ranging scope of letterbox notification in areas within two street blocks of the hospital.</p>

4.3 Environment Protection and Biodiversity Conservation Act 1999

The provisions of the 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 7.

Table 7: 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

Consideration	Yes/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

4.4 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. Such activities are generally carried out by or on behalf of 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.

The EP&A Act requires a determining authority in its consideration of an activity, 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, to 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 8 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 8: Matters for consideration under Subsection 3, Section 5.5 of the EP&A Act

Matter for Consideration	Impacts of Activity
Subsection 3: 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.	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 out on.

Matter for Consideration	Impacts of Activity
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Note: If a biobanking statement has been issued in respect of a development under Part 7A of the *Threatened Species Conservation Act 1995*, the determining authority is not required to consider the impact of the activity on biodiversity values.

4.5 Environmental Planning and Assessment Regulation 2021

Section 171(1) of the EP&A Regulation requires that when considering the likely impact of an activity on the environment, the determining authority must take into account the environmental factors specified in the guidelines that apply to the activity.

The *Guidelines for Division 5.1 Assessment* (DPE June 2022) and *Guidelines for Division 5.1 Assessments – Addendum: Consideration of environmental factors for health services facilities and schools* (DPHI, 2024) provide 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 EP&A Regulation requires the consideration of the impact of an activity in a defined catchment. This is considered further below under Table 9 of this REF.

4.6 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 9: Other Possible Legislative Requirements

Legislation	Comment	Relevant? Yes/No
State Legislation		
<i>Rural Fires Act 1997</i>	The site is not identified as Bushfire Prone Land.	No
<i>Biodiversity Conservation Act 2016</i>	The site does not contain any critical habitat, threatened species or ecological population or community.	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>	The site is not listed on the EPA Register of contaminated sites.	No
<i>Heritage Act 1977</i>	<p>Whilst the site is mapped as a local heritage item under Shoalhaven LEP 2014, the listed item is a Federation-period weatherboard farm house and residence and its well called 'Garrad House' - Item I281. Heritage advice obtained (see Appendix I) advises that the works are remote from and do not impact the listed items. The proposed works are located outside of the footprint of Garrad House and not in proximity to the well.</p> <p>Under the Block A works minor undersurface structural works to strengthen the existing slab to cater for the CT</p>	No

Legislation	Comment	Relevant? Yes/No
	scanner are proposed, however no archaeology is envisaged to be impacted under the scope of works.	
<i>Roads Act 1993</i>	No works are proposed to a public road, or involve any pumping of water onto a public road, or involve the connection of a road to a classified road.	No
<i>National Parks and Wildlife Act 1974</i>	An Basic AHIMS Search result indicates that there are no Aboriginal objects and Aboriginal places protected under this Act located within and within a 50m buffer of the hospital site. The works are internal to Block A on already disturbed urbanised land within the hospital. An Aboriginal Cultural Heritage Assessment Report (ACHAR), in support of an Aboriginal Heritage Impact Permit (AHIP), is accordingly not required.	No
<i>NSW Reconstruction Authority Act 2022</i>	The works respond to the broad requirements of the State Disaster Mitigation Plan (SDMP) under section 38 of the <i>NSW Reconstruction Authority Act</i> , in that the development is designed in response to any disaster event that may occur at the site including flooding, earthquake and the like, noting that the subject building is not on bushfire prone land and is unlikely to be flooded.	No
Section 171A <i>Environmental Planning and Assessment Regulation 2021</i>	The works do not directly, or indirectly, impact catchments as defined for consideration under Section 171 A of the EP&A Regulation.	No
State Environmental Planning Policies		
<i>State Environmental Planning Policy (Sustainable Buildings) 2022</i>	This SEPP, and Chapter 3 in particular, does not apply to Part 5 / REF assessments. Notwithstanding see separate ESD-related discussion elsewhere within this REF.	No
<i>State Environmental Planning Policy (Resilience and Hazards) 2021</i>	The existing site is suitable for continued use as a health services facility. The geotechnical assessment carried out identified the likelihood of uncontrolled fill underneath the Block A slab and accordingly any earthworks in that location that require off-site disposal of waste spoil will typically require a preliminary waste classification in accordance with the NSW EPA Classification Guidelines – see Appendix J . The slab will be reconstructed once strengthening has occurred and no risk would arise to change the classification of the site. No remediation works are anticipated in this location.	No
	This hospital is not mapped as ‘Coastal Use Area’ nor ‘Coastal Environment Area’ under Chapter 2 of this SEPP. The campus is also not mapped as a Coastal Wetlands or Littoral Rainforest.	No

Legislation	Comment	Relevant? Yes/No
<p><i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i></p>	<p>The SEPP provides for alternative planning approval pathways to a DA under Division 10 in relation to Health Services Facilities.</p> <p>Traffic-generating development requires referral to TfNSW. The modest scale of this development does not relate to the relevant traffic-generating development thresholds of either an additional 100 or 200 beds or more. No additional patient beds are proposed.</p> <p>The proposal is consistent with the GANSW Design Guide for Health as far as this extends to the internal works in Block A.</p> <p>The Project has had regard to HI's <i>Community Participation Plan</i> (October 2024) and DPHI's <i>Stakeholder Community Participation Plan</i> (October 2024).</p>	<p>Yes, as set out here.</p>

Shoalhaven Local Environmental Plan 2014

Zone	<p>'SP2 Infrastructure (Health Services Facility)'</p> <p>The works are consistent with the relevant zone objectives which are to provide for infrastructure and related uses and to prevent development that is not compatible with or that may detract from the provision of infrastructure.</p>	Yes
Height of Buildings	<p>As the site is not mapped as being subject any height control, clause 4.3(2A) imposes a height of a building control to not to exceed 11 metres. No change to existing building height arises from the scope of works. In any case, this would be unlikely to extend the building beyond 11m in height above the existing ground level.</p>	Yes, as far as may be relevant.
Floor Space Ratio	N/A	No
Heritage	<p>The whole of the site is mapped as a local heritage item, with the Shoalhaven LEP's heritage listing however identifying a Federation-period weatherboard farm house and residence and its well called 'Garrad House' - Item I281.</p> <p>Heritage advice obtained advises that the works are remote from and do not impact the listed items. The proposed works are located outside of the footprint of Garrad House and not in proximity to the well.</p> <p>Under the Block A works minor undersurface structural works to strengthen the existing slab to cater for the CT scanner are proposed, however no archaeology is envisaged to be impacted under the scope of works.</p>	Yes
Flood Planning	N/A	No
Coastal Planning	N/A	No

4.7 Strategic Plans

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

Table 10: Consideration of the Objects of the EP&A Act

Strategic Plan	Assessment	Relevant? Yes/ No
Illawarra Shoalhaven Regional Plan 2041 (May 2021)	<p>The Illawarra Shoalhaven Regional Plan applies to and includes Milton (and Ulladulla) as settlements within the boundaries of the region.</p> <p>No specific Objectives or Actions apply to Milton, Milton Ulladulla Hospital, or health projects per se in this southern portion of the Region. There is otherwise a significant focus upon Wollongong, Shellharbour and Nowra within the Plan.</p> <p>Notwithstanding the proposal, despite its modest scale, supports general Objectives and Actions of the Plan, including:</p> <ul style="list-style-type: none"> • Build resilient places and communities. • Respond to the changing needs of local neighbourhoods. 	No
Illawarra-Shoalhaven Regional Transport Plan (Future Transport 2056)	<p>The proposed development is not of a scale to be relevant or applicable to the Region-wide transport objectives for the Illawarra-Shoalhaven. As such, the proposal is also not inconsistent with the Plan.</p>	No
Shoalhaven Local Strategic Planning Statement (LSPS) (Shoalhaven 2040)	<p>The Local Strategic Planning Statement 2020 (LSPS) sets out a 20-year land use planning vision in relation to:</p> <ul style="list-style-type: none"> • The number, type, and location of new homes. • Provision of infrastructure and services. • Job creation, economic growth, and the strengthening of commercial centres. • Preserving our environment and adapting to its changing nature. • Enhancing our heritage, landscapes, and the character of neighbourhoods. <p>No specific Objectives or Actions apply to Milton, Milton Ulladulla Hospital or health projects per se in this southern portion of the LGA, given a significant focus upon Nowra and Shoalhaven Hospital within the Plan.</p>	No

5 Consultation

5.1 Statutory Consultation

The REF was notified (concurrently for both the Cancer Care House works and the Block A works) having regard to HI’s *Community Participation Plan* (October 2024) and DPHI’s *Stakeholder Community Participation Plan* (2024) for 21 calendar days to the stakeholders outlined in Table 11. An additional 3 calendar days were added to account for Good Friday 2025 and Easter Monday 2025, as well as Anzac Day 2025.

Notification accordingly ran from 16 April 2025 to 10 May 2025 inclusive, with late submissions beyond 7 May 2025 accepted.

Table 11: Agencies and stakeholders notified

Stakeholder	Relevant section
Shoalhaven City Council	Section 2.62(2)(a)(i)
Occupiers of adjoining land	Section 2.62(2)(a)(ii)

The notification involved 70 letters being letterbox dropped and commenced on 16 April 2025 and concluded on 10 May 2025. Copies of the notification letters are provided at **Appendix K**. See **Figure 12** for the extent of the neighbour notification.

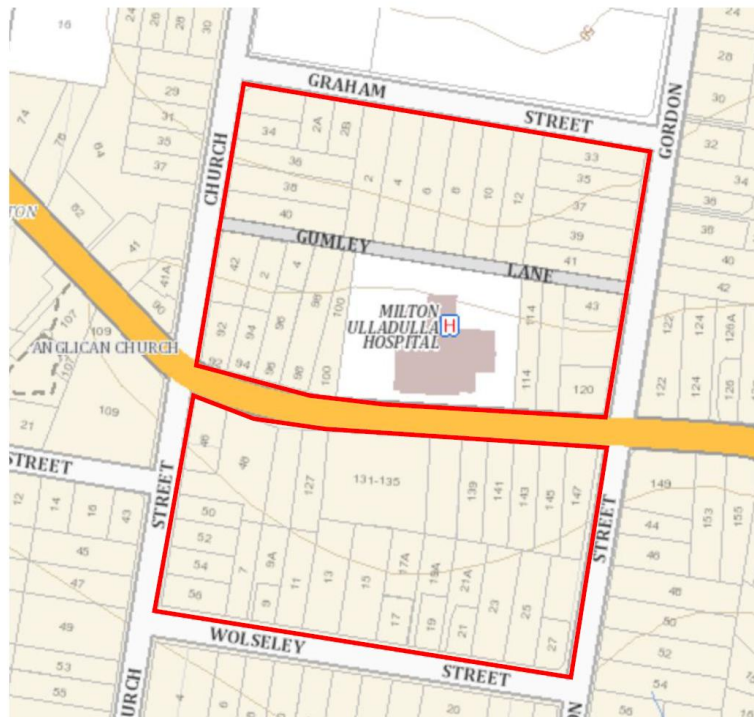


Figure 12 – Extent of neighbour notification on 9 April 2025 (SixMaps base)

No submissions were received with respect to the Block A Works.

5.2 Community and Stakeholder Engagement

An expansion for The Milton Ulladulla Hospital was initially announced by the NSW Government in March 2023, which identified a new CT scanner and an upgrade to the Cancer Services. In addition to the above statutory consultation requirements, the project team has undertaken other consultation activities throughout the project to date, which has informed the current design.

Project User Groups

The design team has engaged with client representatives weekly, including the ISLHD, HI, and staff members over a period of four weeks which commenced on 28 October 2024 and concluded on 18 November 2024. An introductory meeting was held on 28 October 2024 followed by a total of three (3) Project User Group Meetings which were divided into two sessions immediately following each other (3 for CT followed by 3 for Cancer Care), after which endorsement was received for both designs.

Concept designs were presented and reviewed with the design team and client team. The design was modified and represented until the final concept was approved.

Stakeholder briefings

The project team has undertaken a series of stakeholder briefings to further inform the design. These briefings have provided an opportunity to engage with relevant authorities, service providers and local residents to ensure key considerations such as planning requirements and local conditions are appropriately addressed.

The Stakeholder Design Consultation Process for the Cancer Care House Works was conducted through a series of structured engagements to ensure comprehensive input and alignment with project goals.

The process included:

Initial High-Level Consultation

Engagement with the Executive User Group to understand the brief and overall expectations of the design. Clarification of what the facility aims to achieve, its priorities, and the extent of the work required.

Design Consultation Series

A series of consultations to discuss design options and alternatives as set out earlier in this REF. Identification of the most efficient option that minimised impact on the existing structure and operations while ensuring cost-effective design solutions.

Schematic Design Workshops

Collaboration with the Project User Group to design the spatial flow and arrangement of spaces.

Discussion on how the proposed design affects the current flow and identified improvements to enhance functionality.

Design Development Workshops

Workshops with the Project User Group to refine the design.

Focused discussion on detailed requirements, such as internal flow, furniture, fixtures, and equipment (FF&E), and security considerations.

This structured approach ensured that all stakeholders were actively involved in the design process, leading to a well-informed and cohesive outcome for the Block A – CT imaging works.

The project in itself does not strictly qualify for the HI Design Assurance process given its development cost / value, and the scale, scope and nature of the works. Notwithstanding, an assurance review process has been undertaken, all comments received have been addressed and support has been received from HI design assurance team.

Note also, a Connecting with Country response will be addressed through a separate Arts in Health process, again due to the modest scale, scope and nature of the works.

6 Environmental Assessment

6.1 Environmental Planning and Assessment Regulation 2021 – Assessment Considerations

Section 171 (1) of the EP&A Regulation 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 the Guidelines for Division 5.1 assessments—Consideration of environmental factors for health services facilities and schools (October 2024) apply to the activity. The relevant assessment considerations under Section 3 of these Guidelines are provided below.

Table 13: Summary of Environmental Factors Reviewed in Relation to the Activity

Relevant Consideration	Response/Assessment	
<p>Any environmental impact on a community</p>	<p>The likely impact upon the community will be generally limited to short-term largely internalised construction noise, including demolition within Block A (both at the existing imagining unit and the lower level MSB location), as well as minor addition to operational noise from additional mechanical plant associated with the new space.</p> <p>Separate construction and operational noise assessments have been prepared – see each as part of Appendix L.</p> <p>In terms of construction noise, the assessment concludes that based on the types of equipment to be used during construction and predicted noise and vibration levels, adjacent sensitive receivers to the Block A-related works will not be affected by noise exceeding the Highly Noise Affected 75 dBA level.</p> <p>There are some residential receivers that will be subject to noise exceeding the 55 dBA Noise Management Level (NML). These being:</p> <ul style="list-style-type: none"> • Residences immediately to the west of the hospital on Princes Highway • Residences to the rear of the hospital on Gumley Lane <p>There are some other receivers that will be subject to noise exceeding the hospital-related 65 and 70 dBA NMLs. These being:</p> <ul style="list-style-type: none"> • Hospital wards, consulting rooms and administration areas on the western façade of the main hospital building <p>Noise to residences to the east of the hospital and commercial/retail developments across Princes Highway would not exceed the NMLs.</p> <p>To address these impacts feasible and reasonable noise mitigation would need to be investigated to by the contractor to minimise noise impacts, based on the procedures and methods in Section 5 and the ICNG. See further discussion below.</p>	<p>-ve</p>

Relevant Consideration	Response/Assessment	
	<p>Operational noise associated with the Block A-related works, primarily the upgrade of mechanical services including installation of new fan coil unit(s) and associated outdoor condenser unit(s) are anticipated to comply with day and evening project noise trigger levels to sensitive receivers to the east of Block A, but will however exceed the night-time threshold by 2 dBA. It is noted that the location of the condenser unit causing this exceedance is intended to be located amongst other pre-existing condenser units serving Block A. Data is not available for these pre-existing units, however, it is expected that the installation of a single new unit will have a negligible effect on the overall noise emission from the hospital to these receivers.</p> <p>Minor addition to traffic to the site will occur for construction-related deliveries and waste removal, as well as construction workers' daily travel. These additional volumes of traffic are likely to be minor in impact over the course of the works. See further discussion below.</p> <p>The works are otherwise limited and modest in their nature and scale and no significant impact is likely to arise.</p> <p>Dust and air quality will be able to be managed at acceptable levels. See further discussion below.</p>	
Any transformation of a locality	<p>The works will not result in any transformation of the locality. The works are internal and not visible from public spaces or publicly accessible views into the hospital. The proposed works will not alter existing views into the hospital in any significant way.</p> <p>The character of the locality (including streetscape) will be unchanged by these works. The modest internal works will not result in any visual impacts or impacts upon adjacent land uses.</p>	Nil
Any environmental impact on the ecosystems of the locality	<p>The works will have no impact upon the ecosystems of the locality. Flora, fauna, habitats, biodiversity, ecological integrity, biological diversity, connectivity/fragmentation, air, water including hydrology, soil are all generally unaffected by the modest scope of these works.</p> <p>No vegetation is affected and any (albeit unlikely) stormwater run-off during the works will be managed through sediment and erosion control measures.</p> <p>No new trees or landscaping is necessitated as an offset and is not proposed.</p>	Nil
Any reduction of the aesthetic, recreational, scientific or other environmental quality or value of a locality	<p>There will be no reduction of the aesthetic, recreational, scientific or other environmental quality or value of a locality. The works will have no impact upon any heritage or conservation values tied to the hospital site including Garrad House and its well, as set out in the project's heritage advice.</p>	Nil

Relevant Consideration	Response/Assessment	
The effect on any locality, place or building that has aesthetic, anthropological, archaeological, architectural, cultural, historical, scientific or social significance or other special value for present or future generations	<p>There will be no effect or impact on any locality, place or building that has aesthetic, anthropological, archaeological, architectural, cultural, historical, scientific or social significance or other special value for present or future generations.</p> <p>As above, the works will have no impact upon any heritage or conservation values tied to the hospital site including Garrad House and its well.</p> <p>Further, there are no anticipated impacts upon Aboriginal cultural heritage. Note a Basic AHIMS Search result indicates that there are no Aboriginal objects and Aboriginal places protected under this Act located within and within a 50m buffer of the hospital site – see Appendix M. The works are internal to Block A on already disturbed urbanised land within the hospital.</p>	Nil
The impact on the habitat of protected animals (within the meaning of the <i>Biodiversity Conservation Act 2016</i>)	<p>The works have no impact on the habitat of protected animals (within the meaning of the <i>Biodiversity Conservation Act 2016</i>). There are no impacts on listed protected fauna at, and in the vicinity of, the site, including their habitat.</p>	Nil
The endangering of any species of animal, plant or other form of life, whether living on land, in water or in the air	<p>The works will have no impact upon endangering of any species of animal, plant or other form of life, whether living on land, in water or in the air.</p>	Nil
Any long-term effects on the environment	<p>There are no long term effects upon the environment (whether natural or man-made) in relation to the modest internal changes to Block A.</p> <p>This includes flood and bushfire behaviour, flooding and the flood plain, bushfire prone land; natural environment, flora and fauna species and their habitats; agricultural productivity; industrial land supply; housing supply; climate change; and cumulative impacts.</p> <p>There are no long term ecological, social and economic effects, in fact the modest scale of the works will commensurately also have modest yet tangibly positive social (health) and economic impacts.</p>	Nil
Any degradation of the quality of the environment	<p>The works (whether during the works themselves and its operational phase) will have no impact upon quality of the environment to scale to which it would be permanently degraded.</p>	Nil

Relevant Consideration	Response/Assessment	
Any risk to the safety of the environment	<p>The works are not a risk to the safety of the environment.</p> <p>There will be no adverse environmental impacts that will change any environmental characteristics at or near the hospital, including flood or stormwater runoff, storm surge, bushfire, ongoing maintenance of landscaping within an Asset Protection Zone, contamination leak, wind speeds, extreme heat, urban heat, climate change adaptation. There are also no sensitive environmental, cultural areas or residential neighbourhoods that stand to be impacts in any significant way, including that related to heritage or conservation.</p> <p>There are also no impacts upon soil resources and related infrastructure and riparian lands on and near the site, soil erosion, salinity and acid sulfate soils, surface water resources (quality and quantity), hydrology, dependent ecosystems, drainage lines, downstream assets and watercourses, groundwater resources.</p> <p>Whilst the site is identified as subject to Class 5 Acid Sulfate Soils (the lowest risk category) the works will not need an Acid Sulfate Soils management plan due to the shallow and minor earthworks associated with the structural support to Block A to accommodate the new CT scanner.</p>	Nil
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.	Nil
Any pollution of the environment	Minor, short-term, and temporary pollution is likely and inevitable to arise during construction. This includes low-level air (dust and odour) pollution as well as some noise and vibration (in consideration of adjacent sensitive receptors to noise). This however is able to be managed with mitigation measures as set out as part of this REF.	-ve
Any environmental problems associated with the disposal of waste	<p>The likely environmental problems of waste during and after construction (left over construction materials, and personnel waste), transport and disposal of waste, ongoing use and eventual decommission of the development are likely to be modest. The possibility of the need for disposal of hazardous building materials is rare. The volume of demolition and construction-related waste will be commensurate with the scale of the works.</p> <p>From an operational waste handling procedures perspective, there is no change to the waste volumes and handling, disposal and collection regime associated with Block A and the hospital generally.</p> <p>The cumulative impacts arising from waste are likely to be very minor in the context of the works. A waste management plan set out on Council's pro-forma is provided at Appendix N.</p>	Nil

Relevant Consideration	Response/Assessment	
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.	Nil
The cumulative environmental effect with other existing or likely future activities	<p>At its modest scale (including when combined with the proposed separate but concurrent Cancer Care House works) the proposal will not have an impact when considered in conjunction with other activities that are planned, under construction or that have been approved in the immediate area. The scope of works is similar to other works likely within the hospital's catchment at a domestic scale typical within Milton and its urban environs.</p> <p>This includes likely aggregated impacts upon traffic, noise, parking and the like.</p>	Nil
The impact on coastal processes and coastal hazards, including those under projected climate change conditions	The site is remote from the coast and therefore has no impact on coastal processes and coastal hazards, including those under projected climate change conditions.	Nil
Applicable local strategic planning statement, regional strategic plan or district strategic plan made under the Act, Division 3.1	<p>As set out in this REF, the works (at their extremely modest scale) will be consistent with the relevant issues, objectives, policies and actions identified in local, district and regional plans. As far as may be relevant, the works result in compliance and consistency with policies and community priorities as set out in State and Local Government strategic plans.</p> <p>Relevant legislation, including environmental planning instruments (drafts, policies and guidelines) are all satisfied and complied with in the undertaking and operation of these works.</p>	Nil
Any other relevant environmental factors	There will be no new or different health or safety risk to children, visitors, patients or staff of the development.	Nil

7 Summary of Impacts

Any likely impacts relating to the proposed activity have been considered and are discussed in Table 15 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 Q**.

Table 14: Summary of impacts relating to the activity

Issue	Discussion
<p>Traffic access and parking</p>	<p>The works to Block A will not affect existing parking supply at the hospital, and operational parking impacts are likely to be unaffected. The works result in less traffic movements at the site as current trips by patients between Shoalhaven Hospital in Nowra and the Milton Ulladulla Hospital for CT scanning will be removed.</p> <p>Any construction zone related to the Block A works will be delineated to preserve existing access to parking at the hospital.</p> <p>As noted in Section 3 of this REF, site access for deliveries, internal materials handling, and waste removal will be via Princes Highway and through the hospital loading dock area.</p> <p>All vehicle movements and deliveries entering and exiting Milton Hospital will be carried out in a forward direction to and from the Loading Dock on Princess Highway. The majority of materials handling will occur outside of normal working hours before 7:30am to avoid unnecessary vehicular conflicts on the tight hospital site.</p> <p>A traffic management plan will be procured with signage being placed in accordance with its requirements warning motorists of the vehicle movements to and from the site. This process will be continually monitored and will be adjusted if required to suit the conditions. Any deliveries by trucks will be undertaken in accordance with Milton Ulladulla Hospital requirements.</p> <p>Additionally, the contractor will implement access and egress paths from the site entry and amenities to the construction areas. These will be delineated, and sign posted to ensure there is no risk of workers disrupting the general operations of the Hospital.</p> <p>Typically, all deliveries will be directed to the site compound for drivers to sign in prior to entering the site. All vehicles entering the laneway, or the loading dock will be required to adhere to the site rules including access routes on site, demarcation zones and speed limits.</p> <p>Mitigation Measures are applied to manage construction traffic.</p>
<p>Noise and vibration</p>	<p>The works are minor in scale, and result in a minor augmentation to existing mechanical plant to provide for air conditioning for the expanded and reconfigured rooms within Block A. The changed operational noise and vibration impacts have been considered in a noise and vibration assessment (Appendix L) with the conclusion that new fan coil unit(s) and associated outdoor condenser unit(s) are anticipated to comply with day and evening project noise trigger levels to sensitive receivers to the east of Block A, but will however exceed the night-time threshold by 2 dBA. It is noted that the location of the condenser unit causing this exceedance is intended to be located amongst other pre-existing condenser units serving Block A. Data is not available for these pre-existing units, however, it is</p>

Issue	Discussion
	<p>expected that the installation of a single new unit will have a negligible effect on the overall noise emission from the hospital to these receivers.</p> <p>In terms of construction noise, the assessment (also at Appendix L) concludes that based on the types of equipment to be used during construction and predicted noise and vibration levels, adjacent sensitive receivers to the Block A-related works will not be affected by noise exceeding the Highly Noise Affected 75 dBA level.</p> <p>There are some residential receivers that will be subject to noise exceeding the 55 dBA Noise Management Level (NML). These being:</p> <ul style="list-style-type: none"> • Residences immediately to the west of the hospital on Princes Highway • Residences to the rear of the hospital on Gumley Lane <p>There are some other receivers that will be subject to noise exceeding the hospital-related 65 and 70 dBA NMLs. These being:</p> <ul style="list-style-type: none"> • Hospital wards, consulting rooms and administration areas on the western façade of the main hospital building <p>Noise to residences to the east of the hospital and commercial/retail developments across Princes Highway would not exceed the NMLs.</p> <p>To address these impacts feasible and reasonable noise mitigation would need to be investigated to by the contractor to minimise noise impacts, based on the procedures and methods in Section 5 and the ICNG.</p> <p>The noise assessment recommends a project-specific noise and vibration management plan should be implemented to manage noise and vibration impacts. This should set out a range of management and mitigation measures, including:</p> <ul style="list-style-type: none"> • Selection of alternate appliances or processes • Use of acoustic barriers • Use of silencing devises • Treatment of specific equipment • Establishment of site practices • Notification and complaints handling processes <p>Vibration levels are not expected to exceed the amenity and damage rise vibration levels. Therefore, no specific mitigation is recommended for vibration management</p> <p>The preliminary Construction Management Plan at Appendix H ensures that construction noise is managed appropriately and will be finalised through this REF's Mitigation Measures.</p> <p>Noise from the construction site shall not exceed the limits set out in the Interim Construction Noise Guidelines, EPA and Australian Standards. No machine work will occur outside the approved working hours set unless approval has been given through the Disruption Notice (DN) process and relevant authority notifications.</p> <p>The noise and vibration from the use of any plant equipment and/or building services associated with the premises shall not give rise to an offensive</p>

Issue	Discussion
	<p>noise as defined under the provisions of the Interim construction Noise Guidelines, EPA and Australian Standards.</p> <p>As part of noise mitigation for the project, the contractor will be responsible for the management, checking of compliant maintenance regimes and statutory supervision of all equipment, such as making sure all trucks and machinery involved in the Works will be checked for defective exhaust systems and general servicing.</p> <p>Guidelines for operational limits, identification of at-risk receivers and implementation of mitigation measures will be provided in a project Noise and Vibration Management Plan.</p>
Air quality and environment	<p>Not relevant. The works are minor in scale, internal to Block A, and do not have any air quality issues. Mitigation measures are applied to protect existing air quality within the hospital and neighbouring properties from any air quality impacts.</p> <p>Notwithstanding, the preliminary Construction Management Plan also addresses odour and dust impacts with the REF’s Mitigation Measures reinforcing actions to prevent, limit and manage air quality impacts.</p>
Soils and geology	<p>Not relevant. The works are minor in scale and internal with very minor subsurface works for structural purposes centrally within and under Block A to cater for the new CT scanner. Notwithstanding, standard sediment and erosion controls are provided within the Mitigation Measures for the project as a safeguard.</p>
Coastal risks	<p>Not relevant. The works are not located in an area of coastal risks and/or hazards.</p>
Hydrology, flooding and water quality	<p>As above, the works are minor in scale and interna, however in relation to the limited subsurface works, standard sediment and erosion controls are provided within the Mitigation Measures for the project as a safeguard.</p>
Visual amenity	<p>Not relevant. The works have no visual impact upon the locality or neighbourhood as they are internal.</p>
Aboriginal heritage	<p>The site is not affected by any Aboriginal Heritage by review of the Aboriginal Heritage and Information Management Systems (AHIMS) database. Notwithstanding the standard unexpected finds protocol is applied as a safeguard.</p>
Non-Aboriginal heritage	<p>The site is identified by mapping as a local heritage item, however the works will have no more than a minor or inconsequential impact upon that listed item ‘Garrad House’ and its corresponding well, as set out in the provided heritage advice. Heritage advice obtained advises that the works are remote from and do not impact the listed items. The proposed works are located outside of the footprint of Garrad House and not in proximity to the well. Notwithstanding the standard unexpected finds protocol is applied as a safeguard.</p>
Ecology	<p>Not relevant. The works have no impact to flora and fauna, or other natural matters. Accordingly, no requirement for a Species Impact Statement (SIS) nor a Biodiversity Development Assessment Report (BDAR) arises.</p>

Issue	Discussion
Bushfire	Not relevant as the site is not bushfire prone land.
Land uses and services	The works do not impact (change) land use activities or services.
Waste generation	<p>The work does not impact on current hospital waste generation therefore no impact arises. There is no change to the Block A waste volumes and handling, disposal and collection regime.</p> <p>Construction waste can be managed as noted by the preliminary Construction Management Plan at Appendix H, and will be finalised through Mitigation Measures. The volumes of material anticipated to be removed from the site, that cannot be reused or recycled are modest.</p>
Hazardous materials and contamination	<p>A Targeted Hazardous Materials Report And Register from November 2024 (see Appendix O) has advised that the existing X-Ray Room was previously refurbished in 2004. Construction materials generally consist of concrete slab (metal under lining), brickwork walls. Interior walls are lined with Plasterboard, ceilings consist of suspended acoustic panels. Despite being operational at the time of the inspection, suitable assessment was possible and concluded that Block A's X-Ray room is subject to the following:</p> <ul style="list-style-type: none"> • Non-friable asbestos throughout the lower ground tunnels (subsurface areas) with fibre cement fragments and debris in poor condition and with a 'medium' risk rating. • Synthetic mineral fibres in ducting, ceiling tiles and roof sarking in goof condition and with a 'low' risk rating. <p>A detailed set of recommended management and removal guidelines are set out in the survey and are applied as Mitigation Measures.</p> <p>The existing site is suitable for continued use as a health services facility. The geotechnical assessment carried out identified the likelihood of uncontrolled fill underneath the Block A slab and accordingly any earthworks in that location that require off-site disposal of waste spoil will typically require a preliminary waste classification in accordance with the NSW EPA Classification Guidelines – see Appendix J. The slab will be reconstructed once strengthening has occurred and no risk would arise to change the classification of the site. No remediation works are anticipated in this location.</p>
Sustainability and climate resilience	<p>Whilst the project is not of a type of scale required to satisfy DGN 58, the project will nonetheless commit to the following sustainability measures:</p> <ul style="list-style-type: none"> • Efficient LED lighting technology will be provided throughout all spaces. • Provide a 10% improvement over NCC2022 Maximum Illumination Power Density Table J7D3a. • All new electrical equipment purchased by government must be at least 0.5 stars above the market average star rating or comply with high efficiency standards of the Greenhouse and Energy Minimum Standards (GEMS). • All new water-using appliances purchased by agencies must be at least 0.5 stars above the average Water Efficiency Labelling and

Issue	Discussion
	<p>Standards (WELS) star rating by product type, except toilets and urinals, which must be purchased at the average WELS star rating.</p> <ul style="list-style-type: none"> • Potable water will be rated 5+ Stars under the WELS rating scheme. • No new fossil fuel equipment to be included within project scope. <p>The project will also consider the following targets at a later stage:</p> <ul style="list-style-type: none"> • Provide a sustainability Initiatives list including relevant costings and evidence of how initiatives included in design (to be updated throughout project as required). Suggested Initiatives to consider (as appropriate to scope) include, but are not limited, to: <ul style="list-style-type: none"> ○ Solar ○ Concrete with high % SCM ○ Low embodied emission building materials ○ Other recycled building materials • Provide tender schedules/specifications which consider sustainable construction practices and outcomes. • Provide reporting data at project completion stage on: <ul style="list-style-type: none"> ○ Upfront carbon emissions (currently via NABERS Embodied Emissions Materials Form ○ to be replaced with NABERS Embodied Emissions Tool once developed in 2024) ○ Potable water usage ○ % construction waste diverted from landfill ○ % recycled content in construction materials (to include at least concrete/asphalt/aggregate at this stage) • Provide a Construction Waste Management Plan which considers relevant waste streams, reuse and recycling opportunities. • Comply with the following requirements as outlined NSW Government Resource Efficiency Policy: <ul style="list-style-type: none"> ○ *A2 Low-VOC materials (project is to use low VOC paints/coatings under APAS standards AP-D181)."
Community and social impact	<p>The works support the ongoing (and enhanced) operation of the health services facility, therefore broader positive social and community impacts.</p>
BCA and Access	<p>A BCA and Access Capability Statement has been prepared for the project - see Appendix P. The statement contains an assessment of the referenced architectural documentation that will accompany the tender pack for the proposal.</p> <p>The assessment confirms that subject to the measures set out in the statement being appropriately addressed by the project design team, compliance with the provisions of the BCA is readily achievable.</p>

Issue	Discussion
	<p>In addition, it is considered that such matters can adequately be addressed in the preparation of the Crown Certificate documentation without giving rise to any inconsistencies with the approved documentation.</p>
<p>Cumulative impacts</p>	<p>The works are minor in scale, relate to a modest 90m² reconfiguration of parts of the existing Block A and therefore do not have result in any substantial cumulative impact. The works will be carried out concurrently with the Cancer Care House works subject of a separate REF. Combined the works are relatively modest in scope and ongoing impact upon the immediate locality</p>

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 Q**.

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 are low, 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.

9 Justification and Conclusion

The proposed works to Block A at Milton Ulladulla Hospital (106 Princes Highway, Milton) 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 under Part 5 of the EP&A Act. Further a SIS and a BDAR are each also not required in relation to the proposed works.

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.

Appendices

Appendix A - Survey

Appendices

Appendix B – Planning Certificate

Appendices

Appendix C – Architectural Drawings

Appendices

Appendix D – Architectural Design Statement

Appendices

Appendix E – Hydraulic Services Statement

Appendices

Appendix F – Electrical Services Statement

Appendices

Appendix G – Mechanical Services Statement

Appendices

Appendix H – Preliminary Construction Management Plan

Appendices

Appendix I – Heritage Impact Statement

Appendices

Appendix J – Geotechnical Assessment

Appendices

Appendix K – Notification Letters / Package

Appendices

Appendix L – Construction Noise and Vibration Assessment and Operational Noise Statement

Appendices

Appendix M – Basic AHIMS Search

Appendices

Appendix N – Waste Management Plan pro-forma

Appendices

Appendix O – Hazardous Materials Survey

Appendices

Appendix P – BCA and Access Assessment

Appendices

Appendix Q – Mitigation Measures

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