

## MODIFICATION 2 – NEWCASTLE PRIVATE HOSPITAL REDEVELOPMENT

### SUMMARY RESPONSE TABLE TO SUBMISSIONS

#### SUMMARY

- Individual Objections – One (1) individual submission objecting to the modification was received.
- Government / Agency Submissions - Additionally, comments were received in submissions from three (3) government departments / agencies, including NSW Roads and Maritime (NSW RMS) Service, Transport for NSW (TfNSW), and Newcastle City Council (NCC).

This represents a total of four (4) submissions.

- The following two (2) tables summarise and provide responses to the key issues raised in the public submission, and government / agency submissions.

**TABLE 1: ISSUES RAISED IN PUBLIC SUBMISSIONS**

ISSUE	SUMMARY OF ISSUES RAISED	RESPONSE
<b>BUILDING HEIGHT</b>	I am concerned by the modification plans to Newcastle Private Hospital. The proposed 2 floor addition will significantly increase the height of the hospital to much higher than tree height. The Croudace building on the site is a heritage building and always had views to the northeast, above the tree line. The extension will interfere with the original view to the northeast significantly, and prevent views of the ocean and beach that this site would always have had. I propose that the Newcastle Private Hospital be limited to treeline height, in the same way that the John Hunter/Royal Newcastle hospital has been limited to treeline height.	<p>Healthscope Limited has now decided to remove Level 4 from the modification application, resulting in the proposal now being only one (1) additional level to the approved building (refer to the updated architectural plans prepared by dwp   suters, attached at <b>Appendix B</b> of the Response to Submissions report).</p> <p>The impact of the one additional level proposed has been studied in depth by the proponent and consultant team, considering both near and distance views along the ridgeline and access roads.</p> <p>The decision to limit the modification to one additional floor only, coupled with lowering of the soaring skillion roof profile to a horizontal composition comfortably mitigates the perceived impact of the development.</p> <p>The revised comparison views between the approved development and the updated modification from Lookout Road, Dent Street and Moorhead Street demonstrate the limited visual impact the one level extension will have (refer to updated photomontages at <b>Appendix B</b>). The height of the modified development (as updated) sits well within the contours of the treeline.</p>

**TABLE 2: ISSUES RAISED IN GOVERNMENT / AGENCY SUBMISSIONS**

GOVERNMENT DEPARTMENT / AGENCY	ISSUE	SUMMARY OF ISSUES RAISED	RESPONSE
NSW RMS	TRAFFIC MODELLING	<p>On 22<sup>nd</sup> October, 2015 Roads and Maritime Services advised that they are unable to provide comment until electronic traffic modelling (SIDRA 6.1 inputs) is provided for review and consideration. RMS requested a copy of the electronic modelling from the applicant to be forwarded to Roads and Maritime for consideration.</p> <p>RMS then provided the following further comments to DPE:</p> <p><i>"I refer to your email notifying Roads and Maritime Services ('Roads and Maritime') of the proposed amendment to the Newcastle Private Hospital development (your ref: MP08_0170 MOD2).</i></p> <p><i>Following a request by Roads and Maritime for electronic modelling from the proponent, Roads and Maritime have been advised by the applicant's traffic consultant that a revision of the subject application is currently being prepared and is likely to result in the removal of a full storey of medical office space thereby reducing the proposed intensification of the use and resulting traffic. A revised traffic report and associated modelling has been provided to Roads and Maritime by the consultant. Plans illustrating the amendment and other associated documents have not been provided. It is understood that a revised application has not been received by the Department of Planning and Environment ('DPE').</i></p> <p><i>As a fully revised application has not been submitted to DPE for consideration, please be advised that Roads and Maritime will not provide comment/requirements until a revised application is lodged and a new referral is forwarded to Roads and Maritime or clarification from the DPE advising that a revised application will not be submitted".</i></p>	<p>In light of the above design revisions made to the proposed modification application, an updated Traffic and Parking Assessment has been prepared by Intersect Traffic and is attached at <b>Appendix C</b> of the Response to Submissions report.</p> <p>Whilst the updated Traffic and Parking Assessment, and associated SIDRA modelling has already been supplied to NSW Roads and Maritime Services, in light of the recent design changes, the further updated Traffic and Parking Assessment attached at <b>Appendix C</b> should be provided to NSW RMS for review.</p> <p>As requested by NSW RMS, a full set of updated architectural plans have also been provided at <b>Appendix B</b> of the Response to Submissions Report.</p>
TFNSW	SUSTAINABLE TRAVEL PLAN	<p>The original project approval "<i>Determination of the Newcastle Private Hospital Project – Approval of Major Project No. 08_0170</i>" dated 15 January, 2010 included conditions (i.e. D4 and E3) relating to the requirement of a</p>	<p>The proponent acknowledges that the existing conditions of consent for the approved development MP 08_0170 (dated 15<sup>th</sup> January, 2010) incorporate the requirement for preparation of a Sustainable Travel Plan prior to the commencement of works.</p>

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		<p>Sustainable Travel Plan to be prepared. These conditions remain applicable and should be incorporated in any approval to this proposal.</p> <p>As part of the Travel Plan, the location of bus stops on Lookout Road should be reviewed to provide a more direct pedestrian access from bus services to the new hospital facilities and to improve the operation of bus services. The review should consider the possibility of providing a southbound bus stop on Lookout Road on the departure side of the Lookout Road / Jacaranda Drive intersection and removal / relocation of an existing southbound bus stop on Lookout Road between Jacaranda Drive and Kookaburra Circuit. The review should be undertaken in consultation with Council, Roads and Maritime Services, Transport for NSW and the local bus operator.</p>	<p>The proposed modification does not alter this requirement, and the proponent understands that this condition remains applicable.</p>
	<b>CONSTRUCTION TRAFFIC MANAGEMENT PLAN</b>	<p>A Construction Traffic Management Plan (CTMP) should be prepared in consultation with TfNSW and Roads and Maritime Services prior to the commencement of construction. The CTMP needs to specify any potential impacts to general traffic, cyclists, pedestrians and bus services within the vicinity of the site from construction vehicles during the construction of the proposed development. Should any impacts be identified, the duration of the impacts and measures proposed to mitigate these should be clearly identified and included in the CTMP.</p>	<p>The proponent acknowledges that the existing conditions of consent for the approved development MP 08_0170 (dated 15<sup>th</sup> January, 2010) incorporate the requirement for preparation of a Construction Traffic Management Plan prior to the commencement of works.</p> <p>The proposed modification does not alter this requirement, and the proponent understands that this condition remains applicable.</p>
<b>NCC</b>	<b>URBAN DESIGN</b>	<p>The design of the modified project includes two additional storeys which will result in the building protruding well above the treeline of the ridgeline on which the site is located. In terms of visual and scenic impacts to the surrounding area this is not a desirable outcome. Council's Urban Design Consultative Committee's raised the importance of this issue with the proponents at its meeting of 18 June, 2008. It is noted that the proponents have not sought the advice of the Group on the modified project.</p>	<p>As advised above in response to the individual public submission, it is noted that Healthscope Limited has now decided to remove Level 4 from the modification application, resulting in the proposal seeking only one (1) additional level to the approved building (refer to the updated architectural plans prepared by dwp  suters, attached at <b>Appendix B</b> of the Response to Submissions report).</p> <p>The impact of the one additional level proposed has been studied in depth by the proponent and consultant team, considering both near and distance views along the ridgeline and access roads.</p> <p>The decision to limit the modification to one additional floor only,</p>

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			<p>coupled with lowering of the soaring skillion roof profile to a horizontal composition comfortably mitigates the perceived impact of the development.</p> <p>The revised comparison views between the approved development and the updated modification from Lookout Road, Dent Street and Moorhead Street demonstrate the limited visual impact the one level extension will have (refer to updated photomontages at <b>Appendix B</b>). The height of the modified development (as updated) sits well within the contours of the treeline.</p>
	<b>NCC DCP 2012</b>	The ADW Johnson report acknowledges that Council's adopted DCP applies to the modified project with the relevant sections addressed in Sections 3 and 5 of the report. Apart from the section on traffic, parking and access, little evidence could be found of Council's specific requirements being identified and addressed. It is requested that the proponent be required to submit a table which identifies each relevant requirement of the DCP and how it has been addressed.	Please refer to the separate NCC DCP 2012 Checklist Table provided at <b>Appendix D</b> of the Response to Submissions Report.
	<b>CAR PARK LAYOUT</b>	Council's previous submission of 24 July, 2009 raised safety concerns in the relation to the proximity of proposed parking spaces to the access ramps at each level in the parking station. Driver sight lines are considered to be compromised thereby increasing the potential for vehicle conflict. This issue has not been addressed by the traffic consultant's report and needs to be reviewed and resolved prior to the determination of the modification request.	<p>The modified development (as updated) has now removed three (3) car parking spaces near the access ramps (one (1) on each basement level [B3, B2 and B1]).</p> <p>It is noted that the modification application initially submitted to DPE resulted in one (1) additional parking space (increasing the total from 382 to 383), and as such, the deletion of the three (3) parking spaces, will only result in a reduction of two (2) spaces, for a total parking provision of 380 spaces associated with the development.</p> <p>The deletion of the basement car park spaces near the access ramps will provide for improved driver sight lines into and out of the car park, and will have no material impact on parking supply.</p>
	<b>PEDESTRIAN NETWORK</b>	To minimise the potential for vehicular / pedestrian conflict it is recommended the design of the modified project be amended to include a designated pedestrian pathway within the new at-grade car park between bays No. 5 to 14, and 24 to 31, linking to the 'Kingston' and 'Croudace'	The design approach to the at-grade car park area between the Kingston and Croudace buildings had been to re-align car parking arrangements to reduce parking and pedestrian impacts on the hospital road while addressing the changes in levels.

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		buildings.	<p>The difficulty in providing the pedestrian footpath as requested by Council is that there is a significant change of level between the two rows of parking. It is noted however, that there is an existing footpath adjacent to the car park linking the Croudace Building and Kingston Building that can be used by pedestrians, and a footpath addition is now proposed adjoining the accessible parking bay (bay 31 and associated shared zone) in the at-grade car park to direct pedestrians from the lower level of the car park to the footpath linking to the Kingston Building and subsequently the Croudace Building. Drawing SK210 (at <b>Appendix B</b> of the Response to Submissions report) has been amended to identify the access pathway addition.</p>
	<b>SERVICING</b>	<p>Another concern raised in Council's previous submission which has not been addressed is confirmation that the loading service area proposed off Jacaranda Drive is designed to cater for all service vehicles with forward entry and exit and adequate driver sight distance has been provided for drivers exiting the service area onto Jacaranda Drive.</p>	<p>The servicing comments were addressed in detail in the ADW Johnson response to submissions dated 7<sup>th</sup> October, 2009, and incorporated into the project design (refer to these previous comments below).</p> <p><i>"The architectural drawings attached at Appendix C include the turning template of a 9m rigid truck on plan No. SK103. This clearly shows a truck of this size can enter and leave the dock in a forward manoeuvre.</i></p> <p><i>The building is set back from the (near) road kerb alignment by some 8 metres at the lower levels to facilitate visibility. Only the dock awning projects closer to the public footpath, and has a semi transparent dividing screen at its eastern end. The screen has been designed out of steel with proprietary aluminium louvers to filter visibility of dock activities from outside, whilst allowing traffic to detect vehicle movements from both inside and outside.</i></p> <p><i>The design of this area has considered the safe movement of all traffic in this area. The hospital portion of the building does step closer to the road alignment, however this is over two storeys (6.8 metres) above dock and road alignment level, where traffic and road visibility is not impacted.</i></p> <p><i>The visibility will be supplemented by a mirror on the</i></p>

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			<p><i>opposite side of Jacaranda drive”.</i></p> <p>The modification drawings (as updated) have not changed the project commitments and have demonstrated that turning circles for the delivery vehicles confirm the forward entry and exit from the service yard (in particular refer to drawing SK202 at <b>Appendix B</b> of the Response to Submissions report). The modification drawings also indicate the screening arrangement for the service yard and the angled set-out to address visibility for drivers exiting onto Jacaranda Drive.</p>
	<b>SECTION 94A DEVELOPMENT CONTRIBUTIONS</b>	When the project approval was granted in early January, 2010 hospitals were excluded from the section 94A levy under the terms of Council's adopted Section 94A Development Contributions Plan, 2009. Under the current version of the Plan (i.e. Version 5 August, 2015) the levy is applicable to hospitals.	Whilst Newcastle City Council have now amended their Section 94A Development Contributions Plan, 2009, it is noted that the hospital development was previously exempt from the application of a Section 94A levy, and it is considered unreasonable to request a levy part way through the project. A modification should not be seen as an opportunity to levy Section 94A contributions, and the project has not budgeted for these contributions that were not imposed on the original consent. The hospital continues to contribute to the provision of vital health services for the wider Hunter Region community, and as such, should not be subject to the suggested section 94A development contributions levy.