



**Sydney
Local Health District**

SF24/
BR24/

Kiersten Fishburn
Secretary
NSW Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Via email: Kiersten.Fishburn@planning.nsw.gov.au

Re: State Significant Development Application SSD-79888213 – Private Hospital, Camperdown

Dear Secretary,

Sydney Local Health District (SLHD) objects to the proposed development concept based on a number of strategic, planning, traffic, amenity and heritage concerns.

Strategic Concerns

SLHD does not support the assertion contained within the Social Impact Assessment that the proponent has “undertaken early, extensive and frequent engagement with key stakeholders including... Royal Prince Alfred Hospital.” SLHD has not been consulted regarding the proposed scope of services, associated clinical planning, or broader master planning considerations for the precinct. Consequently, there has been limited opportunity for meaningful collaboration to ensure the proposal contributes to improved health outcomes for the community or achieves the objective identified in the Scoping Report of providing “complementary uses that support the existing hospital.”

The Royal Prince Alfred Hospital precinct is currently subject to significant health-related capital investment and expansion initiatives, including both committed and planned infrastructure projects intended to support growing demand for research-integrated healthcare services. These projects are being planned and delivered within the context of long-term District and statewide healthcare strategies and will materially influence future service delivery, patient flows, workforce requirements, transport demand and precinct land use. The application does not adequately consider the cumulative impact of these significant public health investments. Further, while the Environmental Impact Statement (EIS) acknowledges demand for private hospital services, it does not demonstrate how the proposal supports contemporary population health strategies, which increasingly emphasise prevention, integrated care, equitable access to services, and community-based models of care.

Planning Concerns

SLHD notes that a number of planning strategies referenced in support of the application are no longer current. In particular, the NSW State and Premier’s Priorities referred to in the Scoping Report have

evolved significantly since 2022 and should not be relied upon as contemporary strategic justification for the proposal.

Additionally, the Tech Central Strategy has superseded the Camperdown-Ultimo Place Strategy (2019) as the primary strategic vision for the precinct. The application should therefore be assessed against the current strategic planning framework to ensure alignment with government objectives and established land use planning priorities.

Traffic Impact and Accessibility

SLHD has serious concerns regarding the traffic impacts associated with the proposal. It is anticipated that traffic volumes along Missenden Road, which already experiences substantial congestion, will increase considerably as a result of the development. SLHD strongly objects to any increase in non-hospital traffic on Johns Hopkins Drive. This road is the only access route to the very busy hospital loading dock, which supports the daily delivery of essential and time-critical clinical supplies, as well as waste and linen services. It is also the sole access route to the hospital's northern arrivals entrance. Increased congestion on this critical corridor risks delaying patient access, ambulance movements and essential hospital operations, creating an unacceptable risk to patient safety and the effective functioning of the campus.

In addition to the permanent traffic impacts, the application does not adequately address the cumulative effect of construction traffic generated by multiple major projects occurring concurrently within the surrounding area. The combined impact of these projects warrants further assessment to ensure hospital access and precinct functionality are maintained.

Shadowing

SLHD is also concerned about the shadowing impacts associated with the proposed building envelope. Analysis of winter solstice shadow diagrams indicates complete shadowing of Johns Hopkins Drive from approximately 10:00 am and shadowing of the Royal Prince Alfred Hospital Nurses Courtyard and the Northern Arrival precinct from approximately 12:00 pm onwards. These impacts will adversely affect the amenity and functionality of a key hospital arrival point currently undergoing significant redevelopment, reduce the usability of staff open space, and adversely affect the viability of landscaping within the area.

Heritage Concerns

The proposed development is in close proximity to established heritage items along Missenden Road. SLHD considers that the scale and form of the proposal are not appropriately contextualised within the surrounding heritage setting. There is a significant risk that the development will diminish the historic character of the precinct and obscure important cultural and heritage values associated with the area.

In summary, the proposal as submitted is entirely inconsistent and incompatible with the health care and planning setting of the precinct. For the reasons outlined above, SLHD objects to the proposed development concept and considers that further consultation, strategic assessment and detailed analysis are required before the proposal can be appropriately assessed. In particular, greater consideration should be given to the operational impacts on Royal Prince Alfred Hospital, contemporary health planning objectives, cumulative traffic and construction impacts, shadowing effects, and the heritage significance of the precinct.

If you have any questions or wish to discuss further, please do not hesitate to contact me on 0400 006 982 or via email at Deborah.Willcox@health.nsw.gov.au.

Yours sincerely,



Deb Willcox AM
Chief Executive

Date: 14.8.26