

*13583* 28 July 2016

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 PROJECT – UNSW KENSINGTON CAMPUS – STAGE 2

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 Stage 2 of 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) is 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.

This application is the second stage of the Biological Sciences Project at UNSW. The SSD for the first stage of works (Stage 1 SSD) was approved by the Department of Planning and Environment on 20 August 2015 (SSD 14\_6674).

# 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 (in two stages) 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 UNSW 2025 Strategy.

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, AGSM and Mathews buildings.

The Faculty of Science 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.

At the time of the Stage 1 SSD application, the final scope and funding for the second stage of the Project was not confirmed. Given the timing, as well as the scope and nature of the works included in Stage 2, a separate SSD is required. A concurrent S96 modification to the Stage 1 SSD will also be prepared, to modify some components of the approved Stage 1 SSD to coordinate with this application.

# 1.1 Stage 1 SSD Approval (SSD 14 6674)

The SSD for the first stage of the Project (Stage 1 SSD) was approved by the Department of Planning and Environment on 20 August 2015. Approval was granted for the following:

- construction of a nine storey Biological Sciences Building (identified as E26);
- relocation of existing operations from the Biological Sciences Building (D26) to E26;
- refurbishment of the lower ground floor southern wing of the Biolink building;
- refurbishment of the ground floor of building D26, including the Biolink Building;
- construction of a new fire stair between Wallace Wurth Building and Building D26;
- construction of new rooftop plant to Building D26;
- refurbishment of the facade of Building D26;
- construction of a new loading dock and access way; and
- associated landscaping.

# 1.2 Concurrent S96 Modification - Stage 1 SSD

In order to facilitate the delivery of the Stage 2 SSD Project, modification is required to the existing Stage 1 SSD application. As such, a concurrent S96 modification to the Stage 1 SSD approval will be submitted along with the Stage 2 SSD application. The modification will include the following:

- revised ground floor layout to Building D26 and the Biolink Building, including access and entries;
- revised awning and façade treatment to Building D26;
- revised northern ramp and terrace arrangements to Building D26, as well as revised landscaping to the north and west;
- extent of glazed skylight over west atrium reduced and replaced with new concrete slab;
- inclusion of an additional plant level to Building D26 and amendment to roof top plant and equipment; and
- deletion of external stair to the north elevation of Building D26.

A detailed assessment of the proposed amendments will be provided in the S96 modification. Given the scope of amendments, we do not believe additional SEARs are required for Stage 1.

# 1.3 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 Regiment, 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 the subject of this SSD (Stage 2 of the Biological Science Project) shown in red)

# 2.0 DESCRIPTION OF PROPOSED DEVELOPMENT

# 2.1 SSD Scope of Works

As shown on the preliminary Concept Plans prepared by Wood Bagot (Attachment A), Stage 2 of the Project (the subject SSD application) seeks approval for the following:

- internal refurbishment of all floors within the existing Building D26 Biological Sciences Building (with the exception of the ground floor that was included in the Stage 1 SSD approval and will be modified as part of the concurrent S96 modification); and
- landscaping works to Michael Birt Garden (to the north of Building D26).

Given the CIV of the internal fitout works proposed exceeds \$30 million dollars, and is not substantially the same development as the Stage 1 SSD (given the significance of the additional development with Building D26), a separate SSD application is required.

As noted in Section 1 above, a separate S96 modification seeking amendments to the Stage 1 SSD components of the development will be submitted concurrently to the Stage 2 SSD application.

For the purpose of completeness, the Concept Plans prepared by Woods Bagot (Attachment A) indicate the scope of works for both the S96 modification to the Stage 1 SSD, and the Stage 2 SSD (Internal refurbishment and landscaping, the subject of the SEARs request).

Refurbishment of the entirety of the existing Building D26 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 Project Objectives

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 (both Stage 1 and Stage 2), 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 2025 Strategy to enhance effectiveness and interdisciplinary teamworking, 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, Building E26 (Stage 1 SSD) to the south, and the Chancellery Walk to the west.

# 2.3 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.

Each of the levels will typically include laboratory, service and workspaces.

The refurbished floors of D26 will be interconnected with Building E26 to the south (Stage 1 SSD), joining the researchers currently dispersed through the existing buildings. The connection between these two building was foreshadowed in the Stage 1 SSD approval.

Laboratory buildings are service intensive, requiring large plant and serves areas to the top of the building – weighted towards the west to minimize impact to and from Botany Street. Additional plant area was included in the Stage 1 SSD, and it is proposed to expand this space to service the refurbishment of D26 (Stage 2).

# 3.0 PERMISSABILITY AND STRATEGIC PLANNING CONTEXT

The following are the key relevant legislation and environmental planning instruments that will apply to the proposed development:

- State Environmental Planning Policy (State and Regional Development) 2011;
- Environmental Planning and Assessment Act 1979;
- Randwick Local Environmental Plan 2012
- Randwick Comprehensive Development Control Plan 2013
- A Plan for Growing Sydney;
- NSW Tertiary Education Plan; and
- State Environmental Planning Policy (Infrastructure) 2007.

# 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 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. This will be provided with the SSD application.

# 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.)

The proposed works do not seek to amend the existing approved building height within this 30m setback zone, with all additional plant and service zone being setback further within the Campus, reducing visibility from Botany Street and other areas of the public domain.



Maximum Building Height (m)

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

# 3.4 Randwick Comprehensive 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.

Notwithstanding the above, an assessment against the relevant Section of the DCP will be provided as part of the SSD application, consistent with the information that was provided with the Stage 1 SSD application.

## 3.5 A Plan for Growing Sydney

The proposal aligns with a number of key directions and actions outlined within the pre-eminent strategic plan for Sydney. In particular, the following goals:

#### Goal 1: A competitive economy with world class services and transport

- responds to the need to meet Sydney's growing needs in education;
- supports the growth of tertiary education activities in a strategic centre/significant metropolitan health and education precinct; and
- supports one of the NSW Government's priority industries (i.e. international education and research).

#### Goal 3: A great place to live with communities that are strong, healthy and well connected

- supports the delivery of a precinct that builds upon Sydney's vibrant cosmopolitan culture;
- will provide an opportunity to create a new heathy built environment; and
- matches a growing community with better access to jobs and essential social/cultural infrastructure.

# Goal 4: A sustainable and resilient city that protects the natural environment and has a balanced approach to the use of land and resources.

The proposal enables the provision of additional density within a highly suitable urban infill location and therefore takes pressure off potential impacts on the natural environment (often) associated with urban sprawl.

# **Central Subregion**

Key priorities established under the Plan for the Central Subregion (including UNSW) that the proposal supports include:

- supporting Global Sydney as a transformative place;
- providing capacity for additional mixed use development in the precincts that make up Global Sydney; and
- enhancing the Sydney CBD as Australia's premier location for employment, vibrant land uses, cultural activity, and iconic buildings/places.

Further, the Plan includes a specific priority Randwick Education and Health Precinct (in which the site is located) identified as a strategic centre which the proposal supports. These include:

# Randwick Education and Health

- Support health-related land uses and infrastructure around Prince of Wales Hospital and Sydney Children's Hospital.
- Support education-related land uses and infrastructure around the University of New South Wales.
- Work with council to identify if opportunities exist for urban renewal around Randwick's education and health facilities, including offices, retail, services, housing and local community improvements.

# 4.0 THE SEARS

# 4.1 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 Stage 2 of the Project will integrate with the local environment, and that the form, layout and siting of the building achieves optimal design and amenity outcomes. Given the SSD relates to the internal fitout of Building D26, the form will be retained as per the existing building, other than the expanded roof top plantroom that is set back from Botany Street.

Stage 2 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 substantially consistent with that of the existing D26 building, with the exception of additional rooftop plant.

# 4.2 Traffic, parking and accessibility

The site is highly accessible by public transport, particularly noting the CBD and South East Light Rail under construction and stops to be located on High Street and Anzac Parade. The proposal is not expected to incorporate any material changes to the existing parking, servicing and access arrangements.

A traffic, parking and accessibility study will nonetheless be prepared to accompany the EIS and will refer to and build upon previous studies undertaken. The study will consider staff and student population within the existing building and precinct.

# 4.3 Landscaping and Public Domain

Landscaping works are proposed within the Michael Birt Gardens to the north of Building D26. Detailed landscape plans, including the species proposed and any furniture, will be provided with the EIS.

# 4.4 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 Stage 2 of 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 Stage 2 of 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.

Stage 2 of 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 Startool or similar tool and target rating is not appropriate for the proposed building and we request the DGRs allow the above approach to be applied.

## 4.5 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-bourne pollutant control; and
- servicing and infrastructure for Stage 2 of the Project.

#### 4.6 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. This is particularly the case with this application, given the scope of works primarily relates to the refurbishment of an older building on campus, rather than the creation of new floor space.

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 only 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.

## 5.0 CONSULTATION

UNSW (and its project team) will engage in consultation with Randwick Council, SACL and CASA with respect to Stage 2 of the Project. Relevant utilities providers are to be consulted throughout the process.

## 6.0 CONCLUSION

The Capital Investment Value (CIV) of the Project is in excess of the requisite SSD threshold of \$30 Million for Educational Establishment projects.

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

Jarge

Stephen Gouge Principal Planner

Enc. *Attachment A* – Concept Drawings prepared by Wood Bagot *Attachment B* - QS Statement prepared by Rider Levett Bucknell