

Contact Officer: Matthew Salamone
Our Ref: D05699343
30 April 2025

Karen Harragon
Director
Social Infrastructure Assessments
Department of Planning, Housing and Infrastructure
thomas.dales@dpie.nsw.gov.au

Attention: Thomas Dales

Dear Ms Harragon,

Subject: UNSW Building E25 Biolink (SSD-73456206).

Thank you for the opportunity to comment on the State Significant Development Application for the UNSW Building E25 Biolink (SSD-73456206) – “Partial demolition of the UNSW E25 Biolink building, earthworks, extension of the existing building, internal upgrades and facade works”.

The proposed development falls under Part E2 (Randwick Education and Health Specialised Centre) of the Randwick Comprehensive Development Control Plan 2023 (DCP). Council responses below have been guided by the provisions in the DCP.

UNSW Kensington Campus Masterplan

1. It is important to acknowledge the proposed development has inconsistencies in a number of areas with the UNSW Kensington Campus Masterplan contained in the Randwick DCP. Council's submission highlights that a much needed update to the existing Masterplan is required to ensure development proposals on campus can be considered in a coordinated and strategic manner and to provide the long term framework for assessment.

Built Form

2. Council notes that whilst the proposal seeks significant enlargement of the existing E25 Biolink building, the extent of the proposed works are largely contained between the existing building itself and the D26, E26 and F25 buildings and therefore Council raises no objection based on bulk and scale.
3. Whilst the submitted details do not clearly outline the existing height of the building, it is understood the proposal is seeking a modest increase in the overall height by adding screening to the plant infrastructure located on the roof. Nonetheless, the maximum height of 32.76m as indicated in the submitted details comply with the DCP controls for this part of the campus site and therefore this is considered acceptable.

Neighbouring Impacts & Risks to Surrounding Environment

4. Given the location of the building within the Campus, Council concurs that there will be minimal additional neighbouring impacts in relation to overshadowing. It is noted that a variety of plant components are proposed to the roof of the building including a diesel generator and the storage of a number of lab gasses. Council therefore makes the below recommendations for consideration in the assessment and to be applied to conditions of consent where relevant.
5. Council recommends that:
 - Storage of dangerous goods associated with this development must comply with the Work Health and Safety Regulation 2017, AS 1940 – The Storage and Handling of Flammable and Combustible Liquids, and the Australian Dangerous Goods Code. Compliance must specifically address requirements for emergency planning, ventilation, spill containment (including bunding to the appropriate volume capacity), and the compatibility and segregation of dangerous goods and flammable materials;
 - A fire safety study must be prepared for the proposed storage of dangerous goods, due to the site's urban context, educational setting and its proximity to residential colleges. The study should assess potential fire and explosion risks and outline appropriate mitigation measures;
 - To mitigate dangerous goods to the plant area that a solar back up power system be investigated as an alternative to the proposed diesel generator. This would have added ESD benefits and lower operational/maintenance costs, with the presence of an existing solar panel array included in the exiting proposal;
 - If the diesel generator is to be installed, it should be installed implementing all noise measures identified in the Noise and Vibration Impact Assessment Report.

Façade and Materials

6. The proposed facade is considered suitable in terms of design and materiality, with the high level of glazing to the front elevation allowing for a transparent and activated façade. Other adopted elements to the façade are also acceptable and should mitigate any excessive heat gain to the glazed façade allowing for passive solar design and meeting the requirements under the DCP controls.
7. The choice of materials are of good quality and suitable for the campus. In terms of Connecting to Country, the colour palate and choice of materials are reflective of the native landscape of the area. The incorporation of art pieces from local Aboriginal artists is also supported.

Environmentally Sustainable Design (ESD)

8. Council is supportive of the proposed high ESD target, including a design that optimises passive heating and cooling, the installation of PV rooftop solar and the inclusion of high rating energy and water efficient fittings and fixtures that result in a 5 Star Green Rating for the development.
9. The consideration of embodied carbon with the proposed adaptive re-use of the existing concrete shell and the minimisation of construction waste is also supported.

Traffic Impacts

Operational

10. The submitted Environmental Impact Statement (EIS) & Traffic Impact Assessment (TIA) indicates that the proposals will not generate increased demand for parking and additional traffic movements in the locality. It is acknowledged that the majority of students currently utilise public transport to commute to the campus and this is unlikely to change as a result of the current proposal. It is also acknowledged that the (TIA) indicates capacity within existing cycle parking and end of trip facilities within the broader campus to cater for small increases in bicycle movements demand.
11. Council notes that there is currently very high demand for on-street parking in the vicinity of the health/education precinct. Concerns are raised in relation to cumulative parking and traffic impacts from successive proposals on the campus. The potential of the proposal to exacerbate this existing impact on the surrounding neighbourhood and street network. The UNSW Environmental Sustainability Plan 2019-21 (ESP) outlines a roadmap towards best practice in environmental sustainability in the higher education sector. The ESP makes a commitment to the following: *'Ensure our campuses are easily accessible by multiple transport modes and our community is supported to make active and sustainable transport choices'*. It is recommended that a condition be included in any consent to require UNSW to collaborate with Health Infrastructure and Council to strengthen active transport targets and address cumulative off site impacts.

Construction

12. There is potential for the proposed construction works to impact the surrounding transport networks including the operation of adjoining intersections due to the movement and frequency of heavy vehicles, the Construction Management Plan should be referred to Council for comment prior to the commencement of the works. Noting the concurrent SSD Application 'SSD-74670005' under assessment the staging of construction works for the two developments should be addressed in Construction Management Plan as well as any development consent conditions to ensure the cumulative impacts of two concurrent construction projects are considered and mitigation measures implemented where required.

Landscaping and Public Domain

13. The proposed landscaping scheme whilst incorporating a good selection of natives, should be amended to provide an increase in the overall level of soft landscaping to improve biodiversity and greening on the campus.
14. It is noted that the proposed building has a strong interface with Chancellery Walk and therefore the design should protect and enhance vistas along Chancellery Walk as outlined in Part E2 of the Randwick DCP 2023. Similarly, legibility of the entire Chancellery Walk could be enhanced with significant planting that provide a strong landscaped edge.
15. It is also important that the proposed public domain upgrade concept designs for Chancellery Walk be prepared concurrently with this proposed development.
16. Whilst the design of the façade lends itself to significant plantings, the proposed planting above ground level is relatively minor. Furthermore, there is little outdoor space incorporated into the

development above ground level. Further consideration should be given to increasing outdoor space alongside plantings above ground level.

Development Contributions

17. The proposed development is not exempt from levies payable under Randwick Council's Section 7.12 Development Contributions Plan 2024. Additionally, Crown developments such as being proposed are not automatically exempt from payments under Council's Development Contribution Plan. The proposal represents a large-scale redevelopment of the existing E25 building that is intended to maximise student patronage. The proposal will result in significant increase in floor area beyond that existing on-site. Accordingly, there will be an increased intensity of use that in turn results in increase demand on services and facilities levied under the Randwick City Section 7.12 Development Contributions Plan 2024.

I trust that Council's comments will be taken into consideration for this proposal.

If you would like to discuss any of these matters further, please contact David Appleby, Coordinator Strategic Planning, on 9093 6982.

Yours sincerely,



Stella Agagiotis
Manager Strategic Planning