

USHER



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12 December, 2025

Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street,
Parramatta NSW 2124

Att: Cameron Thomson

Dear Sir/Madam

Subject: Submission on SSD-56989722-Mod-2, Eurobodalla Regional Hospital

Lindsay Usher Consulting Pty Ltd has been engaged by Blue Mist Pty Ltd to prepare on their behalf this submission in response to the subject application.

Blue Mist Pty Ltd are the owners of land (See Figure 1), known as Lots 69, 76, 77, 80, 81, 87, 90 DP 752151, Lots 1 and 2 DP125563, South Head Road, Moruya. This land is directly adjoining and adjacent to the Eurobodalla Regional Hospital.

My clients are supportive of the hospital's development and the benefits that it will provide to the community but have been concerned about the potential impacts of the proposed helicopter landing site (HLS) on their land. These concerns were raised in correspondence to the Department of Planning, Housing and Infrastructure by Michael Brown Planning Strategies dated 21 April 2025.

The subject land is zoned R2 Low Density Residential and RU1 Primary Production (See Figure 2) under the Eurobodalla Local Environmental Plan 2012 (the LEP).

Part of the land (Lot 69 DP752151) is benefitted by a development consent for the creation of 77 residential allotments. The consent has been activated with physical work undertaken. Council has confirmed in writing that the consent is operational.

The assessment of potential impacts from the HLS and its use, in particular associated with noise, have not directly considered the impact upon my client's land. The "Eurobodalla Regional Hospital Aviation Report for a Helicopter Landing Site (HLS) Under a State Significant Development (SSD)" (the Aviation Report) dated 1 October 2025 does not acknowledge the subject land as being a sensitive receiver. Also, the "Acoustic Review" dated 21 November 2025 does not identify the subject land in either of the "noise catchment area" considered under the assessment. Broadly there appears to be no acknowledgment by the application of the residential zoning or the existence of the development consent to subdivide the subject land. Further there appears to be no assessment of the potential impacts on the potential future use and development of the land more broadly.



Figure 1 – Locality Plan

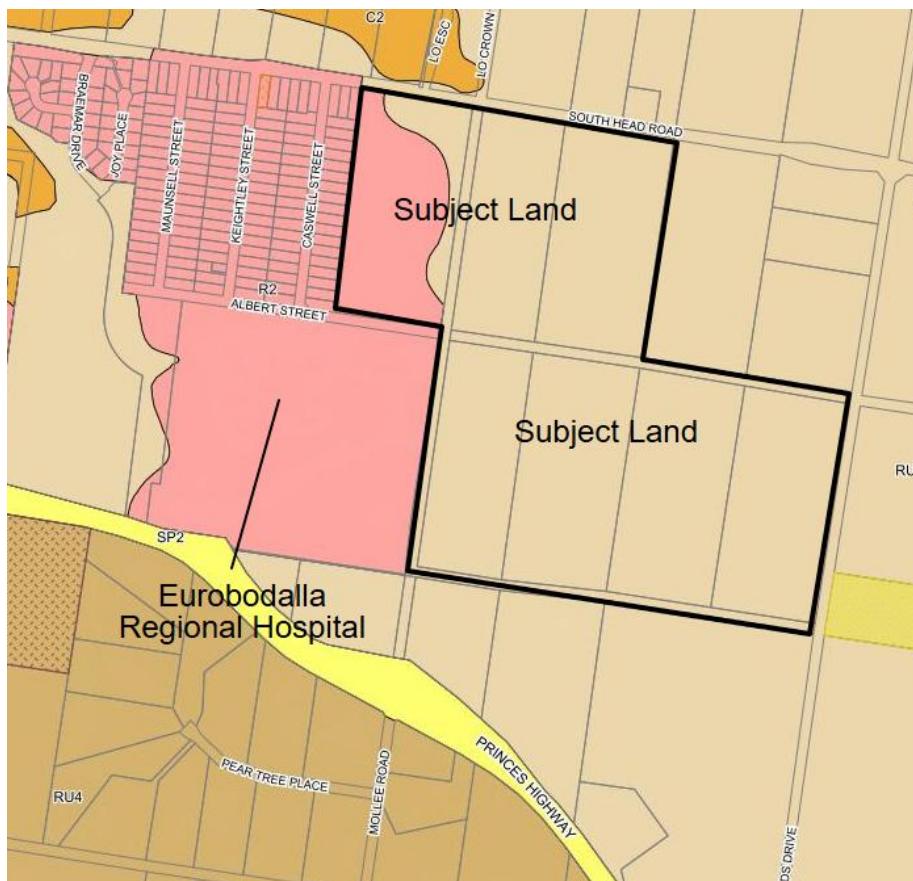


Figure 2 – Land Zone under the Eurobodalla Local Environmental Plan.

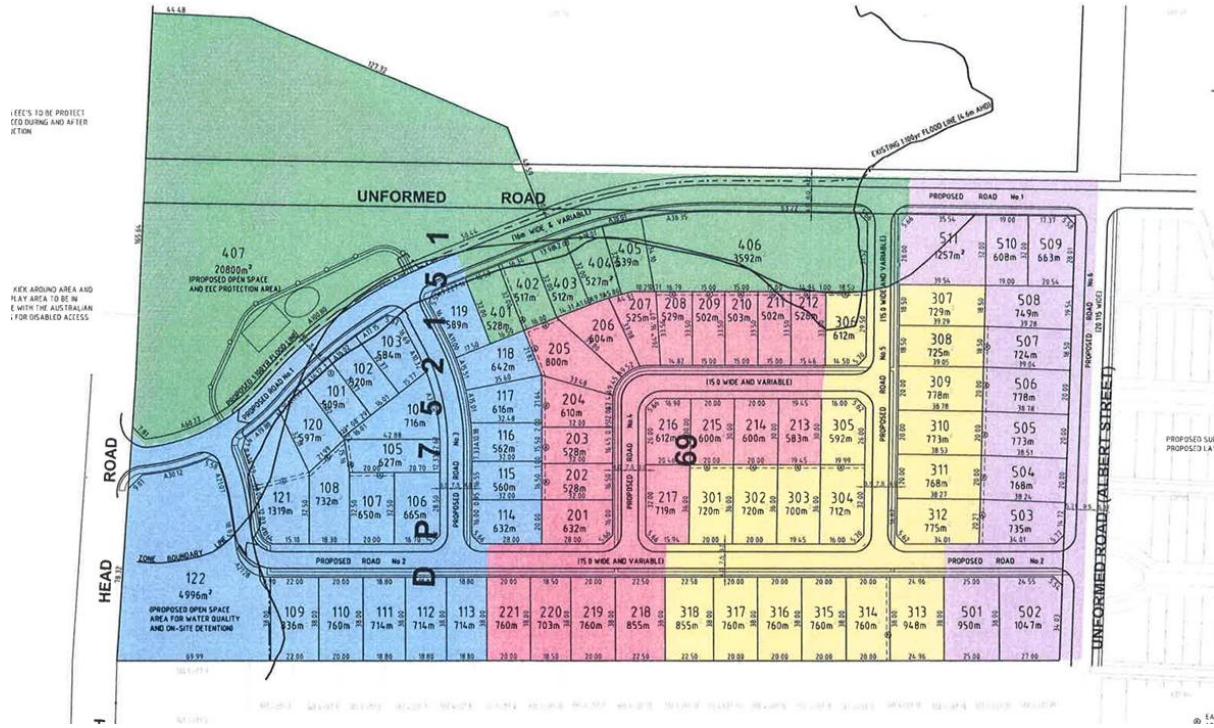


Figure 3 – Approved residential subdivision of Lot 69 DP752151 (Extract from approved plans)

Notwithstanding the above, we understand that the original proposed HLS location was found to be unacceptable not due to the impacts of noise but because it could not be demonstrated that there would be no adverse impacts on the adjoining residential area associated with helicopter rotor wash.

On page 33 of the “Section 4.55(1A) Modification Report” dated 19 November 2025 it states:

The Rotor Wash Impact Assessment (**Appendix G**) assesses the impacts associated with helicopter rotor wash (which is characterised as high turbulent flow of air from beneath the helicopter). Being no closer than 100m from any site boundary, the proposed HLS location will result in there being no possibility of damaging helicopter main rotor wash crossing into any adjacent public or private property. Therefore, there will be no negative impacts on external receivers from main rotor downwash.

The Aviation Report on page 17 states “Acoustic mapping is not planned for the site as it is very distant from all occupied parts of the hospital campus”. We conclude from this statement that due to the separation distance between the HLS and the hospital campus that there will be no adverse impacts associated with noise from the operation of the HLS on the campus or on adjoining land.

Further on page 19 of the Aviation Report it states, “There will be minimal acoustic impacts associated with the conduct of helicopter flight operations to/from the proposed HLS”.

Despite the absence of the assessment directly considering the potential impacts of the proposed HLS and its use on the subject land, given the above we are led to believe that there

will be no adverse impacts on the subject land or its current and potential future use. This being the case my clients have no objection to the proposed modification.

We ask that the Department of Planning, Housing and Infrastructure, before determining the proposed modification, satisfy themselves that the proposed HLS and its use will not adversely impact on the current or potential future use of the subject land.

Should you wish to discuss this matter further please contact me on 0488 242 958 or by return email.

Regards

A handwritten signature in blue ink, appearing to read "Usher".

Lindsay Usher

Director