



13583
1 September 2014

Ms Carolyn McNally
Secretary
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms McNally

**REQUEST FOR SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS (SEARS)
BIOLOGICAL SCIENCES RENEWAL PROJECT - UNSW KENSINGTON CAMPUS**

In accordance with Clause 3 of Schedule 2 of the *Environmental Planning and Assessment Regulation 2000 (EP&A Regulation)* and Schedule 1 (clause 15) of *State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP)*, the University of NSW (UNSW) requests the issue of Secretary's Environmental Assessment Requirements (SEARs) for the Biological Sciences Project (the Project) at UNSW's Kensington Campus. The proposal qualifies as a State Significant Development (SSD) as the Capital Investment Value (CIV) of the Project is \$116,174,000 and in excess of the requisite SSD threshold of \$30 Million for Educational Establishment projects. The purpose of this letter of request is to provide a preliminary environmental assessment and other supporting documentation to allow for the SEARs to be issued to facilitate the preparation of the Environmental Impact Statement (EIS) to accompany the SSD.

1.0 BACKGROUND

UNSW is a teaching and research institution of international, national and state significance. It is ranked 46th worldwide in the World University Rankings (2010) and is a member of the Group of Eight (Go8), a coalition of Australia's leading universities. Amongst others, it has Faculties of Medicine, Science and Engineering and is a key driver of economic growth. It is renowned for the quality of its graduates and its commitment to new and creative approaches to education and research. Notably, it is also the largest employer within the Randwick LGA.

The Project is proposed to address long-term accommodation needs of the School of Biological, Earth and Environmental Sciences (BEES) and the School of Biotechnology and Biomolecular Sciences (BABS) within the Faculty of Science (FoS), as well as functional needs of the wider Biomedical Precinct located as part of the UNSW "upper" Kensington Campus. The Project will align with the University's strategic intent as set out in the B2B Blueprint to Beyond.

The FoS at UNSW is one of Australia's largest faculties in terms of staff, operating budget and international student numbers. In 2012, the Faculty had approximately 920 academic and professional staff and total student enrolments of approximately 5,860 Equivalent Full Time Student Load (EFTSL). FoS consists of nine Schools:

- Aviation;
- BEES, including the Climate Change Research Centre (CCRC) and the Institute of Environmental Studies (IES);
- BABS;
- Chemistry;
- Materials Science and Engineering;
- Mathematics & Statistics;

- Optometry & Vision Sciences;
- Physics; and
- Psychology.

The Project was conceived in response to a Feasibility Study and FoS Accommodation Renewal Strategy. The Feasibility Study focused on the long term future of the UNSW Biosciences building and ancillary structures, along with the accommodation needs of future occupants including:

- BEES;
- BABS;
- Shared research facilities including Mark Wainwright Analytical Centre (MWAC); and
- Biomedical Precinct functions run by the FoS, School of Medical Science (SoMS) and Facilities Management (UNSW FM), which serve occupants of the Biosciences, Wallace Wurth, Lowy Cancer Research Centre and, to a lesser extent, the Samuels, Australian Graduate School of Management (AGSM) and Mathews buildings.

The FOS Accommodation Renewal Strategy focused on:

- How the aging Biosciences Building and surrounds can be renewed in a way that allows BEES and BABS to build on their research and teaching strengths;
- How the Project can also benefit the efficient provision of Biomedical Precinct functions; and
- How the renewal of the existing structures can be achieved with minimal disruption to research and with continuity for teaching activities.

The outcomes of the study identified the need for large scale, highly serviced space with maximised capacity to relocate existing wet research functions and selected teaching spaces. This space would preserve the continuity of research and allow for the capacity to decant and refurbishment of the existing biosciences building. The recommendation of the study forms the basis of this Project. The Project encompasses the consolidation and renewal of accommodation for:

- Research and teaching functions for BEES and BABS;
- Specialist research functions accessible to all groups in the Biomedical Precinct; and
- Service and lab management functions provided to the Biomedical Precinct by FoS, SoMS and UNSW FM.

1.1 The Campus

The UNSW Kensington Campus is located within the Randwick LGA and sits to the south of the Royal Randwick Racecourse, to the west of the Randwick Hospitals' Campus, and between the Kensington and Kingsford town centres on Anzac Parade. The Campus is located some 8km from the Sydney CBD (to the north) and about 6km from Sydney Airport (to the west). See **Figure 1** below for the Campus' sub-regional location relative to the Sydney CBD, Sydney Airport, Port Botany and other sub-regional landmarks.

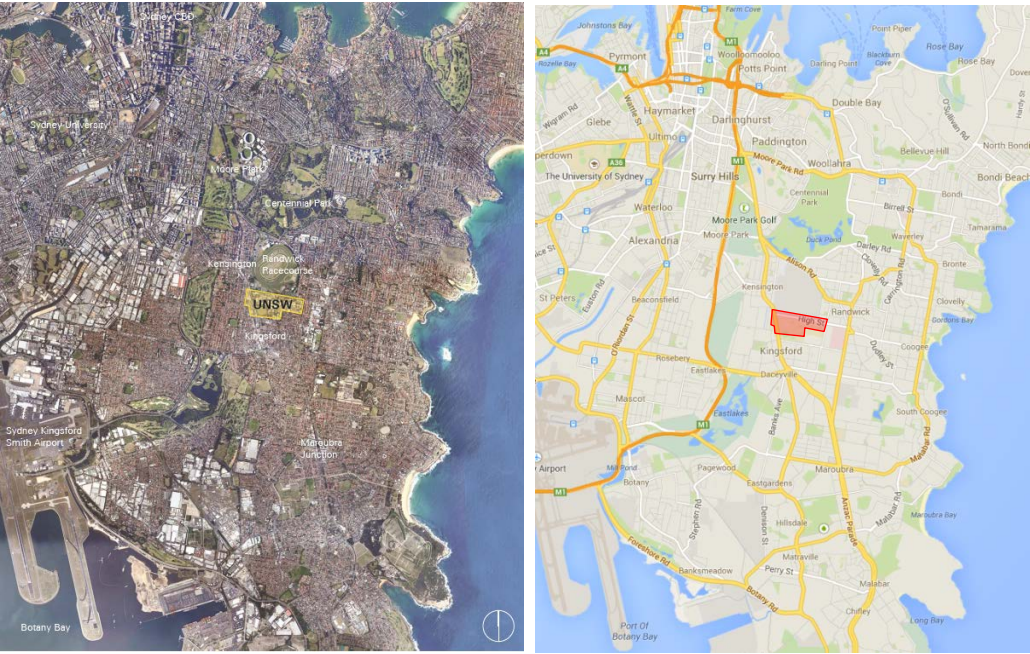


Figure 1 - UNSW Kensington Campus in its sub-regional context

The Campus includes the developments that sit within the main Campus boundaries of Anzac Parade (to the west), High Street (to the north), Botany Street (to the east), and Barker Street (to the south). It also includes developments to the west of Anzac Parade and north of Day Avenue, such as the National Institute of Dramatic Art (NIDA), the University Regent, and the New College Post-Graduate Village.

The Campus is shown below at **Figures 2 and 3**.



Figure 2 - UNSW Kensington Campus

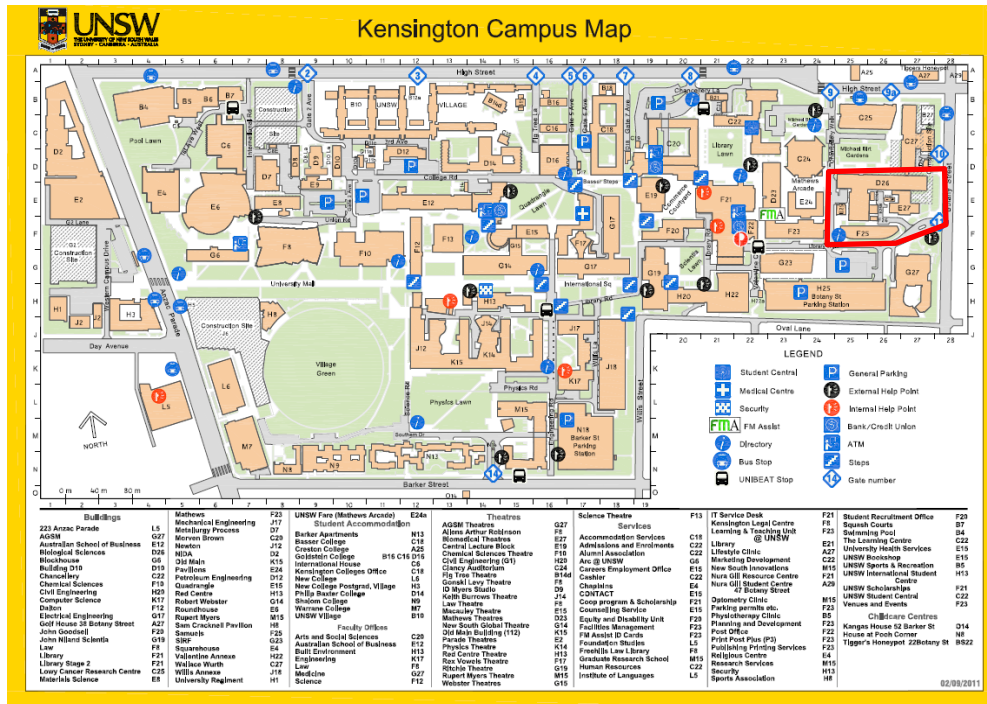


Figure 3 - UNSW Kensington Campus map (indicative site shown in red)

2.0 DESCRIPTION OF PROPOSED DEVELOPMENT

UNSW has identified the need to provide new facilities to accommodate growth at its Kensington Campus. To achieve this, the University has set a number of objectives for the Project, which are to:

- Provide a contemporary, research and teaching environment as part of the Biomedical Precinct;
- Create flexible and adaptable space for strategic recruitment, both short- and long-term taking into account trends in technology, research infrastructure, National and University priority areas;
- Align with the UNSW B2B Blueprint to Beyond: Strategic Intent to enhance effectiveness and interdisciplinary team-working, by reinforcing research synergies between the research groups, Schools and Faculties;
- Build space for collaborative teams with mixed wet and dry researchers;
- Centralise lab services and delivery of shared services across the Biomedical Precinct, to improve efficiency, increase utilisation and reduce operational costs;
- Make a positive contribution to the campus learning environment, with activated and visible zones at ground floor levels;
- Provide clear way finding and connections between important pedestrian destinations, including extension of the campus covered walkway;
- Decant as much as possible of the existing Biosciences building to facilitate its planned redevelopment and to maintain business continuity for key research groups; and
- Provide for new technologies and specialist research facilities, particularly those that may be difficult to accommodate within the physical limitations of existing Biomedical Precinct buildings.

The site of the Project (as shown in **Figure 3**) is located in the UNSW Kensington upper campus and is bounded by the Michael Birt Gardens and the Wallace Wurth Building to the north, Botany Street to the east, the Samuels Building to the south, and the Chancellery Walk to the west.

2.1 Scope of Works

As shown on the preliminary Concept Plans prepared by Wood Bagot (**Attachment A**), the Project seeks approval for the following (the location of the existing buildings are shown on the Campus Map in **Figure 3**):

- Construction of a new nine(9) storey building in the existing location of Building E26;
- Refurbishment of the lower ground floor of the southern wing of Building E26.
- Refurbishment of part the ground floor of the existing D26 building and ground floor of the southern wing of Building E26;
- Refurbishment of facades to the existing D26 building, and
- Upgraded landscape to the open areas surrounding the new E26 and existing D26 buildings.

Demolition of buildings in the area proposed to locate the new building works will be undertaken separately as part of other approval processes and as part of a wider redevelopment of this part of the Campus, as will some of the new roadworks. This is part of a wider program of works to facilitate the renewal and redevelopment of the upper campus and the Biomedical Precinct.

The building is proposed to have a maximum RL, to the top of the plant/services zone of RL89.5.

The proposed GFA provides a range of advantages and opportunities for UNSW including:

- maximising the site potential on a campus with limited growth opportunities; and
- amortisation of enabling costs across a greater floor area with a resultant lower cost per square metre.

It is therefore intended that the Project accommodates not only the FoS, but also general teaching and facility space and research space and promotes collaboration between the FoS and other aligned Science and Engineering Schools, such as Chemistry, Chemical Engineering, and Materials Science.

No parking is proposed within the development, but ample Campus-wide parking exists, noting that the proposal caters for existing student and staff numbers as well as future growth. Traffic and parking issues relevant to project are discussed in further detail later in this letter.

2.2 Design Principles

The changing nature of scientific research has led to an evolution of building designs over the past 10 years. Narrow long research buildings previously catered to the individual or small scientific team working on their individual projects, able manage their own equipment and experiments in a contained space. Modern research practices demand a much more collaborative approach, relying on shared specialised equipment, resources and knowledge. This approach demands a different typology of building – far more connected both horizontally and vertically. Larger floor plates provide the necessary sizes for contemporary workplaces, as well as depth for the functional adjacencies required to meet modern laboratory codes.

Typical floors of the building (levels 1 and above) will be dedicated to biological sciences research, with a mix academic workplace, open plan laboratory, laboratory support spaces, and general amenities (toilets, services access, and meeting spaces) on each floor.

These floors will interconnect with the existing building (D26), joining the researchers currently dispersed through the existing buildings.

Laboratory buildings are service intensive, so a large plant space will be required at the top of the building – weighted towards the west to minimize impact to and from Botany Street. As the site slopes down to the south, there are two floors that will engage with ground level – an upper and lower ground floor.

The upper ground floor will house student facilities such as teaching laboratories, informal learning space and meeting spaces. It will be an important connector into the campus, and an active face to Botany Street.

The lower ground floor will interface with the Gate 11 on Botany Street, and be an access for loading into the central Biomedical Precinct central stores.

3.0 STATUORY PLANNING CONTEXT

3.1 State Environmental Planning Policy (State and Regional Development) 2011

In accordance with Schedule 1 (clause 15) of *State Environmental Planning Policy (State and Regional Development) 2011* (SEPP SRD), UNSW requests the issue of SEARs for the Project at the UNSW Kensington Campus.

The Project qualifies as SSD as the CIV of the project is \$116,174,000 and in excess of the requisite SSD threshold of \$30 Million for Educational Establishment projects.

3.2 Environmental Planning and Assessment Act 1979

The Environmental Planning and Assessment Act 1979 ('the Act') establishes the assessment framework for SSD. Under Section 89D of the Act the Minister for Planning is the consent authority for SSD. Section 78A(8A) requires that a development application for SSD is to be accompanied by an Environmental Impact Statement (EIS) in the form prescribed by the Regulations.

3.3 Randwick LEP 2012

Randwick Local Environmental Plan 2012 (RLEP 2012) is the primary environmental planning instrument controlling development on the Kensington Campus.

Under the LEP the entire Kensington Campus is zoned SP2 Educational Establishment (see **Figure 4**).

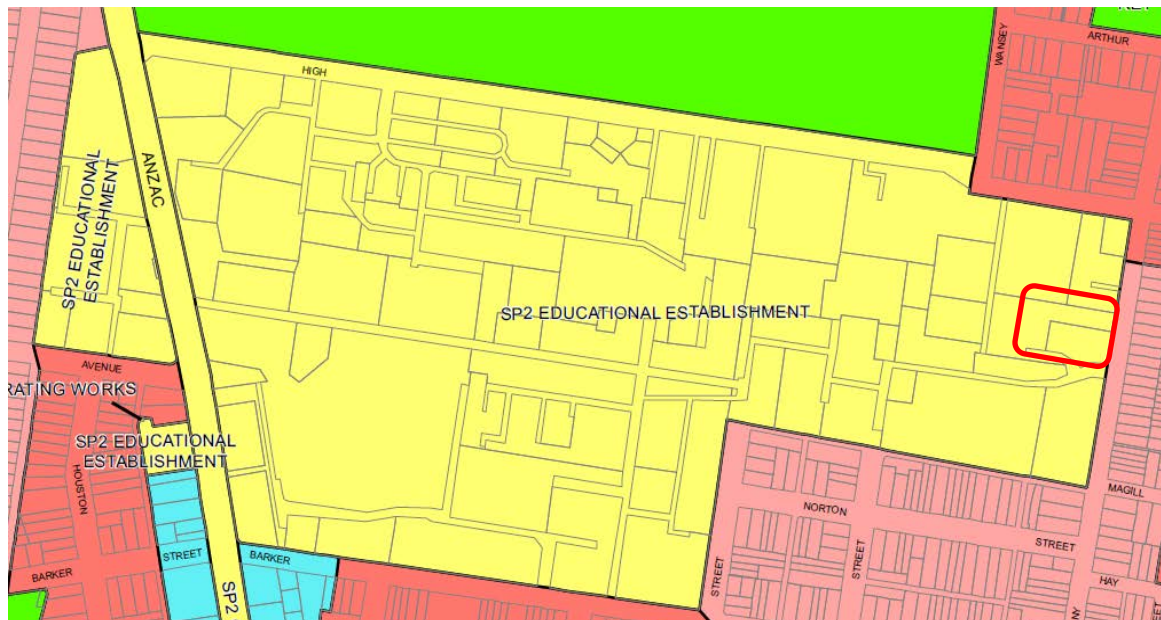


Figure 4 – Extract from Randwick LEP 2012 Zoning Map (indicative site location shown in red)

Source: Randwick Council

The objectives of this zone are:

- To provide for infrastructure and related uses.
- To prevent development that is not compatible with or that may detract from the provision of infrastructure.

- To facilitate development that will not adversely affect the amenity of nearby and adjoining development.
- To protect and provide for land used for community purposes.

Development for the purpose 'shown on the Land Zoning Map, including any development that is ordinarily incidental or ancillary to development for that purpose' is permissible with consent in the zone. The proposed works are being provided by and for the University as an 'Educational Establishment', and are therefore permissible in the SP2 Infrastructure zone.

The LEP has no specific development standards regarding Floor Space Ratios (FSRs) that would affect the proposed works. The site has a height limit of 24 along the Botany Street boundary, the width of which is 30m (as shown below in **Figure 5.**)



Figure 5 – Building Height Map (indicative site location shown in red)
Source: Randwick Council

3.4 Randwick DCP 2013

The Randwick Comprehensive Development Control Plan 2013 (RDCP 2013), contains detailed provisions for development of the UNSW Kensington Campus to support the Randwick LEP 2012 under Part E Specific Sites (Randwick Education and Health Specialised Centre. In accordance with Clause 11 of the SEPP SRD, the requirements of Development Control Plans (DCPs) do not apply.

4.0 STRATEGIC PLANNING CONTEXT

The relevant State-based strategic planning-related strategies are the NSW State Plan 2021, the Draft Metropolitan Strategy for Sydney to 2031, the draft East Subregional Strategy and the Randwick Urban Activation Precinct (UAP).

4.1 NSW State Plan 2021

The stated objective of the NSW State Plan 2021 (NSW 2021) is to make NSW Number One. It is a 10-year plan guiding policy and budget positions. NSW 2021 will drive the Government's agenda for change in NSW and is based around the following five strategies:

- Restore economic growth;
- Return quality health, transport, education, police, justice and community services, putting customer service at the heart of service design;
- Build infrastructure that drives our economy and improves people's lives;
- Strengthen our local environments, devolve decision making and return planning powers to the community; and
- Restore accountability and transparency to government, and give the community a say in decisions affecting their lives.

NSW 2021 is built upon 32 Goals to support these Strategies. See **Figure 6** below for these goals.

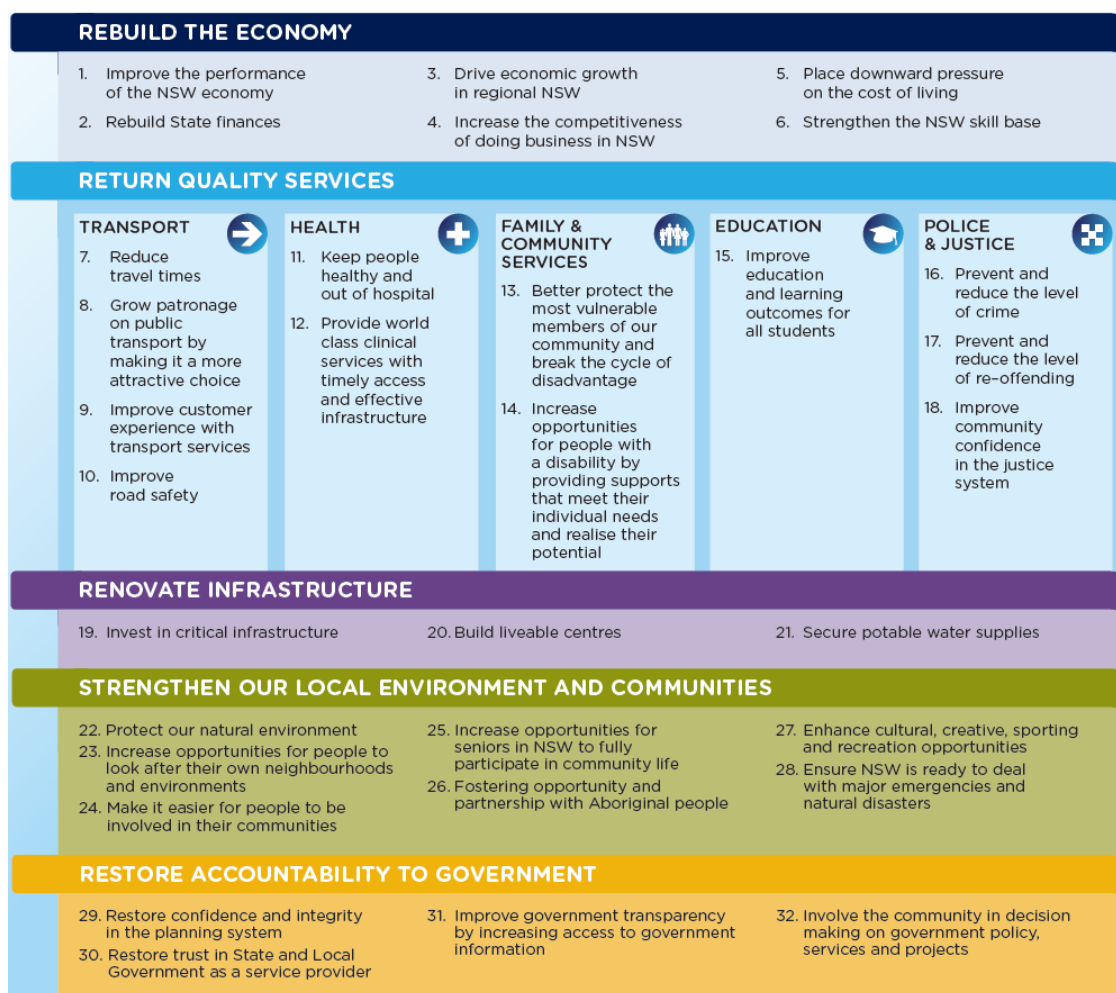


Figure 6 - NSW 2021's 32 Goals

The following goals (and their targets and priority actions) are relevant to UNSW and the Project:

▪ **Goal 1 - Improve the performance of the NSW economy**

Target: Grow business investment by an average of 4% per year to 2020

- *Priority Action: Target and attract potential international investors into priority sectors, especially where we have overseas NSW trade and investment, tourism or education offices.*
- *Priority Action: Leverage research and development activities to drive new investment opportunities in NSW.*

Target: Grow GDP per capita by an average 1.5% per year to 2020 with specific industry growth targets

- *Priority Action: Grow critical industries – professional services (financial, professional, legal), manufacturing, digital economy and international education and research.*
- *Priority Action: Develop Industry Action Plans for professional services, manufacturing, digital economy, tourism and events, international education and research by June 2012, in partnership with industry.*

▪ **Goal 4 - Increase the competitiveness of doing business in NSW**

Target: Reduce Red Tape, Improve development approval and plan making processes

- *Priority Action: Increase the number of developments that are approved without the need for detailed assessment (lengthy merit assessment), by expanding the types of development covered as 'complying development' and further promoting 'complying development'.*

Target: Increase Business Innovation, Grow knowledge industries

- *Priority Action: Support high performing businesses to innovate to further enhance productivity through Industry Action Plans. The plans will identify innovation drivers and barriers within key sectors (professional services, manufacturing, digital economy, tourism and events, and education and research).*

▪ **Goal 6 - Strengthen the NSW skill base**

Target: More people gain higher level tertiary qualifications

- *Priority Action: Increase university enrolments and attainment through improved links between schools, vocational education providers and universities, especially those serving low socio-economic communities and regional NSW.*

▪ **Goal 14 - Increase opportunities for people with a disability.**

Target: Increase participation of people with disabilities in employment or further education

4.2 Draft Metropolitan Strategy for Sydney to 2013

The proposal will support Randwick's role as a strategic centre for education and health, promoting the development of education, research and development clusters in and around Universities. The proposal also supports the desire to promote skills development, capacity for innovation and lifelong community learning, as put forward by the Plan.

4.3 Draft East Subregional Strategy

A similar sentiment to the Metropolitan Plan is echoed in the earlier draft East Subregional Strategy (draft Strategy) which supported the then Metropolitan Strategy (2006). This strategy remains in place, albeit as a draft, and supports the new Metropolitan Plan. The draft Strategy identifies UNSW as the anchor of 'the Randwick Education & Health Specialised Centre' (now referred to as the Randwick Education and Health Specialised Precinct in the Draft Metropolitan Strategy for Sydney to 2013), and also supports a growth strategy with regard to the Campus' future anticipated needs.

A Key Direction of the draft Strategy is to "consolidate and strengthen the Randwick Education and Health Specialised Centre". In doing so Action EA A2.1.2 from the draft Strategy promotes the State Government, Randwick City Council, hospitals and UNSW to establish a Planning Partnership for the Centre, including development of a masterplan or a Precinct Plan (for the whole centre) to better link the university and to address long-term co-ordination and integration of activities.

The draft Strategy goes on to state that *there is an opportunity to build a world class research hub at the Randwick Education and Health Specialised Centre. The Planning Partnership should investigate how to maximise research capacity arising from co-location of three research institutes, three teaching hospitals and the University of NSW. This includes Prince of Wales Medical Research Institute, Black Dog Institute and Children's Cancer Institute Australia for Medical Research working with the three hospitals specialising in children's, women's and adult health services, leveraging off the University's strong medical, science and engineering faculties.*

Outside of a development of a planning partnership, the current project seeks to reinforce UNSW's competitive position, its research capacities, and opportunities for synergies outside of the Campus in the fields of science and engineering.

4.4 Randwick Urban Activation Precinct (UAP)

The proposed 'Randwick Urban Activation Precinct' is a broad 1 km radius around the UNSW Kensington Campus focussed on its High Street interface with the Royal Randwick Racecourse. The proposed Precinct is about 8km from the Sydney CBD and about 6km from Sydney Airport (as shown below in **Figure 7**).

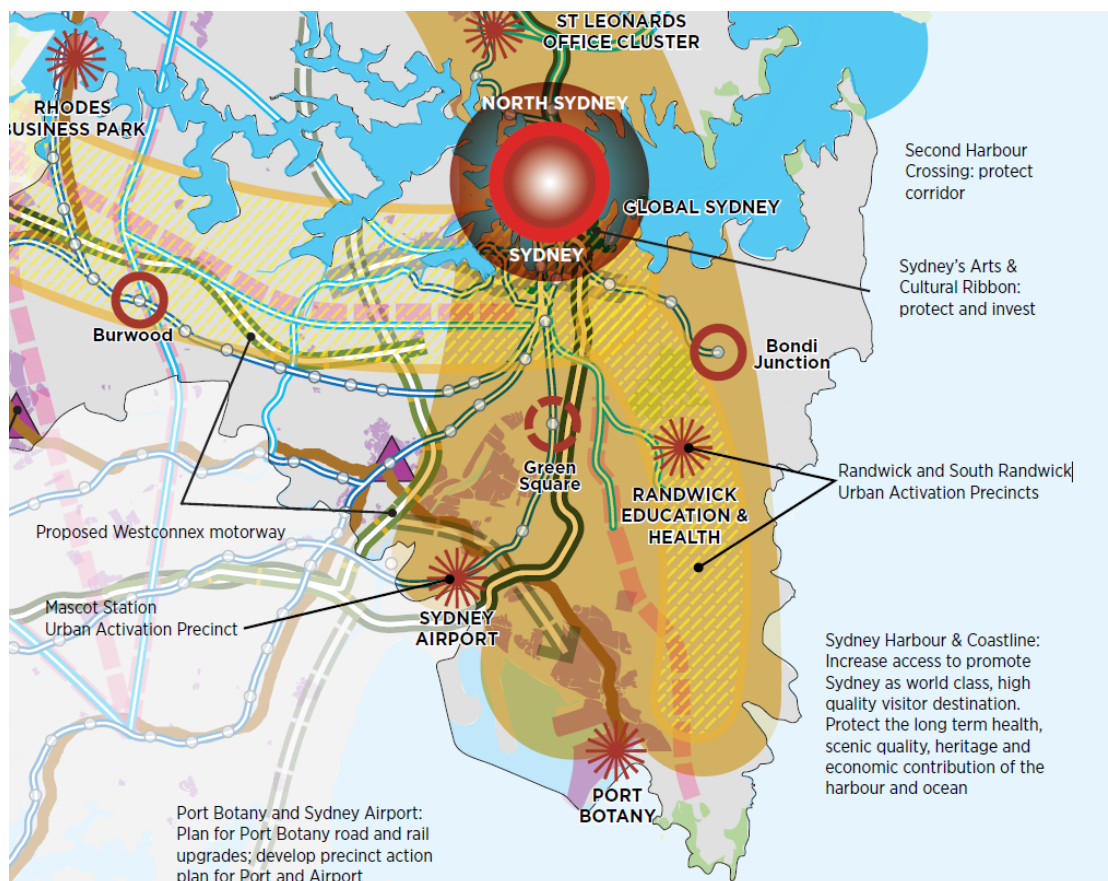


Figure 7 – Central Subregion showing the Randwick Urban Activation Precinct

The Precinct covers the whole of the Royal Randwick Racecourse, the UNSW Kensington and Randwick Campuses (including NIDA), and the Hospitals Campus (which includes the Prince of Wales Hospital, Prince of Wales Private Hospital, Sydney Children's Hospital, the Royal Hospital for Women, and Neuroscience Research Australia). Randwick TAFE is also within the circumference of the proposed Precinct as well as the town centres of Randwick, Kensington, and Kingsford and existing and proposed future transport linkages on Anzac Parade, Alison Road, and High Street.

The goals for the Randwick Urban Activation Precinct, as identified within the Draft Metropolitan Plan for Sydney to 2031 are to:

- Intensify the existing cluster of education and health activity around the University of NSW, Prince of Wales Hospital and Sydney Children's Hospital
- Integrate with multi-functional aspects of Randwick Racecourse
- Provide opportunities for increased student and short-term housing
- Provide capacity for at least 6,000 additional jobs in 2031; and
- Improve public transport access to Sydney CBD.

5.0 RELEVANT PLANNING ISSUES TO GUIDE THE SEARS

Built Form

The EIS will address the height, density, bulk and scale of the Project within the context of the locality and will demonstrate how the Project will integrate with the local environment, and that the form, layout and siting of the building achieves optimal design and amenity outcomes.

The form of the Project is a function of the building services, and context of the network of buildings within the upper campus. The built form is a product of providing integration, co-locating similar uses and providing contiguous floor plates.

The EIS will also address as far as relevant impact of the development upon the Obstacle Limitation Surface and other operational safety requirements of Sydney Airport Corporation Limited (SACL) and the Civil Aviation Safety Authority (CASA).

Environmental Sustainable Development (ESD)

UNSW has a commitment to sustainability in the planning, design and management of all new buildings on campus. In reviewing the project brief, local and university development action plans, the main sustainability objectives for the Project are summarised as:

- Demonstrate environmental leadership, responsibility, and a reduced carbon footprint;
- Contribute to, and improve the campus wide approach to energy and water issues;
- Establish targets for saving water, energy and waste that can be monitored through the life of the building; and
- Enable flexibility and adaptability to extend the life span of the building.

This will ensure consistency with the sustainability objectives outlined in the University's Planning and Design Guide, which seek to demonstrate leadership and responsibility in sustainability by developing a campus that is environmentally sound, socially responsible and economically viable.

Many of the standard sustainability rating and tool systems are intended to guide design of office, education, or health buildings but are inherently unsuitable when applied to laboratories. The operation of research buildings requires special consideration to be invested in energy and water reduction systems to minimise health and safety conflicts. Additionally, the Kensington Campus provides an infrastructure system where energy and water are managed at the precinct level. This leverages the potential of the shared system to realise greater reductions in resources than any of the individual buildings alone.

Because of these unique circumstances, the design team and the University have committed to creating a custom Sustainability Framework for the Project. The Sustainability Framework will draw from the best national and international environmental rating systems, as well as proven benchmark buildings on the Kensington Campus.

The Project is aiming to demonstrate Australian leadership for sustainable laboratory building design. Key to this approach is a 'from first principles design' that is minimising cooling and heating loads through appropriate siting and an innovative envelope and floor plate design, maximising the life span with unparalleled flexibility and adaptability, and reducing the energy and water use of the building with the latest technology and services design.

Accordingly, the application of a Green Star tool or similar tool and target rating is not appropriate for the proposed building and we request the SEARs allow the above approach to be applied.

Construction and Operational Impacts

The EIS will address and consider the construction and operation impacts of or on:

- Noise and vibration;
- Soil, groundwater, and geotechnical attributes of the site and environs;
- Access, parking and traffic;
- Tree replacement;
- Stormwater and air-borne pollutant control; and
- Servicing and infrastructure for the Project.

Development Contributions

Randwick Council's current s94A contributions plan applies to the Campus and the development site. Under the Plan, a 1% levy on the CIV of the development is payable unless it is exempted.

Exemptions to the levy are directly applicable to:

- *any Class 10 building or structure,*
- *Complying Development,*
- *development involving alterations and additions to, or the rebuilding of a building that is used for residential purposes or a building that is used for a purpose that is ancillary or incidental to such a purpose, unless the development involves an enlargement, expansion or intensification of the use of the building or the land to which the building is, or is proposed to be situated,*

Other exemptions from a levy under the Plan may be considered by Council or the relevant consent authority for the following development, or components of development:

- *Places of worship, public housing, public hospitals, boarding houses, police stations and fire stations,*
- *Works proposed to be undertaken for charitable purposes by, or on behalf of, a registered charity,*
- *seniors housing, as defined in the State Environmental Planning Policy (Seniors Living) 2004.*

Those applicants which seek exemption from a levy under this Plan must provide a comprehensive submission to Council, which clearly demonstrates how the proposed development falls within one of the development types defined above, prior to Council determining whether such an exemption applies.

In considering any application for an exemption Council will take into account:

- *the extent to which the proposed development comprises or includes the provision, extension or augmentation of public amenities or public services that provide a public benefit, and/or*
- *whether the applicant is affected by any adverse financial circumstance which will impact on its ability to fund the payment of any levy which is imposed in accordance with this Plan.*

Whilst developments by the Crown are not automatically exempt from payments under this section 94A Plan, development that in the opinion of Council does not increase the demand for the categories of public facilities and services addressed by the Plan should warrant a merit-based exemption.

In this instance, (and consistent with the Department's existing Circular D6) a full exemption is considered appropriate for the proposed development on the following grounds:

- UNSW and the development has a public character, and will provide a number of material public benefits consistent with wider strategic planning objectives;
- The Project is to the larger part replacing existing and redundant university floorspace, and so will not generate any substantial additional staff or students on the site, or any additional demand in terms of traffic and transport infrastructure or open space;
- UNSW is not a developer and is a charitable not-for-profit public institution (and registered as such by the Australian Tax Office) which relies on significant grants, donations, and external funding to provide new facilities for both the UNSW community, and the wider community at large;
- The levying of contributions on projects that are funded by external sources is simply diverting a portion of funds for an educational purpose to local services without any direct nexus to the development;
- The payment of Development Contributions and levies would consume resources which should be devoted to the University's core business of teaching and research and the strategic benefits that would result from such a development; and
- UNSW provides a wide range of social, cultural, and recreational public benefits and contributions to Randwick LGA and its resident and worker population.

6.0 CONSULTATION

UNSW (and its project team) will engage in consultation with Randwick Council, SACL, and CASA with respect to the Project. Relevant utilities providers are to be consulted throughout the process.

7.0 CONCLUSION

The Capital Investment Value (CIV) of the Project is \$116,174,000 and in excess of the requisite SSD threshold of \$30 Million for Educational Establishment projects. A Quantity Surveyors certificate verifying this CIV is attached for reference (**Attachment B**).

On the basis that the Project falls within the requirements of clause 15 of Schedule 1 of the SRD SEPP *being development for the purpose of educational establishments (including associated research facilities) that has a capital investment value of more than \$30 million*, UNSW formally requests the Department issue the SEARs for the Project to facilitate the preparation of the EIS to accompany the SSD Application.

We trust that the information detailed in this letter is sufficient to enable the Secretary to issue the SEARs for the preparation of the EIS. Should you have any queries about this matter, please do not hesitate to contact me on 9956 6962 or sgouge@jbaurban.com.au

Yours faithfully



Stephen Gouge
Senior Planner

Enc.

Attachment A – Concept Drawings prepared by Wood Bagot

Attachment B – QS Certificate prepared by Rider Levett Bucknell