



Department of Planning, Industry & Environment
GPO Box 39
Sydney NSW 2001

21 June 2021

Ref No: F2020/00664

Attention: Megan Fu

Application No: SSD-10822510

Dear Megan,

Re: Randwick City Council submission on the State Significant Development SSD-10822510 – UNSW Health Translation Hub (SSD-10822510)

I refer to the exhibition notice seeking comment on the State Significant development application (SSDA) lodged by Health Infrastructure for the development of the Health Translation Hub (HTH) at the Randwick Hospital Campus.

The proposal involves the construction and use of a new 15 storey education and research building (including an upper plant room). The proposal includes skybridge connections to UNSW campus and hospital buildings, signage, stratum subdivision, public domain works and landscaping.

Council Officers have reviewed the application and provide the following in response. Council will provide comment on draft conditions following the Response to Submissions.

Pedestrian connectivity

East-West pedestrian link

1. The Randwick Hospital expansion area, within which the UNSW HTH building is located, adjoins the UNSW Kensington Campus to the west and the existing Randwick Hospital Campus to the east. The UNSW University Mall and Library Walk provide the primary east-west midblock pedestrian route and unifying social spine through the campus – from Anzac Parade to Botany Street. The signalised crossing proposed on Botany Street at Gate 11 will further enhance the safety and legibility of this east-west pedestrian spine.
2. To the east of the proposal, Nurses Drive and Delivery Drive provides the only viable open air east-west mid-block pedestrian route through the hospital campus – from Avoca Street to Hospital Road. This pedestrian pathway should be progressively upgraded and enhanced to improve pedestrian legibility, compliant accessibility, pedestrian safety, and amenity, as part of a long-term masterplan.
3. Council notes that the completion of this east-west campus pedestrian pathway, through the hospital expansion area to link the university and hospital campuses is critical to the

successful movement of pedestrian workers, visitors and residents between the university and hospital campuses and beyond.

4. The proposed plans provide a generous width stair and podium level east-west connection from the Botany Street footpath to the boundary with the adjoining proposed Sydney Children's Hospital Stage 1 (SCG1) and Comprehensive Children's Cancer Centre (CCCC). Council supports this connection and notes the importance of maintaining this generous stair width and podium connection and paving finishes to provide a seamless connection from Botany Street through to Hospital Road and in the future, continuing east through the hospital campus.

High Street footpath

5. The proposed pedestrian footpath along High Street is approximately 2.5m wide with a nature strip of approximately 1m to 1.2m. Council requires a minimum footpath width of 4 to 5m m to provide for the increased density of new development and to cater for projected increased pedestrian and bike rider movements along High Street, including movements generated by the Light Rail station. It is understood that flooding constraints have informed the design of the footpath and landscaping along High Street, however widening of the footpath width in this location should be further investigated.

Overshadowing of the Integrated Acute Services Building forecourt

6. The Integrated Acute Services Building (IASB) forecourt and main hospital vehicular drop-off/pick-up has the potential to provide an important new green space along Botany Street for the enjoyment of Randwick Hospital, the UNSW campuses, and the broader Randwick community. It will be important to provide a quality landscaped experience that is not unduly overshadowed in the winter months by the upper levels of the proposed UNSW HTH building to the north.
7. It appears that the current southern leg of the UNSW HTH building will overshadow the Children's Hospital emergency vehicular drop off loop and pedestrian waiting area, as currently configured, for most of winter months.
8. The shadow diagrams provided are limited, addressing only the early morning, midday and late afternoon. Hourly shadow diagrams at the 21 June should be provided to assess solar access and amenity.

High Street frontage street wall datum

9. The UNSW HTH building along the northern High Street frontage is eight storeys which maintains the emerging seven to eight storey street wall height along this street frontage. The 6m ground level setback and the additional upper level tower setback of approximately 9.6m is supported, as it will reduce the apparent tower building height and help to mitigate the potential scale impacts upon the High Street streetscape.

Botany Street pedestrian bridge

10. The location of the bridge and the visual openness and transparency of the bridge are supported. These elements should be retained and refined during the detailed design phase.
11. Council questions the reason for providing a central open-air section with glazed airlocks at each end of the bridge. A continuous glass enclosure may provide better weather protection for people crossing the bridge and remove the need for two airlocks.
12. Council requires further information with regard to the legal instrument proposed to locate this piece of infrastructure within the public road reserve.

Transport

13. The proposed utilisation of UNSW main campus parking areas for the parking of vehicles generated by the proposed UNSW HTH is noted. It is recommended that positive incentives be given to HTH staff / visitors to encourage them to utilise the UNSW campus parking areas. Details of proposed positive incentives are to be submitted to the satisfaction of DPIE and Council.
14. The creation of an indented parking bay for the 'Pick Up / Drop Off (PUDO) task along Botany Street is not supported. Along a 55m length of 1 hour parking, the creation of a PUDO bay affords no benefit. Indeed, the creation of the proposed PUDO actually reduces parking efficiency due to the required angled transition from the existing kerb line to the recessed kerb line. Council recommends simply signposting the PUDO area while maintaining the existing shared path and providing the opportunity to continue some low level Botany Street landscaping elements. This signposted area will accommodate the PUDO task and have the adjacent shared path maintained at full width. In addition, a 'signposting only' solution provides flexibility to increase (or decrease) the length of the PUDO zone in the future, depending on demand over time.
15. Notwithstanding the above comments, it is recommended that the pathways in the vicinity of the proposed PUDO bay be constructed (and made available for the passage of the public). This will future-proof the option of subsequently creating a PUDO bay if traffic conditions warrant removal of all parking from along the eastern side of Botany Street.

Travel Demand Management

16. The submitted Transport Impact Assessment states the following:
*“Travel demand management measures, e.g. Travel Plans and carpooling, are currently well established at UNSW. The UNSW Environmental Sustainability Plan 2019-21 (ESP) outlines a roadmap towards best practice in environmental sustainability in the higher education sector. The ESP makes a commitment to the following: **‘Ensure our campuses are easily accessible by multiple transport modes and our community is supported to make active and sustainable transport choices’***
17. From the perspective of people who choose to walk to and from the proposed UNSW HTH, the pedestrian access is good and pathways are well established - the UNSW ESP objective is met. However from the perspective of people who choose to ride a bicycle to and from the HTH, there are significant challenges when approaching the site from the east and from the south.
18. Anecdotal feedback indicates that many professionals working within the Randwick Health and Innovation Precinct (RHIP) choose to reside near to Coogee Beach. From the east, it is now very difficult to ride along High Street due to the complex road and rail layout and the narrow and busy footpaths near to the light rail terminus in High Street. Accordingly, and in support of the UNSW ESP objectives, it is recommended that conditions of consent be included that require UNSW to work closely with Health Infrastructure to nominate and design an appropriate east-west link through the combined campuses – to link Magill Street with Avoca Street.
19. In addition, recent residential developments to the south of the RHIP (such as Newmarket) create latent demand for improved access for bike riders approaching from the south, in addition to existing bicycle links further south across Anzac Parade and down to the Maroubra Junction / Eastgardens area. It is recommended that conditions of consent be included requiring UNSW work with Council and Health Infrastructure to explore the opportunities to strengthen north south bike links along, for example, Hospital Road.
20. The creation of strong east-west, and, north-south links for those who choose to ride bicycles would strongly align with the UNSW's ESP. A condition of consent is

recommended that requires the three agencies - UNSW, Randwick Council and Health Infrastructure, work together on establishing east-west and north-south bicycle routes to meet the UNSW ESP objectives and meet the needs of all workers and visitors who choose to ride to each of the many campuses within the RHIP.

21. The significant End of Trip facilities are commended. However, the need for people walking bicycles to negotiate two swing doors upon entry and two swing doors upon departure, may prove problematic – especially at busier times. Consideration should also be given to the construction of a kerb ramp access from the roadway of Botany Street, to the shared path, in the vicinity of the top of the ramped access to the End of Trip facilities.

Landscaping

22. The ground level plaza and the overall landscape and planting themes are supported. Clarification is required as to the permeability of the paving within the central plaza and whether this will contribute to deep soil areas in a meaningful way. Permeable paving should be provided in this regard. Council also recommends additional trees be planted in the plaza to benefit from this large area of proposed deep soil.
23. A 6m wide stormwater culvert easement of 6m applies along the UNSW HTH, High Street and Botany Street site boundaries. Concern is raised regarding the ability to plant trees above this service. Proposed landscaping should be reviewed to ensure adequate soil mass and depth is provided over the culvert structure.
24. Further landscape detail is required for the proposed roof level and upper level terraces. The podium roof areas should be utilised to provide outdoor landscaped terraces areas for workers and visitors where possible.
25. The indicative street trees and pavement level planting along the Botany Street and High Street frontages within Councils road reserve currently have a formal generic character. In contrast, the landscaping for the UNSW HTH site is inspired by the coastal dune system. A coordinated landscape outcome that picks up some of the sand dune planting themes along this section of the High Street streetscape would be beneficial. Council recommends coordination between Randwick City Council's Public Domain team and the proposals Landscape Architect moving forward.

Delivery of refined detail design

26. The façade design with the varying 3D blades individually changing according to the solar conditions of each orientation is exemplary in conception. However concerns are raised that the feathering of the out edges and the lightness of the sculptured solar shade blades and awning canopy may be difficult to achieve in practice. It is understood that the façade design and construction will be developed in collaboration with the UNSW research faculties. The UNSW and the Architect are encouraged to see the design aesthetic that is illustrated through to delivery.

Sustainability and biodiversity

27. It is noted that the proposal includes landscaping and public domain works, including the creation of over 2,500 sqm of new publicly accessible open space but only a 14 per cent tree canopy for the HTH development site. Given the creation of new open space, Council recommends a minimum 25 per cent tree canopy cover as per the Urban Tree Canopy Guide within the NSW Government Architect's Draft Greener Places Design Guide. The Draft Design Guide is recommended for use by State and Local Governments and industry to increase tree canopy across Greater Sydney. An increased tree canopy target would support the measure in the ESD Design report to achieve a landscape cooled naturally through vegetation, especially trees with substantial canopy.

28. An assessment should be made of the tree cover under previous residential use, to determine a baseline for tree canopy cover and biodiversity on the site. This assessment is required to ensure there is no net loss of tree canopy on the site. In this regard, the proposed landscaping should align with Outcome 1 of Council's Environment Strategy (March 2021).
29. Council supports the proposal to meet a minimum Green Star Design and As Built 5 Star equivalency and questions why certification will not be sought for the UNSW building.
30. The ESD Design Report states that renewable energy could be generated onsite through the provision of roof area suitable for solar PV integration, however the actual location of the proposed 100 kWp PV system has not been specified in the ESD Design Report. This should be a key element in the buildings design and should be included within the design at the assessment stage.
31. Council suggests that the utilisation Water Sensitive Urban Design (WSUD) features as committed to in the ESD Design Report could include a greater percentage of permeable surface in the public domain areas.
32. Consideration should be given to the provision of joint sustainability initiatives between the hospital and UNSW to deliver sustainability initiatives such as localised trigeneration or a centralised stormwater rainwater harvesting system. Further investigation of offsite green energy purchasing to supplement onsite PV energy generation should also be considered.

Noise

33. The submitted Construction Management Plan and Acoustic Assessment Report contain relevant measures to mitigate and minimise the potential noise impacts. The Acoustic Assessment Report also suggests further acoustic assessments be undertaken during design development to determine whether the proposed development can satisfy the relevant requirements when in operation. Appropriate conditions should be included in this regard.

Contamination

34. A Preliminary Site Investigation for Contamination Report and a Remediation Action Plan (RAP) have been prepared for the site. The RAP states that the site can be rendered suitable for the proposed development, subject to implementation of recommendations including data gap analysis, remediation procedures unexpected finds protocols and completion of a validation assessment. A suitably qualified environmental consultant should be engaged to verify the implementation of the RAP and to validate the site following the completion of all below ground works. Appropriate conditions should be included in this regard.

Cooling towers

35. It is noted that cooling towers are proposed for this development in which the *Public Health Act 2010* will need to be complied with and cooling towers will need to be registered with Council. Appropriate conditions should be included.

I trust that Council's comments will be taken into consideration for this proposal. Should you have any questions regarding the submission, please contact Natasha Ridler, Coordinator Strategic Planning, on 9093 6961.

Yours sincerely,

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