Narla Environmental Pty Ltd
www.narla.com.au
(02) 9986 1295
PO Box 406 Mona Vale
NSW 1660

18 August 2025

Re: Request for a Biodiversity Development Assessment Report (BDAR) Waiver for the proposed development at 10 Missenden Road, Camperdown.

Final v.2.0

1. Introduction

This Biodiversity Development Assessment Report Waiver ('BDAR Waiver') has been prepared by Narla Environmental Pty Ltd ('Narla') to accompany a Concept State Significant Development Application (SSDA) for a private hospital and associated ancillary uses located at 10 Missenden Road, Camperdown ('The site', **Figure 2**). The legal description of the site is outlined in **Table 1**.

The area surveyed by Narla for the BDAR Waiver is designated as the "Subject Land". It is noted that the boundaries outlined within this report differ from those depicted in recent architectural drawings and other project documents. As such, the area assessed as part of the BDAR waiver corresponds to the "Subject Land", which is representative of, but not identical to, the Concept Development Area.

Table 1. Legal description of the site

Lot	Address	Site Area
Lot 2 in DP 1124852	10 Missenden Road, Camperdown	4.79ha

For abundant clarity, when referring to the site this is reference to the legal property allotment for 10 Missenden Road, Camperdown. Separately, when referring to the Concept Development Area this is a reference to part of the allotment to which the concept proposal relates. This report has been prepared to address the Secretary's Environmental Assessment Requirements (SEARs) issued for the project (SSD-79888213). This report concludes that the proposed Concept relevant to the private hospital and associated uses is suitable and warrants approval subject to the implementation of the following mitigation measures:

- Conduct surveys before vegetation removal to check for fauna (e.g., microbats, birds, or other wildlife) using habitat trees. If any fauna are found, engage a qualified ecologist or wildlife handler to safely relocate them.
- Inspect buildings slated for demolition for crevices or roosting microbats. If found, implement exclusion methods or provide alternative roosting sites before demolition.
- Retain any native vegetation where possible to maintain local habitat value.

Following the implementation of the above mitigation measures, the remaining impacts are considered appropriate.

The proposal will provide a private hospital that is co-located with the RPA and supports the broader Camperdown Health, Education, and Research Precinct ecosystem by providing for contributory health and life science land uses.

This report has been prepared in response to the requirements contained within the Secretary's Environmental Assessment Requirements (SEARs) dated 5 March 2025 and issued for the SSDA (SSD-79888213). Specifically, this report has been prepared to respond to the SEARs requirement issued below.

Table 2. SEARs Requirements (SSD-79888213)

Item	Description of Requirement	Section Reference (this report)
Biodiversity	Assess any biodiversity impacts associated with the concept development in accordance with the Biodiversity Conservation Act 2016 and the Biodiversity Assessment Method 2020, including the preparation of a Biodiversity Development Assessment Report (BDAR), unless a waiver is granted, or the development is on biodiversity certified land. If the concept development is on biodiversity certified land, provide information to identify the site (using associated mapping) and demonstrate the proposed development is consistent with the relevant biodiversity measure conferred by the biodiversity certification.	Table 4

2. Site Description

For abundant clarity, when referring to the site this is reference to the legal property allotment for 10 Missenden Road, Camperdown. Separately, when referring to the concept development area this is reference to part of the allotment to which the concept proposal relates.

The concept development area comprises 7,329m2. The bulk of the concept development area is currently comprised of at-grade, outdoor carparking (public paid car park) with scattered tree plantings and a driveway/access point from Missenden Road. At the south-west corner, fronting Missenden Road, is a single-storey retail building, known as the Benning Building, which current accommodates three retail tenancies, a post-office, a "7/11" convenience store and an office.

The concept development area has a prevailing topography characterised by a moderate slope from Missenden Road to the east of the concept development area located along John Hopkins Drive.

The concept development area is located within the Camperdown Health, Education and Research Precinct (CHERP), which contains a mixture of healthcare services, medical research and education institutions. Surrounding land uses include the Royal Prince Alfred Hospital (RPAH), University of Sydney and ancillary student accommodation, and mixed-use buildings comprising commercial and residential activity.

St Johns College is identified under the Sydney Local Environmental Plan 2012 (SLEP 2012) as a local heritage item (no. 67). The concept development area has been assessed as having medium to low archaeological significance, with a potential for Aboriginal archaeological materials to be present in the area. However, it is noted by the St Johns College Conservation Management Plan 2020 that based on the level of continued site disturbance, it is highly unlikely that any deposits or materials would be in situ or undisturbed. The concept development area is also situated within the "University of Sydney" Heritage Conservation Area, which is listed under the SLEP 2012 (C5), and is within the curtilage of the State Heritage Register listing for the Sydney University campus (SHR #01974). Further, the concept development area is located in proximity to the "Admission Block" and "Victoria &

Albert Pavilions" of the RPAH to the south of the area, which are listed on the state heritage register (listing numbers 00830 and 00829, respectively).

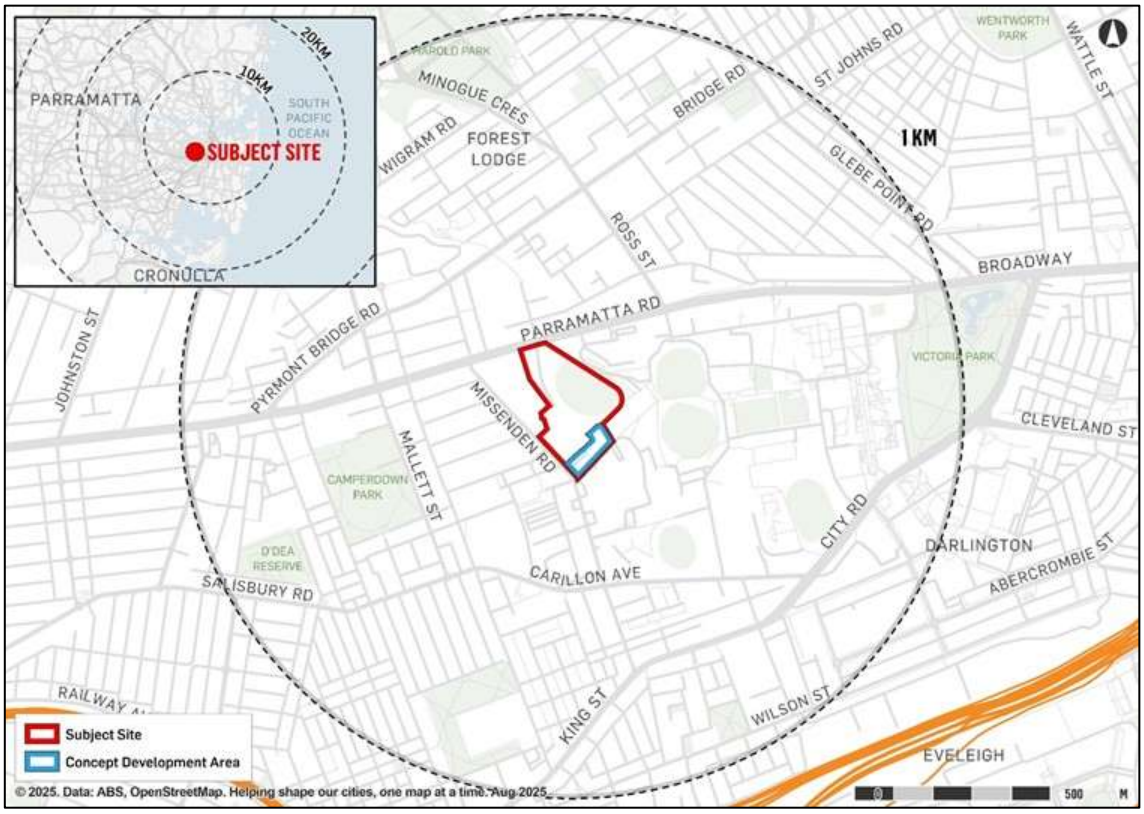


Figure 1. Location Plan (Urbis Spatial, 2025).

3. Planning Approval Strategy

The proposed development qualifies as State Significant Development (SSD) under clause 14 of Schedule 1 of the State Environmental Planning Policy (SEPP) (Planning Systems) 2021. According to this clause, any development for the purposes of a hospital, medical centres, and health research facilities, with an estimated development cost (EDC) exceeding $30 million, is classified as SSD. As the proposal involves the concept development of a private hospital and associated ancillary uses with an EDC of approximately $30 million, it meets the criteria for SSD classification.

As the proposal is for hospitals, medicals, and health research facilities and has an estimated development cost (EDC) of more than $30 million, the proposed development is State Significant Development (SSD) pursuant to Section 14 of Schedule 1 of State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP).

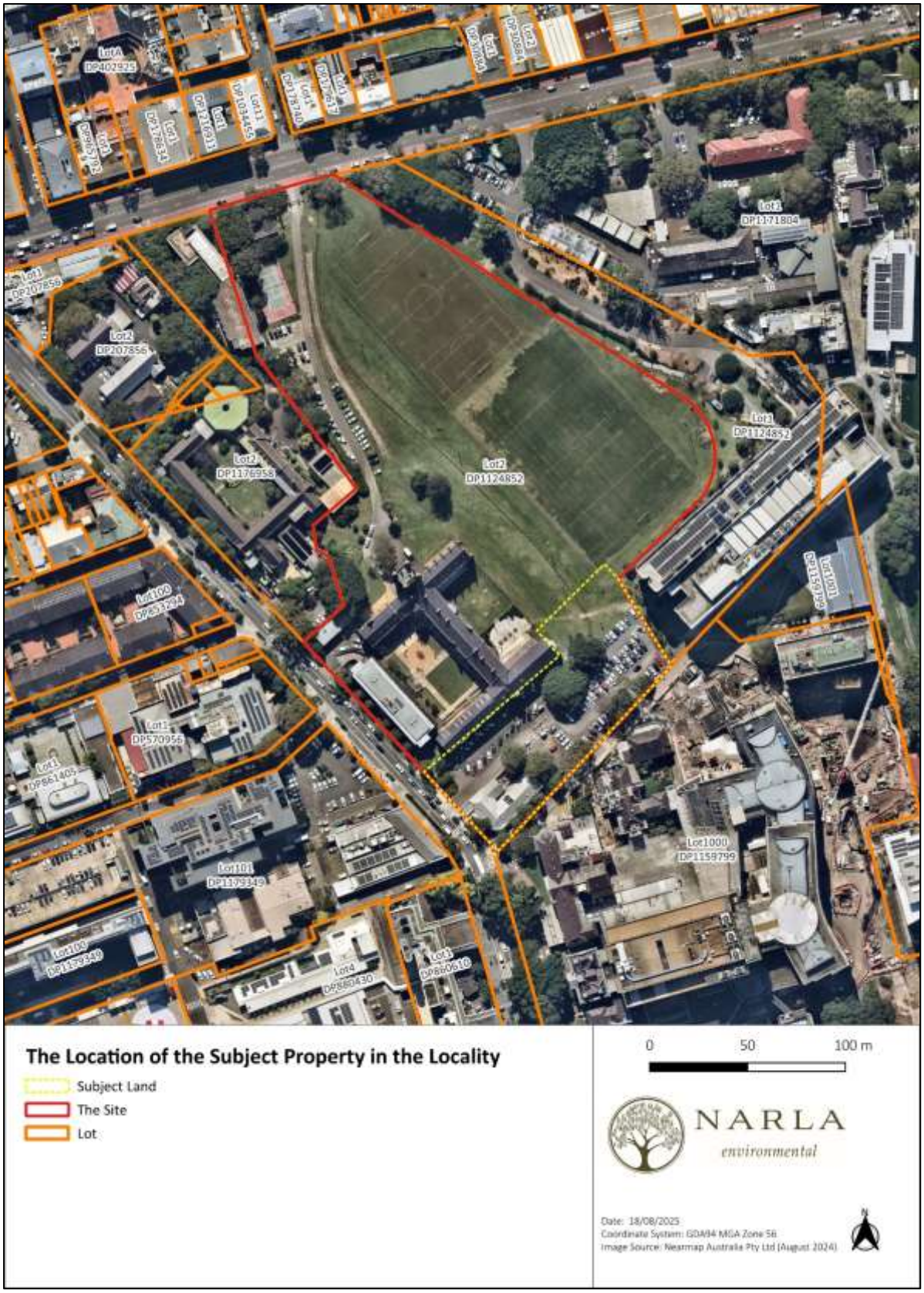


Figure 2. Location of the Subject Land within the locality.

4. Project Description

The Concept SSDA seeks development consent for a Concept Proposal for:

- Development of a private hospital, including the provision of ancillary health and research uses, ancillary retail and commercial office space and carparking.
- A building envelope comprising a stepped building form, with dual setbacks and cantilevered elements which responds to the surrounding heritage and context.
- A building envelope which includes:
    - Three (3) Basement levels to a maximum depth of RL 13.
    - Five (5) Storey terraced podium with a maximum height of RL 56.4.
    - A 10-storey tower, plus roof plant level, with a maximum height of RL 85.5.

The concept proposal anticipates the private hospital development will provide:

- Vehicular access from Missenden Road.
- 33,253m^2 gross floor area.
- A maximum of 264 basement car parking spaces and three (3) Ground floor, hospital drop-off parking spaces.
- Associated tree removal and tree transplanting, site landscaping, public art and public domain upgrades within and adjacent to the site.
- Accommodation of approximately 90 ward beds, 26 ICU/CCU beds and 8 Theatre rooms. Additionally, spaces for ancillary uses, such as:
    - Radiology.
    - Pathology.
    - Clinical suites.
    - Research / technology.
    - Education.
    - Retail food and beverage.
    - Pharmacy.

This Concept SSDA is being sought pursuant to Division 4.4 of the EP&A Act. No physical works are proposed as part of this Concept SSDA. The Concept SSDA seeks development consent for the proposed concept envelope and private hospital land use only, further detailed design in the submission of staged DAs will determine the exact use and operation of these spaces.

All physical works will be the subject of detailed proposals as part of a future required detailed DA. An indicative reference scheme has been prepared by Architectus which provides a proof of concept that the proposed built form outcome is able to sensitively respond and integrate within the existing heritage fabric of the surrounding sites while accommodating the intended land use operations.

The proposal will provide a private hospital that is co-located to the RPA and supports the broader Camperdown Health, Education and Research Precinct ecosystem by providing for contributory health and life science land uses.

Section 7.9(2) of the NSW Biodiversity Conservation Act 2016 (BC Act) stipulates the following:

- "Any such application is to be accompanied by a biodiversity development assessment report unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values.

5. Secretary's Environmental Assessment Requirements

This BDAR waiver has been prepared to be submitted prior to the SSD Application to demonstrate that the proposed development is not likely to have any significant impacts on biodiversity values.

6. Biodiversity

The Subject Land comprises the area as per **Figure 3**, and currently contains existing structures, areas of hardstand, and planted landscaped gardens, typical of an urban environment. The Urban Exotic and Native Planted Vegetation within the Subject Land is described in **Table 3** and displayed in **Figure 4**.

6.1 Impacts on biodiversity values

The relevance and potential impacts to biodiversity values, as defined in the BC Act and the Biodiversity Conservation Regulation 2017 (BC Regulation) is discussed in **Table 4. Table 4** been completed by Narla's Ecologist Brodie Miller who holds a Master of Environmental Management (Conservation) from Charles Sturt University, and has been overseen by Narla's Principal Ecologist Chris Moore, who has a Bachelor in Biodiversity and Conservation from Macquarie University and is Accredited Biodiversity Assessor under the BAM (BAAS21009).

Where a biodiversity value is relevant, an explanation of how impacts have been avoided and the likelihood and extent of any remaining impacts of the proposed development (including impacts prescribed under regulation 6.1 of the BC Regulation) have been assessed. A list of vegetation identified within the Subject Land is detailed in **Appendix A**, and general photos of vegetation within the Subject Land are presented in **Appendix B.**

7. Conclusion

It is not expected that the proposed development will impact upon biodiversity values, therefore, this letter should be submitted in support of the application for a BDAR Waiver.

This report, in its entirety, has been prepared by including:

Brodie Miller – Project Manager / Ecologist
Master of Environmental Management (Conservation)
Narla Environmental Pty Ltd

Chris Moore – General Manager / Principal Ecologist (BAAS 21009)
Bachelor of Biodiversity and Conservation
Narla Environmental Pty Ltd

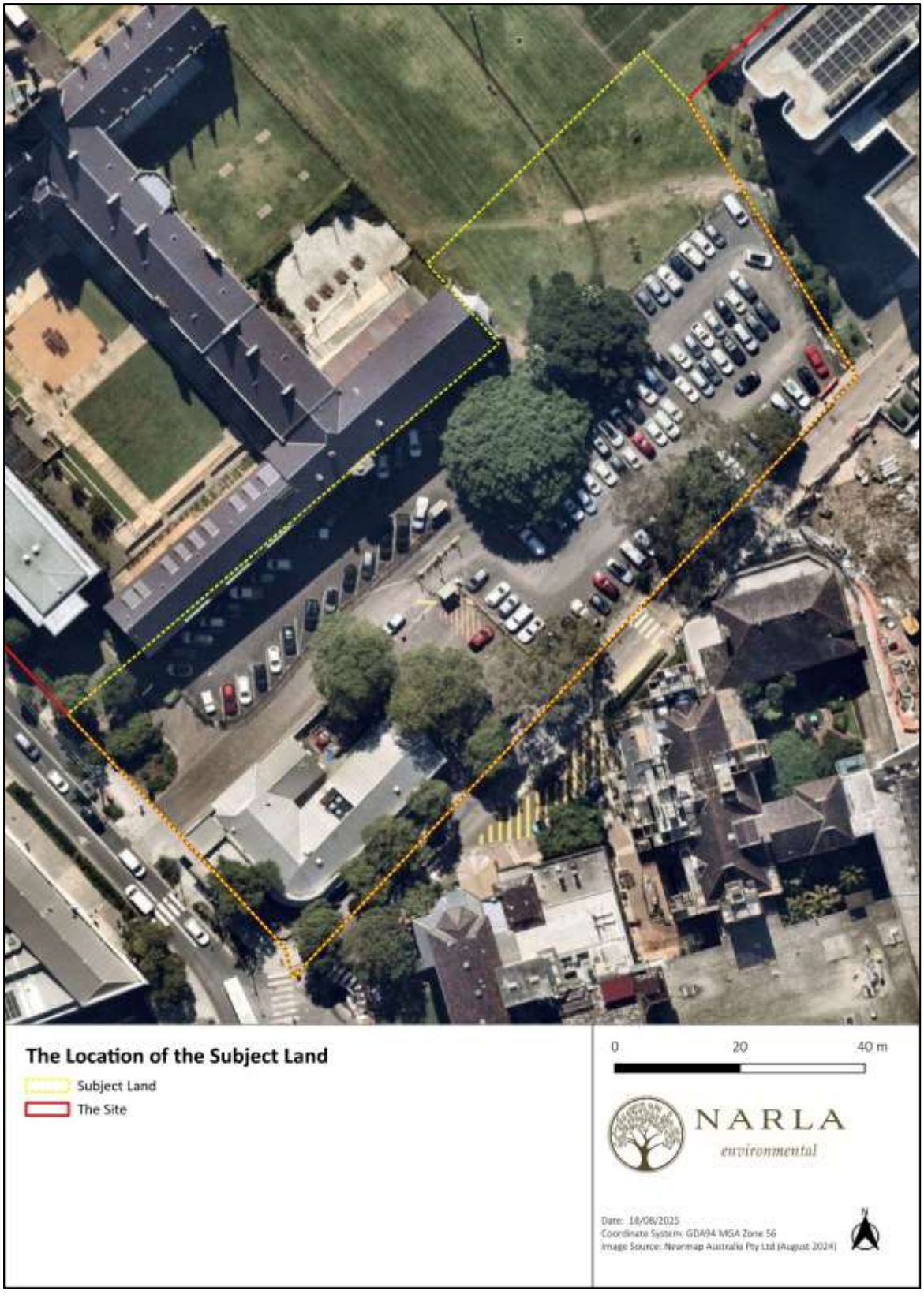


Figure 3. Location of the Subject Land within the Concept Development Area.

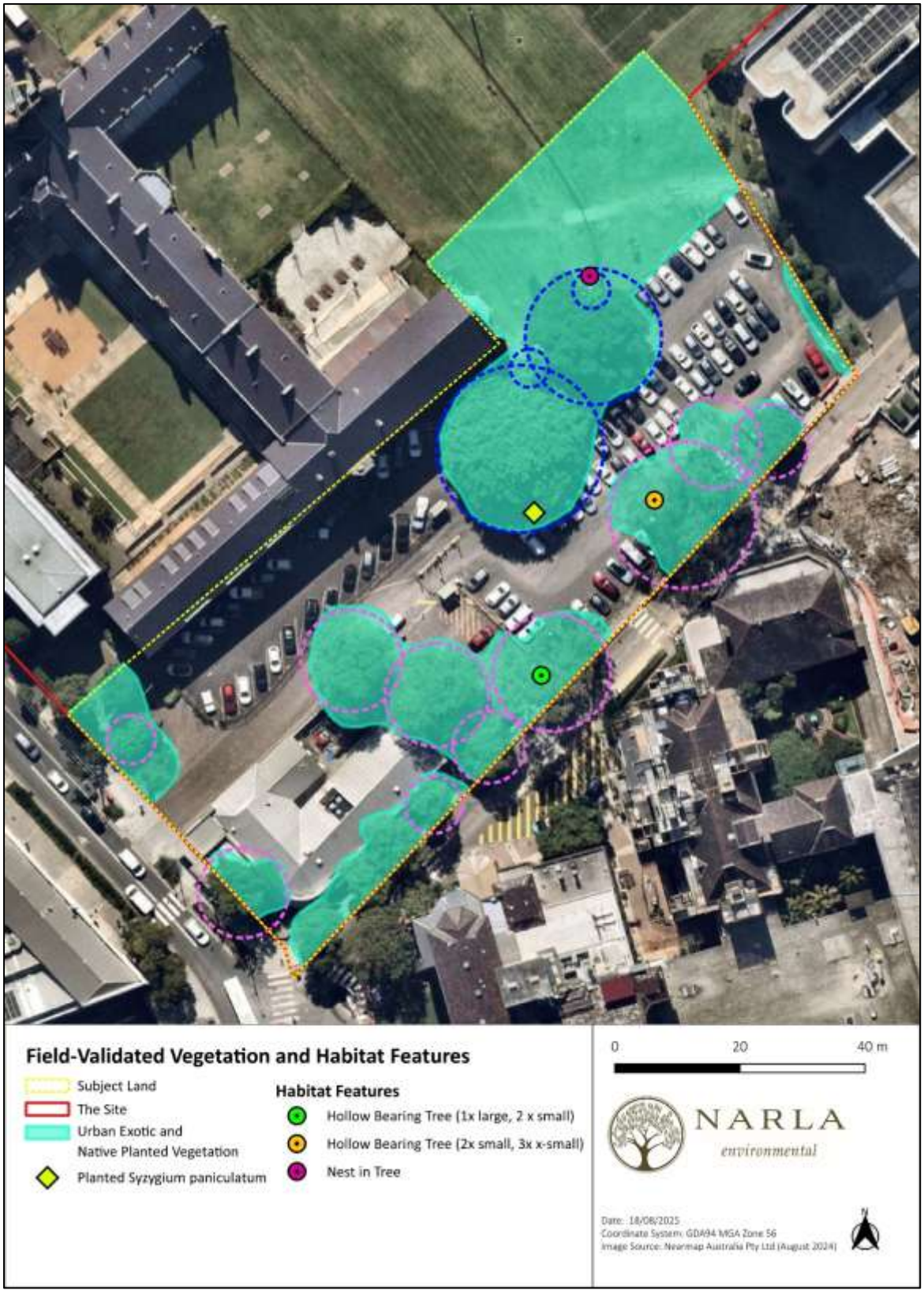


Figure 4. Field-validated vegetation and habitat features identified within the Subject Land.

Table 3. Urban Exotic and Native Planted Vegetation within the Subject Land.

Urban Exotic and Native Planted Vegetation	
	
Extent within the Subject Land (approx.)	0.37 ha
Description of the Vegetation within the Subject Land	
The canopy layer includes both native and exotic species. *Corymbia citriodora, Corymbia maculata*, *Ficus rubiginosa*, and *Lophostemon confertus* are present and are native to NSW, however this particular assemblage of species within this layer does not conform to any locally occurring Plant Community Type. *Jacaranda mimosifolia* is also present as an exotic species in this layer. The mid-storey consists predominantly of commonly planted native species, including *Banksia integrifolia, Syzgium 'Cascade'* and *Syzygium paniculatum*. While *Syzygium paniculatum* is listed as Endangered under the BC Act 2016 and Vulnerable under the EPBC Act 1999, it is also known as a common horticultural species in the Sydney region. *Syzgium 'Cascade'* is a horticultural selection and not a naturally occurring species in NSW. The majority of species in the ground layer are exotic, including *Amaranthus viridis, Bidens pilosa, Bouteloua dactyloides, Capsella bursa-pastoris, Cenchrus clandestinum, Cenchrus setaceus, Cyperus spp., Ehrharta erecta, Hypochaeris radicata, Plantago lanceolata, Rumex spp., Setaria palmifolia*, *Sida rhombifolia*, *Sonchus oleraceus*, *Taraxacum officinale*, and *Trifolium repens*.	
Justification of Vegetation Assignment	This assemblage of species within the landscape of the Subject Land does not conform to any locally occurring Plant Community Type (PCT) and has therefore been classified as Urban Exotic and Native Planted Vegetation
TEC Status	Not Listed.

Table 4. Impacts of the proposed development on biodiversity values.

Biodiversity Value	Meaning	Relevant?	Values within the Subject Land and Potential Impacts associated with the development
Vegetation abundance – BC Regulation Section 1.4(b)	Occurrence and abundance of vegetation at a particular site	Yes	The proposed development does not impact upon any locally occurring vegetation community, only requiring the select removal of areas containing Urban Exotic and Native Planted Vegetation, which contains a mixture of commonly landscaped exotic species. The proposed development will retain eight trees. Removal is proposed for urban exotic and planted native species, including Trees 10–20, 25–30, 35, 41, and 42. Additionally, four trees will be transplanted to mitigate vegetation loss. The vegetation could not be assigned a native PCT due to distribution, geology, or landscape position of the Subject Land, indicating the planted nature of this vegetation. Such landscaped vegetation is common in the locality in the form of street trees and garden beds. It is unlikely that the removal of such vegetation would significantly impact on biodiversity values.
Vegetation integrity – BC Act Section 1.5(2)(a)	Degree to which the composition, structure, and function of vegetation at a particular site and the surrounding landscape has been altered from a near-natural state	N/A	The vegetation within the Subject Land does not conform to a native plant community as it best reflects Urban Exotic and Native Planted Vegetation located in manicured gardens. The species present do not conform to any PCT that occurs in distribution, geology, or landscape position of the Subject Land, highlighting the landscape's alteration from its natural state. As such, the vegetation does not have an integrity score.
Habitat suitability – BC Act Section 1.5(2)(b)	Degree to which the habitat needs of threatened species are present at a particular site	Yes	Three habitat trees were identified during the site assessment (**Figure 4**, **Appendix C**). Due to their location in a highly urbanised environment, it is considered unlikely to provide habitat for any threatened species. The vegetation within the Subject Land may offer occasional foraging opportunities for species such as *Pteropus poliocephalus* (Grey-headed Flying-fox), which is known to forage in cultivated urban gardens. However, given the disturbed and urban nature of the Subject Land, it is unlikely to represent significant foraging habitat for any threatened or migratory species that may pass through. There are also human-made structures within the Subject Land that could potentially provide habitat for threatened species such as microbats, which may be scheduled for demolition as part of the proposed works. Given the flat roof design of the building and lack of crevice habitat, the likelihood of microbat occupation is considered low. To mitigate any potential impacts, a pre-clearance survey is to be conducted to identify any fauna utilising hollows or microbats present in the tree or buildings prior to removal. Should any individuals be found, a qualified wildlife handler or ecologist is to

Biodiversity Value	Meaning	Relevant?	Values within the Subject Land and Potential Impacts associated with the development
			safely capture and relocate them to a suitable location.
Threatened species abundance – BC Regulation Section 1.4(a)	Occurrence and abundance of threatened species or threatened ecological communities, or their habitat, at a particular site	Yes	A threatened flora and habitat survey was undertaken in accordance with Surveying threatened plants and their habitats (DPIE 2020) and no threatened ecological communities were identified with the Subject Land. A threatened species, *Syzygium paniculatum*, was identified within the Subject Land however it is also known as a common horticultural species in the Sydney region. The vegetation within the Subject Land may offer occasional foraging opportunities for species such as *Pteropus poliocephalus* (Grey-headed Flying-fox), which is known to forage in cultivated urban gardens. However, given the disturbed and urban nature of the Concept Development Area, it is unlikely to represent significant foraging habitat for any threatened or migratory species that may pass through. Three habitat trees were identified during the Concept Development Area assessment (**Figure 4**, **Appendix C**). Due to their location in a highly urbanised environment, it is considered unlikely they would provide habitat for any threatened species. There are also human-made structures on the Concept Development Area that could potentially provide habitat for threatened species such as microbats, which may be scheduled for demolition as part of the proposed works. Given the flat roof design of the building and lack of crevice habitat, the likelihood of microbat occupation is considered low. To mitigate any potential impacts, a pre-clearance survey is to be conducted to identify any fauna utilizing hollows or microbats present in the tree or buildings prior to removal. Should any individuals be found, a qualified wildlife handler or ecologist is to safely capture and relocate them to a suitable location.
Habitat connectivity – BC Regulation Section 1.4(c)	Degree to which a particular site connects different areas of habitat of threatened species to facilitate the movement of those species across their range	Yes	The Subject Land is located within a highly urbanised and altered landscape, that would likely only provide habitat for highly mobile species such as avian species or Grey-headed Flying Fox. The proposed development will retain eight trees which will maintain some continuity in canopy cover.
Threatened species movement – BC Regulation Section 1.4(d)	Degree to which a particular site contributes to the movement of threatened species to maintain their lifecycle	N/A	It is not expected that the vegetation within the Subject Land contributes to the movement of threatened species to maintain their lifecycle (e.g migratory species or movement to breeding habitat). The vegetation within the Subject Land may potentially be used by threatened or migratory species as sporadic fly ins, however as previously

Biodiversity Value	Meaning	Relevant?	Values within the Subject Land and Potential Impacts associated with the development
			discussed, habitat connectivity is only available for highly mobile species and is expected to provide a similar level of connectivity and habitat as is currently present, post works.
Flight path integrity – BC Regulation Section 1.4(e)	Degree to which the flight paths of protected animals over a particular site are free from interference	N/A	It is unlikely that the Subject Land is part of a flight path used by threatened or migratory species. Furthermore, the proposed development will be consistent with the surrounding urban landscape and building height. As such, flight path integrity is not expected to be impacted by the development.
Water sustainability – BC Regulation Section 1.4(f)	Degree to which water quality, water bodies, and hydrological processes sustain threatened species and threatened ecological communities at a particular site	N/A	The proposed development is not likely to result in impacts to water quality, water bodies, or hydrological process that sustain threatened species or threatened ecological communities. No threatened communities were identified within the Subject Land and no threatened species that are depended on these features is considered likely to be present. The proposed development is for alterations and additions to existing built form which is unlikely to result in any changes to hydrological processes.

8. Appendices

Appendix A. Vegetation identified within and surrounding the Subject Land.
Appendix B. General photos of vegetation within the Subject Land.
Appendix C. Habitat trees identified during site assessment.
Appendix D. Relevant qualifications of person completing the report (including Table 4).

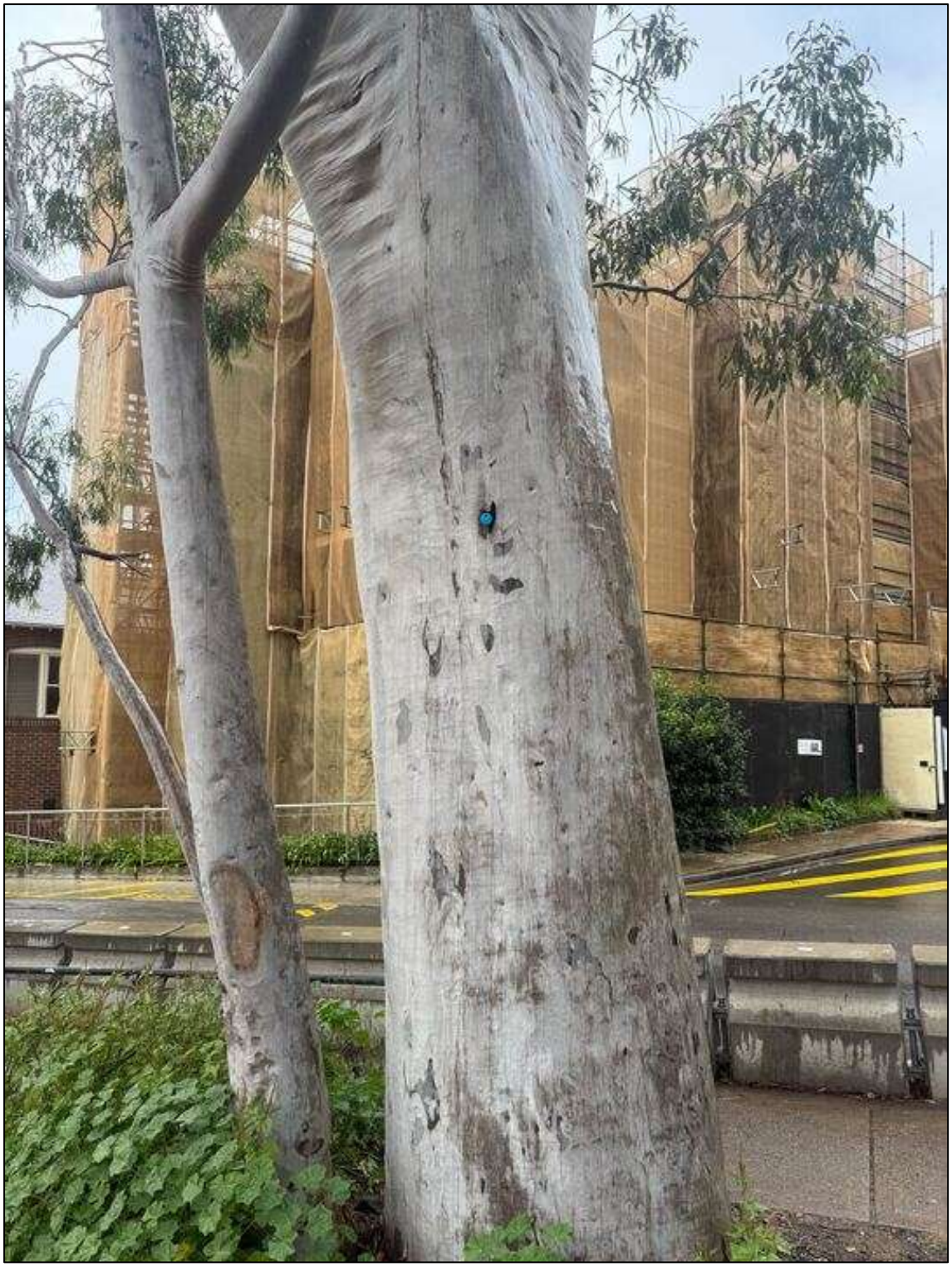
Appendix A. Vegetation identified within and surrounding the Subject Land.

Scientific Name	Canopy	Midstorey	Ground
*Amaranthus viridis**			x
Banksia integrifolia		x	
*Bidens pilosa**			x
*Capsella bursa-pastoris**			x
*Cenchrus clandestinus**			x
*Cenchrus setaceus**			x
Chloris spp.			x
*Cinnamomum camphora**			x
Corymbia citriodora	x		
*Cyperus spp.**			x
*Dietes iridioides**			x
*Dracaena spp.**			x
*Ehrharta erecta**			x
Ficus rubiginosa	x		
*Hypochaeris radicata**			x
*Jacaranda mimosifolia**	x		
Lophostemon confertus	x		
*Malva spp.**			x
*Mentha spp.**			x
*Philodendron 'Xanadu'**			x
*Plantago lanceolata**			x
Platysace spp.			x
*Rumex spp.**			x
*Setaria palmifolia**			x
*Sida rhombifolia**			x
*Soliva sessilis**			x
*Sonchus oleraceus**			x
*Stellaria media**			x
Stenocarpus sinuatus			x
*Stenotaphrum secundatum**			x
*Syzygium 'Cascade'**		x	
Syzygium paniculatum (planted)		x	
*Taraxacum officinale**			x
*Trifolium repens**			x
*Trifolium spp.**			x

*Denotes exotic species

**Denotes Priority Weed species

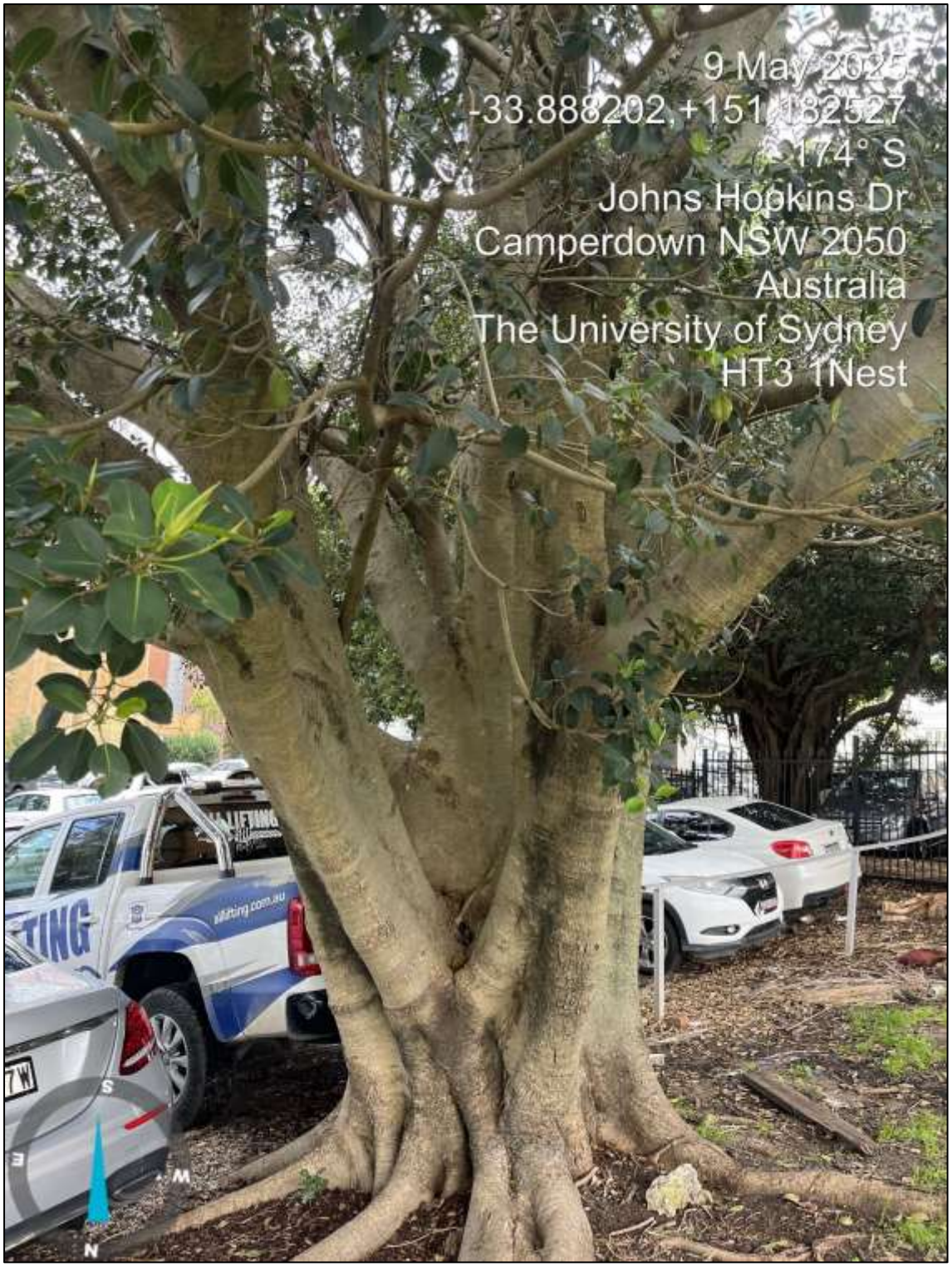
Appendix B. General photos of vegetation within the Subject Land.



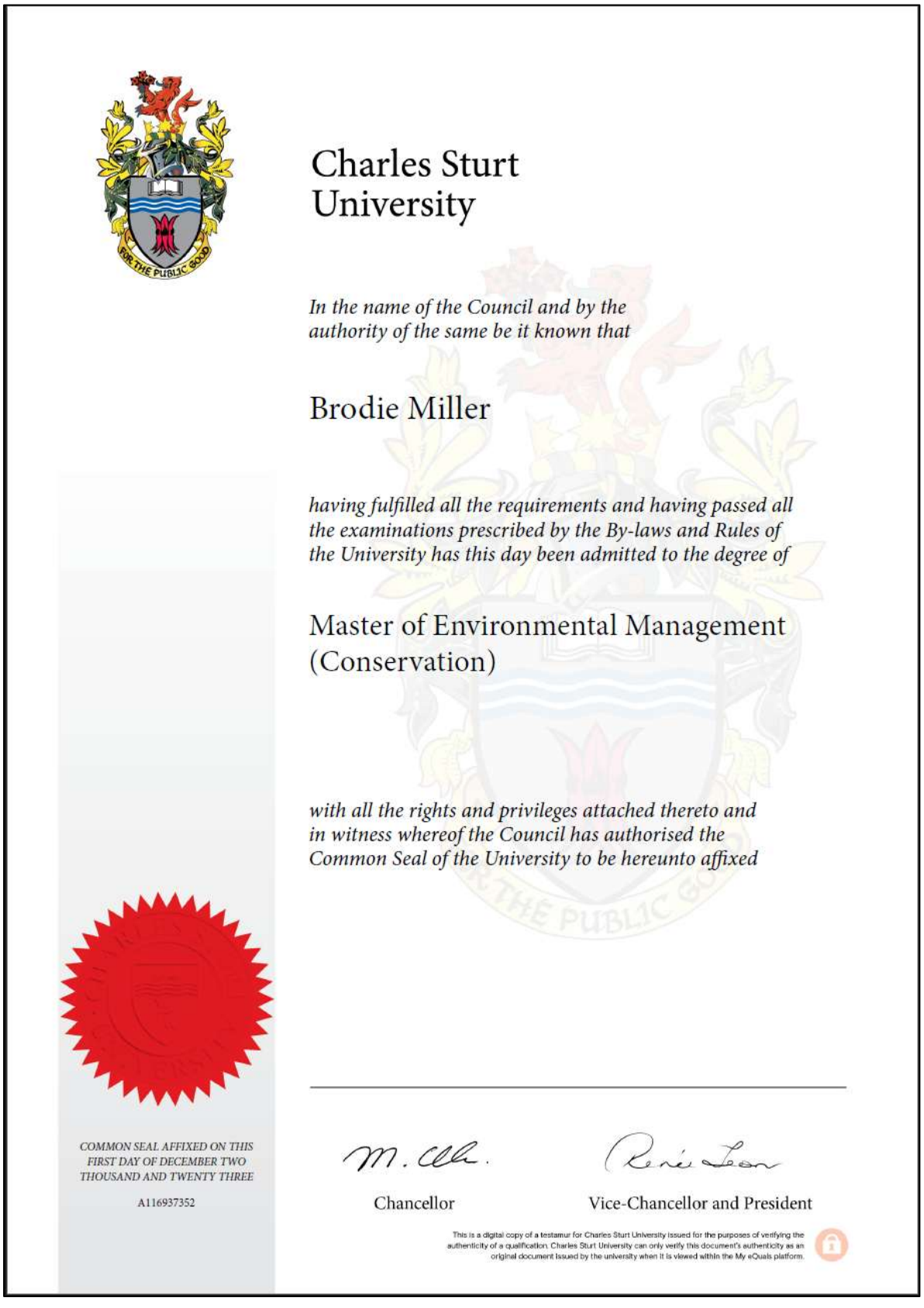

364 GV8

Appendix C. Habitat trees identified during site assessment.


9 May 2025
-33.888287 151.182690
131° SE
Johns Hopkins Dr
Camperdown NSW 2050
Australia
The University of Sydney
HT2 2S 3X5


9 May 2025
-33.888202,+151.182527
174° S
Johns Hopkins Dr
Camperdown NSW 2050
Australia
The University of Sydney
HT3 1Nest

Appendix D. Relevant qualifications of person completing the report (including Table 4).



Charles Sturt University

In the name of the Council and by the authority of the same be it known that

Brodie Miller

having fulfilled all the requirements and having passed all the examinations prescribed by the By-laws and Rules of the University has this day been admitted to the degree of

Master of Environmental Management (Conservation)

with all the rights and privileges attached thereto and in witness whereof the Council has authorised the Common Seal of the University to be hereunto affixed

COMMON SEAL AFFIXED ON THIS FIRST DAY OF DECEMBER TWO THOUSAND AND TWENTY THREE

A116937352

Chancellor

Vice-Chancellor and President

This is a digital copy of a testamur for Charles Sturt University issued for the purposes of verifying the authenticity of a qualification. Charles Sturt University can only verify this document's authenticity as an original document issued by the university when it is viewed within the My eQuals platform.

NARLA

environmental

Eastern Sydney Office
Suite 2.01 4/10 Bridge St
Pymble
NSW 2073
Ph: (02) 9986 1295

Western Sydney Office
7 Twenty-Fifth Avenue
West Hoxton
NSW 2171
Ph: 0414314859

Hunter Valley Office
10/103 Glenwood Drive
Thornton
NSW 2322
Ph: 0414314859

Ph: 02 9986 1295

www.narla.com.au