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24 April 2008

The General Manager
Port Macquarie Hastings Council
PO Box 84
PORT MACQUARIE NSW 2444

Attention: Dan Croft

**RE: IBIS Care
Proposed development 80 bed Nursing Home Facility
Lot 48: DP 791996 & Lot 57: DP 808789 Ocean Drive Bonny Hills**

Dear Sir

Thank you for giving BHPA the opportunity to comment further on this DA by providing us with a copy of the documentation and extending the time for making this submission, following our request to you (letter dated 1/4/08) that Council give consideration to a community awareness forum in partnership with the BHPA. Although this request was refused, our committee has now had time to consider the DA.

While the Bonny Hills Progress Association supports the building of such a facility in the Port Macquarie Hastings region we have a number of concerns about the Development Application for the proposed location, which we consider are sufficiently serious to warrant an external peer review of the application.

These concerns relate to the accuracy and/or inconsistencies of data presented and to a number of omissions which if validated appear to significantly understate the potential impacts of the facility in its current form on the Bonny Hills community and associated infrastructure.

These issues include:

1. Staff Numbers

There appears to be a serious understatement of staff numbers required for an intensive care unit of this size, and of associated people and vehicle movements to and from the facility daily.

Data for a comparable facility in this area (86 beds) indicate that staff numbers are likely to be almost double those quoted in the DA in the busiest period with a considerable number of other people visiting the site daily (see annexure for details).

This in turn affects estimates of:

- i. Impacts of the additional volume of vehicles on traffic flows on Ocean Drive,
- ii. Ease of access to the facility and interruption to traffic flows on Ocean Drive
- iii. The number of parking spaces required.
- iv. Sewage loads

2. Traffic

The DA indicates the Nursing Home will have little impact on traffic with the projected traffic increase being only (4 vph one way). The DA also indicates that there will be a roundabout constructed at the intersection of Ocean Drive and McGilvray Road.

There appear to be a number of inconsistencies in the section on traffic impacts [see annexure] and it appears between this and the underestimation of additional traffic volume that impacts have been underestimated.

The DA also indicates that there will be another entrance to the facility via John Phillip Drive, accessed via McGilvray Rd. If this entrance is available for delivery purposes and entry / exit points to the facility it will have impacts on the residents that currently reside on John Phillip Drive and may have the potential to increase safety issues in that area. These are not mentioned in the DA.

3. Parking

Almost double the number of parking spaces (45) is provided at the above mentioned comparable facility, compared to that proposed in the DA for this facility (25). If this has been underestimated there will be 'on road parking' which will have potential impacts on traffic flows, particularly if it occurs on Ocean Drive.

4. Sewerage

High care nursing home facilities have the capacity to increase sewerage usage up to three times the normal usage per high care resident due to the complexity of the residents healthcare needs, staff ratio, kitchen and laundry.

Council has recently indicated that this can be accommodated even without the proposed augmentation which will boost the existing plant's capacity and cater for new development in Area 14¹.

¹ Currently Bonny Hills is under a sewer moratorium due to the limit of sewer disposal capacity. We understand that a recent resolution of Council has granted to this DA a limited allocation of the small residual sewerage capacity currently identified. At the time of the report (3.1.2 Sewer) in the DA the council had completed designing sewer augmentation work and expected that the work could be completed by the end of 2008. This date may not be met.

At present our understanding is that there continues at times, particularly following rain events, to be faecal contamination in Duchess Creek due to issues related to the current STP.

Has the potential for grey water reuse been incorporated in the design? There is no mention of this in the DA.

5. Laundry and Kitchen Facilities

If as it appears the facility has a commercial kitchen and laundry catering for all the residents on site, this will have the possibility of creating odours that may at times be offensive or irritating to current residents in the immediate area. This does not appear to be mentioned in the DA.

6. Waste Management

The proposal must be expected to generate a considerable quantity of waste. Management issues need to be carefully addressed from a health perspective and to avoid odours affecting neighbouring properties. Additional waste removal services are likely to add to the general traffic impact, most particularly on John Phillip Drive. Presumably waste removal would be required on a daily basis.

7. Vegetation

The DA indicates that there will be little clearing required to current vegetation due to the site being sparsely vegetated at this stage; and that there will be appropriate planting of native trees and shrubs in garden areas of the complex that will enhance refuge for local fauna.

This needs to be monitored closely as at this stage this area is utilised as a corridor for fauna and is also a local habitat for some species.

8. Building Design

The design of the complex appears to be modern and is stated in the DA that it will blend in with the current residential homes in the area.

However the following statement is noted in the Visual Analysis by THG Resource Strategist: “structures not to exceed 18m above existing ground line”. It is our understanding that building in this zone is controlled by the height limits under DCP09 which would limit building height to 6m. We request that Council check the plans very carefully for compliance.

Furthermore, there is no indication that this facility will be designed to be energy and water efficient incorporating the use of solar energy and water capture technologies – which with the apparent size of the roof is an opportunity going begging if Ibis is to be considered a ‘good corporate citizen’ and community leader.

Also potential impacts of ‘light pollution’ from security lighting on adjacent residences, or steps to mitigate the impacts, have not been mentioned in the DA.

Conclusion:

In summary this complex has the potential to make a significant contribution to the community but if poorly designed in this location it could have significant unintended impacts on the local community and the adjacent infrastructure. As such we suggest that council subject the DA to a rigorous independent peer review to address the issues identified in this submission.

Yours sincerely

Penny Marshall
Assistant Secretary
Bonny Hills Progress Association

See Annexure: **Analysis of staffing levels and traffic impact assessment**