

28 February 2014

Mr Chris Ritchie
A/Director
Industry, Key Site and Social Projects
Development Assessment Systems & Approvals
NSW Planning & Infrastructure
GPO Box 39
Sydney NSW 2001

Attention: Peter McManus

Email: peter.mcmanus@planning.nsw.gov.au

Dear Sir,

Submission re Development Application for The University of Sydney Campus Improvement Program (CIP), State Significant Development (SSD 6123)

I write on behalf of Sydney Local Health District (SLHD), the owner and operator of Royal Prince Alfred Hospital (RPA), the direct neighbour on The University of Sydney's (UOS) western boundary, and therefore also on behalf of the NSW Ministry of Health/Health Administration Corporation.

In your letter you offer not to place a copy of our submission on the public website if clearly stated in our submission. As you would appreciate, the relationship between RPA and UOS is very strong, particularly through the shared training and education of NSW's clinical workforce, not to mention the great legacy of health research that has been forged together. It is a wonderful partnership forged over many, many decades. You would also appreciate that our relationship as neighbouring high-volume public campuses is very respectful and also very complex. In short, there are many issues that arise as a result of the Health Precinct proposal forming part of the University's CIP that we have not had the benefit of consultation with the University at this time. Indeed, some of the proposal is quite new to us and we have a number of very reasonable concerns that we are obligated to submit to you within the statutory period for public comment. Having said this, they are matters that may benefit from the University sharing its plans and thoughts with the Hospital further (not to mention further discussion regarding our own concept for future shared development along the common boundary). We look forward to working through these issues that should be able to be resolved through establishing common objectives and consultation.

Therefore, out of respect for the University, our partner and neighbour, we request that our submission is **not placed on your website** because we await an opportunity to discuss such matters with the University and advance a collaborative approach to planning and development in this precinct.

Our comments regarding the DA are presented in two parts:

- A. Some concerns and potential objections to the proposal from the perspective of its impact on RPA's facilities and strategic planning (hence my comments in the paragraph above) including an outline of our proposed alternative approach to the proposed Health Precinct; and
- B. In-principle support for the CIP's objectives including some suggestions to improve the overall development from SLHD's perspective and aim to work with other agencies to develop healthy environments.

A. Concerns and Objections

Our concerns set out below refer to the proposed Health Precinct. SLHD is, of course, very supportive of the apparent aim of this precinct development which appears to be to consolidate and expand the Health Sciences Faculties. As you would be aware, many of the academic staff that would work in these faculties and facilities are con-joint appointments to SLHD's various Hospitals including RPA. Further, the students to be trained in them also train in our Hospitals, including RPA.

I admit to some disappointment at the absence of collaboration and shared planning to leverage the future use of our both our constrained sites to best address the CIP's stated objective. SLHD supports the concept of optimising comprehensive resources in health and medical research over the next 10 years (page 18) to ensure the University and SLHD provide world class research facilities across the disciplines of medicine, nursing, health sciences, allied health, public health, health services and health policy.

We therefore have a shared objective to see such facilities improved and redeveloped in the context of a long term integrated vision. However, our immediate concerns relate to the proposed location/massing of the buildings and access issues proposed in the current CIP.

Before outlining our concerns in respect to the proposed building height, envelope and access, we note that the CIP's Urban Design Principles state, amongst other principles:

- *"Building designs should be based upon an analysis of solar access;*
- *Avoid overshadowing and visual intrusion onto adjoining sites and spaces; and*
- *Design building forms that contribute to and respect the existing scale, heritage fabric and curtilages of precincts.*

Building Footprint

1. The proposal features tall buildings right on the boundary, and in part over the boundary, with RPA (see proposed building alignment west of the existing Bosch Building, Drwg No. SSD-E-11).

In some very early planning the University queried the possibility of improving the interface and perhaps better sharing the boundary. However the University has not specifically consulted us regarding this proposed encroachment by the development and there has not been any agreement. There has been preliminary and high level discussion regarding SLHD's vision to jointly plan the long-term future use of our shared boundaries, in particular for an Integrated Health Research Centre, otherwise known as an Academic Health Science Centre. Unfortunately those discussions do not appear to be reflected in this Health Precinct proposal and, if so in part, we are not familiar with its proposed composition.

2. Significantly, in the absence of shared and integrated planning along the boundary, RPA will be compelled in the future to extend its Clinical Services Building (CSB) into the area on RPA land between Gloucester House (heritage listed) and the proposed Health Precinct in order to meet with the very significant growing demand for services. The east campus of RPA represents a billion dollar investment on a fairly constrained site and, for cost efficiency, those services must be maintained on this side of Missenden Road and expand. It would be extremely problematic to have that opportunity curtailed by the CIP proposal, hence our desire to plan an integrated facility. Building the university's educational facility hard-up to the boundary has potential to limit the further development of RPA that is seeing the demand for services grow in the order of 15-30% over the next decade.

The Hospital could not agree to a proposal without setbacks without a shared long-term plan and mutually beneficial outcome including for the hundreds of thousands of patients who are treated annually at RPA, ie. our broader community and constituents of SLHD.

3. The construction of the Health Precinct as proposed, a set of buildings hard up on the boundary, has the potential to disrupt and risk the amenity of the RPA's east campus, in particular the historic and special area of trees and separation between the existing RPA inpatient building and the University's existing Blackburn Building currently on the boundary. Considerable planning and consultation is required here.

Building Envelope (refer Drwg No.s SSD-E-12 to 15 inclusive)

4. The proposed height of the building envelope is equivalent to the height of the Chris O'Brien Lifehouse on Missenden Road, seemingly putting the height of the proposed Health precinct buildings at RL77. This is not in our view appropriate given that there is a significant step-down in height from Missenden Road to the proposed Health Precinct, ie Lifehouse's ground floor starts approximately 3 to 4 levels higher. In short, the proposed height is out of context with surrounding RPA buildings, in particular Gloucester House and the CSB.
5. We assume it would be more appropriate for the proposed envelope height to be guided by, and respectful of, the surrounding building heights. Simply put, the imposing western facade of the Health Precinct appears inconsiderate to RPA (RL77 with no step-back, refer Drwg No. SSD-E-13) when compared with the step-back in height on its south-side to St Andrews (30 degree angle from RL44.3) and its east-side to UOS itself (45 degree angle from RL48.8). While the sections do not directly show Gloucester House which, as you would be aware, is a heritage-listed item, the proposed southern building appears to be respectful in height however we believe the envelope should also angle/step-back on its western aspect. We should also mention here, that there may be some considerations required in respect to the helicopter flight path if new buildings are higher than the existing RPA helipad which delivers emergency medical/surgical cases and forms an integral part of NSW's trauma response plans.
6. The proposal shows very tall and imposing buildings that would overwhelm and overshadow Gloucester House, the commemorative Courtyard and the RPA cafeteria in the trees. Naturally, we are concerned regarding the loss of solar access, not to mention inpatient views and staff/visitor amenity. The proposal, as currently presented, does not appear to satisfy the urban design principles outlined above.

Again, the Hospital could not agree to any such proposal with an associated loss of current amenity without a shared long-term plan and mutually beneficial outcome.

Access

7. The Access Strategy accompanying the DA refers to a "Proposed Future Service Road", "Proposed Drop-off/Pick-up for Health Precinct", "Proposed general Vehicle Route", "Proposed Future Access Road, subject to RPA + St Andrews agreement" and a "proposed campus gateway" (eg. Figures 40 to 43 inclusive) using Gloucester Drive off Missenden Road. Gloucester Drive is of course a private road serving the RPA east campus and would require the consent of SLHD/RPA.

UOS has not had formal discussions with RPA regarding the use of this road for its Health Precinct other than the preliminary high-level discussions I refer to above which unfortunately, are not reflected in this current proposal. As you are aware, RPA is one of the busiest hospitals in Australia and projected health services demand and workload increases every year so we do not expect that use of our private road by patients and visitors will reduce. It is therefore very unlikely that SLHD/RPA could agree to such access (to a large underground carpark under the Health Precinct, presumably for University staff and students only) without a clear long term synergy between RPA's needs and the proposed use of the associated buildings and car park users.

Alternative Approach

8. SLHD and RPA are keen to work with UOS to develop a joint long-term plan to the development of integrated facilities along our shared boundary that will achieve mutually beneficial outcomes. We believe that the concept of an Integrated Health Research Centre (consistent with the McKeon Review recommendations in 2013 and the trend to Academic Health Science Centres internationally) is ideal for our combined sites. Bringing together health education/academia and world-renowned research organisations already affiliated with UOS and SLHD in a translational clinical setting/form linked into existing RPA would be a profound and very exciting prospect for Sydney and NSW.

We have the support of many of the medical research institutes already forming part of Sydney Research, and organisation established by SLHD and UOS to encourage collaboration and leverage in research endeavours and resources. We also believe that this proposal, which we have shared with UOS in a preliminary way, is entirely consistent with the stated principles of the University's' CIP, namely:

- *Create innovative solutions for the built form that respond to current pedagogical methods and are flexible enough to accommodate future teaching trends;*
- *Create spaces that promote the integration of inter faculty activities and allow for collaborative work, whilst inviting and encouraging the wider community to engage and participate with the University; and*
- *Promote opportunities for a collegiate style of research, teaching and learning.*

B. In-principle support for the CIP's objectives

Sydney Local Health District (SLHD) aims to protect and promote the health of the local population and recognises that many local and global factors affect health and illness. One of our strategic directions is to develop our capacity to work with other agencies to develop healthy environments. Together with NSW Ministry of Health, we have developed the NSW Healthy Urban Development Checklist as a guide for health services when commenting on development policies, plans and proposals. A pdf and an interactive copy of the Checklist can be found at:
<http://www.sswahs.nsw.gov.au/populationhealth/HUD/>

The proposal seeks consent for precinct-based building envelopes and built form design controls, open space and transport linkages. The proposal appears to be consistent with the draft NSW Metropolitan Strategy for Sydney 2031 objective of encouraging growth in the education and research sector.

SLHD supports the aims and objectives of the proposal provided the appropriate checks, balances and safeguards as identified are in place. We particularly commend the following areas of the Plan:

- Objectives 6 and 7 (page 14): “Develop a healthy and sustainable campus environment and Ensure safe, navigable and equitable access to and through the campus.”
- Optimising the University’s comprehensive resources in health and medical research over the next 10 years (page 18) to ensure the University provides world class research facilities across the disciplines of medicine, nursing, health sciences, allied health, public health, health services and health policy.
- Sustainability Strategy (page 18) - The University has developed a number of sustainability strategies to improve the built environment and campus liveability. The University recognises that leading teaching, learning and intensive research facilities all impact on the environment whilst contributing to knowledge and solutions that will benefit future generations.
- Student Accommodation (page 22) - The CIP seeks to deliver up to 4,000 affordable student accommodation beds on or near campus, which may include the integration of student housing with other facilities within mixed-use buildings. This will provide common spaces to be used out of hours for study and other related student activities. This will contribute to the holistic student campus living experience and environment.
- Open space (page 23) - Providing public open spaces encourages people to exercise, to meet with others, to relax and to play which can assist them to be more active and engaged in their community. This can help to diminish the impact of major risk factors to health such as lack of physical activity, being overweight, social isolation and stress.
- Walking and cycling infrastructure (Pages 25 - 26) – These objectives are supported. The University of Sydney’s Campus Improvement Program (CIP) will connect well with: The Sydney Local Health District Health Promotion Unit Strategic Plan 2014 – 2018, including the Cycling/Walking/Active Travel Action Plan; The NSW Healthy Eating And Active Living (HEAL) Strategy 2013-2018 (<http://www.health.nsw.gov.au/obesity/Pages/nsw-healthy-eating-strategy.aspx>); Transport NSW 2013 documents: Sydney City Centre Access Strategy (<http://www.transport.nsw.gov.au/sites/default/files/b2b/publications/sydney-city-centre-access-strategy-final-web.pdf>); and the City of Sydney’s cycling promotion which includes availability of free resources, maps and skills courses for university staff and students that will encourage staff and students’ participation in national physical activity events such as Ride2Work Day and Walk2 Work Day (<http://sydneycycleways.net/>).
- Use of the Healthy Urban Development Checklist (pages 45 and 47) - It is encouraging for SLHD to see that the Healthy Urban Development Checklist has been used and we are keen to support this initiative and work collaboratively with the University in the further application of the Checklist.

SLHD suggests consideration of the following:

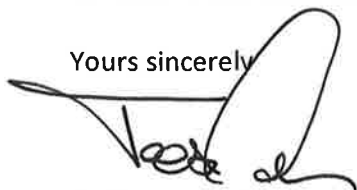
- Bicycle infrastructure (page 26) - In addition, end of trip facilities for staff and students such as adequate change rooms, shower and locker facilities should be considered (or improved). The CIP will build on previous work with Royal Prince Alfred Hospital and improve connectivity between the two sites. Our Health Promotion Unit will work with RPAH and the University to enhance and coordinate cycling infrastructure.
- Healthy food – The CIP seeks to deliver student accommodation for 4,000 (page 22) but nothing has been mentioned on access to fresh, nutritious and affordable food, which is a basic requirement for health and well-being. On page 28 it was mentioned that the CIP proposes an appropriate range of campus retail facilities and services to meet the needs of the campus population, future student accommodation and the CIP precincts. These retail

facilities could include supermarkets, and fruits and vegetable shops to encourage a range of opportunities for the supply of healthy foods.

- A suggestion which would strengthen the urban design (page 39) would be to undertake a Health Impact Assessment (HIA) to highlight the positive health impacts of the proposal and to determine any potential negative impacts. This could be achieved through either a separate HIA, or a combined Social and Health Impact Assessment. SLHD would welcome the opportunity to participate in or provide support to such an assessment.
- Environmental Assessment – Key Issues (pages 41 - 42)
 - Indoor Air Quality: The objectives are supported. Useful resources on indoor air quality are located at the Safe Work Australia website:
<http://www.safeworkaustralia.gov.au/sites/SWA>
 - Rainwater Collection and water reuse: Proposals which involve recycling of water and how it can be safely achieved should have risk assessments undertaken. NSW Health recommends the use of the Australian Guidelines for Water Recycling: Managing Health and Environmental Risks for the development of recycled water schemes. The Australian Guidelines have replaced the 1993 NSW Recycled Water Co-ordination Committee's NSW Guides for Urban and Residential Use of Reclaimed Water for use with dual reticulation schemes. More information can also be obtained at:
<http://www.waterforlife.nsw.gov.au/recycling>
 - Some uses of recycled water may trigger licencing requirements under the Water Industry Competition Act 2006 (WICA) that commenced on 8 August 2008. WICA, among other things, sets out when a licence is required, the procedures for applying for a licence, how licences and licence fees are determined, and how licences are audited and enforced. WICA is supported by the Water Industry Competition (General) Regulation 2008 which sets out the matters a licence application must address, standard licence conditions and the retailer of last resort provisions:
http://www.ipart.nsw.gov.au/Home/Industries/Water/Private_Sector_Licensing_WICA

Thank you for the opportunity to express our important concerns and, on behalf of the many patients and staff of RPA, I trust that they will be addressed by the Department of Planning and reflected in subsequent development applications. We appreciate the opportunity to comment on this proposal and are keen to continue to work in partnership to achieve high-quality outcomes. We would be eager to work with the University and the Department wherever possible and to their end we look forward to a meeting with the University to discuss ongoing opportunities for collaboration.

Yours sincerely



Dr Teresa Anderson
Chief Executive

28.2.18

cc. Vice Chancellor, University of Sydney