Email sent 25 July 2022

Lingard Private Hospital Planning Proposal

For the attention of Alexandra Tobin

City of Newcastle

We wish to comment on the Planning Proposal by Lingard Private Hospital currently on public exhibition. We do not support the Hospital's application to Council for the following reasons:-

- The proposal to rezone land from R3 Medium Density Residential and B5 BusinessDevelopment to Zone SP2 Infrastructure zone (Health Services Facility) is not appropriate in this residential area.
- The proposal to amend the maximum height control from 10 meters to 18 meters is completely out of character with the area. There are no other buildings over 10m anywhere near the hospital as the majority are either single or two-storey residential properties.
- We do not agree with the removal of the current floor space ratio control from the Hospital sites as this will result in an over development of a constrained site leading to negative impacts on the surrounding residential streets.

In response to the Planning Proposal exhibited on the City of Newcastle's website, we offer the following comments:-

The proposal relates to two development precincts, the existing Lingard Private Hospital and the Kingsland Precinct. While the Hopkins Street Precinct (currently zoned R3 with a 10m building height limit) is not included in this Proposal, the scale and impact of the proposed changes in Merewether and Lingard Streets lead us to believe the Hopkins Street Precinct development will be equally inappropriate for the area. As residents of Hopkins Street, we are extremely concerned about the effect on both our property and the quiet, high amenity residential location we have enjoyed calling home for the past 16 years.

We do not have any confidence that the 'bulk and scale of the Hospital proposal *(will)* be managed through the adoption of building envelope controls.' (Page 9) The recently developed Kingsland Precinct is bulky and dominant to the edges of the site, with minimal landscaping to soften the impact of the building. The 'public space' on the corner of Merewether and Lingard Streets is an uninspiring patch of grass. As a regular walker, I have never seen anyone taking advantage of this space for recreation, rest or rejuvenation. It is a patch of grass with no amenity. We see no reason to believe the Hospital will design the new buildings and public realm to a standard that will ameliorate the effect of the increased building heights.

The increased size of the Hospital will lead directly to increased traffic. This includes staff, patient and visitor cars, and service and delivery trucks, vans and other vehicles. Staff routinely use Hopkins Street for parking (we see the same number plates regularly and see staff walk down Tye Street to the Hospital) which has increased since their expansion despite the parking on the Kingsland Precinct. The Planning Proposal refers to staff parking reimbursement and incentives to use public or active transport options. Given the staff are specialists and likely to live out of the local area, them using anything other than private car transport is extremely unlikely. Resident parking on Hopkins Street is already nearly impossible and this will increase as the Hospital grows. Council must make Hopkins Street residents parking only if this development proceeds.

By definition, patients attending cardiology and orthopaedic appointments or surgeries are unlikely to use active travel or public transport. Therefore, the Hospital expansion will increase patient and visitor numbers leading to increased traffic and parking congestion.

Service and delivery vehicles are already a major concern in Hopkins Street. The Planning Proposal admits 'the intensification of the site may result in increased noise associated with increased traffic volumes, deliveries and pedestrian movement to and from the Hospital site (Page 25).'

With the loading docks for the Hospital located at the end of Tye Street, large trucks enter and exit at all times of day and night. Safety of residents, and particularly young children both living in Hopkins Street and walking to The Junction Public School, is not being considered. Most of the heavy goods vehicles accessing the loading docks are too large for these narrow residential streets. With no turning bay at the end of Tye Street, they are forced to reverse into or out of the site, creating a significant hazard for pedestrians and traffic. The constant 'beeping' of the reversing alert on the vehicles is loud, repetitive and very annoying for residents. Any plans for extending the Hospital and attracting further vehicle movements must include relocating the loading dock so delivery trucks, vans and heavy vehicles do not use Hopkins and Tye Streets.

Additionally, to the above over riding concerns, we note the following:

- Page 10 'Future DAs for the site will **consider** incorporating water-sensitive urban design...' The Hospital needs to commit to sustaining water quality and security if it is going to state the proposal aligns with the Hunter Regional plan 2036.
- Page 11 'Future DAs will consider flooding' Given this is a flood prone area, the Hospital
 must commit to the safety of their buildings, but also design which does not exacerbate flooding in
 nearby areas.
- Page 14 The Proposal does not align with Newcastle 2040 CSP. We see no evidence it will enrich
 neighbourhoods and places as the quality of recent Hospital developments have not created great
 spaces and they are not well designed. Safe, active and linked movement across the city will not
 be enhanced as residential roads will be overwhelmed by increases in car and truck movements
 and parking.
- Page 15 While this Planning Proposal rezones the two existing Hospital sites, the Hospital also owns the Hopkins Street Precinct which is zoned R3. A future change to this zoning would decrease the amount of high quality residential zoned land and not protect it, contradicting the Newcastle Local Housing Strategy 2020.
- Page 16 'Future DAs may be referred to Transport for NSW (TfNSW) as 'traffic generating development'. All DAs should be referred to TfNSW as expansion of the Hospital will inevitably lead to an increase in traffic.
- Page 17 The Concept Plan (Appendix B) shows heritage interpretation including choosing colours to reflect the pottery and hanging heritage photos/plans in corridors of the hospital. This is a totally underwhelming response to the significant local heritage of the area.

- Page 18 There is no reference to the effect the Hospital expansion may have on flood incidence and severity for the surrounding area.
- Page 19 See above comments on transport and the effect of traffic on this quiet neighbourhood.
- Page 21 'Noise, traffic and parking impacts and mitigation measures can be assessed and
 rectified as part of the DA process.' Street parking by Hospital staff, patients and visitors is already
 an issue in Hopkins Street and has not been addressed. Delivery and service vehicles are a noise
 and safety issue in Hopkins and Tye Streets and have also not been addressed. The increased size
 of the Hospital will lead to a significant increase in vehicles. On past performance, we do not have
 confidence this will be addressed by the Hospital when it submits a DA.
- Page 22 'there are opportunities to include a pedestrian link from Tye Road to Merewether Street. The potential noise impacts and consideration to Crime prevention Through Environmental Design (CPTED) Principles will be assessed as part of the DA process.' This will lead to even more staff, patients and visitors parking in Hopkins Street and is not desirable.
- Page 25 Increases to delivery vehicle movements are addressed above, and pose considerable concern for the residents of Hopkins and Tye Streets.
- Page 27 The quality and scale of recent Hospital developments do not give us confidence the expansion will be managed to maximise quality urban design and mitigate bulk and scale and overshadowing issues.

Appendix B – Concept Plans

We are very concerned about the proposals for the Hopkins Street Precinct.

- The building mass is totally out of context with this quiet residential street with 10m tall buildings shown to the Hopkins Street boundary. Given the quality of landscaping and set back on Lingard Street, the aspiration that the precinct 'will feature design features including building articulation and reduced built form' do not give us confidence the Hospital will be an asset to Hopkins Street.
- Even more concerning is the statement 'Main loading off Tye Street with future through link'. Maintaining heavy vehicle access into the hospital through these small residential streets, with local traffic, pedestrians of all ages and mobility issues, is incomprehensible. Locating the main loading area here is totally inappropriate.
- 3. Locating a pedestrian through link from the Lingard Precinct, between Merewether Street and Tye Street, will increase parking issues in Hopkins Street.
- 4. 'Terracotta hues to be included for heritage interpretation' is at best tokenistic and does not address the interesting and significant history of the local area.
- 5. The Indicative Massing of the Hopkins Street Precinct is alarming.
- 6. The Public Domain Improvement Plan shows very little regard for the creation of quality public space. The existing 'trees' to be retained on the corner of Tye and Hopkins Streets are one introduced palm of no visual, environmental or ornamental benefit. The existing Activation Node on the corner of Lingard and Merewether Streets is a patch of grass. If this is indicative of the public realm, it shows no regard for creating an attractive, welcoming and inclusive public space. While bicycle parking in Activation Node C is welcome, the seating is likely to be used by staff as a comfortable smoking area instead of standing at the end of Tye Street as they do now. The Heritage Interpretation proposed is overly simplistic and is a missed opportunity for significant

heritage interpretation and celebration. There is no reference to Aboriginal heritage being incorporated into any of the Precincts.

7. It appears that a long-term strategy to improve vehicular circulation is to 'create a link between Tye Road and Merewether Street to avoid the need for servicing vehicles to undertake a turning movement within the site to exit on Tye Road. This will significantly reduce impacts to Tye Road.' In the short to medium-term, servicing vehicles will increase with the proposed development, including having to reverse out of Tye Street onto Hopkins Street. In the long-term this proposal will not remove service vehicles from these quiet residential streets, they will continue to be a noise, amenity and safety issue. The service dock needs to be moved to a location where it is accessed from Lingard or Merewether Street.

Yours sincerely