



NORTHBRIDGE
PROGRESS ASSOCIATION

Working for the advancement of Northbridge since 1919

ABN 733 956 702

PO Box 357 Northbridge 2063

March 1 2010

Mr Greg Woodhams
Environmental Services Director
Willoughby City Council
PO Box 57 CHATSWOOD 2057

Dear Mr Woodhams

**Re: DA-2010/16
Construction of a nursing home
170 Sailors Bay Rd, Northbridge**

This Association has long supported in principle the development of aged care facilities in an appropriate location in Northbridge or a nearby suburb.

In the case of this Development Application, however, we are concerned that:

1. Many of this Association's members are strongly opposed to the presence of a large nursing home within an area of residential homes on Baringa Rd and Sailors Bay Rd. Many members feel strongly that the scale and character of the proposed nursing home is inappropriate for this area of Northbridge. They would much prefer a smaller development of single or multiple dwellings on the site, as they would always have expected from its Residential 2(a) zoning.
2. Many of NPA's members feel strongly that the additional traffic generated by the proposal would be unacceptable on Sailors Bay Rd, which is already highly congested in peak hours. Many believe that the parking proposed for the facility would be inadequate and that the facility would therefore add to the parking problems on nearby Northbridge streets.

For these reasons, **NPA urges Council not to support this DA.**

Having said that, NPA recognises that there is a general community interest to be served by the development of a nursing home in Northbridge.

We also recognise that the DA has been submitted under the provisions of SEPP (Housing for Seniors) and that a Joint Regional Planning Panel (JRPP), not Council, will be the determining authority for the proposal.

As we understand that Council is unable to unilaterally refuse the DA, NPA requests that Council recommends to the JRPP that the proposal be modified in line with NPA's objections set out below:

The proposal does not comply with the standards and controls provided in SEPP (Housing for Seniors):

- The proposed development is three storeys high on Sailors Bay Rd whereas Clause 40(4)(b) of the SEPP requires a nursing home to be **a maximum of two storeys** high.
- It is two storeys high on Baringa Rd whereas Clause 40(4)(c) requires that a nursing home building in the rear **25%** of the site **must not exceed one storey** in height.
- The proposed Floor Space Ratio (FSR) is 1.32:1 which **exceeds by 32%** the maximum 1:1 FSR standard for a nursing home included in Clause 48 of the SEPP.
- The landscaped area of 16.3 sq m per bed is **35% less than the minimum** of 25sq m per nursing home bed required by the SEPP.
- The overall height of the building **exceeds the maximum height** required by the SEPP.

We ask that Council recommends to JRPP that it insists on compliance with the SEPP and refuses any SEPP1 submitted by the developer that seeks to vary the above standards and controls.

In addition, the development is out of character with the area:

- It is in conflict with Clause 25(5) of the SEPP which requires that the development be similar in scale and built form to existing developments in the area. Furthermore, the development does not contribute to the quality and identity of the locality as required by the Clause.
- The development is not consistent with the current and future character of the area as required by Clause 33 of the SEPP. It does not maintain reasonable neighbourhood amenity or an appropriate residential character to the area as required by the Clause.
- The development overlooks neighbours and impacts on their privacy, especially on 164-166 Sailors Bay Rd (see below).

We ask Council to recommend to JRPP revisions to the design to better reflect the scale, character and built form of the neighbourhood.

The proposal isolates 164-166 Sailors Bay Rd

- We understand that the developer of the nursing home has attempted to purchase the one storey semi-detached houses at 162-164 Sailors Bay Rd but without success. This leaves the houses isolated between the three storey office building at No 160 and the (proposed) three storey nursing home at No 170. This situation is clearly unacceptable.

NPA requests that Council recommends to JRPP that changes be made to the design (height, setbacks, landscaped area) of the nursing home to prevent serious shadowing and privacy impacts on these houses.

The proposal will cause traffic and parking problems

- The proposed nursing home will generate 20 vehicle trips per hour at peak morning and afternoon times (page 44 of the Statement of Environmental Effects). These vehicle trips would be additional to movements by school and business traffic already generated at peak hours. During peak hours, present traffic congestion causes queues of cars in Sailors Bay Rd from the Junction back well past St Philip Neri School. It can take 40 minutes for a vehicle to exit Northbridge through this stretch of road. The traffic analysis appears to use broad weekly averages which on average over 24x7 hours are not high. However, there will be peaks generated from such a facility that are not considered. Weekend visitation will be dominant as well as late afternoon and evening. Delivery, laundry, medical servicing, ambulances and garbage waste will be regular and will add to traffic at Northbridge Junction. The nursing home, at its proposed scale, will have a serious impact on traffic congestion in Northbridge (not “negligible impact” as the developer states in the Statement).
- The proposal includes 31 basement car parking spaces. However, there are 36 employees and 116 patients at the facility. The parking spaces allowed assume only 18 spaces for staff and 13 for visitors. Despite meeting minimum requirements of the SEPP, the opinions of several NPA members with experience in such matters indicate that **the 31 spaces proposed will be inadequate**. Current parking spaces do not adequately cater for staff; staff arriving will need to park elsewhere while a shift is still on duty but has not left. Numbers for visitors seems low to cater for peak use as noted above. If 31 spaces are indeed inadequate, employees and visitors will be forced to park on scarce street parking in Northbridge, to the detriment of businesses and residents.
- We have some concerns that exiting and entering the nursing home from the small Euroka St roundabout will be difficult, especially at times of traffic congestion or an accident. We suggest that a larger, safer roundabout could be incorporated into the project by allotting some land from the development to the roadway. This would also better cater for a safe pedestrian crossing over the entrance to the nursing home.

NPA requests that Council recommends to JRPP: reducing the scale of the nursing home in order to reduce vehicle movements in Sailors Bay Rd; increasing the number of basement car parking spaces per bed by 50% compared with the current proposal; and allocating land from the development to enable a bigger, safer roundabout to be built at Euroka St.

Construction issues

During excavation and construction work, this project will cause a large amount of disruption to Northbridge residents, especially those in Baringa Rd and Sailors Bay Rd, for a period of two years or more. NPA asks Council to set clear requirements for the developer, to be included in the Construction Management Plan.

The Plan should include special provisions for parking cars (for a large number of workers), heavy trucks and cranes, usage of local roads, road blockages, night-time work, start-up times for weekdays and weekend days, provisions for heavy equipment, steel unloading, concrete deliveries, bin filling, crane motors, and management of noise, dust, etc.

The proposal would not comply with Council's policies and controls

NPA recognises that approval for the project is being sought under the SEPP. We understand that the SEPP policies and controls over-ride Council's policies and controls under WLEP 1995 and WDCP 1995. Nevertheless, **we bring to Council's attention that Council's requirements for nursing homes in Willoughby are vastly different to those proposed by the applicant.**

The site is zoned Residential 2(a) which applies to single dwellings of one or two storeys height. A nursing home is not consistent with the general and specific objectives of Residential 2(a) zoning. Normally, Council cannot consent to such a development unless it is consistent with those objectives. Residents of homes near the proposed facility who reasonably expected the Residential 2(a) zoning to be honoured by local and State governments are now in danger of being sadly disappointed.

Moreover, the proposal would be inconsistent with WDCP 1995 controls

- Under WDCP 1995, the minimum site area per bed is 60 sq m per bed. **This would restrict the number of beds to 65** compared with 116 proposed.
- The minimum site area for landscaping is 40%.
- A two storey height is only permitted under WDCP 1995 when it would "conform to the existing environmental character of the area and maintain the privacy and amenity of neighbouring premises". Otherwise, **only one storey height is permitted.**
- Additional setbacks of 3 metres at the sides and rear are required when the development would be likely to affect adjoining premises.

In addition to the requests above in this letter, we urge Council to recommend to JRPP that the proposal be amended to make it consistent with Council's controls under WDCP 1995.

We would be pleased to discuss any of the points above with Council officers during the assessment process.

Yours sincerely

A handwritten signature in black ink, appearing to read "Peter McNair". The signature is fluid and cursive, with a large initial "P" and a long horizontal stroke at the end.

Peter McNair
President

Copy: Sailors Bay Ward Councillors