



NORTHBRIDGE  
PROGRESS ASSOCIATION

*Working for the advancement of Northbridge since 1919*

ABN 733 956 702

PO Box 357 Northbridge 2063

October 12 2010

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

Dear Mr Woodhams

**Re: DA-2010/575**  
**Construction of a residential aged care facility**  
**164-176 Sailors Bay Rd and 47-51 Baringa Rd, Northbridge**

This Development Application is very similar to DA-2010/16 about which this Association made a substantial submission dated March 1 2010. The developer is now proposing a building on seven residential blocks compared with six blocks previously. The proposal remains in non-compliance with several key SEPP (Housing for Seniors) controls include maximum height, maximum FSR and minimum landscaped area.

**Broad community opposition to proposal**

In the case of this Development Application, many of NPA's members are strongly opposed to the presence of a large aged care facility 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 facility 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.

Many of NPA's members feel strongly that the additional traffic generated by the proposal would be unacceptable on Sailors Bay Rd and Baringa Rd, which are already highly congested in peak hours and school drop-off and pick-up times. Many believe that the parking proposed for the facility will 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.

### **Recognition of general community interest**

This Association has long supported in principle the development of aged care facilities in an appropriate location in Northbridge or a nearby suburb. We recognise that there is a general community interest to be served by the development of an aged care facility in Northbridge provided its bulk, scale, traffic generation and character is acceptable to the community.

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:

### **Specific objections to the proposal**

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

- The proposed development is three storeys high on Sailors Bay Rd whereas Clause 40(4) of the SEPP requires an aged care facility to be a maximum of two storeys high.
- The proposed 8.5 metres height to the underside of the topmost ceiling on the Sailors Bay Rd frontage of the building exceeds the maximum height of 8.0 metres required by Clause 40(4) of the SEPP.
- The proposed building is two storeys high on Baringa Rd whereas Clause 40(4) requires that an aged care facility building in the rear 25% of the site must not exceed one storey in height.
- The proposed Floor Space Ratio (FSR) is 1.24:1 which exceeds by 24% the maximum 1:1 FSR standard for an aged care facility included in Clause 48 of the SEPP. The proposal also does not meet the draft WLEP requirement (as yet not approved) of maximum FSR of 0.7:1 in this location.
- The landscaped area of 19 sq m per bed is 24% less than the minimum of 25sq m per aged care facility bed required by Clause 48 of 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.

### **The development is out of character with the area**

- The proposal 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.

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 will cause traffic and parking problems**

- The aged care facility, at its proposed scale, would have a significant impact on traffic congestion in Northbridge. The facility would generate 20 vehicle trips per hour at peak morning and afternoon times. 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 proposal includes 34 basement car parking spaces. However, there are 36 employees and 116 patients at the facility. The proposal assumes that only 50% of the 24 day staff will drive and park, which believe is optimistic. Despite meeting minimum requirements of the SEPP, the opinions of several NPA members with experience in such matters indicate that the 34 spaces proposed will be inadequate. If proposed 34 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 aged care facility from the small Euroka St roundabout will be difficult, especially at times of traffic congestion or an accident. The DA states there will be “no significant change in the operation of the (*Euroka St roundabout*) intersection”. We believe this is a highly optimistic assertion, especially at peak hours. 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 aged care facility.

NPA requests that Council recommends to JRPP: reducing the scale of the aged care facility 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 aged care facilities in Willoughby are vastly different to those proposed by the applicant.

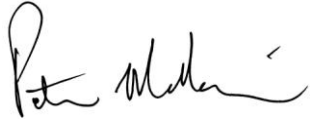
The site is zoned Residential 2(a) which applies to single dwellings of one or two storeys height. An aged care facility is not consistent with the general and specific objectives of Residential 2(a) zoning. Normally, Council cannot consent to such a development unless it is consistent with those objectives. 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.

### **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.

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', with a stylized flourish at the end.

Peter McNair  
President

Copy: Sailors Bay Ward Councillors

*Northbridge Progress Association has been operating continuously since 1919. At June 30 2010 the Association had 511 members.*