



16 October 2020

Mr Jim Betts
Secretary
Department of Planning Industry and Environment
Locked Bag 5022, Parramatta NSW 2124

Attn: David Gibson, Team Leader Social Assessments

Dear Mr Betts

Request for Secretary's Environmental Assessment Requirements – for proposed Health Translation Hub at Randwick Hospitals Campus

Health Infrastructure NSW (**HI**) is the applicant for the proposed Health Translation Hub (**HTH**) at Randwick Hospitals Campus (the Project). The HTH forms an extension of the existing and proposed hospital facility the - Prince of Wales Hospital -Integrated Acute Services Building (**POW- IASB**), providing a specialist health-related research and education facility on the Randwick Hospitals Campus (**RHC**).

The proposal is State Significant Development (**SSD**) for the purposes of the *Environmental Planning and Assessment Act 1979 (EP&A Act)*, and Schedule 1, Clause 14(a) of the *State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP)* as it involves development for the purposes of a health services facility with a capital investment value in excess of \$30 million.

The purpose of this letter is to request the Secretary's Environmental Assessment Requirements (**SEARs**) in accordance with Section 5.15 of the EP&A Act and Clause 3 of Schedule 2 of the *Environmental Planning and Assessment Regulation 2000 (EP&A Regulation)* for the preparation of an Environmental Impact Statement (EIS).

1. Background

The proposed HTH will be located on the corner of High Street and Botany Road, Randwick. A partnership agreement has been established between Health Administration Corporation (**HAC**) and the University of New South Wales (**UNSW**) to develop the HTH. This partnership will also allow UNSW to operate the building as well as manage its design and delivery.

The partnership is intended to bring together educational and medical researchers, clinicians, educators and public health officials to drive excellence, and support the rapid translation of research, innovation and education into improved patient care. It will strengthen the symbiotic relationship between UNSW and the Randwick Hospitals Campus and its research institutes and broader health partners which form part of the Randwick Health and Education Precinct (**RHEP**).

The HTH will build on the existing affiliation between UNSW and Sydney Children's Hospital, Randwick, Sydney; Health Infrastructure; and South Eastern Sydney Local Health District, including Prince of Wales Hospital, The Royal Hospital for Women and Eastern Suburbs Mental Health Services.

2. Site Description and Location

The site is located approximately 6 kilometres (km) from the Sydney Central Business District (CBD), within the Randwick Local Government Area (LGA). It is located approximately 4km from Sydney Airport. **Figure 1** provides a regional context map of the site showing its location in relation to the Sydney CBD and surrounding centres.

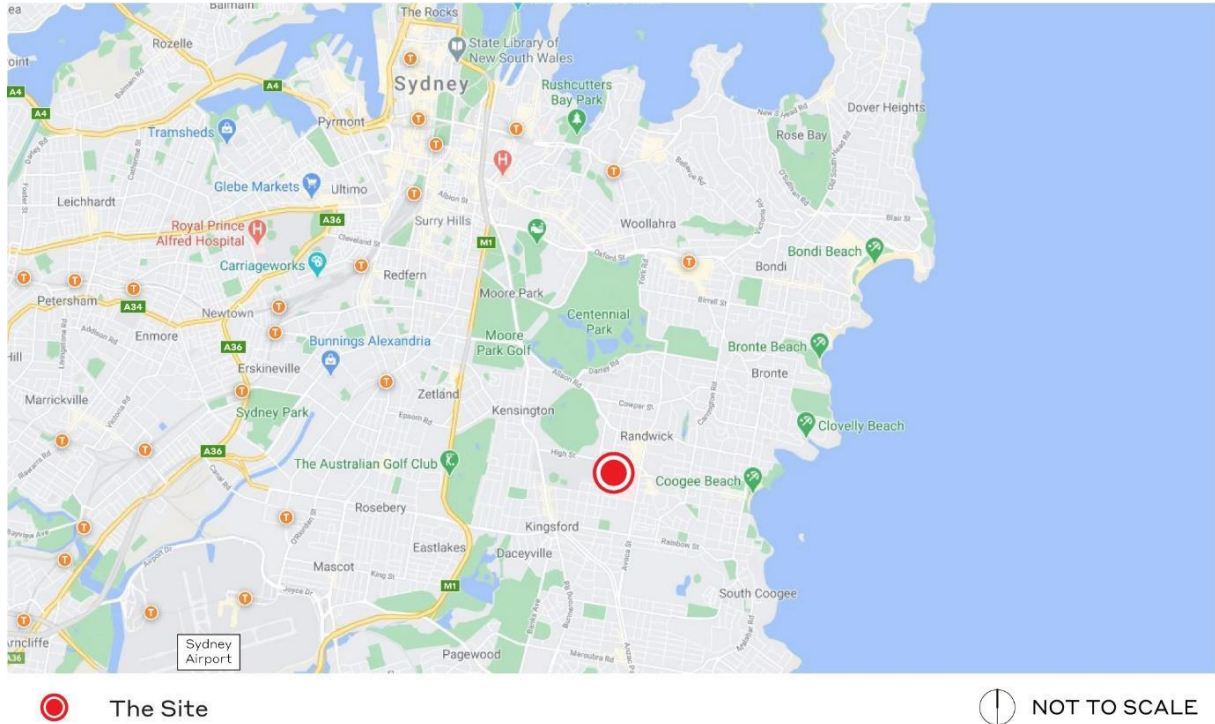


Figure 1: Regional context map (Source: Google Maps and Ethos Urban)

The site forms part of the South East Sydney Local Health District (**SESLHD**), which is one of 19 Local Health Districts and Speciality Health Networks in NSW. The SESLHD covers the LGAs of Woollahra, Waverley, Randwick, Botany Bay, the City of Sydney, Lord Howe Island, Rockdale, Kogarah, Hurstville and Sutherland (Figure 2).



Figure 2: SESLHD Catchment (Source: NSW Health)

2.1. The Site

The site is located on the corner of High Street and Botany Road, within the Randwick LGA. It forms the north-west portion of the block bound by High Street to the north, Hospital Road to the east, Magill Street to the south and Botany Street to the west.

This block sits in between the existing Prince of Wales Hospital and the UNSW Kensington Campus, and directly adjacent to the CBD and South East Light Rail service which runs along High Street (**Figure 3**).

The site of the proposed HTH has an area of 8,897square metres (sqm).

The HTH site has been cleared and is devoid of any development or vegetation. It has been subject to some site preparation and early works associated with the broader development of the block. Adjacent to the site, along the High Street and Botany Road frontages, runs a 6-metre (m) wide stormwater and sewage easement.

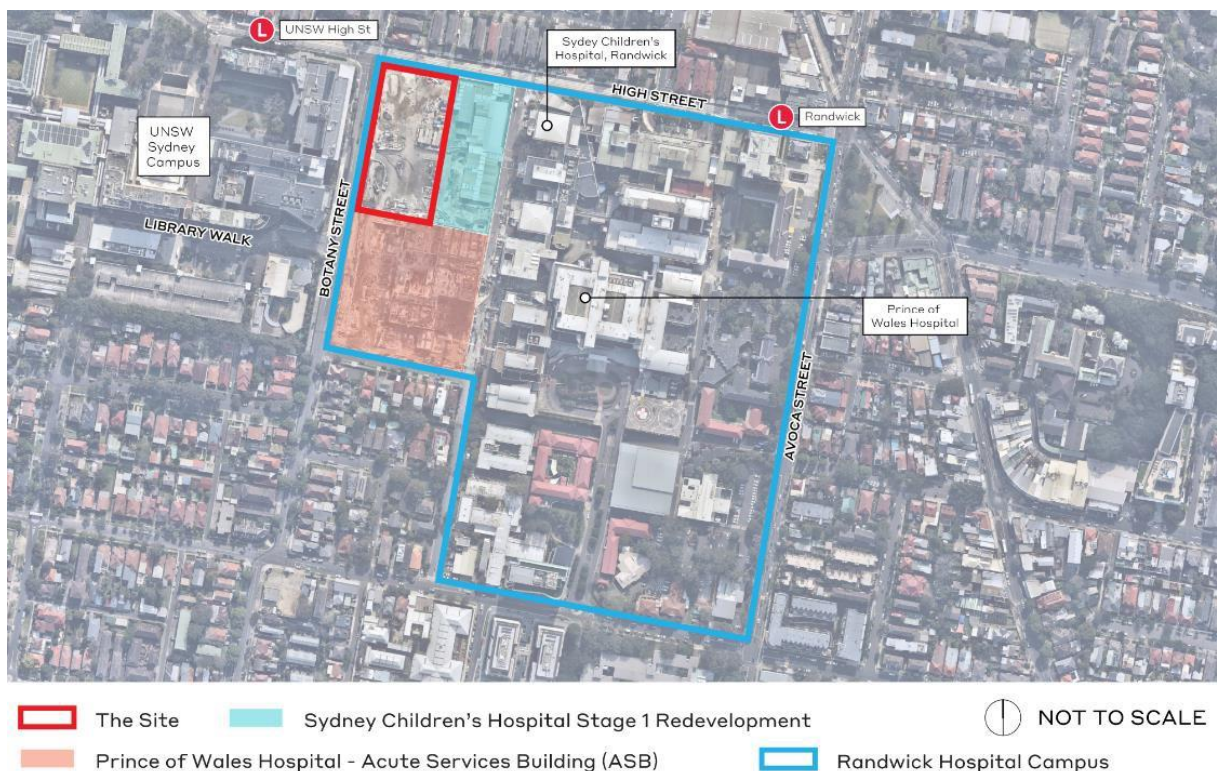


Figure 3: Site aerial (Source: Nearmaps and Ethos Urban)

3. The Project

The proposal involves the expansion of POW-IASB to provide ancillary health research and education uses. This will be in the form of a single building which will be physically connected (at podium level) to the neighbouring Stage 1 SCH1/CCCC redevelopment.

Health Infrastructure on behalf of HAC is the applicant for the HTH, which will be delivered with UNSW, to allow the University to integrate education and research to deliver translational medicine benefits, and to translate medical research and innovation into improved patient care.

Preliminary envelope drawings are provided at **Figures 4 – 7 (Attachment 1)**. The anticipated scope of the SSD Application (SSDA) includes:

- Relevant site preparation, excavation and enabling works.
- Construction and use of a new, 15-storey (RL 124.80) building and link bridge accommodating research and education uses, comprising:

One basement level; and

A total GFA of 35,600sqm, including health-related research, education and administrative floor space.

- Landscaping and public domain works, including the creation of a new public domain / plaza within the eastern portion of the site, sitting between the HTH and the Stage 1 SCH1/CCCC redevelopment.
- Services and utilities augmentation as required.

3.1. Cost of Works

The project will have a capital investment value in excess of \$30 million. In accordance with Schedule 1, cl 14(a) of SEPP SRD the proposal is SSD for the purposes of the EP&A Act.

3.2. Operation and Function of the HTH

The HTH will be a 35,600 sqm expansion of the Randwick Hospitals Campus which includes the POW-IASB (currently under-construction) to accommodate new health related education, research, and administrative facilities. It will include:

- Purpose-built spaces for health educators and researchers to work alongside clinicians;
- An education hub, including education and training rooms allowing hospital staff to educate and train UNSW medical students;
- Spaces for internal hospital seminars and clinician training events;
- Clinical schools for the Women's and Children's Health, Psychiatry and Prince of Wales Hospital;
- Ambulatory care clinics;
- Link bridge between UNSW Kensington Campus and the Randwick Health Campus; and
- Supporting facilities including retail premises.

These uses provide health, education and research facilities for the Randwick Hospitals Campus, and they are consistent with the scope of uses identified under the definition of a *hospital* in the Standard Instrument.

Specifically, the Standard Instrument defines a hospital as follows (**our emphasis**):

hospital means a building or place used for the purpose of providing professional health care services (such as preventative or convalescent care, diagnosis, medical or surgical treatment, psychiatric care or care for people with disabilities, or counselling services provided by health care professionals) to people admitted as in-patients (whether or not out-patients are also cared for or treated there), and includes ancillary facilities for (or that consist of) any of the following—

- (a) day surgery, **day procedures or health consulting rooms,***
- (b) accommodation for nurses or other health care workers,*
- (c) accommodation for persons receiving health care or for their visitors,*
- (d) shops, kiosks, restaurants or cafes or take away food and drink premises,*
- (e) patient transport facilities, including helipads, ambulance facilities and car parking,*
- (f) educational purposes or any other health-related use,***
- (g) research purposes (whether or not carried out by hospital staff or health care workers or for commercial purposes),***
- (h) chapels,*
- (i) hospices,*

(j) *mortuaries.*

A hospital can include ancillary facilities for a range of uses, including health consulting rooms, education and research purposes. The HTH is therefore defined as a hospital in accordance with the Standard Instrument.



Figure 4: Proposed HTH, west elevation (Source: Architectus)

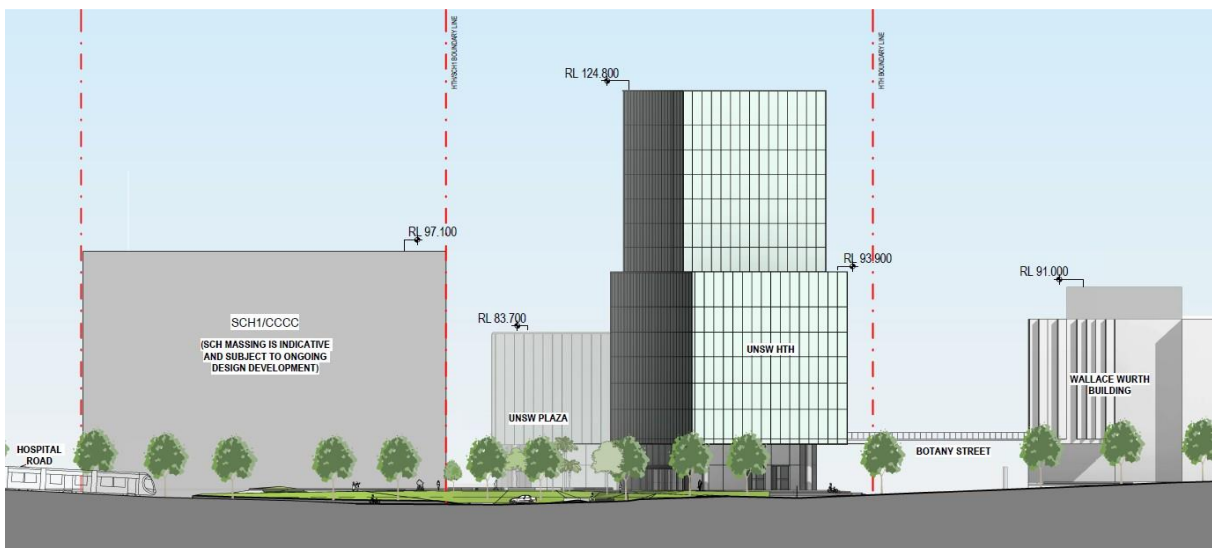


Figure 5: Proposed HTH, north elevation (Source: Architectus)

4. Planning Framework

4.1. Strategic Planning Context

The following strategic planning documents are relevant to the proposal and will be subject to consideration and assessment as part of the SSDA. Those of key significance are discussed under the relevant subheadings.

- NSW State and Premier Priorities;
- The State Infrastructure Strategy 2018;
- The Greater Sydney Region Plan - A Metropolis of Three Cities;
- The Eastern District Plan;
- Future Transport 2056;
- Healthy Urban Development Checklist, NSW Health; and

- Better Placed – An integrated design policy for the built environment of NSW 2017.

4.1.1. The Greater Sydney Region Plan

Objective 5 and Action 1 of the Greater Sydney Region Plan speak to the identification, prioritisation and delivery of collaboration areas. These areas are identified due to their metropolitan significance and ability to grow into centres of heightened productivity and innovation. The site is located within the Randwick Health and Education Precinct, which forms part of the Randwick Collaboration Area (**Figure 6**).

The overarching vision is to support the transition of the Randwick Health and Education Precinct and broader Randwick Collaboration Area into a future innovation district through a ‘maturity pathway’, which sees the evolution and conglomeration of health and education uses (**Figure 7**).

The proposal is on land identified for future expansion (refer to Figure 6), and is consistent with the type of uses expected in the Randwick Health and Education Precinct. It will support the clustering of educational, medical and research uses in line with the existing hospital and University campuses.



1	Kensington Town Centre	5	UNSW Randwick Campus	9	The Spot
2	Kingsford Town Centre	6	Future Campus Expansion		Light rail and stations (under construction)
3	TAFE NSW Randwick	7	Randwick Hospitals' Campus		Collaboration Area
4	UNSW Kensington Campus	8	Randwick Junction Town Centre		Health and Education Precinct (core activity)

Figure 6: Randwick Collaboration Area Key Sites Map (with the site identified with purple circle)(Source: Randwick Place Strategy, Greater Sydney Commission)

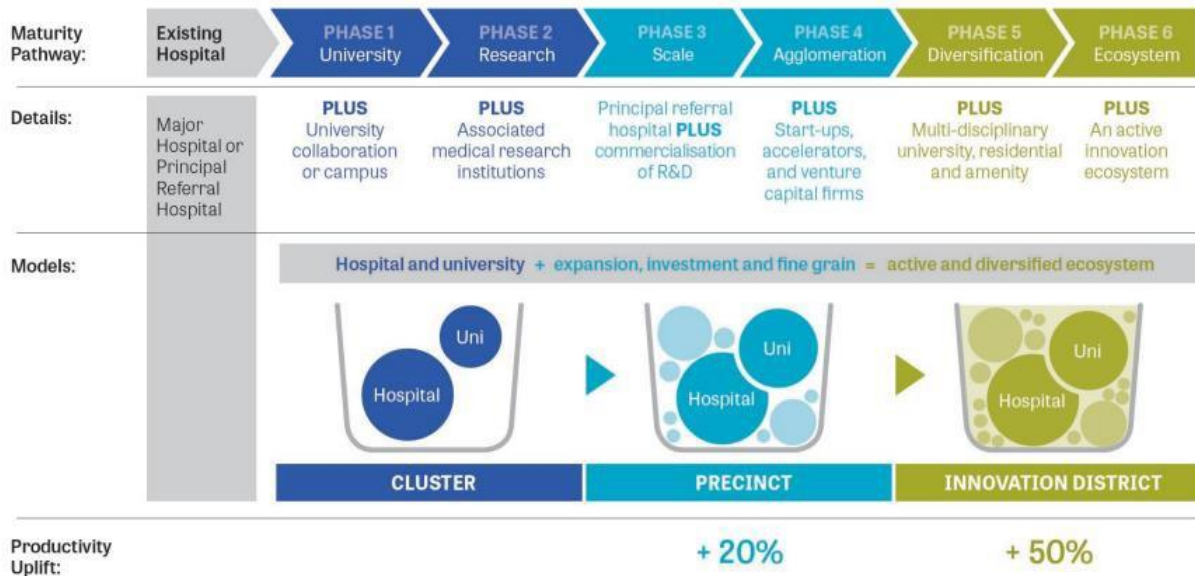


Figure 7: Maturity pathway for health and education precincts(Source: Randwick Place Strategy, Greater Sydney Commission)

4.1.2. Eastern City District Plan

The Eastern City District Plan sets out the strategic direction for the Eastern District and reflects the priorities outlined in A Metropolis of Three Cities. The key planning priorities in the District Plan that are relevant to the proposal are:

Planning Priority E1 – Planning for a city supported by Infrastructure

Aligning land use and infrastructure planning ensures that infrastructure is maximised, and that growth and infrastructure provision are aligned. The development of 35,600sqm of health-related GFA is aligned with additional public transport capacity that has been delivered by the State Government in the form of the Sydney CBD and South East light rail service.

Planning Priority E8 – Growing and investing in health and education precincts and the Innovation Corridor.

The proposal will support the diversification and expansion of the Randwick Health and Education Precinct and provide health-related floor space that will contribute to Randwick’s job targets (which sit between 32,000 and 35,500 by 2036). It will also support the co-location of health, research and education related facilities which will to support the precinct’s growth, within a highly accessible location. The colocation of health and educational facilities will support the more efficient translation of education and research into patient care for patients within the Randwick Hospitals Campus.

Planning Priority E11 – Growing investment, business opportunities and jobs in strategic centres

The site is located in Randwick which is identified as a Strategic Centre (as well as a Health and Education Precinct). The provision of 35,600sqm of health-related GFA will support access to jobs in an identified Strategic Centre. Access to jobs is also supported (under Action 38) by quality and human-scale public domain spaces

and walkability. The proposal includes a high-quality public domain plaza which will support activation and vibrancy while strengthening pedestrian connections between the existing UNSW Kensington Campus to the west and the neighbouring Stage 1 SCH1/CCCC redevelopment on the Randwick Hospitals Campus.

Planning Priority E18 – Delivering High Quality Open space

The design of the proposal has been driven by the delivery of a new centrally positioned high-quality open space in the form of the plaza accessible to the public. It will significantly enhance the character of the proposal, and support site permeability and spaces for informal meeting.

4.2. Statutory Planning

The following legislation and Environmental Planning Instruments will be relevant considerations to the SSDA. Those under the following subheadings are of key relevance to the proposal.

- Environmental Planning and Assessment Act 1979;
- Environmental Planning and Assessment Regulation 2000;
- Biodiversity Conservation Act 2016;
- State Environmental Planning Policy (State and Regional Development) 2011;
- State Environmental Planning Policy (Infrastructure) 2007;
- State Environmental Planning Policy No 55—Remediation of Land;
- State Environmental Planning Policy No 33 – Hazardous and Offensive Development;
- State Environmental Planning Policy No 64—Advertising and Signage; and
- Randwick Local Environmental Plan 2012.

4.2.1. Environmental Planning and Assessment Act 1979

The EP&A Act establishes the assessment framework for SSD. Under Section 4.38 of the Act the Minister for Planning and Public Spaces is the consent authority for SSD. Section 4.12(8) requires that a development application for SSD is to be accompanied by an EIS in the form prescribed by the Regulations.

4.2.2. Biodiversity Conservation Act 2016

Section 7.9 of the *Biodiversity Conservation Act 2016* (BC Act) applies to development applications seeking consent under Part 4 of the EP&A Act for the purpose of SSD. A Biodiversity Development Assessment Report is required to accompany the SSD unless the Planning Agency Head and Environmental Agency head consider that the proposed development will not have an adverse impact to biodiversity values.

The site is currently devoid of vegetation and is not mapped as containing terrestrial biodiversity under the *Randwick Local Environmental Plan 2012*. For these reasons, our preliminary assessment considers that the proposal will not adversely impact the existing biodiversity value of the site.

This request for SEARs is therefore accompanied by a request to waive the requirement for a Biodiversity Development Assessment Report (**Attachment 2**).

4.2.3. State Environmental Planning Policy (State and Regional Development) 2011

The SRD SEPP identifies development which is declared to be State Significant. Clause 14 of Schedule 1 of the SRD SEPP provides that:

Hospitals, medical centres and health research facilities

Development that has a capital investment value of more than \$30 million for any of the following purposes—

- a) *hospitals,*
- b) *medical centres,*

- c) *health, medical or related research facilities (which may also be associated with the facilities or research activities of a NSW local health district board, a University or an independent medical research institute).*

The proposal represents an expansion of the Randwick Hospitals Campus and has an estimated CIV in excess of \$30 million. It will provide health, research and education facilities consistent with the Standard Instrument definition of a hospital. The proposal is therefore defined as a hospital and can be declared SSD.

4.2.4.State Environmental Planning Policy (Infrastructure) 2007

The Randwick Hospitals Campus is defined as a *hospital*. By definition, a *hospital* can also include ancillary facilities for health consulting rooms, education, and research purposes (whether or not the research is carried out by hospital staff or health care workers or for commercial purposes).

The Randwick Hospitals Campus is proposed to be expanded to include a new health, research and education facility. This facility (being the HTH) will be operated by UNSW to deliver translational medicine benefits, and to translate research and education back into the hospital through improved patient care. The HTH is defined as a hospital in accordance with the definition of a *hospital* under the Standard Instrument.

Development for the purpose of a *health service facility* (which includes hospitals) is permissible on the site by virtue of clause 57(1) of the Infrastructure SEPP.

The clause states that development for the purpose of a *health services facility* may be carried out by any person with consent on land in a prescribed zone. The site is zoned part R2 Low Density Residential and part R3 Medium Density Residential under the *Randwick Local Environmental Plan 2012* (Randwick LEP), both of which are listed as prescribed zones under the Infrastructure SEPP.

4.2.5.Randwick Local Environmental Plan 2012

The site is zoned part R2 Low Density Residential and part R3 Medium Density Residential under the Randwick LEP. The site is also subject to a part 15m (fronting High Street) and part 9m height limit, and a 0.5:1 FSR control applies to the southern portion of the site.

The proposal exceeds the provisions of the LEP. Irrespective of this, clause 5.12 permits the carrying out of any development by or on behalf of a public authority (irrespective of whether it is ordinarily prohibited or restricted under the LEP) if it can be carried out with or without consent under the Infrastructure SEPP.

As outlined in **Section 4.2.4**, the proposal is permissible with consent by virtue of clause 57(1) of the Infrastructure SEPP.

As the proposal is permissible with consent under the Infrastructure SEPP and because the owner and applicant is a public authority (being HAC and Health Infrastructure), clause 5.12 of Randwick LEP is applicable and can be used to exceed the development standards (i.e. height and floor space ratio) which would otherwise apply to development on the site.

5. Key Environmental and Planning Issues

Based on our preliminary environmental assessment, the following are the key environmental assessment issues that will need to be considered as part of the future SSDA.

5.1. Urban design, built form and streetscape

The EIS will address the height, density, bulk, and scale of the proposal within the context of the locality. The EIS will be supported by a Design Report which will set out the massing and built form outcome proposed for the site. It will:

- Outline the design rationale which has driven the arrangement and positioning of the building in line with the site's constraints and opportunities, the streetscape and proposed internal vehicular arrangements;
- Demonstrate how the proposal integrates with the surrounding environment and how the form, layout and siting of development achieves appropriate design and amenity outcomes for users of the site and occupants of surrounding development;

- Include a series of architectural and landscape plans, and massing diagrams to demonstrate the building envelope, its height, bulk and scale and positioning (setbacks) from the boundaries of the site and surrounding development; and
- Consider the design in relation to the existing transport network (including light rail, roads, pedestrian, and cycleways).

5.2. Traffic and transport

There is no dedicated car parking proposed in the basement. Only service vehicles will have access to the basement. Vehicle parking demands will be accommodated within existing car parking areas within the UNSW Kensington Campus.

A Transport Assessment will be submitted as part of the EIS, which will include analysis to determine current vehicle (daily and peak), public transport, pedestrian and bicycle movements. This will include an analysis of the provision of staff and visitor car parking and an assessment of existing and future transport needs.

The assessment will consider service vehicle access and egress from the site, and also consider any potential cumulative traffic and intersection impacts associated with the broader redevelopment of the block. Measures to mitigate any associated traffic impacts will also be detailed.

5.3. Heritage

Archaeological and Aboriginal heritage will be assessed as part of the SSDA. A Statement of Heritage Impact will be submitted if the site and its surrounds are considered to hold, or have the potential to hold, archaeological or Aboriginal heritage significance. Given the site is within a block that has already been subject to site preparation and early works, it has already been subject to a heritage assessment, heritage investigations, and discovery. Pending further heritage advice, there is potential develop the site in accordance with the Unexpected Finds Protocol already operating within the broader block.

5.4. Visual impact

The proposed building envelope will be visible from adjoining dwellings (particularly to the north across High Street) and the surrounding public domain. An assessment of visual impact from the public domain will be prepared and submitted as part of the EIS.

5.5. Noise and vibration

The EIS will be accompanied by a Noise and Vibration Impact Assessment to assess the noise and vibration impacts associated with the construction and operation (including traffic) of the proposal, both individually and in the context of existing and surrounding development. Relevant noise mitigation and managements measures (if required) to reduce noise and vibration caused by the proposal will also be detailed.

5.6. Infrastructure and services

The EIS will assess the impact the proposal will have on existing utility services and service provider assets surrounding the site. The infrastructure requirements and augmentation needed (on and off site) to support the development will also be outlined and assessed in detail.

5.7. Contamination

Preliminary site investigations have been undertaken across the block and further investigations are currently being carried out across the subject site. The findings will be provided in Stage 1 Preliminary Site Investigation Report with the SSD.

5.8. Drainage and stormwater

An assessment of stormwater and drainage will be prepared and submitted with the EIS. The assessment will detail measures to minimise any impacts on water quality, and will detail proposed drainage with respect to any downstream properties.

5.9. Geotechnical conditions

A Geotechnical Assessment will be prepared and submitted with the EIS. It will identify existing ground conditions and the implications for construction of the proposal.

5.10. Construction management

Construction management is expected to be complex given the concurrent development anticipated to the immediate east, and the current development under construction to the immediate south of the site. A Construction Management Plan will be submitted with the EIS. It will detail the proposed construction hours and management measures required to mitigate any construction impacts associated with the proposal.

5.11. Environmentally sustainable development

An ESD Report will be submitted with the EIS. It will outline how ESD principles will be incorporated into the design and ongoing operation of the development.

5.12. Site suitability

The EIS will be supported by a detailed assessment on the suitability of the site for the proposal. This will consider existing site conditions and context, as well as future conditions and context of the site within the broader Randwick Health and Education Precinct.

5.13. Social and economic impacts

The social and economic impacts resulting from the proposal will be detailed in the EIS. Anticipated social and economic benefits include:

- significantly improved health facilities for the community;
- creation of construction and operational jobs;
- direct and indirect benefits to the local economy; and
- enhancement of the visual amenity of the health and education precinct through development of well-designed, high quality buildings and associated facilities, along with significant landscaping.

5.14. Waste management

A detailed Waste Management Plan will be prepared and submitted with the EIS. It will outline the anticipated quantities and streams of waste generated by the proposal during construction and operation, and the intended management of waste in terms of storage, removal off-site and disposal.

5.15. Air quality

The air quality impact caused by the construction and operation of the proposal to surrounding sensitive receivers will be subject to assessment under the EIS. Mitigation and management measures to reduce the proposal's impact to adverse air quality will also be identified where relevant.

6. Consultation Undertaken

In preparing the EIS, a Communication Strategy will be developed to detail the consultation activities undertaken in preparation of the EIS. Consultation with the following key stakeholders and government agencies will be undertaken:

- Community, including surrounding landowners, UNSW staff and students;
- Sydney Light Rail;
- Randwick City Council;
- South East Sydney Local Health District;
- NSW Government Architect, through the State Design Review Panel (SDRP); and
- Transport for NSW.

A meeting was held with the NSW Government Architect, through the SDRP, on 29 July 2020. At that early stage, the urban design principles underpinning the proposal were supported. The SDRP also provided recommendations for information to include in the first SDRP review session. The second session with the SDRP will be held in late October.

7. Request for SEARs

On the basis that the proposal meets the criteria identified in Schedule 1 Clause 14(a) of the State and Regional Development SEPP, Health Infrastructure formally requests that the Planning Secretary issue the SEARs to facilitate the preparation of the EIS for the proposed Health Translation Hub at the Randwick Hospitals Campus.

Should you have any queries, please do not hesitate to contact Claire Muir, Senior Town Planning Advisor on 0422 379 612.

We would be happy to meet with your Department to discuss the proposal at any time.

Yours sincerely,

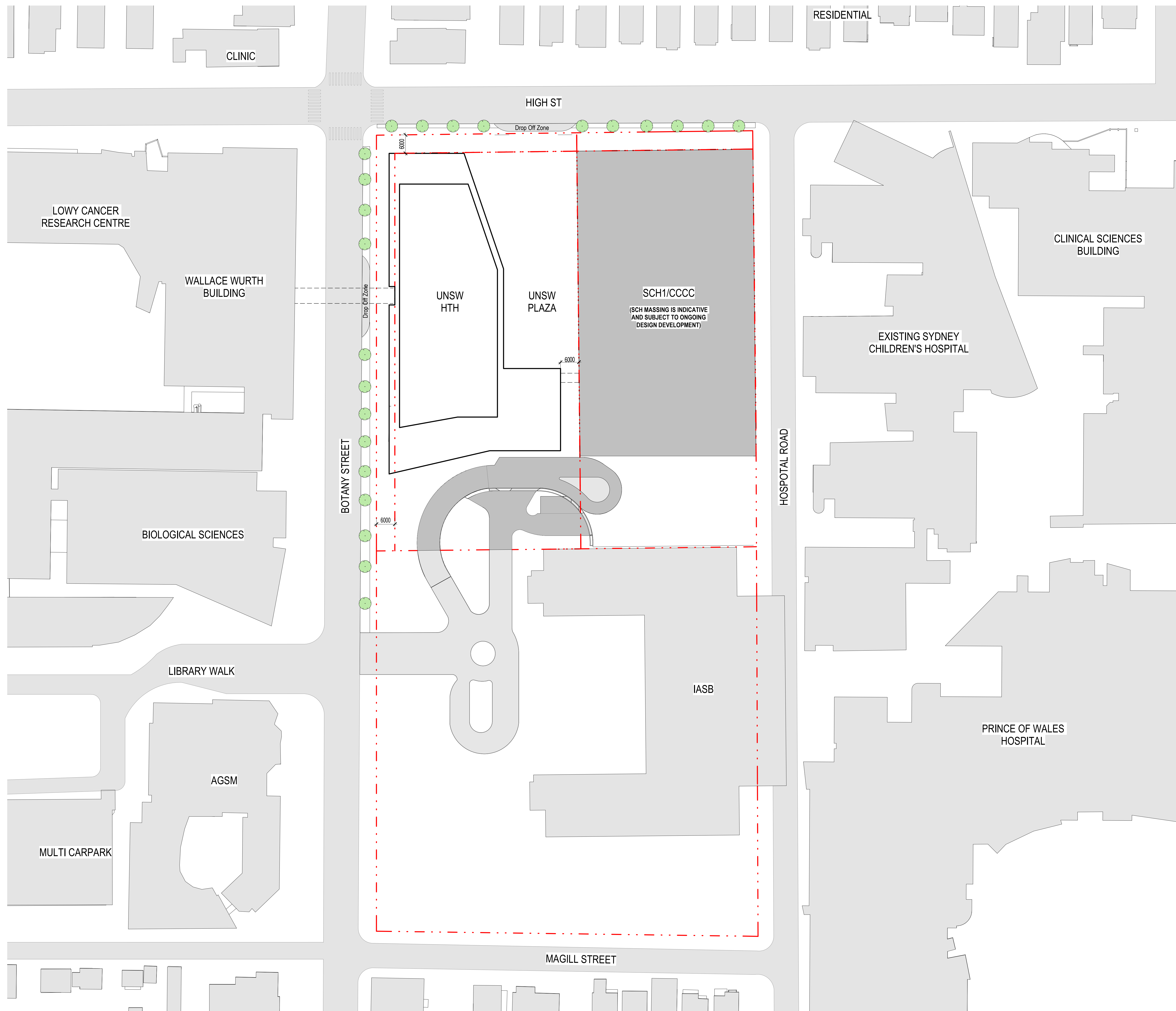


Rebecca Wark

Chief Executive, Health Infrastructure

Attachment 1 – Massing diagrams

Attachment 2 – Request to Waiver Biodiversity Assessment Requirements



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Nominated Architect
Ray Brown, NSWARB 6359

Do not scale drawings. Verify all dimensions on site.

issue	amendment	date
A	Concept Design Issue	10.09.20

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Sydney
Melbourne
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Perth
Auckland
Christchurch
Brisbane

project: UNSW HTH

drawing: Proposed Site Plan

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drawn: TH

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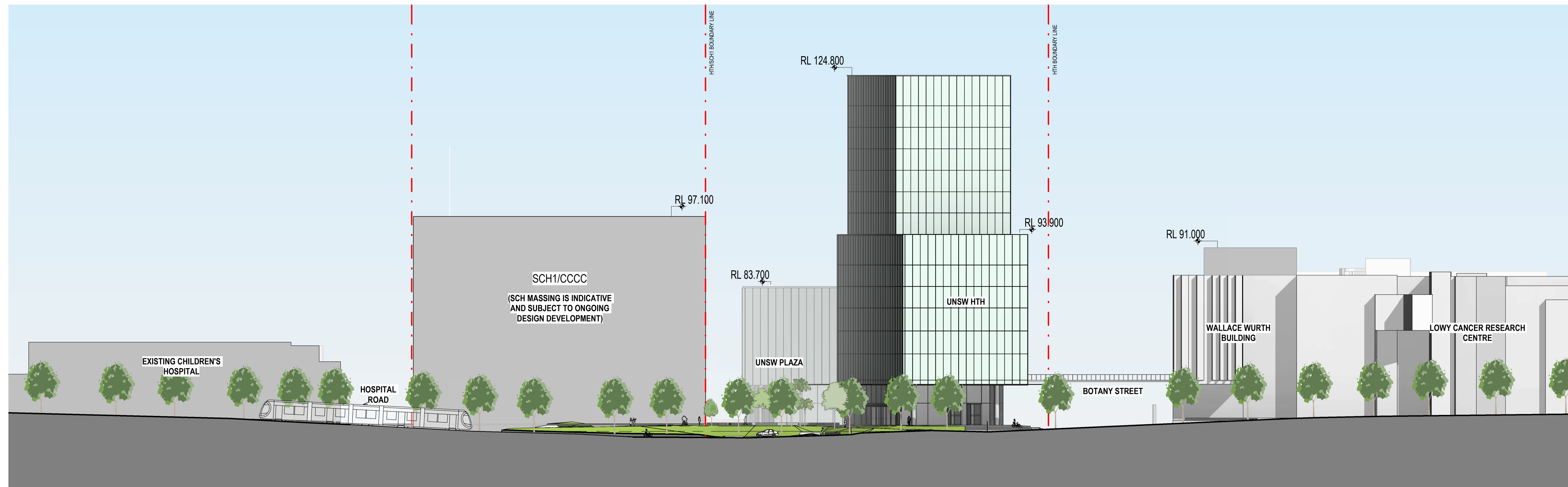
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issue	amendment	date
A	Concept Design Issue	10.09.20



project **UNSW HTH**

drawing **North Elevation**

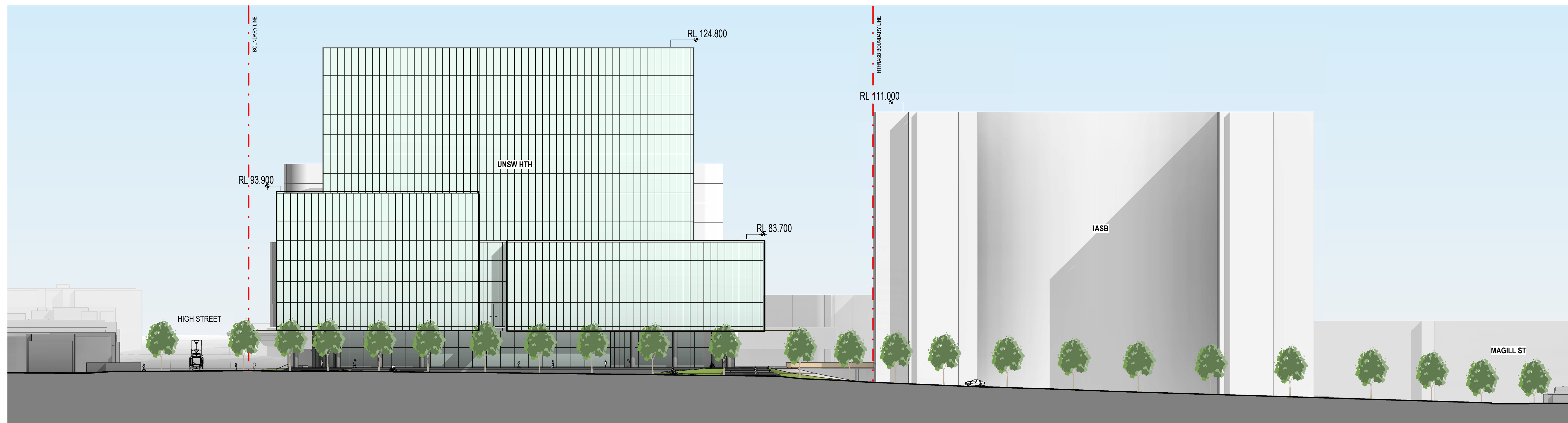
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project no **190551.00** **A**

issue	amendment	date
A	Concept Design Issue	10.09.20



14 September 2020

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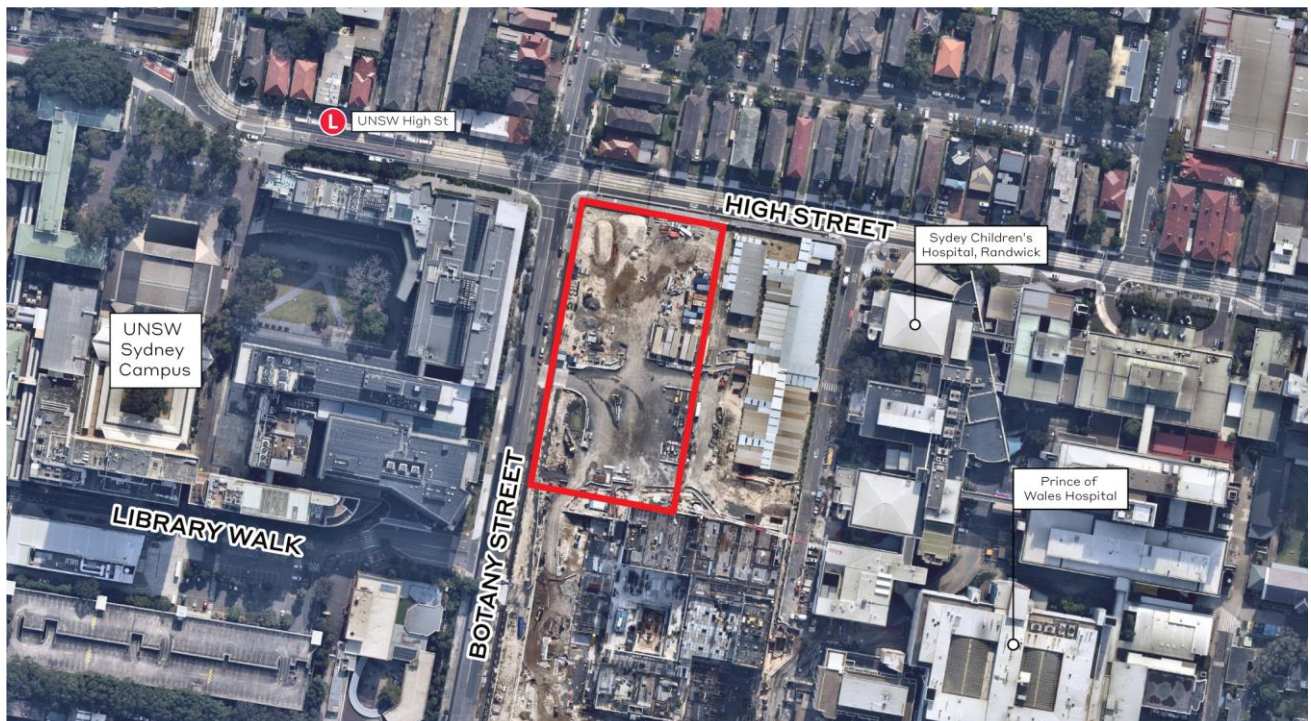
Jim Betts
Secretary
NSW Department of Planning, Industry and Environment
4 Parramatta Square, 12 Darcy Street,
PARRAMATTA NSW 2150

Dear Mr Betts,

**RE: BIODIVERSITY ASSESSMENT WAIVER REQUEST
HEALTH TRANSLATION HUB AT RANDWICK HOSPITALS CAMPUS**

This Biodiversity Assessment Waiver Request has been prepared on behalf of Health Infrastructure NSW regarding the proposed Health Translation Hub (HTH). The HTH forms an extension of the existing and proposed hospital facility the - Prince of Wales Hospital -Integrated Acute Services Building, providing a specialist health-related research and education facility on the Randwick Hospital Campus.

The proposed development is located within the Randwick Local Government Area on land bound by High Street to north, Hospital Road to the east, Magill Street to the south and Botany Road to the west. The land is devoid of any vegetation and it has been subject to site preparation and early works associated with the broader redevelopment for the block (refer to **Figure 1**).



 The Site

 NOT TO SCALE

Figure 1 – Site aerial

Source: Nearmaps and Ethos Urban

Section 7.9 of the *Biodiversity Conservation Act 2016* applies to development applications seeking consent under Part 4 of the EP&A Act for the purpose of SSD. A Biodiversity Development Assessment Report is required to accompany the SSD unless the Planning Agency Head and Environmental Agency head consider that the proposed development will not have an adverse impact to biodiversity values.

On 12 January 2018, the (former) Department of Planning and Environment advised that in instances where it is believed that such an application is not required, a waiver should be requested from the Department prior to lodgement of the application. Such a waiver request should contain sufficient evidence to determine whether the proposed development is likely to have a significant impact on biodiversity values including a specific assessment against the relevant Biodiversity Values contained at Clause 1.5 of the *Biodiversity Conservation Act 2016* and Clause 1.4 and Clause 6.1 of the *Biodiversity Conservation Regulation 2017*.

A specific assessment of the proposal against the relevant biodiversity values has been provided in **Table 1**. From the assessment in **Table 1**, and given the fact that the land is devoid of any vegetation and has already been subject to site preparation and early works associated with the broader renewal of the block, it is considered that the land does not have biodiversity value and the proposed development will not cause a significant impact on the biodiversity values on the land.

Table 1 - Assessment of the proposed HTC against the relevant biodiversity values

Biodiversity Conservation Act 2016 – Clause 1.5	
<i>(a) vegetation integrity – being the 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</i>	The land is significantly altered and does not contain vegetation or habitat. It has already been subject to site preparation and early works associated with the wider renewal of the block.
<i>(b) habitat suitability – being the degree to which the habitat needs of threatened species are present at a particular site</i>	
<i>(c) biodiversity values, or biodiversity-related values, prescribed by the regulations</i>	This waiver request has considered values contained within the <i>Biodiversity Conservation Act 2016</i> , as well as the values prescribed by the <i>Biodiversity Conservation Regulation 2017</i> . The land is currently a construction zone and does not contain any vegetation or biodiversity value.
Biodiversity Conservation Regulation 2017 – Clause 1.4	
<i>(a) threatened species abundance – being the occurrence and abundance of threatened species or threatened ecological communities, or their habitat at a particular site</i>	The land is located within an urban area. The land has been cleared of all vegetation and does not contain any threatened species.
<i>(b) vegetation abundance – being the occurrence and abundance of vegetation at a particular site</i>	The land is located within an urban area and has been cleared. The land does not contain an abundance of vegetation.
<i>(c) habitat connectivity – being the degree to which a particular site connects different areas of habitat of threatened species to facilitate the movement of those species across their range</i>	The land is located within an urban area and is surrounded by built development. It is devoid of vegetation and does not connect to other areas of habitat.
<i>(d) threatened species movement – being the degree to which a particular site contributes to the movement of threatened species to maintain their lifecycle</i>	The land is located within an urban environment. It has been cleared of all vegetation and does not facilitate the movement of threatened species.
<i>e) flight path integrity – being the degree to which the flight paths of protected animals over a particular site are free from interference</i>	The site has been cleared of all vegetation. There is no indication that the flight paths of any protected species will be interfered with by the proposal.
<i>(f) water sustainability – being the degree to which water quality, water bodies and hydrological processes sustain threatened species and threatened ecological communities at a particular site</i>	The proposed development will not result in any adverse impacts on water bodies surrounding the land.
Biodiversity Conservation Regulation 2017 – Clause 6.1	

<p>(1) The impacts on biodiversity values of the following actions are prescribed (subject to subclause (2)) as biodiversity impacts to be assessed under the biodiversity offsets scheme:</p> <p>(a) the impacts of development on the following habitat of threatened species or ecological communities:</p> <p>(i) karst, caves, crevices, cliffs and other geological features of significance,</p> <p>(ii) rocks,</p> <p>(iii) human made structures,</p> <p>(iv) non-native vegetation,</p>	<p>The land is being developed, within the context of a highly urbanised environment. It does not contain habitat for threatened species or ecological communities which would be adversely affected by the HTH. The land has been cleared and levelled and does not contain any significant geological features of significance, rocks, human made structures and or native vegetation which would be adversely impacted by the HTH.</p>
<p>(b) the impacts of development on the connectivity of different areas of habitat of threatened species that facilitates the movement of those species across their range,</p>	<p>The land has been cleared of all vegetation. It does not contain any threatened species and does not connect to other areas of threatened species habitat. The proposed development will not therefore impact the movement of threatened species.</p>
<p>(c) the impacts of development on movement of threatened species that maintains their lifecycle,</p>	
<p>(d) the impacts of development on water quality, water bodies and hydrological processes that sustain threatened species and threatened ecological communities (including from subsidence or subsidence resulting from underground mining or other development),</p>	<p>The proposed development is on land that does not contain threatened species. As such, there will be no impact on water quality, water bodies and hydrological processes that sustain threatened species and threatened ecological communities.</p>
<p>(e) the impacts of wind turbine strikes on protected animals,</p>	<p>N/A. No wind turbines are proposed on the land.</p>
<p>(f) the impacts of vehicle strikes on threatened species of animals or on animals that are part of a threatened ecological community.</p>	<p>The land does not contain threatened species or animals that are part of a threatened ecological community. They will not therefore be impacted by vehicle strikes.</p>

Should you like to discuss this matter, please do not hesitate to contact me on 02 9409 4991 or at aantoniazzi@ethosurban.com.

Yours sincerely,



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