

20 November 2024

Courtney Fung
Planning Officer
Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

LETTER OF OBJECTION

SSD 64388218-Scalabrini Harbourside Seniors Housing, Drummoyne

Dear Courtney,

This submission has been prepared by *Keylan Consulting* (Keylan) on behalf of m projects in response to the exhibited State significant development application (SSDA) for the Scalabrini Harbourside Seniors Housing development (SSD 64388218) at 1A Lyons Road, Drummoyne.

We have undertaken a detailed review of the exhibited documentation in relation to the neighbouring residential properties at 2 and 1-6/4 Lyons Road, Drummoyne.

Overall, this submission objects to the proposal on the basis that the proposed SSDA will result in adverse impacts on the surrounding residential area.

We request that any details and /or references to m projects and residential properties at 2 and 1-6/4 Lyons Road, Drummoyne are not made publicly available.

The key impacts are outlined in detail below:

1. Café operation

The proposal seeks consent for a refurbished café for residents and visitors at the northern corner of the site, which will operate 7 days a week and will not be open to the general public. We also note the café will sell alcoholic beverages and assume an appropriate liquor licence is obtained and maintained for the venue.

Limited information is provided within the exhibited documentation in regard to the operation of the proposed café, particularly to proposed hours of operation (i.e. increased night-time activity and increased noise impacts) and ongoing management of the café.

Given there are potential adverse impacts on the amenity of nearby residential properties, we make the following recommendations for consideration:

- the development consent includes a condition that ensures the café is not open to the public
- hours of operation not to exceed 8:00am – 6:00pm as a condition of development consent to ensure acceptable residential amenity of the surrounding area

- the development consent includes a condition that requires compliance with the standard noise criteria set by Liquor and Gaming NSW and Council's DCP
- the development consent includes a condition requiring a Plan of Management for the café

2. Waterfront garden

We understand that the proposed *Waterfront Garden* will be dedicated for the use of future residents.

Concern is raised over this Waterfront Garden being potentially used for medium – large scale events (outside of the resident's general uses). In this event, amplified noise and music is likely to have adverse impacts on the residential properties, of which, has not been considered or assessed.

As such, we recommend the development consent include a condition that ensures this area of open space is not open to the public and amplified music be limited to acceptable noise levels.

3. Proposed car parking

We note the proposal provides a shortfall of 5 parking spaces for the Independent Living Units (ILUs). Given the sites location (proximity to water and public open spaces) the on-street parking demand is limited, this non-compliance will place further pressure on the already limited demand and is not considered acceptable.

Further, we understand the proposal provides 3 visitor spaces and 2 staff spaces. Although there is no applicable control in the Housing SEPP, this provision appears insufficient given the undersupply of ILUs being proposed.

The residential parking rates in CBD CP 2022 for medium/high density dwellings is 1 space for every 5 dwellings. If this applied to the proposal, 11 spaces are required for visitors. We consider the shortfall in visitor parking be fully addressed as part of this assessment given the likely increased use of the cafe.

We also note, the previous operation of the seniors housing at the site (which closed in 2019) resulted in significant issues on the on-street parking demand. This was a direct result of the lack of onsite carparking spaces.

Given the sites location and limited access to public transport, residents, staff and visitors will rely on cars as a primary mode of transportation, placing further pressure on the public on street parking.

4. Construction management

Traffic

A construction works zone is proposed at the northern end of Lyons Road to support access to the site. We note the proposal incorporates an area of approximately 1000m² for on-site material storage and handling.

The closure of Lyons Road and adjoining public open space for the construction period is unreasonable, given the site has 4 separate points of vehicle access and a considerable amount of land which could be otherwise dedicated for material handling and storage.

Lyons Road is a quiet, narrow No Through Road, turning construction vehicles around at the end of Lyons Road will cause significant impacts to residents and users of the public open space.

We strenuously object to this aspect of the proposal as it involves the closure of a public park and part of a road, which will result in adverse impacts on vehicles and pedestrians using this area, including for residents entering and exiting 2 and 1-6/4 Lyons Road, Drummoyne, given the location of this properties driveway and proximity to the works zone.

Acoustic

The Noise Impact Assessment finds the construction and noise vibration as a result of the construction are predicted to substantially exceed the construction management noise levels (50 dB(A)). We recommend that the development consent require the preparation of a detailed construction noise and vibration management plan prior to the commencement of construction to ensure that the noise impacts can be adequately managed to limit impact on the surrounding locality.

Construction hours

The proposed construction hours on Saturdays outlined in the EIS and Noise Impact Assessment are inconsistent. We recommend the development consent include a standard condition to restrict the construction hours on Saturdays to be 8:00am - 1:00pm, given the residential nature of the area and scale of the construction activities.

Conclusion and recommendations

This submission objects to the proposal in its current form. Our assessment concludes the application will result in adverse amenity impacts on the surrounding residential area.

We recommend that the *Department of Planning, Housing and Infrastructure* consider the following recommendations as part of its assessment and impose adequate conditions:

- condition that ensures the café is not open to the public
- café operating hours to be conditioned not to exceed 8:00am – 7:00pm
- condition that requires compliance with the standard noise criteria set by Liquor and Gaming New South Wales and other planning controls
- condition that ensures the northern open space is not open to the public
- increase car parking for the ILUs by 5 spaces to comply with the Housing SEPP
- increase visitor car parking to provide adequate visitor parking, noting the likely intensification of the use of the café by visitors
- restrict construction hours on Saturdays to 8:00am-1:00pm

- condition to require a detailed construction noise and vibration management plan be prepared prior to the commencement of construction
- revise the closure of the northern end of Lyons Road and the public park

If you would like to discuss any of the above, please do not hesitate to contact Sammy Hamilton, Senior Planner, at sammy@keylan.com.au.

Yours sincerely

Michael Woodland

Michael Woodland BTP MPIA
Director