

Memorandum to JOINT REGIONAL PLANNING PANEL - NORTHERN

JRPP No.	2014NTH025
DA Number	DA2014/0596
Local Government Area	Clarence Valley Council
Proposed Development	Redevelopment of Residential Care Facility
Street Address	125 Crown Street & 217-221 Queen Street, Grafton
Applicant	Newton Denny Chapelle Surveyors, Planners Engineers
Owner	Frank Whiddon Masonic Homes trading as The Whiddon Group

Reference is made to issues that have been raised regarding the proposed draft conditions of consent which are attached to the Assessment Report and Recommendation.

1. Number of required on-site parking spaces

During the assessment of the application it was agreed that the parking spaces on the adjoining block belonging to the Grafton Hospital could not be used in the parking calculation.

Attached to this memorandum is a letter dated 8 April 2015 (**Attachment M1**), agreeing that the additional number of parking spaces to be provided on-site is to be nine (9) as per the following calculation under Clause 48(d) of SEPP Seniors Living:

- 113 beds / 10 = 11.3 parking spaces
- 25 staff / 2 = 11.5 parking spaces
- Total required is 22.8 (23 when rounded to nearest number)
- 14 parking spaces are shown on the submitted plans
- Required on-site spaces are 23 – 14 = 9 spaces.

A marked up plan (attached to this memorandum – **Attachment M2**) has been provided by the applicant to show the area where the additional parking spaces can be provided.

The amended number of parking spaces differs to that provided in the Section 79C assessment of the application and should be updated accordingly.

Condition 51 of the draft conditions of consent requires the submission of parking area plans to be approved at the Construction Certificate stage.

2. Provision of four (4), two (2) hour limited parking spaces

With the expansion of the facility from 66 beds to 113 beds Council's it is anticipated that there will be an increased need for short-term parking to the facility. A large portion of visitors are likely to be elderly persons and/or mobility impaired persons only requiring short term parking. The facility adjoins the Grafton Hospital and Crown Street is utilised by the hospital staff and visitors. Submissions received from the exhibition of the development have raised concerns regarding parking demand in the area.

Council cannot install regulatory parking signage without the endorsement of the Local Traffic Committee (LTC). A report was presented to the LTC on 17 March 2015 for consideration and the

proposal was endorsed at that meeting by the Local State Member of Parliament, Roads & Maritime Services and NSW Police representatives on the Committee.

It is the opinion of Council staff that time restricted limited parking should be provided. The four spaces are only a small portion of the parking available in Crown Street and they will provide an alternative for short term visitors where parking can be limited during peak times.

The applicant and owner do not agree to the proposed timed parking spaces (see submission in letter dated 17 March 2015 **Attachment M3** and letter from The Whiddon Group dated 1 May 2015 – **Attachment M4**) as it will place an unfair imposition in reducing longer term parking available to visiting families and visitors.

Condition 41 of the draft conditions requires the provision of four (4) two (2) hour parking spaces.

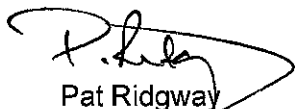
3. Section 64 Contributions

A letter has been provided from The Whiddon Group dated 1 May 2015 (**Attachment M4**), requesting that the JRPP consider the significant cost to the organisation from Section 64 Contributions payable.

The report to the JRPP outlines the Section 64 contribution amounts advised by Council's Water Cycle Section that would be applied on application for a certificate of compliance for water and sewer reticulation. Developer charges are based on an Equivalent Tenement and are taken from the NSW Water Directorate publication *Section 64 Determinations of Equivalent Tenements Guidelines, January 2005*. The charge applied to Sewer and Water contributions is based on Developer Contributions Plans for sewer and water which were adopted by Council resolution on 28 June 2005. These charges are adjusted each financial year in accordance with Council's adopted Fees and Charges.

Council's Water Cycle Manager has advised that the only issue open to JRPP to consider regarding Section 64 is whether a Certificate of Compliance is required. To ensure that the JRPP is correctly briefed in this matter my response for the JRRP is as follows:

Section 224 of the Water Management (General) Regulation, 2011 prescribes development for which a certificate of compliance is required under Section 306 of the Water Management Act, 2000, which is called up under Section 64 of the Local Government Act, 1993. The proposed development is a prescribed development and therefore the Water Supply authority has advised the planning authority that it requires a Certificate of Compliance for this proposed development.



Pat Ridgway
Senior Development Planner
5 May 2015



Ref: S0027-150408 Grafton DA response to council Rev A

08 April 2015

Pat Ridgway,
Senior Development Planner
Clarence Valley Council,
Lock Bag 23, Grafton, NSW 2460

Dear Pat,

**RE: DEVELOPMENT APPLICATION No. DA2014/0596
REDEVELOPMENT OF RESIDENTIAL AGED CARE FACILITY, 219 QUEEN STREET, GRAFTON NSW 2460**

We refer to your email to Newton Denny Chappelle dated 1 April 2015 (attached) where you have identified three (3) items requiring a response. Please find our response to the three (3) items as follows;

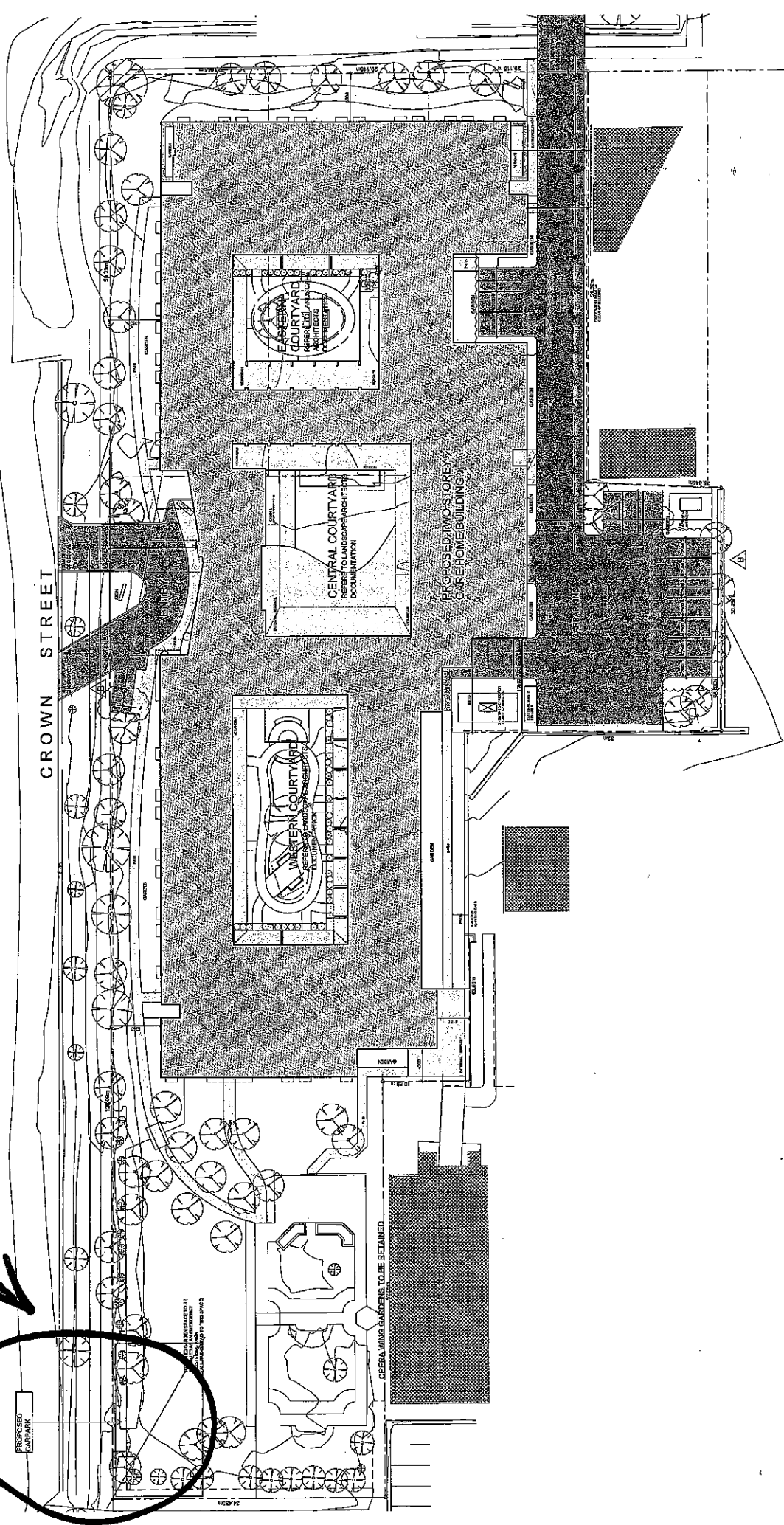
1. We have advised the owners that the JRPP panel will be undertaking a site visit at 8.30 am on 16 April 2015;
2. Please find attached a markup of the location for the additional car parking; and
3. The entire facility is able to cater for dementia residents. Some of the residents will have dementia, while others may develop dementia during their time at the facility. To allow the facility to better service the community of Grafton and the flexibility to cater for both dementia and non-dementia residents it is proposed that the calculation of visitors car parking should be based on a non-dementia facility (given there is not a calculation for a partial dementia facility). Therefore an additional 9 car parking spaces shall be provided in lieu of 6 car parking spaces. The location is per item (2) above.

Yours faithfully,
Crown Project Services Pty Ltd

Huy Huynh
Senior Project Manager

Attachment M2

parking area



PROJECT: PROPOSED THREE STOREY CARE HOME
CLIENT: THE WHIDON GROUP
LOCATION: CROWN STREET, GRAFTON

DATE: 20/03/08
SCALE: 1:500
DRAWN BY: J. TEEGE
CHECKED BY: J. TEEGE
APPROVED BY: J. TEEGE

SITE PLAN

DATE: 20/03/08
SCALE: 1:500
DRAWN BY: J. TEEGE
CHECKED BY: J. TEEGE
APPROVED BY: J. TEEGE

JACKSON TEEGE

SCALE: 1:500

DATE: 20/03/08

PROJECT: PROPOSED THREE STOREY CARE HOME
CLIENT: THE WHIDON GROUP
LOCATION: CROWN STREET, GRAFTON

DATE: 20/03/08
SCALE: 1:500
DRAWN BY: J. TEEGE
CHECKED BY: J. TEEGE
APPROVED BY: J. TEEGE

SITE PLAN

DATE: 20/03/08
SCALE: 1:500
DRAWN BY: J. TEEGE
CHECKED BY: J. TEEGE
APPROVED BY: J. TEEGE

JACKSON TEEGE

SCALE: 1:500

DATE: 20/03/08

Ref: S0025-150317 Grafton DA response to council Rev D

17 March 2015

Pat Ridgway,
Senior Development Planner
Clarence Valley Council,
Lock Bag 23, Grafton, NSW 2460

Dear Pat,

**RE: DEVELOPMENT APPLICATION No. DA2014/0596
REDEVELOPMENT OF RESIDENTIAL AGED CARE FACILITY, 219 QUEEN STREET, GRAFTON NSW 2460**

We refer to your letter to Newton Denny Chappelle dated 19 February 2015 (attached) where you have identified four (4) items requiring a response. Please find our response to the four (4) items as follows;

1. Based on the information provided in your letter, clarifying the conditions of Consent No. 2260 we have reviewed the number of on-site car parking spaces proposed as part of the Development Application and note that an additional six (6) spaces will be required. It is proposed that this be provided on site in a location that is to the satisfaction of council prior to the issue of a Construction Certificate and that this be addressed as a condition of Development Consent;
2. With respect to a dedicated ambulance parking area and a disable parking space that can be accessed at all time, please refer to letter attached from TEF Consulting 12 March 2015;
3. We do not wish to extend the on-street parking as a solution for the shortfall of on-site parking. As noted in item (1) the shortage of on-site parking currently shown in the Development Application shall be address by way of an additional six (6) spaces on-site; and
4. While the works shall be phased to allow the relocation of existing residents and the demolition of the existing building, the construction of the building will be continuous. The construction shall not be staged, hence the current development application lodged with Council is not lodged pursuant to Section 83B of the Environmental Planning & Assessment Act.

We refer to your email to Damian Chappelle dated 2 March 2015, 11:49am (attached) and can advise as follows;

1. The dimension of the car park and car parking space shall be in accordance with the relevant Australian Standards;
2. We note council's proposal to apply a two hour time limit to four (4) on street parking spaces on Crown Street. Given that the Grafton service cares for a higher than average number of supported residents we do not support this proposal as it will predominantly impact their families visiting the facility. Additionally as these visitors are generally emotionally vulnerable due to their circumstances we also believe that this would be an unfair impost to place on them; and
3. With respect to the ambulance bay and staged construction, please refer to our response to your letter 19 February 2015 above.

We refer to your email to Damian Chapelle dated 2 March 2015, 2:16pm (attached) and can advise as follows;

1. Parking for staff and visitors shall be sign posted accordingly; and
2. With respect to access to the main entry from the visitor's carpark (including access for mobility impaired persons), there is a path from the carpark which connects to the footpath which leads directly to the main entry.

We refer to your emails to Damian Chapelle dated 11 March 2015 and 10 March 2015 (attached) with respect to the existing sewer line. We note that there is an existing sewer line from Grafton Base Hospital passing through the site of the proposed development and that this will need to be addressed as part of the development. The sewer line was not identified in the authority records when a search was undertaken prior to the lodgment of the Development Application. Further investigation is required to prepare design options that meets council's requirements. We concur with your proposal that resolution of the existing sewer line be identified as a condition of Development Consent with the final design to follow.

Yours faithfully,

Crown Project Services Pty Ltd



Huy Huynh
Senior Project Manager

1 May 2015



Scott Greensill
General Manager
Clarence Valley Council
Locked Bag 23,
GRAFTON NSW 2460

Dear Mr Greensill,

I write with respect to the proposed redevelopment of our residential care facility located at 125 Crown Street & 217-221 Queen Street Grafton.

Firstly, we are delighted that the Clarence Valley Council has recommended that our Development Application 2104/0596 be approved pursuant to Section 80(1) (a) of the Environmental Planning & Assessment Act 1979 subject to the draft conditions of consent.

The Whiddon Group are committed to the Clarence Valley and this proposed development in the Grafton area represents a significant financial investment for us. As a not-for-profit organisation we are looking to provide a facility that meets the accommodation requirements of the local community going forward as well as employing numerous people which will benefit the local community.

With regard to your report to the Joint Regional Planning Panel we wish to table our comments so further consideration can be given by you with respect to their application for this project. Specifically, the proposed Section 64 Contributions totalling \$236,783.80 represents a significant cost to us and given our status as a not-for-profit organisation as well as the benefit that this project will provide to the Grafton community we believe it is overly onerous. We do understand the requirement of condition no 35 relating to the easement requirement for the hospitals sewer line. However, this also represents additional unforeseen costs for us and request that this also is taken into account when applying any Section 64 contribution. With respect to the schedule of draft conditions no 41 we re-iterate our objection to having any timed parking spaces along the Crown Street frontage.

Thank you for your anticipated consideration of these points identified.

Yours faithfully

Lee-ann Irwin
Chief Executive Officer