



**GREATER  
SYDNEY  
PARKLANDS**

# **REVIEW OF ENVIRONMENTAL FACTORS**

## **Centennial Park Ranger's Residence**

**March 2024**

**Centennial Park and Moore Park Trust**



# Review of Environmental Factors Report

Centennial Park and Moore Park Trust

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## Change of Use of Ranger's Residence



March 2024

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## Acknowledgement of Country

Greater Sydney Parklands acknowledges the Dharawal and Gadigal People as the traditional custodians of the Land, Sky and Waters where the Parklands are located.

As part of the Parklands role in Caring for Country, we walk alongside our Aboriginal communities, journeying together as we care for and learn from Country.



## Document Control Register

Version	Date	Changes since last version	Pages
1.0	22.01.2024	Not applicable – initial version	Various
2.0	08.02.2024	GSP edits – BCA/heritage issues	Various
3.0	11.03.2024	Updates by HM	Various
4.0	26.03.2024	GSP edits – revisions to proposal/assessment and conditions, TOC	Various

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## Decision Statement

This Review of Environmental Factors (REF) has been prepared by Helen Mulcahy Urban Planning Pty Ltd on behalf of the Centennial Park and Moore Park Trust to take into account all matters affecting, or likely to affect the environment as a result of the proposed change of use of the Ranger's Residence at Centennial Park from short-term residential to commercial use.

The REF has been prepared in accordance with the *Environmental Planning and Assessment Act 1979*, *Environmental Planning and Assessment Regulation 2021*, and the relevant provisions of the *Environment Protection and Biodiversity Conservation Act 1999*, *Heritage Act 1977*, and *State Environment Planning Policy (Transport and Infrastructure) 2021, Chapter 2*.

This REF addresses all matters affecting, or likely to affect the environment as a result of the proposed activity and provides a true and fair review in relation to its potential effects on the environment. The information contained in this REF is neither false nor misleading and contains all available information that is relevant to the environmental assessment of the proposed activity.

It is concluded that by adopting mitigation measures identified in Section 7 to eliminate, minimise or manage environmental impacts, the proposed activity:

- a. is not likely to have a significant impact on the environment, therefore an Environmental Impact Statement is not required;
- b. the proposed activity will not be carried out in a declared area of outstanding biodiversity value and is not likely to significantly affect threatened species, populations or ecological communities, or their habitats or impact biodiversity values, meaning a Species Impact Statement and/or BDAR is not required;
- c. is not likely to affect any Commonwealth land, or significantly affect any matters of National Environmental Significance.

Subject to implementation of the mitigation measures identified in Section 7 the proposed activity is recommended for approval.

The proposed activity does not require publication of the REF in accordance with clause 171(4) of the EP&A Regulation.

**Prepared by:** Helen Mulcahy, Director Helen Mulcahy Urban Planning Pty Ltd

**Qualifications:** Diploma in Town & Country Planning, Charles Sturt University

**Signature:**




**Date:** 18 March 2024

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## Certification


I certify that I have reviewed and endorsed the contents of this REF document and, to the best of my knowledge, it is in accordance with the EP&A Act, the EP&A Regulation and the Guidelines approved under clause 170 of the EP&A Regulation, and the information it contains is neither false nor misleading.

Endorsed by:	Kerrie Symonds
Qualifications	BTP (Hons 1) , M Comm (Land Ec), MBA (Tech Mgt)
Signature	
Date	26 March 2024

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## Determination

Having regard to the Review of Environmental Factors and all supporting technical documentation for the project addressing matters under Division 5.1 of the *Environmental Planning and Assessment Act 1979*, I accept this REF on behalf of the Centennial Park and Moore Park Trust, as the determining authority, and determine that the proposed activity is approved and may proceed subject to mitigation measures in Section 7.0 being implemented.

<b>Trust Delegated Officer:</b>	Callantha Brigham
Position	Director Strategy, Design and Delivery
Signature	
Date	2 April 2024

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## Executive Summary

This Review of Environmental Factors (REF) has been prepared by Helen Mulcahy Urban Planning Pty Ltd on behalf of the Centennial Park and Moore Park Trust to take into account all matters affecting, or likely to affect the environment as a result of the proposed change of use of the Ranger's Residence at Centennial Park from short-term residential to commercial use.

The Ranger's Residence is located at Martin Road, Centennial Park, being Lot 1723 DP 45644. It is located near the western boundary of Centennial Park, approximately 150 metres southeast of the Robertson Road Gates. The residence has an internal area of 113m<sup>2</sup>.

It is proposed to change the use of the premises from the existing short-term residential purposes to commercial purposes (the Activity). This may include private offices (e.g. architects, solicitors or other professionals). CPMPT then proposes to offer the premises for lease for commercial purposes, which will provide a revenue stream to assist with the ongoing maintenance of the premises.

The REF includes an assessment of the potential environmental impacts associated with the proposed Activity and relies on technical advice from a heritage consultant and a BCA consultant.

The occupants of the adjoining Martin Road and Roberston Road residential area were notified of the proposed activity. Three submissions were received raising concerns regarding the proposed commercial use including noise, traffic and parking and security. Responses to the issues raised in the submissions are provided in Section 5 of this REF.

There are no separate approvals, authorisations or notifications required in relation to the proposed activity prior to determination under Part 5 of the EP&A Act or under any other Acts.

It is concluded that when carried out in accordance with the environmental mitigation measures outlined in the REF, the proposed Activity will not result in any significant and long-term negative impacts on the environment and can proceed, subject to the implementation of mitigation measures identified in Section 7.



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# 1. Introduction

## 1.1. Proposed Activity

This Review of Environmental Factors (REF) has been prepared by Helen Mulcahy Urban Planning Pty Ltd for the Centennial Park and Moore Park Trust (CPMPT) to take into account all matters affecting, or likely to affect the environment as a result of the proposed change of use of the Ranger's Residence, located near the Martin Road frontage of Centennial Park, from short term residential to commercial (e.g. professional private offices – architects, engineers, solicitors and the like).

The CPMPT is both the proponent and the determining authority under Part 5 Division 5.1 of the *Environmental Planning and Assessment Act 1979* for the proposed activity. Greater Sydney Parklands Trust (GSP) has responsibility for all functions of CPMPT under the *Centennial Park and Moore Park Trust Act 1983* (CPMPT Act).

## 1.2. Proposal Background

The CPMPT Act together with the *Centennial Parklands Plan of Management: 2018 and beyond* (Plan of Management) guide the use, development, activities and management and operation of the park. The Plan of Management guides and informs a range of more detailed plans and policies including master plans, Conservation Management Plan, Environmental Policy and Management System, Tree Management Plan and Transport Access and Parking Plan.

CPMPT proposes to offer the premises for lease for commercial purposes, including office space or consultation rooms, which necessitates a change of use from the existing short-term residential purposes. This REF addresses the change of use of the premises. Any fit-out works to the building associated with the future use (which because of the State Heritage listing are very limited), will be the subject of a separate assessment by CPMPT, guided by specialist heritage and BCA advice.

The Centennial Parklands Plan of Management: 2018 (PoM) is the overarching strategic planning document that guides and informs a range of more detailed plans and policies for the day to day planning, design and management of the Parklands. The proposed change of use is demonstrably consistent with the strategic priorities set out in the PoM, together with the suite of supporting strategic plans and documents, including the Centennial Park Master Plan 2040 and the Conservation Management Plan for the Ranger's Cottage (GAO, 2009). Further discussion in this regard is included at Section 4.7 of this REF.

## 1.3. Environmental Assessment and Approval process

The proposed change of use is permissible without consent under s2.73(2)(a) of the *State Environmental Planning Policy (Transport and Infrastructure) 2021* (TI SEPP) as it is consistent with the Plan of Management and is to be carried out by or on behalf of CPMPT.

Accordingly, the proposal is subject to assessment and determination under Division 5.1 of the EP&A Act. This is discussed in more detail in Section 4.

## 1.4. Methodology

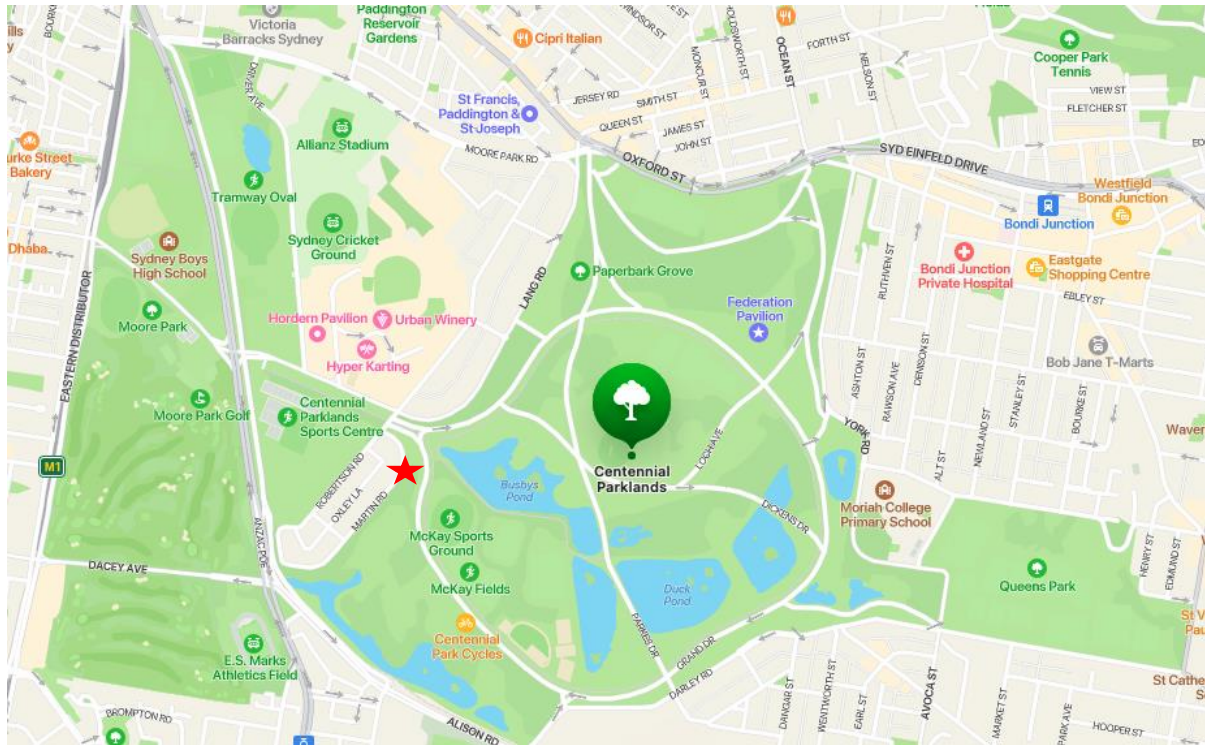
This REF relies on specialist technical assessments to address the environmental impact of the proposal. The findings of this report consider the results of the studies undertaken by these specialists, with the relevant technical reports reproduced in the Appendices of this report.

## 2. Site Analysis

### 2.1. Site Location and Context

The Ranger’s Residence is located near the western boundary of Centennial Park (Martin Road), approximately 150 metres southeast of the Robertson Road Gates (see **Figure 1**).

Centennial Park falls within the Randwick local government area (LGA), while Martin Road delineates the boundary with the City of Sydney LGA. The site is approximately 3.6km south east of the Sydney GPO.



**Figure 1: Site Location**  
Source: Apple Maps

The Ranger’s Residence is located on the western edge of Centennial Park. The adjoining land use is low density residential, generally comprising large dwellings ranging from period houses to more contemporary dwellings. Beyond the residential development in the area defined by Martin Road and Robertson Road is Moore Park (also owned by CPMPPT), which includes a range of active and passive recreation facilities including Moore Park Golf Club, tennis courts, playing fields and other sports facilities.

### 2.2. Site Characteristics

The site is legally described as follows:

**Table 1: Site Identification**

Address	Legal Description	Lot Area
1R Oxford Street, 2R Darley Road, 1 Martin Road, Centennial Park	Lot 1723 DP 45644	1.856km <sup>2</sup> (approx.)

CPMPPT is the registered owner of Centennial Parklands.

The interface between the garden curtilage of the Ranger's Residence and the wider Centennial Park is delineated by a painted timber picket fence, approximately 900mm in height constructed along the north, south and eastern sides of the building with an 1800mm high timber paling fence and single car brick garage to the south-west of the building.

The site of the Ranger's Residence, including the aforementioned fenced area is located at the top of a small hill, affording views across Centennial Park to the north and east. The fenced curtilage is approximately 480m<sup>2</sup> in area.

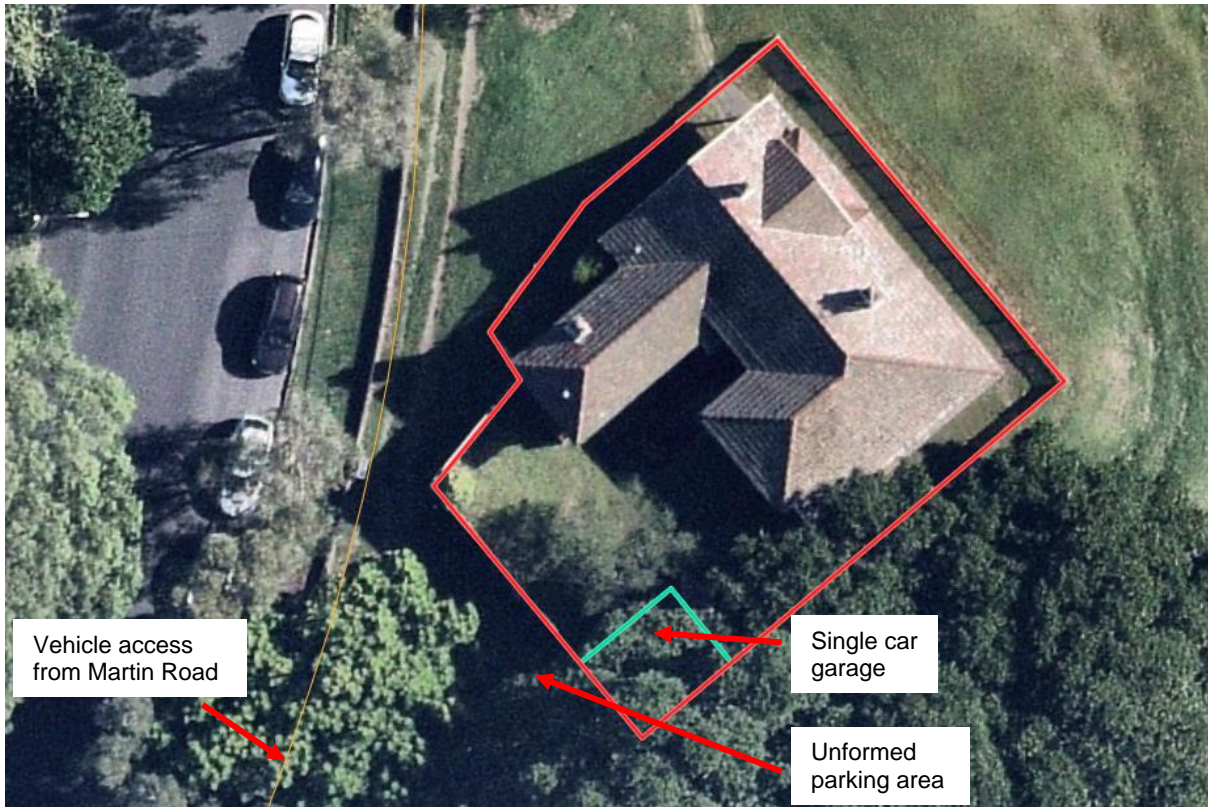


**Figure 2: Relationship between Ranger's Residence and The Grand Drive (looking south on The Grand Drive)** Source: City Plan Services

Pedestrian access to the property is achieved either via Martin Road or from The Grand Drive. Vehicular access is available via locked gates on Martin Road to an unformed parking area and the single car garage, located under the tree canopy. This is available for use by tenants of the Ranger's Residence (see **Figure 3** and **Figure 4**).



**Figure 3: Vehicular access from Martin Road and unformed parking area (note garage and rear fence of Ranger's Residence in middle left of photograph)** Source: Google Street View



**Figure 4: Location of vehicle access from Martin Road, garage and unformed parking area**  
Source: Nearmap

Existing vegetation on the site is limited to two small trees in the rear yard of the premises and a climbing plant which grows on the 1800mm high timber paling fence which delineates the private rear yard. The remaining curtilage of the building is grassed.

The landscape in the general vicinity of the Ranger's Residence would generally be described as open grassy parkland interspersed with trees and some densely vegetated pockets, consistent with the character of this part of Centennial Park. Mackay Oval is located approximately 130 metres to the south east of the building and Busby's Pond, at its closest point, is approximately 120 metres to the east (see **Figure 5**).



**Figure 5: Aerial view illustrating local context** Source: Nearmap

An AHIMS search undertaken on 2 August 2023 reveals that there are 2 recorded items within a 50m buffer of Centennial Park and 5 items within a 200m buffer. None of these are in physical proximity to the Ranger's Residence. However, despite the considerable level of disturbance by various activities associated with development, maintenance and other activities in Centennial Parklands, there is the potential for archaeological artefacts associated with various phases of Indigenous occupation of the land to be extant.

The subject site is listed as part of a heritage item of State significance under Part 1 of Schedule 5 of the Randwick Local Environmental Plan (LEP) 2012 (2013 EPI 36) as 'Centennial Park, including Federation monument, Superintendent's residence, park gates, 2 Corinthian columns, 2 statues', located at 1R Oxford Street; 2R Darley Road; 1 Martin Road in Centennial Park (Item no. I01).

Centennial Park is also listed on the State Heritage Register (SHR) under the *Heritage Act 1977* as 'Centennial Park, Moore Park, Queens Park' (SHR no. 01384).

The proposed activity is unlikely to have an impact on any matters of national environmental significance (MNES) identified under the EPBC Act.

Furthermore, the site is not identified as being bush fire prone land, nor is it flood prone.

### 3. Proposed Activity

#### 3.1. Description of the Activity

The Ranger’s Residence is a single storey face brick Federation Bungalow style dwelling, dating from c1899. It has a decorative roughcast finish on the external surfaces above window sills and features a large simple roof plane in red tiles, with a prominent gable and a covered U-shaped verandah coinciding with the main entry. The residence has an internal area of only 113m<sup>2</sup>, verandah of 55m<sup>2</sup> and a separate single car garage.

The plan at **Figure 6** illustrates the layout of the premises.



**Figure 6: Floor Plan of Ranger’s Residence**

CPMPT proposes to offer the premises for lease for commercial purposes, which may include private offices (e.g. architects, solicitors or other professionals), which necessitates a change of use from the existing short-term residential purposes.

Business opening hours are expected to be 7.30am to 6.00pm Mondays to Fridays and 8am to 4pm Saturdays.

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## 3.2. Alternatives and Preferred Option

CPMPT's objectives in seeking a change of use for the building are to:

- ensure ongoing care and conservation of the building
- provide minimal environmental impacts to the Park, its users and the local community
- provide revenue for the management of heritage structures and the Park
- implement the Centennial Park Master Plan 2040, which proposed refurbishment of the Ranger's Residence and to make it accessible for public commercial use.

Refurbishment as proposed within the Centennial Park Master Plan 2040 has already been undertaken.

Uses considered will include commercial uses, professional services, community, or educational uses. Other uses which satisfy the objectives above and are consistent with the *Centennial Parklands Plan of Management: 2018 and Beyond* will also be considered.

Any fitout works to the premises by the successful tenant will require approval of CPMPT. Fitouts will be limited to loose fixtures and fittings with no modifications to internal walls or structures.

**Table 2: Project Alternatives**

Option	Assessment
Do-Nothing	Limiting the use of the premises to short-term accommodation will derive a limited income stream. In addition, existing issues associated with noise / amenity impacts either on short-term residents from events within the Park, or impacts generated by short-term residents (e.g. house parties) on users of Centennial Park would be perpetuated. Lack of a tenant for the building does not assist in ensuring security of the building.
Alternative Design	Alternative uses could be considered, however any future use is limited by: <ul style="list-style-type: none"><li>• the terms of the Plan of Management and subsidiary plans; and</li><li>• the heritage status of the building and the restrictions on any physical alterations to the building i.e. modification to the building should be avoided due to the heritage status of the Ranger's Residence/</li></ul>
Alternative Location	N/A

## 3.3. Project Justification

The use of the Ranger's Residence for short-term residential accommodation has historically presented a number of amenity issues, both in terms of activities in the Park impacting temporary residents as well as the activities associated with the short-term residential use on users of the wider Centennial Park.

The proposed change of use of the premises is consistent with the objectives and strategies set out in the Plan of Management (refer Section 4.7.2) and the specific provisions of the Centennial Park Master Plan 2040 (refer Section 4.7.4).

Furthermore, the proposed Activity will result in an economic use of the premises and will provide an income stream which will contribute to the upkeep and maintenance of the heritage building, preserving it for future generations.

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## 4. Legislative and Planning Framework

This section includes an assessment of the proposal against the applicable legislative and planning framework.

### 4.1. Planning Approval Pathway

Section 4.1 of the EP&A Act states if an environmental planning instrument (EPI) provides that development does not need consent that development may be carried out without the need for development consent.

The proposed Activity is not considered to be exempt development.

The proposed Activity is 'development without consent' in accordance with the provisions of s2.73(2)(a) of TI SEPP as it is development for the purposes of implementing a plan of management and is carried out by or on behalf of the CPMPT.

Further discussion regarding the consistency of the proposed Activity in the context of the Centennial Parklands Plan of Management is provided at Section 4.7 of this REF.

### 4.2. Environmental Planning and Assessment Act 1979

#### **Duty to Consider Environmental Impact**

Division 5.1 of the EP&A Act applies to activities that are permissible without consent and are generally carried out by a public authority (excluding State significant infrastructure). Activities under Division 5.1 of the EP&A Act are assessed and determined by a public authority, referred to as the determining authority. CPMPT is a public authority and is the proponent and determining authority for the proposed works.

For the purpose of satisfying the objects of the EP&A Act relating to the protection and enhancement of the environment, a determining authority, in its consideration of an Activity shall examine and take into account to the fullest extent possible all matters affecting or likely to affect the environment by reason of that Activity.

### 4.3. Environmental Planning and Assessment Regulation 2021

Clause 170 of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation) provides for the issue of Guidelines for Division 5.1 assessments in relation to factors to be taken into account when considering the likely impact of an activity and the form of the document required to be prepared by a determining authority. This REF is consistent with the Guidelines.

Clause 171 of the EP&A Regulation provides a list of environmental factors that must be taken into account for an environmental assessment under Division 5.1 of the EP&A Act. These requirements are considered at section 6.1 of this REF.

The EP&A Regulation (clause 171(4)) requires publication of an REF for an activity with:

- a capital investment value of more than \$5 million or,
- an approval or permit for activity that requires approval under:
  - *Fisheries Management Act 1994* sections 144, 200, 205 or 219, or
  - *Heritage Act 1977* section 57, or
  - *National Parks and Wildlife Act 1974* section 90 or



- 
- *Protection of the Environment Operations Act 1997* sections 47-49 or 122, or
  - if the determining authority considers it to be in the public interest.

City Plan Heritage Pty Ltd was engaged to prepare a Statement of Heritage Impact and has confirmed that the proposed Activity satisfies the requirements for standard exemptions under the *Heritage Act 1977*. The proposed activity does not require any of the approvals or permits listed above.

Furthermore, the proposed activity represents a change of use of the premises and as such, does not have a capital investment value. As a consequence there is no requirement to publish the REF.

#### **4.4. Greater Sydney Parklands Trust Act 2021**

Centennial Parklands are managed under the umbrella of the *Greater Sydney Parklands Trust Act 2022* (GSPT Act). The objects of the GSPT Act include to maintain and improve the parklands estate across Greater Sydney and ensure it is effectively managed, and to ensure the conservation of the natural and cultural heritage values and the protection of the environment.

The GSPT Act also establishes functions of Greater Sydney Parklands and requires that each park has an approved plan of management and gives effect to that plan of management.

The proposal is consistent with the Plan of Management for Centennial Parklands as discussed in section 4.7.1 of this report.

#### **4.5. Centennial Park and Moore Park Trust Act 1983**

Under the CPMPT Act, CPMPT has a duty to maintain and improve the Trust lands, as well as encouraging the use of the Trust lands by the public by increasing the 'recreational, historical, scientific, educational, cultural and environmental value of those lands'.

The proposed Activity aids in meeting these objectives.

Additionally and in accordance with the Act, CPMPT must have an approved plan of management to guide the use, development, management and operation within the park. The current Plan of Management, *Centennial Parklands, Great parks for a great city, Plan of Management 2018 and beyond* fulfils the requirements of the CPMPT Act.

The proposal is consistent with the Plan of Management, the Centennial Park Master Plan 2040 and the Conservation Management Plan for the Ranger's Residence, as discussed in section 4.7 of this REF.

## 4.6. Other Relevant Legislation

The following table lists any additional legislation that should be considered.

**Table 3: Other Relevant Legislative Requirements**

State Legislation	Purpose of Legislation	Relevance to the Proposal and Approval Requirements
Environment Protection and Biodiversity Conservation Act 1999	The EPBC Act provides for the protection of the environment, especially matters of national environmental significance (MNES) and provides a streamlined national environmental assessment and approvals process.	The proposed Activity is unlikely to affect Commonwealth land or have an impact on any MNES. Commonwealth approval is therefore not required under the EPBC Act.
Biodiversity Conservation Act 2016	The BC Act aims include to 'maintain a healthy, productive and resilient environment for the greatest well-being of the community, now and into the future, consistent with the principles of ecologically sustainable development'. It provides for the listing of threatened species and communities, establishes a framework to avoid, minimise and offset the impacts of proposed development, and establishes a standard method for assessing the likely impacts on biodiversity values and calculating measures to offset those impacts.	The proposed Activity represents a change of use of an existing building in Centennial Park. The commercial use of the premises would not significantly affect critical habitat, threatened species or endangered ecological communities (EECs).
Water Management Act 2000	The Act outlines approval requirements for activities at a specified location in, on or under waterfront land. Waterfront land includes the bed of any river, lake or estuary and all land within 40 metres of the highest bank of the river, lake or estuary.	Not applicable. The site is not located on waterfront land, nor does the proposal constitute a controlled activity.
Fisheries Management Act 1994	The objects of this Act are to conserve, develop and share the fishery resources of the State for the benefit of present and future generations.	Not applicable.
Contaminated Land Management Act 1997	The CLM Act provides the framework for the management of contaminated land in NSW, and requires that the nature and extent of any potential contamination be investigated and demonstrated.	Noted, however the proposed change of use of the Ranger's Residence does not require any ground disturbance.
Heritage Act 1977	The Heritage Act 1977 is the principal Act for the management of NSW's environmental heritage. It establishes the State Heritage Register (SHR) and includes provisions for Interim Heritage Orders, Orders to Stop Work and archaeological relics (both on land and underwater). It also requires government agencies to maintain a Heritage Conservation Register under Section 170.	<p>The Statement of Heritage Impact prepared by City Plan (<b>Appendix 2</b>) confirms that the proposed change of use:</p> <ul style="list-style-type: none"> <li>will not have a substantive impact on the heritage significance of the building and place;</li> <li>satisfies the requirements for standard exemptions under the Heritage Act; and</li> <li>is consistent with the Conservation Management Plan for the Ranger's Residence.</li> </ul>
National Parks and Wildlife Act 1974	The NPW Act provides protection for all Aboriginal places and objects, regardless of whether they have been previously recorded in the OEH Aboriginal Heritage Information Management System. Part 6 of the Act states that it is an offence to harm or desecrate an Aboriginal place or object, unless it is undertaken in accordance with an Aboriginal Heritage Impact Permit. Clause 87A outlines an obligation to report any discoveries of previously unknown Aboriginal sites to the OEH.	<p>Noted, however the proposed change of use of the Ranger's Residence does not require any ground disturbance.</p> <p>An AHIMS search undertaken on 2 August 2023 reveals that there are 2 recorded items within a 50m buffer of Centennial Park and 5 items within a 200m buffer. None of these are in physical proximity to the Ranger's Residence. A copy of the search results is included at <b>Appendix 3</b>.</p>
Roads Act 1993	The objects of this Act are to, among other things, confer certain functions (in particular, the function of carrying out road work) on TfNSW and on other roads authorities, and to provide for the distribution of the functions conferred by this Act between TfNSW and other roads authorities.	Not applicable. The proposed change of use of the premises does not necessitate any works to public roads.

State Legislation	Purpose of Legislation	Relevance to the Proposal and Approval Requirements
Waste Avoidance and Recovery Act 2001	Aims to encourage the most efficient use of resources and to reduce environmental harm in accordance with the principles of ecologically sustainable development.	Noted. No construction works or ground disturbance is proposed as part of the change of use. Operational waste will be managed in accordance with the established waste management regime for Centennial Parklands.

## 4.7. State Environmental Planning Policies

### 4.7.1. State Environmental Planning Policy (Transport and Infrastructure) 2021

In accordance with section 2.73(2)(a) of Division 12 Parks and other public reserves of the TI SEPP, development on Trust lands within the meaning of the CPMPT Act, by or on behalf of the CPMPT, may be carried out without consent if it is for the purposes of implementing a plan of management (and its subsidiary master plans) adopted under the CPMPT Act.

### 4.7.2. Plan of Management

Centennial Parklands' Plan of Management (2018) is an overarching strategic planning document that guides and is informed by a series of subordinate strategic plans, which provide details of how the Plan of Management will be implemented.

Of particular relevance to the proposed Activity are:

- Conservation Management Plan – Centennial Parklands (see section 4.7.3)
- Centennial Park Master Plan 2040 (see section 4.7.5)

The proposed change of use is consistent with the conservation objectives of the PoM as detailed below:

- ***Retain, restore and reinstate significant heritage attributes of the Parklands***

Comment: Complies. The future commercial use of the Ranger's Residence will provide a revenue stream which will ensure resources for future and ongoing maintenance / preservation of the heritage fabric.

- ***Conserve the significance of the Parklands, including functional relationships, spaces, vistas and fabric***

Comment: Complies. The proposed change of use will not fundamentally alter the prevailing functional relationships, spaces, vistas to and from the premises or within the Parklands, nor will it alter the heritage fabric of the building.

- ***Record all elements of significance which are affected by change***

Comment: Complies. A Statement of Heritage Impact (SoHI) has been prepared by City Plan (**Appendix 2**) which documents the Statements of Significance of relevance to the Ranger's Residence and makes a detailed assessment of how the proposed change of use might impact the heritage fabric. The SoHI also includes recommendations in relation to minor works recommended by the BCA consultant (Jensen Hughes

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**Appendix 1)** and business identification signage associated with any future commercial use of the premises.

- ***Enhance appreciation of the Parklands' heritage significance through appropriate presentation, education and interpretation***

Comment: Complies. The SoHI notes that whilst a future commercial use will allow for public access to the heritage building, it will be limited in nature (i.e. clients / visitors to the future business).

The presentation of the exterior of the building within the context of the Parklands will not change and will remain legible within the landscape.

- ***Fulfill the objectives of the Centennial Park and Moore Park Trust Act, the NSW Heritage Act, the Centennial Parklands Conservation Management Plan and the principles of the Australian Natural Heritage Charter and the Burra Charter***

Comment: Complies. An SoHI has been prepared by City Plan (**Appendix 2**) which provides an assessment of the proposed Activity in the context of the relevant Acts and other legislation and in accordance with the principles of the Australian Natural Heritage Charter and the Burra Charter.

- ***Consider the relative significance of the whole and individual elements in conservation and use***

Comment: Complies. The SoHI (**Appendix 2**) examines the proposed change of use in the context of the heritage significance of the wider Parklands as well as the significance of the building itself.

- ***Allow ongoing use, change, development and maintenance in the Parklands, whilst retaining its heritage significance***

Comment: Complies. The SoHI (**Appendix 2**) confirms that the proposed change of use will not adversely impact the heritage significance of the building or its wider context within Centennial Park.

- ***Strive for ecological, social and economic sustainability***

Comment: Complies. The proposed change of use of the Ranger's Residence does not require any fit-out works (other than loose furniture) to the existing building or necessitate any disturbance of the ground surface. Any future commercial use of the premises will occur within the environmental capacity of the existing building (i.e. domestic standard utilities) and having regard to the heritage status of the building. Furthermore, the future commercial use will secure a revenue stream which will ultimately benefit the wider Parklands and enable ongoing maintenance / preservation of the heritage fabric of the building.

- ***Observe and comply with legislative requirements***

Comment: Complies. This REF and supporting specialist reports have been prepared to assist CPMPT in meeting its statutory obligations under the EP&A Act and the *Heritage Act 1977*.

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### 4.7.3. Conservation Management Plan – Centennial Parklands

Section 5.2 of the CMP sets out the conservation principles for the Parklands. Of particular relevance to the proposal:

- **Allow ongoing use, change, development and maintenance in the Parklands, whilst retaining its heritage significance;**

Comment: A Heritage Impact Statement has been prepared by City Plan (**Appendix 2**) which concludes that the proposed change of use from short-term residential accommodation to commercial use will not adversely impact the heritage significance of the premises or the wider Parklands.

- **Ecological, social and economic sustainability;**

Comment: The proposed change of use will facilitate an economic use of the premises, thereby securing an income stream to ensure ongoing maintenance within the Parklands.

- **Observe and comply with legislative requirements.**

Comment: This REF has been prepared to assess the environmental impacts associated with the proposed change of use and to identify any safeguards or mitigation measures required to be implemented to manage those impacts. It has been prepared in accordance with the provisions of Part 5.1 of the EP&A Act and clause 171 of the EP&A Regulation.

### 4.7.4. Conservation Management Plan – Ranger’s Cottage

The Conservation Management Plan prepared by the Government Architect’s Office (2009) provides the following narrative in relation to use of the Ranger’s Residence:

*The subject building was purpose designed as a family residence for Senior Park Rangers, and had been continuously used for this purpose from its construction in 1899 until 2007, at which time it was left vacant. It is recognised that the CPMP Trust no longer requires this building for its original use.*

*The CPMP Trust Act provides a number of opportunities for the retention of the building, and enhancement of its presence within the Parklands through interpretation and use.*

The following conservation policies are relevant to the proposed Activity:

#### **Policy 1.5**

*Potential adaptive re-uses should take into consideration the differing levels of heritage significance of the various areas and elements of the building and site as identified in this CMP.*

*Adaptive re-use of the building should include methods of interpretation to improve awareness and understanding of the significance of the former Ranger’s cottage within the overall Centennial Parklands.*

#### **Policy 1.6**

*Future adaptive re-use of the building and site would be considered compatible if the following criteria are met:*

- *The internal planning and spatial relationship of individual rooms is retained.*
- *Remaining original fabric is not removed, including brick walls, timber boarded ceilings, fireplaces and joinery.*
- *The nature of the new use would not result in an unacceptable level of wear and tear on the fabric of exceptional, high and moderate significance.*
- *Adaptation is limited to areas and elements of little significance,*

- *Fixtures and fittings that may be required for any new use should not damage or compromise significant fabric and be able to be removed.*

Specifically in relation to Conservation Works, the CMP states:

**Policy 4.3**

*Ensure that a record of the underlying methodology for each conservation or adaptive re-use project is maintained including:*

- *Documentation of the reasoning behind major decisions;*
- *Recording of any testing or additional research undertaken; and*
- *Archiving records appropriately.*

**4.7.5. Centennial Park Master Plan 2040**

The Master Plan provides a blueprint for the Park for the next 25 years which allows it to respond to internal and external factors whilst enhancing its unique and much-loved landscape character.

The Master Plan describes the future of the Ranger’s Residence as follows:

*Refurbish the Ranger’s Cottage and make accessible for public / commercial use. Future uses to respect proximity to adjacent residential area.*

The proposed Activity is specifically consistent with the Master Plan.

**4.7.6. Other State Environmental Planning Policies (SEPPs)**

**Table 4: Consideration of SEPPs**

SEPPs	Purpose of SEPP	Relevance to the Proposal and Approval Requirements
SEPP (Biodiversity and Conservation) 2021	The SEPP includes assessment processes for biodiversity and ecologically significant land.	Not Applicable
SEPP (Resilience and Hazards) 2021	The SEPP provides a coordinated approach to assessing development in NSW in the context of contamination and coastal considerations.	There is no known contamination of the site of the Ranger’s Residence. Furthermore, the activity represents a change of use of the premises and no construction or ground disturbance is proposed.  It is noted that an area within Centennial Park is mapped as Coastal Wetlands, however this is located approx. 1.1km to the east of the Ranger’s Residence and as such, the proposed change of use is not expected to have any impact on the integrity of the area of coastal wetland.

**4.7.7. Summary of Statutory Position**

As the proposed Activity is to be carried out by or on behalf of a public authority (CPMPT), the development must be assessed in accordance with Part 5, Division 5.1 of the EP&A Act. An REF is required and CPMPT is both the proponent and the determining authority.

As the proposed Activity is wholly consistent with the Centennial Parklands Plan of Management and its subsidiary / supporting plans, it can be considered ‘Development Without Consent’.

## 4.8. National, State, regional, subregional, district and local plans

The following table considers how the proposal contributes or responds to relevant objectives, directions, policies, actions, community priorities and key issues of National, State, regional, subregional, district and local plans.

**Table 5: Plans to be considered**

Plans	Relevance to the Proposal	Compliance
The Greater Sydney Region Plan – A Metropolis of Three Cities	<p>The Greater Sydney Region Plan, <i>A Metropolis of Three Cities</i> is built on a vision of three cities where most residents live within 30 minutes of their jobs, education and health facilities, services and great places. It seeks to meet the needs of a growing and changing population by transforming Greater Sydney into a metropolis of three cities – the Western Parkland City, the Central River City and the Eastern Harbour City.</p> <p>The proposed change of use would help support the vision of a Metropolis of Three Cities, by providing employment opportunities within an established urban area, with excellent access to public transport.</p> <p>It also represents an environmentally sustainable and economically responsible adaptive re-use of an existing heritage item.</p>	Yes
Eastern City District Plan	<p>The <i>Eastern City District Plan</i> is a 20-year plan to manage growth in the context of economic, social and environmental matters to achieve the 40-year vision for Greater Sydney. It is a guide for implementing the Greater Sydney Region Plan, <i>A Metropolis of Three Cities</i>, at a district level and is a bridge between regional and local planning.</p> <p>The vision for the <i>Eastern City District Plan</i> is to transform the district over the next 20 to 40 years to see it become more innovative and globally competitive, carving out a greater portion of knowledge-intensive jobs from the Asia Pacific Region. At the same time, the plan will improve the District's lifestyle and environmental assets.</p> <p>This proposal is consistent with the objectives of the Planning Priorities featured in the plan as follows:</p> <p><b>Planning Priority E6</b> – Creating and renewing great places and local centres and respecting the District's heritage.</p> <p><u>Comment:</u> The proposed change of use represents renewal and sustainable use of existing heritage infrastructure in Centennial Park. The physical context within an established urban area, its access to ample off-street parking and a range of public transport options, renders the proposed change of use to commercial purposes appropriate and consistent with the District Plan.</p> <p><b>Planning Priority E16</b> – Protecting and enhancing scenic and cultural landscapes</p> <p><u>Comment:</u> Centennial Parklands, including the Ranger's Residence, is listed in the State Heritage Register. The proposed activity is limited to a change of use of the premises and no physical changes to either the curtilage or the heritage fabric of the building will be permitted (without prior approval), thereby protecting the scenic and cultural landscape.</p> <p>A commercial use of the building will secure an income stream for CPMPT thereby ensuring its long-term economic future.</p>	Yes
Randwick Local Strategic Planning Statement	<p><b>Planning Priority Liveability</b> – Conserve and protect our unique built cultural heritage. <i>Council encourages and promotes the adaptive re-use of heritage items ... in a way that encourages activity and entices people to visit and</i></p>	Yes

Plans	Relevance to the Proposal	Compliance
	<p><i>promotes understanding of their heritage values ... to ensure that the heritage values and fabric of these buildings are retained and protected.</i></p> <p><b>Liveability Action 4.4</b> – Work with DPE and adjoining councils to protect and enhance views from and curtilages of Centennial Park (short term)</p> <p><u>Comment:</u> The heritage status precludes any external changes to the building or its curtilage. As a consequence there will be no substantive change to views to and from Centennial Park as a result of the proposed change of use from short-term residential to commercial.</p>	
Randwick Local Environmental Plan 2012	<p>The entirety of Centennial Park, including the Ranger's Residence, is listed in Schedule 5 of Randwick LEP as both an item of environmental heritage and a Heritage Conservation Area, noting State significance.</p> <p><u>Comment:</u> Noted. However the provisions of the TI SEPP prevail. A SoHI has been prepared to address the likely heritage impacts of the proposed change of use (refer <b>Appendix 2</b>).</p>	Yes



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## 5. Engagement

Statutory consultation is not required for the proposed change of use of the premises for the following reasons:

- (i) it will not have any impact on council-related infrastructure or services (s2.10, T&I SEPP);
- (ii) the Ranger's Residence is part of the Centennial Parklands listing on the State Heritage Register (s2.11, T&I SEPP);
- (iii) the land is not flood liable (ss2.12 and 2.13, T&I SEPP);
- (iv) it is not located in the coastal zone (s2.14, T&I SEPP);
- (v) it does not constitute "specified development" for the purposes of s2.15 of the T&I SEPP; and
- (vi) the land is not identified as being bush fire prone (s2.16, T&I SEPP)

The proposed Activity is wholly consistent with the Centennial Parklands Plan of Management 2018 and the Centennial Park Master Plan 2040, both of which have been the subject of extensive community consultation prior to their adoption and implementation.

### 5.1. Local community consultation

Having regard to the Centennial Parklands Master Plan 2040 commitment for future commercial uses of the Ranger's Residence to respect its proximity to the adjacent residential area, GSP undertook a community engagement program for all residents living on Martin Road, Robertson Road, Oxley Lane and Dibbs Street, some 50 dwellings.

Letters notifying residents of the proposed change of use were hand-delivered on 29 September 2023. The correspondence directed residents to online frequently asked questions developed by GSP to provide further information about the proposal.

Residents were invited to share their feedback in one of the following ways:

- an online survey form, and / or
- sending a written submission via email.

The notification period concluded on 27 October 2023 (total of 29 days).

Three (3) written submissions were received via email and all objected to aspects of the proposed Activity.

No responses were submitted via the online survey form.

#### 5.1.1. Issues Raised

The submissions received in response to the notification correspondence raised the following matters:

- There are currently no commercial uses along Martin Road and Robertson Road and this should remain the case.
- Increased noise.
- Increased cars leading to increased traffic which could pose a danger to children, dog walkers and learner drivers.
- Security concerns.

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The submissions also shared ideas about how the Ranger's Residence could be used in the future, including:

- A residence.
  - A family who can rent the residence and become part of the neighbourhood.
  - A Ranger family who can help care for the park. One submission noted a Ranger family used to live in the Ranger's Residence when they first moved in to the area.
- Art gallery.

A copy of the Engagement Summary report prepared by Cred Consulting is included at **Appendix 4**.

### 5.1.2. Response to Issues Raised

#### Issue 1

**There are currently no commercial uses along Martin Road and Robertson Road and this should remain the case.**

**Response:** The residential area defined by Martin and Robertson Roads is zoned R2 Low Density Residential under the provisions of the *Sydney Local Environmental Plan 2012*. This zoning also allows with consent some uses that are considered low impact and generally compatible with the residential neighbourhood, such as health consulting rooms and community facilities. Centennial Parklands is not subject to the same zoning and land use controls as the residential area.

The Centennial Parklands Plan of Management and the Centennial Park Master Plan 2040 guide the use of the Ranger's Residence, with the Master Plan noting the intention to make the Ranger's Residence accessible for public commercial use. Similar to the non-residential uses that are permitted in the neighbouring R2 Low Density Residential zone commercial uses can operate with minimal impact on the adjoining residential area.

CPMPT does not currently support residential use of the building due to potential conflicts with park users.

#### Issue 2

##### **Increased noise**

**Response:** The proposed change of use of the Ranger's Residence does not require / allow any physical works to the existing building or necessitate any disturbance of the ground surface, as such there will be no significant construction noise.

The Centennial Parklands Master Plan 2040 contemplates the future change of use of the Ranger's Residence to commercial purposes, but clearly states that future uses are to respect the proximity to the adjacent residential area. Any decision about the future commercial tenant of the Ranger's Residence will be made by CPMPT in this context.

#### Issue 3

##### **Increased cars leading to increased traffic which could pose a danger to children, dog walkers and learner drivers**

**Response:** The domestic scale of the Ranger's Residence, together with its heritage status (and the associated constraints on any alterations to the building) is expected to limit the size and type of commercial operation that would seek such accommodation.

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Furthermore, the selection of any future tenant / commercial use of the Ranger's Residence will be made in consideration of the relative proximity of the adjacent residential area.

Having regard to the above, any future commercial use of the premises would generally be expected to generate low traffic volumes, that would be consistent with the current traffic environment in the Martin Road / Robertson Road residential area.

#### Issue 4

#### **Security concerns**

**Response:** The proposed change of use of the Ranger's Residence to commercial purposes will remove the temporary short-term residential use of the building and establish a full-time, more consistent long-term commercial use.

A long term commercial tenant would have a vested interest in the security of the premises, which could reasonably be expected to have a number of safety and security benefits including improved passive surveillance of the Ranger's Residence and its curtilage.

## 6. Environmental Impact Assessment

This chapter provides an assessment of the environmental issues affecting the proposed change of use of the Ranger’s Residence from short-term residential to commercial use. This chapter will detail the potential operational impacts (as there is no construction phase associated with the activity) and outline mitigation measures. The mitigation measures are summarised in Section 7.

### 6.1. EP&A Regulation 2021 – Environmental Factors to be considered

The environmental factors that the determining authority must take into account in accordance with the Guideline and Section 171(2) of the EP&A Regulation are considered below. Section 6.2 of this REF, together with specialist BCA and heritage advice included at **Appendices 1** and **2** respectively, make an assessment of impact.

**Table 6: Factors to be considered**

Relevant Factor	Comment	Impact rating
(a) the environmental impact on the community,	<p>The future commercial use of the premises will be limited:</p> <ul style="list-style-type: none"> <li>to standard business hours under the terms of the lease and</li> <li>as a result of the heritage status of the building</li> </ul> <p>Environmental impacts to the community will therefore be low key / low impact.</p>	Negligible impact
(b) the transformation of the locality,	<p>The Ranger’s Residence is located adjacent to the western boundary of Centennial Park, which interfaces with a pocket of residential development broadly defined by Martin Road and Roberston Road.</p> <p>Any future commercial use of the premises will be limited by the heritage status of the building and the Parklands, as well as the relative proximity to the residential properties in Martin Road. The ultimate use is therefore likely to be comparatively low key / low impact and will not result in any substantive transformation of the locality.</p>	Negligible impact
(c) the environmental impact on the ecosystems of the locality,	<p>The proposed Activity does not involve any construction works or tree removal and as such there will be no changes in the prevailing physical environment. Any future commercial use of the premises will occur within the environmental capacity of the building (i.e. connections to utility services, waste generation etc). The nature of future use is constrained by the heritage status of the building</p>	Negligible impact
(d) reduction of the aesthetic, recreational, scientific or other environmental quality or value of the locality,	<p>No alterations or additions to the existing heritage building are proposed and as such, the appearance of the Ranger’s Residence, its curtilage or its context within the broader Parklands will not alter.</p>	Negligible impact

Relevant Factor	Comment	Impact rating
(e) the effects on any locality, place or building that has— (i) aesthetic, anthropological, archaeological, architectural, cultural, historical, scientific or social significance, or (ii) other special value for present or future generations,	The proposed Activity does not involve any ground disturbance or physical changes to the heritage fabric of the building or its curtilage. The commercial lease will create a revenue stream which will ensure the heritage and cultural value of the Ranger's Residence and the wider Parklands will be preserved and maintained for future generations.	Positive impact
(f) the impact on the habitat of protected animals, within the meaning of the Biodiversity Conservation Act 2016,	The proposed Activity does not involve any construction works or tree removal and as such there will be no changes in the prevailing physical environment.	Negligible impact
(g) the endangering of a species of animal, plant or other form of life, whether living on land, in water or in the air,	The proposed Activity does not involve any construction works or tree removal and as such there will be no changes in the prevailing physical environment and no substantive impact on flora or fauna species or their habitat.	Negligible impact
(h) long-term effects on the environment,	No long term adverse impacts on the environment in terms of ecological, social or economic issues are anticipated. Indeed the commercial lease of the premises will provide a revenue stream to contribute to ongoing maintenance of the heritage building.	Negligible impact
(i) degradation of the quality of the environment,	Any future commercial use will be limited by the heritage status of the building and therefore is likely to be comparatively low key / low impact (e.g. architects offices, solicitors etc) and is not expected to result in any degradation of the environment.	Negligible impact
(j) risk to the safety of the environment,	No risk to the safety of the environment is anticipated as a result of the proposed change of use.	Negligible impact
(k) reduction in the range of beneficial uses of the environment,	The proposed change of use of the Ranger's Residence will not alter the ongoing recreational / ecological / heritage of Centennial Park.	Negligible impact
(l) pollution of the environment,	Future commercial use is expected to be limited to offices (eg. Architects, solicitors or other professionals) and is not expected to generate air, water or noise pollution.	Negligible impact
(m) environmental problems associated with the disposal of waste,	No construction works or ground disturbance is proposed as part of the change of use. The nature of future commercial uses is such that operational waste will be managed in accordance with the established waste management regime for Centennial Parklands.	Negligible impact
(n) increased demands on natural or other resources that are, or are likely to become, in short supply,	The proposed commercial use will be required to operate within the environmental capacity of the premises in terms of domestic scale connections to utility services.	Negligible impact
(o) the cumulative environmental effect with other existing or likely future activities,	The proposed change of use of the Ranger's Residence will not alter the ongoing recreational / ecological / heritage of Centennial Park.	Negligible impact

Relevant Factor	Comment	Impact rating
(p) the impact on coastal processes and coastal hazards, including those under projected climate change conditions,	<p>It is noted that an area within Centennial Park is mapped as Coastal Wetlands, however this is located approx. 1.1km to the east of the Ranger's Residence and as such, the proposed change of use is not expected to have any impact on the integrity of the area of coastal wetland.</p> <p>The proposed change of use of the premises is not expected to have any substantive impact on coastal processes or hazards, nor is it likely to be impacted by coastal hazards.</p>	Negligible impact
(q) applicable local strategic planning statements, regional strategic plans or district strategic plans made under the Act, Division 3.1,	The proposed change of use is demonstrably consistent with the relevant strategic plans, policies and statutory provisions (as detailed in Section 4 of this REF)	Negligible impact
(r) other relevant environmental factors.	Nil	Negligible impact

## 6.2. Consideration of Key Issues

The following section includes a description of those aspects of the environment that are likely to be affected as a result of the proposed change of use of the Ranger's Residence and the likely significance of the impact. It considers the legislative requirements of the following:

- Part 8, Division 1 of the EP&A Regulation and Guidelines for Division 5.1 assessments
- impacts to Matters of National Environmental Significance under the *Environment Protection and Biodiversity Conservation Act 1999*
- application of Part 7 of the *Biodiversity Conservation Act 2016* and Part 7A of the *Fisheries Management Act 1994* in accordance with Part 1 Clause 1.7 of the EPA Act
- State Environmental Planning Policy (Transport and Infrastructure) 2021.

### 6.2.1. Biodiversity

#### **Fauna**

Parts of Centennial Parklands contain habitat that supports a range of fauna, for example:

- Some 45 bird species have been recorded by members of NSW Birding conducting quarterly surveys across a number of sites within Centennial Parklands. Data has been collected since 2009.
- It is understood that Latham's Snipe, a migratory wader has been observed outside of the formal bird surveys at Fly Casting Pond (located approx. 1.1km to the east of the Ranger's Residence).
- The Boobook Owl has also been recorded using a nest box near the Learning Centre, and Powerful Owl (listed as vulnerable) has been recorded roosting in Lachlan Swamp.
- Brush-tail and Ringtail Possums live within the Parklands. Introduced Black Rats are expected to be present on-site and have been observed in the IPCWP Garden.
- Three different species of microbats have been recorded in the park: Gould's wattled bat, Eastern bentwing-bat and Eastern broad-nosed bat.
- Anecdotal observations indicate that the Large-footed Myotis (listed as vulnerable) is present in the Park, this species specifically forages over the ponds and surrounding riparian vegetation.

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- The Grey-headed Flying-fox (GHFF; listed as vulnerable) colony is located at Lachlan Swamp and occupies an area of approximately 6.5 ha.

The proposed change of use of the Ranger's Residence is not likely to significantly impact local populations of any of the aforementioned fauna species as no physical works (construction) are required to either the building or its curtilage. On this basis it is considered there will be no degradation of foraging habitat, or disturbance to the species.

### **Flora**

No Endangered Ecological Communities occur on the site.

**Significance rating:** Negligible

**Mitigation measure(s):** NIL

## 6.2.2. Heritage impacts

### **Aboriginal Cultural Heritage**

For thousands of years the land on which the Parklands sit has been a significant site for the people of the Sydney Basin. The Gadigal people managed the sites with a strong custodial focus as they used the land for food, shelter, celebration and family.

AHIMS searches, utilising a 50 metre and 200 metre buffer were conducted on 2 August 2023 (refer **Appendix 3**), which identified 2 sites within the 50m buffer area and up to 5 recorded sites within the 200m buffer around the entire boundary of Lot 1723 DP 45644, none of which were in close proximity to the Ranger's Residence.

It is noted that the AHIMS searches did not identify any recorded sites within the boundary of Centennial Park. However, despite the considerable level of disturbance by various activities associated with development, maintenance and other activities in Centennial Parkland, there is the potential for archaeological artefacts associated with various phases of Indigenous occupation of the land to be extant.

This REF assesses the likely environmental impacts arising from the proposed change of use of the premises from short-term residential to commercial. The proposal does not involve any disturbance to the ground surface and as a consequence, the likelihood of any impact on Aboriginal Cultural Heritage is considered to be negligible.

**Significance rating:** Negligible

**Mitigation measure(s):** NIL

### **Post 1788 Cultural Heritage**

Centennial Park in its entirety is listed on the State Heritage Register (SHR) as 'Centennial Park, Moore Park, Queens Park' (SHR no. 01384).

The subject site is also listed as part of a heritage item of State significance under Part 1 of Schedule 5 of Randwick Local Environmental Plan (LEP) 2012 as follows:

*'Centennial Park, including Federation monument, Superintendent's residence, park gates, 2 Corinthian columns, 2 statues', located at 1R Oxford Street; 2R Darley Road; 1 Martin Road in Centennial Park (item no. I01).*

City Plan has prepared a Statement of Heritage Impact (SoHI) to assess the potential impacts of the proposed Activity on the heritage integrity of the listed item. The assessment has been prepared

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having due regard to the Statements of Significance for the building set out in the following documents:

- *Ranger's Residence, Centennial Parklands, Conservation Management Plan* prepared by the Government Architect's Office (2009)
- State Heritage Register listing for Centennial Park, Moore Park, Queens Park

The SoHI identifies that no alterations, additions, refurbishment and maintenance works, are proposed to the subject heritage item as part of the change of use and hence, no damage will occur to the significant fabric of the Ranger's Residence. In addition, the proposed commercial use is capable of being accommodated within the existing layout and form of the building, and the original characteristics of the residence will continue to be maintained.

Furthermore the SoHI notes that any changes associated with the tenancy would be reversible, which means the subject residence could return to its original use, if and when required.

The SoHI makes specific comment in relation to the recommendations of the BCA Assessment (see discussion below).

The report notes that some alterations may be required to the non-significant fabric (such as furniture or additional light fittings, power points etc.) to accommodate the requirements of the future commercial use. However this will be subject to the approval of CPMPT, including an assessment of heritage impact, and as a consequence, the identified heritage significance of the subject site will be protected and enhanced. Furthermore the proposed change of use is in accordance with the aims and intentions of the CMP for the former Ranger's Residence.

The SoHI also makes recommendations regarding any building / identification signage for the proposed use. These are further discussed in section 6.2.4.

The SoHI confirms the proposed Activity, including the minor works associated with ensuring the building complies with BCA requirements, satisfies the requirements for standard exemptions under the *Heritage Act 1977*.

### **BCA Compliance**

The BCA Assessment prepared by Jensen Hughes (**Appendix 1**) indicates that the proposed commercial use of the premises is not considered to have an adverse impact, considering that the type of construction will not change as a result of the proposed change of use.

The BCA report notes the proposed change of use will result in a change of building classification from an existing Class 3 to Class 5. The report assesses the proposed change of use under the EP&A Regulation and provides recommendations and advice in relation to the 'E2P2 – Safe evacuation routes.'

### **E2P2 – Safe evacuation routes**

- *The entry to the main entry door and the rear entry consists of a stairway without handrails which is non-compliant. To make these stairway entries compliant, handrails will be required to be installed to in accordance with D3D22.*

*The rear doorway is provided with the steps directly at the doorway and would not comply with BCA Clause D3D15 and D3D16 however within BCA Volume Two this is an allowable construction method where minimal steps are provided. It would be considered that due to*



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*the existing Heritage nature of the building that the steps may remain subject to signage being provided internal of the discharge door stating "Caution Step".*

- *The egress swinging doors located at the North-East, North-West, East and West side open in the opposite direction of egress. The North-West door is a bifold style and only achieves a clear width of 770mm when both leaves are open, this is considered suitable for egress widths under the BCA. These doors must be provided with a hold open device in accordance with BCA Clause E2P2 and D3D25 as a reasonable upgrade strategy considering the Heritage nature of the building. A hold-open device such as a parrot hook and latch would be considered sufficient.*
- *The bathroom door has a clear opening width of 700mm; however, this would be in accordance with the concessions under BCA Clause D3D25 due to this being a sanitary compartment.*
- *The internal door latch devices are of a round knob style and at a height of approximately 840mm; however, these are not considered as required exits.*

*Due to the Heritage nature of the building, consideration may be required as to the upgrading of these doorways. Dispensation may be provided with regards to the upgrading of these applicable doorways is not possible due to Heritage restrictions. However, should there not be any Heritage implication of upgrading these latches it would be proposed that this upgrade is undertaken.*

- *The North-East, North-West, East and West side egress door latch device is non-compliant due to the lever design and height above 1100mm and below 900mm respectively in lieu of the required anti-slip curve end lever and height between 900-1100mm above the floor. The latch device must be replaced to be compliant with BCA Clause D3D26. The south side egress doors latch devices must also be replaced accordingly to comply with this Clause.*

*Due to the Heritage nature of the building, consideration may be required as to the upgrading of these doorways. Dispensation may be provided with regards to the upgrading of these applicable doorways is not possible due to Heritage restrictions. However, should there not be any Heritage implication of upgrading these latches it would be proposed that this upgrade is undertaken.*

- *The rear egress stairway has an awning with a height of 1990mm above the floor which is non-compliant in lieu of the required 2m unobstructed height in accordance with BCA Clause D2D7. Due to allowable encroachments under this Clause down to 1980mm at doorways, it is considered that the awning height would have a negligible impact on egress and may remain as existing.*
- *Portable Fire Extinguishers are to be provided throughout the building in accordance with BCA Clause E1D14.*

The report also notes that due to the nature of the building, there is no requirement for hydrants, sprinklers or a fire control centre of smoke detection. Furthermore, due to the size of the building there is no requirement to be provided with emergency lighting or exit signage.

The SoHI provides specific commentary on the recommendations of the BCA report, as follows:

*The majority of recommended upgrades can be exempted in relation to BCA requirements due to the heritage impacts on the Ranger's Residence. The required changes as part of the BCA*

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*upgrade are generally not well suited for the subject heritage item, and in many instances, their implementation will damage the heritage fabric. Due to the heritage nature of the building, dispensation would generally be applied for the required upgrades to make the building compliant, as the heritage item in its current form is deemed to satisfy the BCA provisions.*

*The only upgrade necessary to make the Ranger's Residence compliant with the current standards is the provision of handrails to be installed in accordance with D3D22 to make the stairway entries at the main entry door and the rear entry compliant. But, due to the heritage values and exceptional Federation Queen Anne architectural features of the building, the existing steps at the entrance may be subject to signage being provided at the interior of the discharge door stating "Caution Step" rather than installation of handrails that will be an intrusive addition to its significant façade. The addition of the proposed signage will be acceptable from a heritage perspective as it will not be a dominant addition to the front of the building and will not be a visible element from the exterior of the building. The signage at the interior of the discharge door stating "Caution Step" will have negligible impact on the heritage values of the Ranger's Residence.*

*In order to make the building compliant, the requirement for Portable Fire Extinguishers to be provided throughout the building in accordance with BCA Clause E1D14 is acceptable as it will be located at the interior of the Ranger's Residence. The Portable Fire Extinguishers to be installed on the walls should use minimum fixing points and location for the installation of the extinguishers should be finalised in accordance with the advice of the Fire Consultant and Built Heritage Specialist.*

**Significance rating:** Minor

**Mitigation measure(s):**

- No alterations or interventions to the heritage fabric shall be undertaken without the prior approval of CPMPT.
- Signage at the interior of the discharge door stating "Caution Step".
- Portable Fire Extinguishers to be provided throughout the building in accordance with BCA Clause E1D14 is acceptable as it will be located at the interior of the Ranger's Residence. The Portable Fire Extinguishers to be installed on the walls should use minimum fixing points and location for the installation of the extinguishers should be finalised in accordance with the advice of the Fire Consultant and Built Heritage Specialist.
- Installation of a hold-open device to the egress swinging doors (bifold style) located at the North West.

### 6.2.3. Water management

This REF assesses the likely environmental impacts arising from the proposed change of use of the premises from short-term residential to commercial.

Any future use of the building for commercial purposes will not alter existing stormwater management and because of the heritage status of the building, no construction works will be undertaken that will result in changes to water quality.

**Significance rating:** Negligible

**Mitigation measure(s):** NIL

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## 6.2.4. Visual and amenity impacts

### **Visual Impact**

The heritage status precludes any substantive external changes to the building or its curtilage. As a consequence there will be no discernible visual impact as a result of the proposed change of use from short-term residential to commercial.

Any future tenant may seek landowner's consent from CPMPT for signage associated with the commercial use of the premises, however it is anticipated that because of the heritage status of the building any such signage would be limited in both size and location. The SoHI prepared by City Plan (**Appendix 2**) makes specific commentary and recommendations in this regard, as follows:

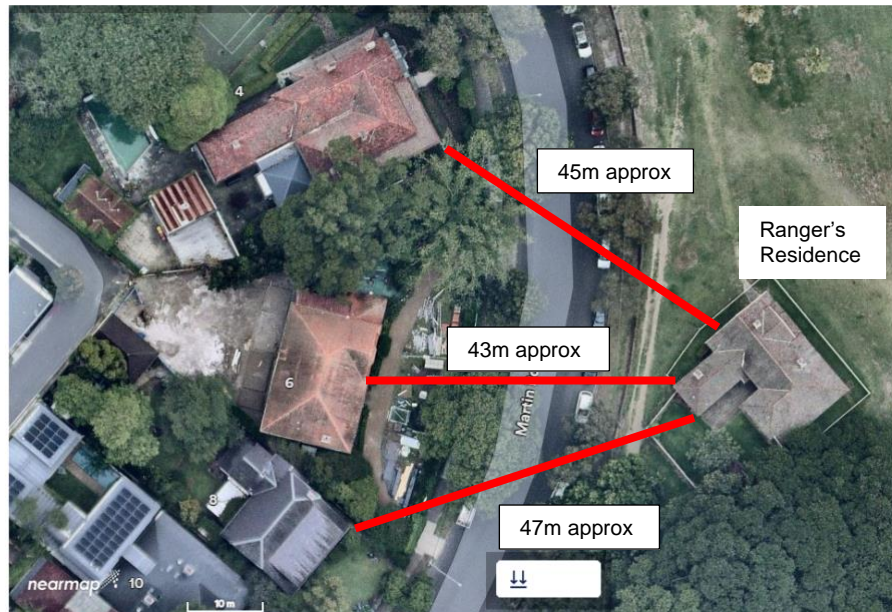
*After the proposed change of use is finalised, it is anticipated that the future commercial tenant will require the installation of signage as part of the business identification. The subject site currently includes two signs attached to picket fence at north-eastern and north-western elevations ... Taking into consideration the heritage significance of the Ranger's Residence within the Centennial Park, any new signage to the building should be compatible with the heritage significance of the conservation area or the item.*

*Signage is to be appropriately located to prevent significant components or distinguishing features of heritage buildings from being obscured. The future signage could utilise a free-standing design with no intervention to the significant fabric and could be located at entrance of the residence at the north-western elevation. The size of the signage should be similar to the existing signage located at the timber paling fence at the north-western and north-eastern elevations. The new signage should be non-illuminated, and the design, style, materials, colours, images and lettering of new signage should be high quality and consistent with the relevant heritage style and period, such as stainless steel.*

*Corporate branding and colour schemes are to be modified to fit in with the character and significance of the area or item. The construction and installation of new freestanding signage are to be high quality and should not damage significant fabric. The new signage should be freestanding and should not be fixed on the building fabric, including the surrounding timber picket fence.*

### **Amenity Impact**

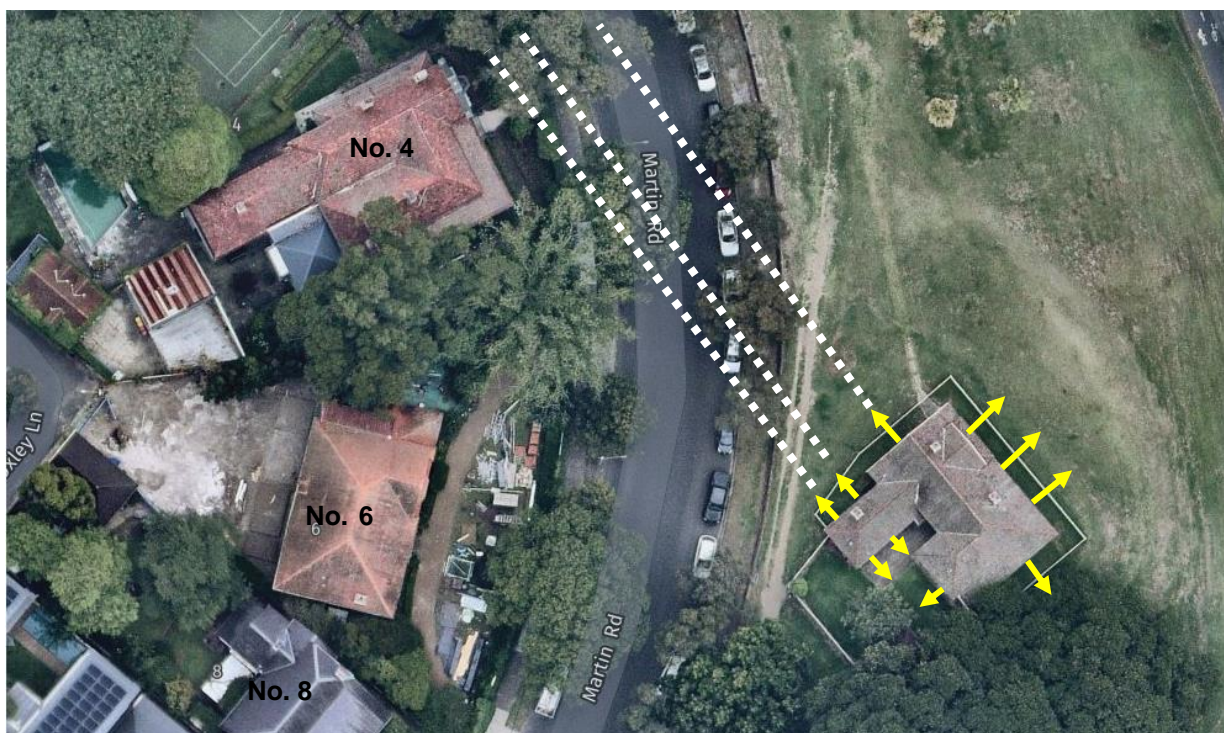
CPMPT is cognisant of the adjacent residential properties on the western side of Martin Road, the closest of which (No.6 Martin Road) is located approx. 43 metres from the façade of the Ranger's Residence. CPMPT will not consider any commercial use that would attract high traffic volumes or require changes to the heritage interiors or exteriors of the building.



**Figure 7: Relationship of Ranger's Residence to dwellings in Martin Road**

Hours of opening of the premises will similarly be limited by CPMPT and as a consequence, any future commercial use of the premises is unlikely to adversely impact the general amenity of Centennial Park and the residential areas in the immediate vicinity of the Ranger's Residence.

As indicated above and illustrated at **Figure 7**, the Ranger's Residence is physically separated from the nearest residential properties by Martin Road road reserve and the setbacks observed by the dwellings from the street as well as the partial screening offered by fencing treatments, landscape planting and street trees on the residential side of Martin Road. Furthermore the windows of the Ranger's Residence are oriented to look away from residential properties and so there are minimal opportunities for direct overlooking and associated loss of privacy, as illustrated in **Figure 8** below.



**Figure 8: Direction of views available from Ranger's Residence**

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**Significance rating:** Minor

**Mitigation measure(s):**

- Any new signs must not be affixed to significant fabric of Ranger's Residence and must not be internally illuminated or flashing;
- Any new signs must not conceal or involve the removal of or damage to significant pre-existing signs;
- Any new signs should not obscure, affix to, penetrate or otherwise damage significant fabric, including landscape or archaeological features or obstruct significant views to and from the Ranger's Residence;
- Reuse of existing fixing points is preferable;
- Any new signs should not be in the form of a mural or artwork;
- The installation of new signs should be reversible and should be able to be later removed without causing damage to the significant fabric of Ranger's Residence;
- Any new signage should not be of a modular or cantilever structure;
- Any new signage should be used for business name identification or wayfinding only and not advertising; and
- Any new external signage, including its size, design and material, will require the prior approval of the CPMPT.

#### 6.2.5. Safety and security

The proposed change of use of the Ranger's Residence to commercial purposes will eliminate the sporadic short-term residential use of the building and establish a full-time, more consistent long-term commercial use. This can reasonably be expected to have a number of safety and security benefits including the introduction of a full-time use of the premises will increase the "population" of the building, including visitors to the premises, thereby improving passive surveillance of the Ranger's Residence and its curtilage.

**Significance rating:** Positive

**Mitigation measure(s):** NIL

#### 6.2.6. Impacts of contaminants and hazardous substances

There is no known contamination of the site of the Ranger's Residence. Notwithstanding, no ground disturbance or penetration is proposed as part of the change of use of the premises.

**Significance rating:** Negligible

**Mitigation measure(s):** NIL

## 6.2.7. Transport, traffic, access and parking

### **Public Transport**

As described in Section 2.2 of this REF, the Ranger's Residence is located on the western side of Centennial Park. It has access to bus routes which run along Lang Road and Cook Road:

- **Route 373** – Central Station to Coogee, with the nearest bus stop located approx. 340m to the west on Lang Road, opposite the Entertainment Quarter
- **Route 355** - Marrickville to Bondi Junction via Moore Park and Erskineville, bus stop location approx. 120m to the north of the site

Railway stations at Central and Bondi Junction afford access to all inter urban train services.

The nearest light rail stations are located at Moore Park, approx. 800m to the north west, or Royal Randwick, located approx. 1100m to the south through Centennial Park.

### **Vehicular Access and Parking**

Vehicular access is available to / from Martin Road via a lockable gate at the rear of the building.

Centennial Park has an established internal road network which provides vehicle and cycle access to all areas of the Park. Whilst the internal road network does not provide direct access to the Ranger's Residence, visitors to the premises could conceivably park on Grand Drive and walk roughly 50 metres up the grassy slope to the front door. Parking on Grand Drive is limited to a maximum 3 hours.

The informal parking area at the rear of the premises provides access to the single car garage attached to the Ranger's Residence and can accommodate several vehicles. This area can be utilised by future tenants of the premises (refer photograph at **Figure 9**).



**Figure 9: Informal parking area and access to garage at rear of Ranger's Residence**

It could reasonably be anticipated that visitors to any future commercial tenancy within the Ranger's Residence would utilise kerbside parking in Martin Road. Analysis of a series of aerial photographs taken over a period of 12 months (20 Nov. 2022 – 7 December 2023) indicates that while the eastern side of Martin Road (i.e. the Centennial Park side) is well-utilised for parking it is time-limited to 4 hours, thereby ensuring a reasonable turnover of vehicles, and there appears to be a number of

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vacant spaces at various times of the day in the general vicinity of the Ranger's Residence. A copy of the series of aerial photographs is included at **Appendix 5**.

Kerbside parking on the western side of Martin Road is restricted to 1 hour. The same set of aerial photographs referred to above indicate that there is less intensive use of kerbside parking on this side of Martin Road, adjacent to the residential properties. It should also be noted that the majority of the properties on Martin Road have access to on site parking via Oxley Lane at the rear. Only a small number of properties (Nos. 6, 24, 26, 28 and 30 Martin Road) also have driveways to / from Martin Road.

Having regard to the nature of the likely future commercial use of the Ranger's Residence and the characteristics of existing parking in this locality, it is not anticipated that such use would result in any substantive adverse impact on parking or traffic. To minimise any potential adverse impact on the grounds of Centennial Park, the informal parking area at the rear of the premises accessed from Martin Road is intended to be limited to four vehicles.

### **Pedestrian Environment**

A network of pathways, both made and unmade, traverse Centennial Park. In the immediate vicinity of the Ranger's Residence, there are no formalised sealed pathways although a well-utilised track runs along the western fenceline of Centennial Park, passing the rear of the Ranger's Residence.

It is also noted that the verge of Martin Road adjacent to the Park does not include a footpath, however the western side of Martin Road has an 1800mm (approx.) wide concrete footpath.

### **Potential Impacts**

No works to the premises are required as part of the change of use and as such there will be no construction traffic generated by the Activity.

The scale and intensity of future commercial use of the premises is largely dictated by its domestic scale. As a consequence, it is considered unlikely that the proposed Activity will:

- result in any significant additional traffic or associated demand for parking within the Parklands or on the surrounding external road network;
- have any substantive impact on pedestrian and cycle movements;
- impede public access to areas available for recreational use; or
- inhibit public access to or use and enjoyment of the Parklands.

**Significance rating:** Minor

**Mitigation measure(s):** Tenants of the premises shall utilise the existing single car garage and the off-street parking area accessed from Martin Road.

## **6.2.8. Utilities, infrastructure and services**

The proposed use of the Ranger's Residence for commercial purposes will be the subject of a lease agreement with the CPMPT. As a consequence CPMPT retains ultimate control over future use of the land.

The Ranger's Residence has connections to the following utility services – water, electricity, sewer and telecommunications.

Commercial use of the premises is not expected to result in the need for any alteration or augmentation of existing services.

**Significance rating:** Negligible

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**Mitigation measure(s):** NIL

### 6.2.9. Sustainability and Resources

CPMPT aims to pursue sustainability as a “whole of life” approach for facilities planning and implementation.

The proposed change of use represents a sustainable and efficient use of an existing, underutilised heritage building. Furthermore, the use as a commercial office will utilise existing utility services connections and is not expected to place unreasonable additional demand on water and energy resources.

Similarly, operational waste generated by any future commercial use of the premises is not expected to be significant and will be managed in accordance with the existing waste management regime within Centennial Parklands. The tenant will be able to utilise CPMPT’s waste service provider.

**Significance rating:** Negligible

**Mitigation measure(s):** NIL

### 6.2.10. Cumulative Impacts on the environment

Cumulative impacts are incremental environmental impacts caused by the combination of past, present, and reasonably foreseeable future actions. Cumulative impacts accumulate over time, from one or more sources. While impacts may be insignificant in isolation, significant impacts may occur when individual effects are considered in combination. As such assessment of the Activity is required in the context of other projects in the vicinity and where construction and/or operational timeframes are likely to be concurrent.

Martin Road provides physical separation between the Ranger’s Residence and the nearest residential properties, the closest of which (No. 6 Martin Road) is approximately 42m to the west. No physical works are associated with the change of use of the premises (other than internal fit-out comprising loose furniture) and as such there will be no substantive change to the presentation of the heritage building in either the Martin Road streetscape or the broader urban landscape. Furthermore any future commercial use of the premises will be constrained by the terms of the lease with CPMPT.

In terms of its relationship to the remainder of Centennial Park, the curtilage of the premises is defined by established fencing which will contain the future use. As such it is not expected to impact the ongoing recreational use of the wider Parklands.

Having regard to the preceding assessment, the Activity is unlikely to have any significant impact on the environment, therefore would not contribute to any cumulative negative impacts.

Two positive impacts have been identified, namely:

- (i) an economic use of the premises will provide an income stream which will contribute to the upkeep and maintenance of the heritage building; and
- (ii) regular use of the premises will improve passive surveillance in the immediate locality.

Furthermore, the proposed commercial use of the Ranger’s Residence is consistent with the objectives and principles set out in the Centennial Park Master Plan 2040.

**Significance rating:** Positive

**Mitigation measure(s):** NIL



## 7. Mitigation Measures

The following Mitigation Measures will be imposed to ensure that any development activity is carried out in accordance with the plans/documentation.

**Table 7: Mitigation Measures**

Issue	Mitigation measure	Timing
Fire Safety	Portable Fire Extinguishers are to be provided throughout the building in accordance with BCA Clause E1D14	Prior to Occupation
	Signage shall be installed at the interior of the discharge door stating "Caution Step".	Prior to Occupation
	Installation of a hold-open device to the egress swinging doors (bifold style) located at the North West.	Prior to Occupation
Heritage	No alterations or interventions to the heritage fabric of the building shall be undertaken without the prior approval of CPMPT and where required, Heritage NSW.	Ongoing
Visual Impact (Signage)	Approval of CPMPT is to be sought for any future external signage associated with the commercial use of the premises, including size, design and materials.	Prior to Occupation
	Depending on the size, scale and materiality of any proposed external business identification signage, a separate approval under section 60 of the <i>Heritage Act 1977</i> may also be required.	Prior to Occupation
	<p>Future signage will be required to comply with the following guidelines:</p> <ul style="list-style-type: none"> <li>Any new signs must not be affixed to significant fabric of Ranger's Residence, internally illuminated or flashing;</li> <li>Any new signs must not conceal or involve the removal of or damage to significant pre-existing signs;</li> <li>Any new signs should not obscure, affix to, penetrate or otherwise damage significant fabric, including landscape or archaeological features or obstruct significant views to and from the Ranger's Residence;</li> <li>Reuse of existing fixing points is preferable;</li> <li>Any new signs should not be in the form of a mural or artwork;</li> <li>The installation of new signs should be reversible and should be able to be later removed without causing damage to the significant fabric of Ranger's Residence;</li> <li>Any new signage should not be of a modular or cantilever structure; and</li> <li>Any new signage should be used for business name identification or wayfinding only and not advertising.</li> </ul>	Prior to Occupation
Transport, traffic, access and parking	Tenants of the premises shall utilise existing off-street parking located in the garage attached to the Ranger's Residence and in the adjacent unsealed area accessed from Martin Road. The latter is to be restricted to a maximum of four vehicles.	Ongoing

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## 8. Conclusion

All relevant statutory planning instruments have been examined in relation to the Activity. Based on the review undertaken, the Activity does not require development consent pursuant to Section 2.73 of the T&I SEPP and is subject to environmental impact assessment under Part 5 of the EP&A Act.

The potential environmental impacts posed by the Activity have been thoroughly examined through this REF.

The proposed activity does not involve any physical works and is simply a change of use from short-term residential accommodation to commercial office use.

While no substantive environmental impacts are anticipated as a result of the change of use, a number of mitigation measures and safeguards are recommended to be implemented to help ensure that the extent of impacts is limited and that unavoidable impacts are managed and minimised.

In conclusion, it is considered that the Activity:

- (i) is justifiable taking into account the minimal potential environmental impacts and the measures and safeguards recommended to mitigate any possible impacts;
- (ii) supports the objectives of the Centennial Parklands Plan of Management;
- (iii) is consistent with the Conservation Policies of the Conservation Management Plan for the Ranger's Residence (2009);
- (iv) is consistent with the provisions of Centennial Park Master Plan 2040;
- (v) is in accordance with ESD principles; and
- (vi) is consistent with the objects of the EP&A Act.