

# Survey Responses

11 February 2016 - 26 July 2020

## 16 & 18 Betty Street and 73 & 75 Doonan Road - Submission Form

# Your Voice Nedlands

Project: Development Application - 16 & 18 Betty Street and 73 & 75 Doonan Road, Nedlands - Residential Aged Care Facility



VISITORS					
759					
CONTRIBUTORS			RESPONSES		
505			505		
505	0	0	505	0	0
Registered	Unverified	Anonymous	Registered	Unverified	Anonymous



**Respondent No:** 1

**Responded At:** Jun 26, 2020 10:09:59 am

**Last Seen:** Jun 26, 2020 01:59:33 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I support the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I support the proposal in that not only is aesthetically pleasing and well designed but also a valuable addition to our community in that it services the needs of the ageing population within the city.

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**Respondent No:** 2

**Responded At:** Jun 26, 2020 14:19:59 pm

**Last Seen:** Jun 26, 2020 06:15:33 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Owner of a property

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Concerned about increased flow of traffic through the area.

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**Respondent No:** 3

**Responded At:** Jun 26, 2020 14:24:47 pm

**Last Seen:** Jun 26, 2020 06:21:17 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Increased traffic on Doonan road is a concern.

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**Respondent No:** 4

**Responded At:** Jun 27, 2020 09:29:49 am

**Last Seen:** Jun 27, 2020 01:14:04 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am outraged that such a facility is even being considered. It changes the whole dynamic of the area. It brings significant additional traffic on a daily basis, there isn't sufficient parking. Such a large commercial development isn't fit for purpose for that area. It will significantly devalue my property. It also feels like this is an attempt at opportunistic development without proper consideration and time given to the rate payers and residents in the immediate vicinity to understand the negative impact and change such an ill-conceived proposal would have. The Mason garden area would totally lose the sanctuary/serenity that the greater community benefits from if such a large multi-story commercial aged care facility (hospital) was put on its door step. I implore all councilors to reject this proposal outright and to act in the best interests of your ratepayers and residents.

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**Respondent No:** 5

**Responded At:** Jun 27, 2020 16:54:15 pm

**Last Seen:** Jul 25, 2020 03:55:16 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I do not support the development application of 16 & 18 Betty Street and 73 & 75 Doonan Road. The proposed development is not of an appropriate scale to protect and enhance the existing amenity and character of the area. The streets are not designed to accommodate the amount of traffic for a facility of this size. There is completely inadequate amount of parking for this development. Several large trees will have to be removed. The setback has been greatly reduced to the other homeowners in the area. The building will completely overshadow the park where we regularly walk as well as their surrounding neighbours.

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**Respondent No:** 6

**Responded At:** Jun 27, 2020 16:57:16 pm

**Last Seen:** Jul 25, 2020 03:52:20 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I do not support the development application of 16 & 18 Betty Street and 73 & 75 Doonan Road. The proposed development is not of an appropriate scale to protect and enhance the existing amenity and character of the area. The streets are not designed to accommodate the amount of traffic for a facility of this size. There is completely inadequate amount of parking for this development. Several large trees will have to be removed. The setback has been greatly reduced to the other homeowners in the area. The building will completely overshadow the park where we regularly walk as well as their surrounding neighbours.

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**Respondent No:** 7

**Responded At:** Jun 28, 2020 09:34:12 am

**Last Seen:** Jun 28, 2020 01:32:00 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Development not appropriate for residential area.

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**Respondent No:** 8

**Responded At:** Jun 28, 2020 10:29:48 am

**Last Seen:** Jul 17, 2020 05:26:46 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property

Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**

I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the current proposa. I support the original two story proposal.

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**Respondent No:** 9

**Responded At:** Jun 28, 2020 18:34:05 pm

**Last Seen:** Jun 28, 2020 10:27:31 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

This development is completely inappropriate for this area. There is already too much traffic using Vincent St/Adelma Rd and Melvista Ave. The children playing at Mason Gardens are at significant risk of death from speeding motor vehicles. My children have nearly been hit several times. Please consider another area for this development.

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**Respondent No:** 10

**Responded At:** Jun 29, 2020 10:22:05 am

**Last Seen:** Jul 14, 2020 06:24:30 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

There has been no communication with residents regarding the project. The proposal for a five (5) storey high care 90 bed hospital on the site is appalling. There are numerous untruths in the letter from developers dated 15th June. The plans describe suites when in fact they are wards, NO consideration has been given to the safe evacuation of patients, No consideration has been given to fire brigade responding to an event, parking provision on site is at a bare minimum and are inadequate. There are many other matters which are inadequate including devaluation of property values for residents who have been long time ratepayers of City of Nedlands. We require an appointment to attend the Community Information Session on Wednesday 8th July 2020.

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**Respondent No:** 11

**Responded At:** Jun 30, 2020 20:26:03 pm

**Last Seen:** Jun 30, 2020 12:21:51 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**      All of Dalkeith nedlands

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

We grew up in the area, have family and friends on Doonan Rd, and other nearby locations. It's devastating to see a leafy green, family neighbourhood . The development is completely inappropriate in size.

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**Respondent No:** 12

**Responded At:** Jun 30, 2020 22:41:34 pm

**Last Seen:** Jun 30, 2020 14:21:11 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

As a community health worker I feel I have a good understanding on this facility and its needs and as much as facilities like this are needed it is not appropriate at all for a facility of this nature and size to locate in this particular residential area. If approved by Nedlands city council members It would be shocking and disappointing to see another council bow to developers over the community they are representing hopefully councillors will take time to ponder if this was proposed across from their family home would they be be happy with the development.

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**Respondent No:** 13

**Responded At:** Jul 01, 2020 06:10:58 am

**Last Seen:** Jun 30, 2020 22:09:10 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

The 4 storey proposed development covering 4 residential lots is not an appropriate size, scale or height appropriate for its setting or for the current or future character of the local area, which is predominantly residential and is characterised by 1 and 2 storey homes. A development of this scale is not sympathetic to, and will in fact detract from, all of the distinctive characteristics of this local area - a low-rise, leafy and quiet neighbourhood with large green setbacks. Several large and very old trees of local importance will be removed and lost forever, further degrading the amenity. The setback for the development has been greatly reduced to the other homeowners in the area. Given the topography of the local area, the building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens where we regularly walk and from various vantages around the neighbourhood. The 2 streets on which the development will sit are narrow and are not designed to accommodate the amount of traffic for a facility of this size, particularly given the reliance on street parking (as the suggested parking is completely inadequate for the commercial operation of the nature contemplated). The increased traffic on the streets, and crossing the footpath down Doonan Road, will be a danger to the large number of pedestrians, including children, who use the footpath to walk to Mason Gardens and the local childcare centre located less than 100m from the development. The noise from the large scale commercial air-conditioning plant, commercial laundry and commercial kitchen and traffic will destroy the peaceful amenity of the residential locality. The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. This development will reduce the value and amenity of all the neighbouring and nearby homes that residents have worked all their lives to afford.

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**Respondent No:** 14

**Responded At:** Jul 01, 2020 08:15:03 am

**Last Seen:** Jul 01, 2020 00:11:33 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Other

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Our Concerns: The 4 storey proposed development covering 4 residential lots is not an appropriate size, scale or height appropriate for its setting or for the current or future character of the local area, which is predominantly residential and is characterised by 1 and 2 storey homes. A development of this scale is not sympathetic to, and will in fact detract from, all of the distinctive characteristics of this local area - a low-rise, leafy and quiet neighbourhood with large green setbacks. Several large and very old trees of local importance will be removed and lost forever, further degrading the amenity. The setback for the development has been greatly reduced to the other homeowners in the area. Given the topography of the local area, the building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens where we regularly walk and from various vantages around the neighbourhood. The 2 streets on which the development will sit are narrow and are not designed to accommodate the amount of traffic for a facility of this size, particularly given the reliance on street parking (as the suggested parking is completely inadequate for the commercial operation of the nature contemplated). The increased traffic on the streets, and crossing the footpath down Doonan Road, will be a danger to the large number of pedestrians, including children, who use the footpath to walk to Mason Gardens and the local childcare centre located less than 100m from the development. The noise from the large scale commercial air-conditioning plant, commercial laundry and commercial kitchen and traffic will destroy the peaceful amenity of the residential locality. The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. This development will reduce the value and amenity of all the neighbouring and nearby homes that residents have worked all their lives to afford.

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**Respondent No:** 15

**Responded At:** Jul 01, 2020 08:27:22 am

**Last Seen:** Jul 01, 2020 00:19:49 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**  On behalf of a company

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the development application of 16 & 18 Betty Street and 73 & 75 Doonan Road because: - The 4 storey proposed development covering 4 residential lots is not an appropriate size, scale or height appropriate for its setting or for the current or future character of the local area, which is predominantly residential and is characterised by 1 and 2 storey homes. - A development of this scale is not sympathetic to, and will in fact detract from, all of the distinctive characteristics of this local area - a low-rise, leafy and quiet neighbourhood with large green setbacks - Several large and very old trees of local importance will be removed and lost forever, further degrading the amenity. - The setback for the development has been greatly reduced to the other homeowners in the area. - The 2 streets on which the development will sit are narrow and are not designed to accommodate the amount of traffic for a facility of this size, particularly given the reliance on street parking (as the suggested parking is completely inadequate for the commercial operation of the nature contemplated). The increased traffic on the streets, and crossing the footpath down Doonan Road, will be a danger to the large number of pedestrians, including children, who use the footpath to walk to Mason Gardens and the local childcare centre located less than 100m from the development. - The noise from the large scale commercial air-conditioning plant, commercial laundry and commercial kitchen and traffic will destroy the peaceful amenity of the residential locality. - The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. - This development will reduce the value and amenity of all the neighbouring and nearby homes that residents have worked all their lives to afford.

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**Respondent No:** 16

**Responded At:** Jul 01, 2020 08:37:41 am

**Last Seen:** Jul 01, 2020 00:34:36 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

The 4 storey proposed development covering 4 residential lots is not an appropriate size, scale or height appropriate for its setting or for the current or future character of the local area, which is predominantly residential and is characterised by 1 and 2 storey homes. A development of this scale is not sympathetic to, and will in fact detract from, all of the distinctive characteristics of this local area - a low-rise, leafy and quiet neighbourhood with large green setbacks. Several large and very old trees of local importance will be removed and lost forever, further degrading the amenity. The setback for the development has been greatly reduced to the other homeowners in the area. Given the topography of the local area, the building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens where we regularly walk and from various vantages around the neighbourhood. The 2 streets on which the development will sit are narrow and are not designed to accommodate the amount of traffic for a facility of this size, particularly given the reliance on street parking (as the suggested parking is completely inadequate for the commercial operation of the nature contemplated). The increased traffic on the streets, and crossing the footpath down Doonan Road, will be a danger to the large number of pedestrians, including children, who use the footpath to walk to Mason Gardens and the local childcare centre located less than 100m from the development. The noise from the large scale commercial air-conditioning plant, commercial laundry and commercial kitchen and traffic will destroy the peaceful amenity of the residential locality. The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. This development will reduce the value and amenity of all the neighbouring and nearby homes that residents have worked all their lives to afford.

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**Respondent No:** 17

**Responded At:** Jul 01, 2020 09:29:09 am

**Last Seen:** Jul 01, 2020 01:26:46 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Our Concerns: The 4 storey proposed development covering 4 residential lots is not an appropriate size, scale or height appropriate for its setting or for the current or future character of the local area, which is predominantly residential and is characterised by 1 and 2 storey homes. A development of this scale is not sympathetic to, and will in fact detract from, all of the distinctive characteristics of this local area - a low-rise, leafy and quiet neighbourhood with large green setbacks. Several large and very old trees of local importance will be removed and lost forever, further degrading the amenity. The setback for the development has been greatly reduced to the other homeowners in the area. Given the topography of the local area, the building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens where we regularly walk and from various vantages around the neighbourhood. The 2 streets on which the development will sit are narrow and are not designed to accommodate the amount of traffic for a facility of this size, particularly given the reliance on street parking (as the suggested parking is completely inadequate for the commercial operation of the nature contemplated). The increased traffic on the streets, and crossing the footpath down Doonan Road, will be a danger to the large number of pedestrians, including children, who use the footpath to walk to Mason Gardens and the local childcare centre located less than 100m from the development. The noise from the large scale commercial air-conditioning plant, commercial laundry and commercial kitchen and traffic will destroy the peaceful amenity of the residential locality. The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. This development will reduce the value and amenity of all the neighbouring and nearby homes that residents have worked all their lives to afford.

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**Respondent No:** 18

**Responded At:** Jul 01, 2020 10:34:47 am

**Last Seen:** Jul 01, 2020 02:29:06 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the development application of 16 & 18 Betty Street and 73 & 75 Doonan Road because I have a number of concerns:-

- The 4 storey proposed development covering 4 residential lots is not an appropriate size, scale or height appropriate for its setting or for the current or future character of the local area, which is predominantly residential and is characterised by 1 and 2 storey homes.
- A development of this scale is not sympathetic to, and will in fact detract from, all of the distinctive characteristics of this local area - a low-rise, leafy and quiet neighbourhood with large green setbacks
- Several large and very old trees of local importance will be removed and lost forever, further degrading the amenity.
- The setback for the development has been greatly reduced to the other homeowners in the area.
- Given the topography of the local area, the building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens where we regularly walk and from various vantages around the neighbourhood.
- The 2 streets on which the development will sit are narrow and are not designed to accommodate the amount of traffic for a facility of this size, particularly given the reliance on street parking (as the suggested parking is completely inadequate for the commercial operation of the nature contemplated).
- The increased traffic on the streets, and crossing the footpath down Doonan Road, will be a danger to the large number of pedestrians, including children, who use the footpath to walk to Mason Gardens and the local childcare centre located less than 100m from the development.
- The noise from the large scale commercial air-conditioning plant, commercial laundry and commercial kitchen and traffic will destroy the peaceful amenity of the residential locality.
- The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes.
- This development will reduce the value and amenity of all the neighbouring and nearby homes that residents have worked all their lives to afford. I just cannot believe that a development of that size is being considered in a quiet leafy suburb. The poor residents of Doonan and Betty Street must be going through so much stress - its ridiculous. I really hope common sense prevails - this is not the correct place for such a huge development

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**Respondent No:** 19

**Responded At:** Jul 01, 2020 11:04:31 am

**Last Seen:** Jul 01, 2020 02:56:01 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Its a residential area and the proposed development is too large, the proposed nursing home would be more suited to a commercial area. It is not in keeping with the distinctive characteristics of a low rise quite neighbourhood.

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**Respondent No:** 20

**Responded At:** Jul 01, 2020 11:26:46 am

**Last Seen:** Jul 01, 2020 03:24:49 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

The 4 storey proposed development covering 4 residential lots is not an appropriate size, scale or height appropriate for its setting or for the current or future character of the local area, which is predominantly residential and is characterised by 1 and 2 storey homes.

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**Respondent No:** 21

**Responded At:** Jul 01, 2020 13:08:41 pm

**Last Seen:** Jul 01, 2020 05:00:12 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Owner of a property

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

This is a quiet residential area. Increase in density and workers/carers will mean increased traffic/pollution. I like the current landscape.

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**Respondent No:** 22

**Responded At:** Jul 01, 2020 20:38:14 pm

**Last Seen:** Jul 01, 2020 12:34:28 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Other

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

The 4 storey proposed development covering 4 residential lots is not an appropriate size, scale or height appropriate for its setting or for the current or future character of the local area, which is predominantly residential and is characterised by 1 and 2 storey homes. A development of this scale is not sympathetic to, and will in fact detract from, all of the distinctive characteristics of this local area - a low-rise, leafy and quiet neighbourhood with large green setbacks. Several large and very old trees of local importance will be removed and lost forever, further degrading the amenity. The setback for the development has been greatly reduced to the other homeowners in the area. Given the topography of the local area, the building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens where we regularly walk and from various vantages around the neighbourhood. The 2 streets on which the development will sit are narrow and are not designed to accommodate the amount of traffic for a facility of this size, particularly given the reliance on street parking (as the suggested parking is completely inadequate for the commercial operation of the nature contemplated). The increased traffic on the streets, and crossing the footpath down Doonan Road, will be a danger to the large number of pedestrians, including children, who use the footpath to walk to Mason Gardens and the local childcare centre located less than 100m from the development. The noise from the large scale commercial air-conditioning plant, commercial laundry and commercial kitchen and traffic will destroy the peaceful amenity of the residential locality. The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. This development will reduce the value and amenity of all the neighbouring and nearby homes that residents have worked all their lives to afford.

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**Respondent No:** 23

**Responded At:** Jul 01, 2020 21:18:28 pm

**Last Seen:** Jul 01, 2020 13:10:16 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Other
Owner of a property

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the development application of 16 & 18 Betty Street and 73 & 75 Doonan Road because: The 4 storey proposed development covering 4 residential lots is not an appropriate size, scale or height appropriate for its setting or for the current or future character of the local area, which is predominantly residential and is characterised by 1 and 2 storey homes. A development of this scale is not sympathetic to, and will in fact detract from, all of the distinctive characteristics of this local area - a low-rise, leafy and quiet neighbourhood with large green setbacks Several large and very old trees of local importance will be removed and lost forever, further degrading the amenity. The setback for the development has been greatly reduced to the other homeowners in the area. Given the topography of the local area, the building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens where we regularly walk and from various vantages around the neighbourhood. The 2 streets on which the development will sit are narrow and are not designed to accommodate the amount of traffic for a facility of this size, particularly given the reliance on street parking (as the suggested parking is completely inadequate for the commercial operation of the nature contemplated). The increased traffic on the streets, and crossing the footpath down Doonan Road, will be a danger to the large number of pedestrians, including children, who use the footpath to walk to Mason Gardens and the local childcare centre located less than 100m from the development. The noise from the large scale commercial air-conditioning plant, commercial laundry and commercial kitchen and traffic will destroy the peaceful amenity of the residential locality. The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. This development will reduce the value and amenity of all the neighbouring and nearby homes that residents have worked all their lives to afford.

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**Respondent No:** 24

**Responded At:** Jul 02, 2020 14:47:29 pm

**Last Seen:** Jul 02, 2020 06:44:13 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object because the 2 streets on which the development will sit are narrow and are not designed to accommodate the amount of traffic for a facility of this size, particularly given the reliance on-street parking (as the suggested parking is completely inadequate for the commercial operation of the nature contemplated). In addition the increased traffic on the streets, and crossing the footpath down Doonan Road, will be a danger to the large number of pedestrians, including children, who use the footpath to walk to Mason Gardens and the local childcare centre located less than 100m from the development.

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**Respondent No:** 25

**Responded At:** Jul 02, 2020 16:52:03 pm

**Last Seen:** Jul 02, 2020 08:38:01 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I support the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I fully and wholeheartedly support the construction of an Aged Care Facility in Doonan Rd/Betty Street. I have recently retired after working more than 3 decades in the health and aged care industry. I know first hand how hard it is for residents to find an aged care facility close to home. I have seen so much anxiety and Heartache when residents in an aged care facility do not see their family very much due to the distance away from family and friends. The ageing population is rapidly Growing particularly in the City of Nedlands and we have very few opportunities/options. We used to have a small nursing home on Betty street but that has been closed for over 12 years and it is sorely missed by so many of us. I see this newly proposed aged care facility replacing the services the old one gave - and more. I am extremely impressed with the other aged care facilities owned and managed by Oryx and if they bring the same high standards of accommodation and care to the City of Nedlands, Melvista Ward, we will be very, very fortunate. I acknowledge that there may be a bit of inconvenience during the initial demolition stage, that is inevitable, however the long term benefits far, far out way initial inconvenience. I am happy to discuss my thoughts further if required - bottom line - fully support this initiative. Thank you.

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**Respondent No:** 26

**Responded At:** Jul 02, 2020 17:43:54 pm

**Last Seen:** Jul 02, 2020 09:47:08 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property
Occupier of a property

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Our Concerns: • The 4 storey proposed development covering 4 residential lots is not an appropriate size, scale or height appropriate for its setting or for the current or future character of the local area, which is predominantly residential and is characterised by 1 and 2 storey homes. • A development of this scale is not sympathetic to, and will in fact detract from, all of the distinctive characteristics of this local area - a low-rise, leafy and quiet neighbourhood with large green setbacks • Several large and very old trees of local importance will be removed and lost forever, further degrading the amenity. • The setback for the development has been greatly reduced to the other homeowners in the area. • Given the topography of the local area, the building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens where we regularly walk and from various vantages around the neighbourhood. • The 2 streets on which the development will sit are narrow and are not designed to accommodate the amount of traffic for a facility of this size, particularly given the reliance on street parking (as the suggested parking is completely inadequate for the commercial operation of the nature contemplated). • The increased traffic on the streets, and crossing the footpath down Doonan Road, will be a danger to the large number of pedestrians, including children, who use the footpath to walk to Mason Gardens and the local childcare centre located less than 100m from the development. • The noise from the large scale commercial air-conditioning plant, commercial laundry and commercial kitchen and traffic will destroy the peaceful amenity of the residential locality. • The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. • This development will reduce the value and amenity of all the neighbouring and nearby homes that residents have worked all their lives to afford.

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**Respondent No:** 27

**Responded At:** Jul 02, 2020 17:49:34 pm

**Last Seen:** Jul 02, 2020 09:48:33 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property
Occupier of a property

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Our Concerns: • The 4 storey proposed development covering 4 residential lots is not an appropriate size, scale or height appropriate for its setting or for the current or future character of the local area, which is predominantly residential and is characterised by 1 and 2 storey homes. • A development of this scale is not sympathetic to, and will in fact detract from, all of the distinctive characteristics of this local area - a low-rise, leafy and quiet neighbourhood with large green setbacks • Several large and very old trees of local importance will be removed and lost forever, further degrading the amenity. • The setback for the development has been greatly reduced to the other homeowners in the area. • Given the topography of the local area, the building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens where we regularly walk and from various vantages around the neighbourhood. • The 2 streets on which the development will sit are narrow and are not designed to accommodate the amount of traffic for a facility of this size, particularly given the reliance on street parking (as the suggested parking is completely inadequate for the commercial operation of the nature contemplated). • The increased traffic on the streets, and crossing the footpath down Doonan Road, will be a danger to the large number of pedestrians, including children, who use the footpath to walk to Mason Gardens and the local childcare centre located less than 100m from the development. • The noise from the large scale commercial air-conditioning plant, commercial laundry and commercial kitchen and traffic will destroy the peaceful amenity of the residential locality. • The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. • This development will reduce the value and amenity of all the neighbouring and nearby homes that residents have worked all their lives to afford.

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**Respondent No:** 28

**Responded At:** Jul 02, 2020 17:55:34 pm

**Last Seen:** Jul 02, 2020 09:54:34 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Our Concerns: • The 4 storey proposed development covering 4 residential lots is not an appropriate size, scale or height appropriate for its setting or for the current or future character of the local area, which is predominantly residential and is characterised by 1 and 2 storey homes. • A development of this scale is not sympathetic to, and will in fact detract from, all of the distinctive characteristics of this local area - a low-rise, leafy and quiet neighbourhood with large green setbacks • Several large and very old trees of local importance will be removed and lost forever, further degrading the amenity. • The setback for the development has been greatly reduced to the other homeowners in the area. • Given the topography of the local area, the building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens where we regularly walk and from various vantage points around the neighbourhood. • The 2 streets on which the development will sit are narrow and are not designed to accommodate the amount of traffic for a facility of this size, particularly given the reliance on street parking (as the suggested parking is completely inadequate for the commercial operation of the nature contemplated). • The increased traffic on the streets, and crossing the footpath down Doonan Road, will be a danger to the large number of pedestrians, including children, who use the footpath to walk to Mason Gardens and the local childcare centre located less than 100m from the development. • The noise from the large scale commercial air-conditioning plant, commercial laundry and commercial kitchen and traffic will destroy the peaceful amenity of the residential locality. • The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. • This development will reduce the value and amenity of all the neighbouring and nearby homes that residents have worked all their lives to afford.

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**Respondent No:** 29

**Responded At:** Jul 02, 2020 17:57:52 pm

**Last Seen:** Jul 02, 2020 09:56:52 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Our Concerns: • The 4 storey proposed development covering 4 residential lots is not an appropriate size, scale or height appropriate for its setting or for the current or future character of the local area, which is predominantly residential and is characterised by 1 and 2 storey homes. • A development of this scale is not sympathetic to, and will in fact detract from, all of the distinctive characteristics of this local area - a low-rise, leafy and quiet neighbourhood with large green setbacks • Several large and very old trees of local importance will be removed and lost forever, further degrading the amenity. • The setback for the development has been greatly reduced to the other homeowners in the area. • Given the topography of the local area, the building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens where we regularly walk and from various vantage points around the neighbourhood. • The 2 streets on which the development will sit are narrow and are not designed to accommodate the amount of traffic for a facility of this size, particularly given the reliance on street parking (as the suggested parking is completely inadequate for the commercial operation of the nature contemplated). • The increased traffic on the streets, and crossing the footpath down Doonan Road, will be a danger to the large number of pedestrians, including children, who use the footpath to walk to Mason Gardens and the local childcare centre located less than 100m from the development. • The noise from the large scale commercial air-conditioning plant, commercial laundry and commercial kitchen and traffic will destroy the peaceful amenity of the residential locality. • The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. • This development will reduce the value and amenity of all the neighbouring and nearby homes that residents have worked all their lives to afford.

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**Respondent No:** 30

**Responded At:** Jul 02, 2020 19:24:03 pm

**Last Seen:** Jul 02, 2020 11:13:09 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Other

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Our Concerns: The 4 storey proposed development covering 4 residential lots is not an appropriate size, scale or height appropriate for its setting or for the current or future character of the local area, which is predominantly residential and is characterised by 1 and 2 storey homes. A development of this scale is not sympathetic to, and will in fact detract from, all of the distinctive characteristics of this local area - a low-rise, leafy and quiet neighbourhood with large green setbacks. The setback for the development has been greatly reduced to the other homeowners in the area. Given the topography of the local area, the building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens where we regularly walk and from various vantages around the neighbourhood. The 2 streets on which the development will sit are narrow and are not designed to accommodate the amount of traffic for a facility of this size, particularly given the reliance on street parking (as the suggested parking is completely inadequate for the commercial operation of the nature contemplated). The increased traffic on the streets, and crossing the footpath down Doonan Road, will be a danger to the large number of pedestrians, including children, who use the footpath to walk to Mason Gardens and the local childcare centre located less than 100m from the development. The noise from the large scale commercial air-conditioning plant, commercial laundry and commercial kitchen and traffic will destroy the peaceful amenity of the residential locality. The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. This development will reduce the value and amenity of all the neighbouring and nearby homes that residents have worked all their lives to afford.

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**Respondent No:** 31

**Responded At:** Jul 03, 2020 11:53:25 am

**Last Seen:** Jul 03, 2020 03:41:45 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

The "Community Consultation" has not been done appropriately. This project has been calculated, planned and underhanded from the moment it was initiated. If this project has the community in mind - why are the community so outraged? I am sure the community would be supportive if it was blended in with the landscape and surrounding areas. The developers don't appear to be honest - is it 3 stories plus a basement plus a roof top garden plus plant rooms on the roof ie: 6 stories?

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**Respondent No:** 32

**Responded At:** Jul 03, 2020 12:04:37 pm

**Last Seen:** Jul 03, 2020 04:01:45 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Life of the neighbourhood will change for worse. The development is too big.

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**Respondent No:** 33

**Responded At:** Jul 03, 2020 12:33:28 pm

**Last Seen:** Jul 03, 2020 04:30:47 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**      not answered

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

- The 4 storey proposed development covering 4 residential lots is not an appropriate size, scale or height appropriate for its setting or for the current or future character of the local area, which is predominantly residential and is characterised by 1 and 2 storey homes.
-



**Respondent No:** 34

**Responded At:** Jul 03, 2020 13:46:07 pm

**Last Seen:** Jul 03, 2020 05:33:37 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I have friends that live on Doonan Rd, opposite the proposed development, and visit frequently. So I am quite familiar with the street, it's quiet residential, low-rise aspect, so typical (and enviable) of the suburb - particularly this part of the suburb. I believe that such a large development is out of character with the area, and will impact not only the residents but visitors, and perceptions of the suburb. Quality aged care is vital for communities, but should not subtract from them. A facility more in keeping with the residential nature of the area would be the best option.

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**Respondent No:** 35

**Responded At:** Jul 03, 2020 17:19:53 pm

**Last Seen:** Jul 03, 2020 09:15:30 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**      All of Betty Street

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I cannot believe such a development has been lodged in such a small suburban street - what is the zoning of this area ???  
The 2 streets on which the development will sit are narrow and are not designed to accommodate the amount of traffic for a facility of this size, particularly given the reliance on street parking (as the suggested parking is completely inadequate for the commercial operation of the nature contemplated).. The increased traffic on the streets will be significant but the roads are very narrow - how did this development get to submission stage ???

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**Respondent No:** 36

**Responded At:** Jul 03, 2020 21:17:31 pm

**Last Seen:** Jul 03, 2020 12:51:26 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

The 4 storey proposed development covering 4 residential lots is not an appropriate size, scale or height appropriate for its setting or for the current or future character of the local area, which is predominantly residential and is characterised by 1 and 2 storey homes. A development of this scale is not sympathetic to, and will in fact detract from, all of the distinctive characteristics of this local area - a low-rise, leafy and quiet neighbourhood with large green setbacks. Several large and very old trees of local importance will be removed and lost forever, further degrading the amenity. The setback for the development has been greatly reduced to the other homeowners in the area. Given the topography of the local area, the building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens where we regularly walk and from various vantages around the neighbourhood. The 2 streets on which the development will sit are narrow and are not designed to accommodate the amount of traffic for a facility of this size, particularly given the reliance on street parking (as the suggested parking is completely inadequate for the commercial operation of the nature contemplated). The increased traffic on the streets, and crossing the footpath down Doonan Road, will be a danger to the large number of pedestrians, including children, who use the footpath to walk to Mason Gardens and the local childcare centre located less than 100m from the development. The noise from the large scale commercial air-conditioning plant, commercial laundry and commercial kitchen and traffic will destroy the peaceful amenity of the residential locality. The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. This development will reduce the value and amenity of all the neighbouring and nearby homes that residents have worked all their lives to afford.

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**Respondent No:** 37

**Responded At:** Jul 04, 2020 15:38:23 pm

**Last Seen:** Jul 24, 2020 02:25:15 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

As an older resident in Dalkeith I understand and support the need to develop appropriate facilities to care for the frail elderly in their local community. However, this proposed development is not the way to achieve that objective for the following reasons: 1. The scale, height and bulk of the proposed development detracts from, and does not complement, the local area which is predominantly residential and characterised by homes [many recently constructed] that are 1 or 2 storeys in height. 2. Clearly, with 90 residents and the requisite staff to care for them [and to man the cafe and wellness centre], together with visitors, the proposed plan for parking is woefully inadequate. 3. In addition, the streets are narrow and not designed to handle heavy traffic. Currently, parked cars engender difficulty for cars travelling in opposite directions. this is also a problem for the buses. Additional street parking generated by this proposed development will create a major traffic difficulty.

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**Respondent No:** 38

**Responded At:** Jul 04, 2020 16:06:46 pm

**Last Seen:** Jul 24, 2020 02:14:44 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

---

Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

There is a need in the City of Nedlands for facilities that can provide special care for the frail elderly. As an older and retired person, I acknowledge that. However, this proposed development is not an appropriate way to achieve that desired objective for the following reasons: 1. The area of Betty Street and Doonan Road is a leafy and quiet neighbourhood with large, green setbacks. Much of the housing is relatively newly built or recently renovated and of 1 or 2 storeys in height. The scale, height and bulk of the proposed development detracts from and does not complement the amenity of the area. 2. Both Betty Street and Doonan Road are narrow. Accordingly, traffic flow in opposite directions can be obstructed and delayed by parked vehicles. 3. That problem, clearly, will be significantly compounded by the woefully inadequate parking the proposed development suggests. Parking requirements for 90 residents, their carers, the staff required to man the café, hairdresser, physiotherapy suite, wellness centre, etc and visitors will inevitably flow on to the surrounding streets. 4. In turn, vehicle movements will increase risks to local children walking or cycling to Masons Gardens.

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**Respondent No:** 39

**Responded At:** Jul 04, 2020 16:15:23 pm

**Last Seen:** Jul 23, 2020 07:07:25 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the development application of 16 & 18 Betty Street and 73 & 75 Doonan Road because I believe the parking provided to be totally inadequate for the scale and purpose of the development. Cars from visitors and staff will overflow to Mason's Gardens and surrounding streets, thereby limiting the ability of residents to utilise the park. Other concerns relate to:

- The 4 storey proposed development covering 4 residential lots is not an appropriate size, scale or height appropriate for its setting or for the current or future character of the local area, which is predominantly residential and is characterised by 1 and 2 storey homes.
- A development of this scale is not sympathetic to, and will in fact detract from, all of the distinctive characteristics of this local area - a low-rise, leafy and quiet neighbourhood with large green setbacks
- The setback for the development has been greatly reduced to the other homeowners in the area.
- Given the topography of the local area, the building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens where we regularly walk and from various vantages around the neighbourhood.
- The 2 streets on which the development will sit are narrow and are not designed to accommodate the amount of traffic for a facility of this size, particularly given the reliance on street parking (as the suggested parking is completely inadequate for the commercial operation of the nature contemplated).
- The increased traffic on the streets, and crossing the footpath down Doonan Road, will be a danger to the large number of pedestrians, including children, who use the footpath to walk to Mason Gardens and the local childcare centre located less than 100m from the development.
- The noise from the large scale commercial air-conditioning plant, commercial laundry and commercial kitchen and traffic will destroy the peaceful amenity of the residential locality.
- The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes.
- This development will reduce the value and amenity of all the neighbouring and nearby homes that residents have worked all their lives to afford.

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**Respondent No:** 40

**Responded At:** Jul 04, 2020 17:21:31 pm

**Last Seen:** Jul 04, 2020 09:19:30 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Our Concerns: • The 4 storey proposed development covering 4 residential lots is not an appropriate size, scale or height appropriate for its setting or for the current or future character of the local area, which is predominantly residential and is characterised by 1 and 2 storey homes. • A development of this scale is not sympathetic to, and will in fact detract from, all of the distinctive characteristics of this local area - a low-rise, leafy and quiet neighbourhood with large green setbacks • Several large and very old trees of local importance will be removed and lost forever, further degrading the amenity. • The setback for the development has been greatly reduced to the other homeowners in the area. • Given the topography of the local area, the building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens where we regularly walk and from various vantage points around the neighbourhood. • The 2 streets on which the development will sit are narrow and are not designed to accommodate the amount of traffic for a facility of this size, particularly given the reliance on street parking (as the suggested parking is completely inadequate for the commercial operation of the nature contemplated). • The increased traffic on the streets, and crossing the footpath down Doonan Road, will be a danger to the large number of pedestrians, including children, who use the footpath to walk to Mason Gardens and the local childcare centre located less than 100m from the development. • The noise from the large scale commercial air-conditioning plant, commercial laundry and commercial kitchen and traffic will destroy the peaceful amenity of the residential locality. • The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. • This development will reduce the value and amenity of all the neighbouring and nearby homes that residents have worked all their lives to afford.

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**Respondent No:** 41

**Responded At:** Jul 04, 2020 19:41:47 pm

**Last Seen:** Jul 19, 2020 08:06:23 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property
Occupier of a property

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

The scale and height of the proposed development is totally inappropriate for this residential area

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**Respondent No:** 42

**Responded At:** Jul 04, 2020 20:51:12 pm

**Last Seen:** Jul 04, 2020 23:14:54 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

It is entirely inappropriate to have a five storey, 90 plus aged care facility (which is a for profit and therefore commercial venture) approved on residential properties. There has been zero consultation in the last four years and the design now is very different to that which was discussed four years ago. This will destroy value for many many rate payers and it is simply unacceptable. It is appropriate that I advise that my rights are strictly reserved.

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**Respondent No:** 43

**Responded At:** Jul 04, 2020 21:16:24 pm

**Last Seen:** Jul 04, 2020 13:12:26 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Owner of a property

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

It is absolutely not appropriate to be building an aged care facility in thus region. We do not want such a thing in the middle of our suburb. It's supposed to be a quiet family suburb, not over taken by massive businesses in the middle of it! Not appropriate AT ALL!!

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**Respondent No:** 44

**Responded At:** Jul 04, 2020 21:31:08 pm

**Last Seen:** Jul 04, 2020 13:11:56 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I have a few concerns: 1) Parking at Mason Gardens near Kidz Galore childcare centre. My son's go here & parking is limited, especially at post school pick-up times. This proposal will see visitors parking here which will make drop off and picks hard (& dangerous... try walking 200m down the road to your carpark with 3 kids & 2 hands!!). This is NOT acceptable. I'm sure they say "adequate parking"... but by the time residents & staff park how many visitors can you get in their underground lot? 2) It shouldn't be allowed on a quiet residential street. Why is it happening south of princess rd rather than in all the R60 zoned areas that the are close to Stirling highway infrastructure? This spot is R12.5 as I understand. Can it happen next door to me?

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**Respondent No:** 45

**Responded At:** Jul 05, 2020 09:55:14 am

**Last Seen:** Jul 05, 2020 01:52:21 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Other

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

We are a family with young children that uses and masons gardens and college park a lot and really enjoy the outdoor space and safety. We are worried about lack of parking, increased traffic and safety of pedestrians if a development such as is proposed is to go ahead.

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**Respondent No:** 46

**Responded At:** Jul 05, 2020 16:10:12 pm

**Last Seen:** Jul 05, 2020 08:04:15 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property
Occupier of a property

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

The 4 storey proposed development covering 4 residential lots is not an appropriate size, scale or height appropriate for its setting or for the current or future character of the local area, which is predominantly residential and is characterised by 1 and 2 storey homes. A development of this scale is not sympathetic to, and will in fact detract from, all of the distinctive characteristics of this local area - a low-rise, leafy and quiet neighbourhood with large green setbacks. Several large and very old trees of local importance will be removed and lost forever, further degrading the amenity. The setback for the development has been greatly reduced to the other homeowners in the area. Given the topography of the local area, the building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens where we regularly walk and from various vantages around the neighbourhood. The 2 streets on which the development will sit are narrow and are not designed to accommodate the amount of traffic for a facility of this size, particularly given the reliance on street parking (as the suggested parking is completely inadequate for the commercial operation of the nature contemplated). The increased traffic on the streets, and crossing the footpath down Doonan Road, will be a danger to the large number of pedestrians, including children, who use the footpath to walk to Mason Gardens and the local childcare centre located less than 100m from the development. The noise from the large scale commercial air-conditioning plant, commercial laundry and commercial kitchen and traffic will destroy the peaceful amenity of the residential locality. The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. This development will reduce the value and amenity of all the neighbouring and nearby homes that residents have worked all their lives to afford.

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**Respondent No:** 47

**Responded At:** Jul 05, 2020 19:07:13 pm

**Last Seen:** Jul 05, 2020 11:03:41 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Our Concerns: The 4 storey proposed development covering 4 residential lots is not an appropriate size, scale or height appropriate for its setting or for the current or future character of the local area, which is predominantly residential and is characterised by 1 and 2 storey homes. A development of this scale is not sympathetic to, and will in fact detract from, all of the distinctive characteristics of this local area - a low-rise, leafy and quiet neighbourhood with large green setbacks. Several large and very old trees of local importance will be removed and lost forever, further degrading the amenity. The setback for the development has been greatly reduced to the other homeowners in the area. Given the topography of the local area, the building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens where we regularly walk and from various vantages around the neighbourhood. The 2 streets on which the development will sit are narrow and are not designed to accommodate the amount of traffic for a facility of this size, particularly given the reliance on street parking (as the suggested parking is completely inadequate for the commercial operation of the nature contemplated). The increased traffic on the streets, and crossing the footpath down Doonan Road, will be a danger to the large number of pedestrians, including children, who use the footpath to walk to Mason Gardens and the local childcare centre located less than 100m from the development. The noise from the large scale commercial air-conditioning plant, commercial laundry and commercial kitchen and traffic will destroy the peaceful amenity of the residential locality. The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. This development will reduce the value and amenity of all the neighbouring and nearby homes that residents have worked all their lives to afford.

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**Respondent No:** 48

**Responded At:** Jul 06, 2020 07:48:35 am

**Last Seen:** Jul 05, 2020 23:38:28 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	On behalf of a company

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

This development is too high with overlooking and shadowing impacts on surrounding properties. The nature of the commercial property in this location is also problematic. Parking for staff and visitors also seems inadequate. Setting this precedent is not appropriate in this residential area. Nedlands council is becoming inconsiderate of current residents lifestyle and privacy and is devaluing residential properties and wrecking the family environment of Nedlands and the street look and appeal of the area.

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**Respondent No:** 49

**Responded At:** Jul 06, 2020 09:57:52 am

**Last Seen:** Jul 06, 2020 01:56:11 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

• The 4 storey proposed development covering 4 residential lots is not an appropriate size, scale or height appropriate for its setting or for the current or future character of the local area, which is predominantly residential and is characterised by 1 and 2 storey homes. • A development of this scale is not sympathetic to, and will in fact detract from, all of the distinctive characteristics of this local area - a low-rise, leafy and quiet neighbourhood with large green setbacks • Several large and very old trees of local importance will be removed and lost forever, further degrading the amenity. • The setback for the development has been greatly reduced to the other homeowners in the area. • Given the topography of the local area, the building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens where we regularly walk and from various vantages around the neighbourhood. • The 2 streets on which the development will sit are narrow and are not designed to accommodate the amount of traffic for a facility of this size, particularly given the reliance on street parking (as the suggested parking is completely inadequate for the commercial operation of the nature contemplated). • The increased traffic on the streets, and crossing the footpath down Doonan Road, will be a danger to the large number of pedestrians, including children, who use the footpath to walk to Mason Gardens and the local childcare centre located less than 100m from the development. • The noise from the large scale commercial air-conditioning plant, commercial laundry and commercial kitchen and traffic will destroy the peaceful amenity of the residential locality. • The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. • This development will reduce the value and amenity of all the neighbouring and nearby homes that residents have worked all their lives to afford.

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**Respondent No:** 50

**Responded At:** Jul 06, 2020 11:45:57 am

**Last Seen:** Jul 06, 2020 03:36:45 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

- Much too big and tall for a residential area - Insufficient onsite parking which will overflow onto surrounding streets - Increased traffic in residential area - Inappropriate having such a large building in a residential area and overlooking Masons Gardens

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**Respondent No:** 51

**Responded At:** Jul 06, 2020 12:24:42 pm

**Last Seen:** Jul 06, 2020 04:21:21 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Other

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I want to know how a 5 storey hospital consisting of 90 + bedrooms can be developed in a residential zoning area.

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**Respondent No:** 52

**Responded At:** Jul 06, 2020 13:24:17 pm

**Last Seen:** Jul 06, 2020 05:20:54 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

We would like to strongly object to the proposed "The Melvista Nedlands Aged Care" development application for 16-18 Betty Street & 73-75 Doonan Road, Nedlands and with reference to the following sub-clauses of clause 67 of the relevant Planning and Development (Local Planning Schemes) Regulations 2015. (m) The whole scale of the building, height, bulk, footprint of the building in relation to the plot ratio and visual privacy is completely inappropriate for this location and will have a significantly detrimental effect on the surrounding streets. (n) The development would adversely affect the character of the locality. It is completely inappropriate to have a large commercial facility, operating 24/7 in this area of small quiet family orientated, predominately residential streets. It is equally inappropriate for the Council to have even considered changing the R-coding for a single house per block to allow aged-care special use to these 4 blocks, let alone making this change without significant public discussion. Given the significant re-zoning along the Stirling Highway corridor, such a development would be far more appropriate there rather than quiet residential streets. (s) While the 26 car bay carpark will provide some parking on-site, that is significantly insufficient for all the staff and various trades required to service such a large commercial operation and all the inevitable visitors that patients will have during their stay. So there will be an inevitably need for a lot of vehicles to park close to the proposed development and surrounding streets. During the development itself, there will be significant disruption with the number of trades needing parking. (u) There will be significant adverse impact on the area with the requirement to service such a large commercial operation, with the daily need for ambulance access, linen services, cleaning staff, food services, waste management and medical waste management. There may also be an impact on the various public utility services with a change from 4 single houses to such a large commercial operation.

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**Respondent No:** 53

**Responded At:** Jul 06, 2020 14:16:58 pm

**Last Seen:** Jul 06, 2020 06:13:34 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

---

Q6. **Address of the property affected (if applicable)**      All surrounding houses

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

Our Concerns: • The 4 storey proposed development covering 4 residential lots is not an appropriate size, scale or height appropriate for its setting or for the current or future character of the local area, which is predominantly residential and is characterised by 1 and 2 storey homes. • A development of this scale is not sympathetic to, and will in fact detract from, all of the distinctive characteristics of this local area - a low-rise, leafy and quiet neighbourhood with large green setbacks • Several large and very old trees of local importance will be removed and lost forever, further degrading the amenity. • The setback for the development has been greatly reduced to the other homeowners in the area. • Given the topography of the local area, the building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens where we regularly walk and from various vantage points around the neighbourhood. • The 2 streets on which the development will sit are narrow and are not designed to accommodate the amount of traffic for a facility of this size, particularly given the reliance on street parking (as the suggested parking is completely inadequate for the commercial operation of the nature contemplated). • The increased traffic on the streets, and crossing the footpath down Doonan Road, will be a danger to the large number of pedestrians, including children, who use the footpath to walk to Mason Gardens and the local childcare centre located less than 100m from the development. • The noise from the large scale commercial air-conditioning plant, commercial laundry and commercial kitchen and traffic will destroy the peaceful amenity of the residential locality. • The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. • This development will reduce the value and amenity of all the neighbouring and nearby homes that residents have worked all their lives to afford.

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**Respondent No:** 54

**Responded At:** Jul 06, 2020 16:20:31 pm

**Last Seen:** Jul 06, 2020 08:17:26 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**      not answered

---

Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

It is not in keeping with the quiet residential street that is already there (Doonan Rd). I worry about neighbourhood children cycling to Masons Gardens. It is not the right street to build such a large development.

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**Respondent No:** 55

**Responded At:** Jul 06, 2020 19:59:17 pm

**Last Seen:** Jul 06, 2020 11:45:11 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object to this proposal as it is for a commercial business in a residential area. The residential blocks should never be rezoned for commercial use as this will result in additional traffic 24/7. There is insufficient parking facilities for visitors and staff, neighbouring properties will be over looked and residents of the Melvista aged care facility will be constant in the shadows. The city of Nedlands is known and wanted by home owners for its large leafy blocks, why is the city and WA planning so determined to destroy this.

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**Respondent No:** 56

**Responded At:** Jul 06, 2020 22:17:43 pm

**Last Seen:** Jul 10, 2020 06:33:21 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**      not answered

---

Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

This development lacks community consultation for this project. The immediate residents are all taken by surprise of the advanced stage of the proposed development. I strongly object this development for the following reasons: 1) Height: 4 storeys towering over the 2 storey homes in the vicinity, resulting in loss of privacy for the lower buildings. The height, bulk and density of the building is extremely excessive with respect to residential houses in the vicinity. It brutally destroys the character of a garden suburb. 2) Activity: It is a commercialised service provider, a, high care institution with access through Doonan and Betty Streets. There will be an exponential increase in traffic on these streets; leading to problems with parking and increase the road risk for young families in the vicinity. I OBJECT TO THIS DEVELOPMENT in view of its height, density, increase in traffic and increase in road risks. There is lack of ratepayers consultation and must be radically reviewed in every respect and downsized.

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**Respondent No:** 57

**Responded At:** Jul 07, 2020 07:08:45 am

**Last Seen:** Jul 17, 2020 06:07:50 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Other

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am a ratepayer and a grandparent career of young grandkids living on Betty Street. I object to the size and multilevel residence as proposed : 1.It is totally incompatible with the Betty Street and Doonan Street streetscapes in terms of bulk,scale,height,design building facade and street alignment. The surrounding streets are all R12.5 orR10 zoning not above R60 zoning. The proposed design is hotel-like not complementing or sensitive to surrounding nleghbourhood,. 2.proposed development does not consider adequate parking.The proposal allows only 23 car park bays and 3 wellness car park bays. There is insufficient consideration given to: A. Parking for 24 hour staff/ contractors( nursing,medical, pharmacists,Carers/cleaners,maintenance personnel etc, wellness centre attendees >3. B. Insufficient consideration given to visitors parking especially when family and friends get together events are expected to be held regularly in aged care residences, C. Not forgetting that the for profit Aged Care invites potential buyers for touring on open days , inadequate parking for such visitors D. Insufficient parking for visitors parking on weekends and special father or mothers'days visitation, E. Street parking is not an option for the narrow Betty and Doonan streets, F. Parking lots across the road near Mason park should be strictly reserved for childcare parents of the Kidsgalore Childcare across the road and Mason Park users, these attendees are to be given preference, 3. Increase in commercial vehicle traffic due to deliveries, medical personnel, rubbish waste disposals, caterer, potential danger for local children on pedestrian strips and roads, 4.increase in noise levels due to presence of mechanical, electrical, maintenance 5. Plant room and submerged basement parking are to be considered as 2 levels, not to be cunningly hidden or not appropriately considered as such, 6.the proposed development is not environmentally green friendly .In ground deep soil planting of big trees to cover up ugly multi level structure not considered in proposal. The hotel style development is definitely very insensitive to the surrounding individual residential housing in which residents invested in the R 10 and R12.5 zoning. City of Nedlands should support ratepayers rather than for profit commercial venture Organisation.

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**Respondent No:** 58

**Responded At:** Jul 07, 2020 10:20:52 am

**Last Seen:** Jul 07, 2020 02:16:16 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Other

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

- The 4 storey proposed development covering 4 residential lots is not an appropriate size, scale or height appropriate for its setting or for the current or future character of the local area, which is predominantly residential and is characterised by 1 and 2 storey homes. - The 2 streets on which the development will sit are narrow and are not designed to accommodate the amount of traffic for a facility of this size, particularly given the reliance on street parking (as the suggested parking is completely inadequate for the commercial operation of the nature contemplated). - The noise from the large scale commercial air-conditioning plant, commercial laundry and commercial kitchen and traffic will destroy the peaceful amenity of the residential locality. - The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. - This development will reduce the value and amenity of all the neighbouring and nearby homes that residents have worked all their lives to afford.

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**Respondent No:** 59

**Responded At:** Jul 07, 2020 10:29:00 am

**Last Seen:** Jul 07, 2020 02:25:33 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Sheer scale of the project for a residential area is completely unsatisfactory. I strongly object to a project of this size for the area.

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**Respondent No:** 60

**Responded At:** Jul 08, 2020 08:56:54 am

**Last Seen:** Jul 08, 2020 00:52:06 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Other  
Owner of a property

---

Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

As a family of young children and more expected, we are regular users of surrounding parks and facilities. We are concerned that increased traffic and decreased parking availability will negatively impact our daily lives.

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**Respondent No:** 61

**Responded At:** Jul 08, 2020 16:01:09 pm

**Last Seen:** Jul 08, 2020 07:44:42 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I think it is an unreasonably large, dense and high commercial development to drop in the middle of a quiet, low density residential area. It's dishonest to show a photo of a 3 story building when the actual plans call for more. 26 bays can not be enough parking for the employees here, let alone the 90 residents and their visitors. No doubt this will cause substantial disruption to neighbours and road congestion as the overflow parks on surrounding streets. There are plenty of aged care facilities in Nedlands and many better places to put such a development - like closer to Hollywood hospital on the massive vacant blocks, where there are existing facilities and already high density. It sounds like the development will be high care requiring staff and services - this traffic will cause a congestion problem on what are now quiet residential streets. By putting this in a commercial area the traffic could be more easily absorbed and the additional parking required could be shared. Or it could be nearer a rail line where public transport can help service it. Anyone who would suggest the bus service here is will help has either not ridden the bus or never tried to get to or fro anywhere but the city on it. I don't know what the impact on water and sewerage will be but can only imagine adding up to 140 highly concentrated residents in a historically low density area will also cause a problem - what studies have been done on this? It is odd that the council has spent 20+ years fighting any increase in density in this area but now seems to be encouraging radically high density additions with no graduation or sufficient infrastructure into deeply residential areas. I object to this and continue to be upset by the lack of common sense being applied to developments across the city Nedlands. There is a lot of middle ground between fighting for R10 everywhere and allowing outrageously high density developments to spring up at random amidst quiet residential streets - I wish someone at Nedlands could come up with and deliver a sensible long term vision.

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**Respondent No:** 62

**Responded At:** Jul 08, 2020 16:11:21 pm

**Last Seen:** Jul 08, 2020 07:57:06 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property
<input type="checkbox"/>	On behalf of a company

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the 4-storey height of the proposal as well as the manner under which the development proposal has been handled. The proposal does not match what was initially proposed and the changes have been implemented by stealth with zero community consultation. Whilst my properties are several blocks away from the proposed site, this same issue could have the potential to occur in my own street. Nedlands Council planners have lost the plot (pun intended) and the interests of the ratepayers are not being addressed. On a separate issue, the scale of the development footprint will utilise the full extent of the four existing blocks with virtually zero trees or vegetation other than some verge shrubs. The development is not suited to this residential neighbourhood and would be more appropriate closer to the highway or a main arterial road.

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**Respondent No:** 63

**Responded At:** Jul 09, 2020 14:31:01 pm

**Last Seen:** Jul 09, 2020 06:06:55 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I object to this development as it is of a physical and commercial scale far too large for the surrounding area. The development is completely out of character for its location deep in the heart of quiet inner Nedlands streets, with a well-loved children's playground nearby and well established, traditional residential blocks. The bulk of the building will overshadow neighbouring properties and spoil views from Masons Gardens. It is a poor choice of location for adequate access and traffic movement. The increase of traffic (from both staff and visitors EVERY day of the week) will greatly lower the amenity of the neighbouring park and severely restrict the ability for children to safely walk there and cross on each access corner along Melvista Ave. I am also extremely concerned about the increased flow of traffic from Stirling Hwy along Taylor, Marita, Doonan, Princess and surrounding roads to feed into the site. The safety of parents and children moving from within the childcare centre opposite will also be at risk with greater road traffic. The nature of the proposed operation (medical facilities, in house laundry etc) will have a significantly damaging impact on the character, liveability and desirability of surrounding properties, as well as those in neighbouring streets. The 24-hour operation of the facility will generate substantial noise and light pollution which will be hugely detrimental to the entire community. I hope the Council will do the right thing by their long term resident ratepayers and prevent this development from progressing at its full proposed scale.

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**Respondent No:** 64

**Responded At:** Jul 09, 2020 16:34:48 pm

**Last Seen:** Jul 18, 2020 08:57:48 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object to this development as it is of a physical and commercial scale far too large for the surrounding area. The development is completely out of character for its location deep in the heart of quiet inner Nedlands streets, with a well-loved children's playground nearby and well established, traditional residential blocks. The bulk of the building will overshadow neighbouring properties and spoil views from Masons Gardens. It is a poor choice of location for adequate access and traffic movement. The increase of traffic (from both staff and visitors EVERY day of the week) will greatly lower the amenity of the neighbouring park and severely restrict the ability for children to safely walk there and cross on each access corner along Melvista Ave. I am also extremely concerned about the increased flow of traffic from Stirling Hwy along Taylor, Marita, Doonan, Princess and surrounding roads to feed into the site. The safety of parents and children moving from within the childcare centre opposite will also be at risk with greater road traffic. The nature of the proposed operation (medical facilities, in house laundry etc) will have a significantly damaging impact on the character, liveability and desirability of surrounding properties, as well as those in neighbouring streets. The 24-hour operation of the facility will generate substantial noise and light pollution which will be hugely detrimental to the entire community. I hope the Council will do the right thing by their long term resident ratepayers and prevent this development from progressing at its full proposed scale.

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**Respondent No:** 65

**Responded At:** Jul 09, 2020 16:56:23 pm

**Last Seen:** Jul 09, 2020 09:57:37 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object to this development as it is of a physical and commercial scale far too large for the surrounding area. The development is completely out of character for its location deep in the heart of quiet inner Nedlands streets, with a well-loved children's playground nearby and well established, traditional residential blocks. The bulk of the building will overshadow neighbouring properties and spoil views from Masons Gardens. It is a poor choice of location for adequate access and traffic movement. The increase of traffic (from both staff and visitors EVERY day of the week) will greatly lower the amenity of the neighbouring park and severely restrict the ability for children to safely walk there and cross on each access corner along Melvista Ave. I am also extremely concerned about the increased flow of traffic from Stirling Hwy along Taylor, Marita, Doonan, Princess and surrounding roads to feed into the site. The safety of parents and children moving from within the childcare centre opposite will also be at risk with greater road traffic. The nature of the proposed operation (medical facilities, in house laundry etc) will have a significantly damaging impact on the character, liveability and desirability of surrounding properties, as well as those in neighbouring streets. The 24-hour operation of the facility will generate substantial noise and light pollution which will be hugely detrimental to the entire community. I hope the Council will do the right thing by their long term resident ratepayers and prevent this development from progressing at its full proposed scale.

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**Respondent No:** 66

**Responded At:** Jul 10, 2020 08:43:41 am

**Last Seen:** Jul 10, 2020 00:36:43 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I support the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I have received \_\_\_\_\_'s flyer. As far as I am aware she lives across the road from this development and this was not disclosed. I with an aging population I think we need high dependency nursing homes and we should have these facilities within our suburbs.

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**Respondent No:** 67

**Responded At:** Jul 10, 2020 08:55:39 am

**Last Seen:** Jul 10, 2020 00:49:22 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

The development will increase traffic and congestion The 4/5 story building is out of character with the much loved single residential "Nedlands" streetscape. Negative impact on the immediate neighbours' living place from overbearing scale, shading and noise of operation

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**Respondent No:** 68

**Responded At:** Jul 10, 2020 10:03:31 am

**Last Seen:** Jul 10, 2020 01:55:47 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I have concern about: 1)the minimal parking made available on the development. This would see street parking along Melvista Ave reducing the width of usable road and creating a traffic hazard. At present there is already parking congestion on Betty street and in front of the child care centre on the corner of Melvista and Hackett Road. 5)This is the thin edge of the wedge and the development site will increase to incorporate the current Melvista Lodge 2) the positioning of plant equipment on the roof level, creating noise across the valley or Masons Garden 3) the 24/7 nature of the facility and the noise and traffic congestion created service trucks (especially reversing) to deliver supplies and remove rubbish. 4) increase congestion on one of the only controlled intersections in and out of the Dalkeith Nedlands peninsular, namely the intersection of Dalkeith road and Stirling hwy

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**Respondent No:** 69

**Responded At:** Jul 10, 2020 10:23:52 am

**Last Seen:** Jul 10, 2020 02:12:17 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)**  Owner of a property  
 Other

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the development application of 16 & 18 Betty Street and 73 & 75 Doonan Road because: The 4 storey proposed development covering 4 residential lots is not an appropriate size, scale or height appropriate for its setting, or for the current or future character of the local area, which is predominantly residential and is characterised by 1 and 2 storey homes. A development of this scale is not sympathetic to, and will in fact detract from, all of the distinctive characteristics of this local area - a low-rise, leafy and quiet neighbourhood with large green setbacks. Several large and very old trees of local importance will be removed and lost forever, further degrading the amenity. The setback for the development has been greatly reduced to the other homeowners in the area. Given the topography of the local area, the building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens where we regularly walk and from various vantages around the neighbourhood. The 2 streets on which the development will sit are narrow and are not designed to accommodate the amount of traffic for a facility of this size, particularly given the reliance on street parking (as the suggested parking is completely inadequate for the commercial operation of the nature contemplated). The increased traffic on the streets, and crossing the footpath down Doonan Road, will be a danger to the large number of pedestrians, including children, who use the footpath to walk to Mason Gardens and the local childcare centre located less than 100m from the development. The noise from the large scale commercial air-conditioning plant, commercial laundry and commercial kitchen and traffic will destroy the peaceful amenity of the residential locality. The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. This development will reduce the value and amenity of all the neighbouring and nearby homes that residents have worked all their lives to afford. The parking is inadequate for such a huge development. 25 bays is not nearly enough for a 90 bed hospital and its staff and services. Parking will overflow into the surrounding streets, which is already busy due to Masons Gardens Park, the childcare centre and the nearby bus route.

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**Respondent No:** 70

**Responded At:** Jul 10, 2020 10:24:27 am

**Last Seen:** Jul 10, 2020 02:08:44 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

There is already in the area Lisle villages Melvista Homes along Melvista Ave which is old and could be remediated or rebuilt with a smaller project that proposed in mind. I do not think that this very residential area is suitable for aged care home it is not near any shops or a hub and as I attend some aged care homes I know that the residents and staff like to have a nearby centre at hand. Oryx has other homes in the Western suburbs which fulfill this need to fit into the community and not impact on local residential traffic and increase pressure on utilities services etc. It is much less ideal for staff and visitors if getting around the facility relies on lifts and the public health risks are increased by this type of multilevel development. There are already homes in the area which are not full up and a pressing need for more aged care beds is not obvious. These streets also are narrow and trucks going around with deliveries will be creating traffic obstructions; unsafe for children pets and the elderly.

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**Respondent No:** 71

**Responded At:** Jul 10, 2020 17:29:55 pm

**Last Seen:** Jul 10, 2020 09:23:16 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property
Occupier of a property

---

Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object to this development due to the size of the building and the consequences to the surrounding area. A 4 storey building will stand out and be an eye sore compared to the surrounding buildings. This is a residential area and large multistory buildings must be prohibited. Such a large building will result in significantly increased traffic to the area. This is unsafe. There are many children and elderly people in the area due to Kidz Galore and Masons Garden. It is unsafe to have increased vehicles, especially ambulances in the area as these pose a threat to pedestrians and cyclists, many of whom are young children. The increased noise generated will disrupt a peaceful residential neighbourhood. This development cannot be approved for the safety and well being of the community.

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**Respondent No:** 72

**Responded At:** Jul 11, 2020 22:26:31 pm

**Last Seen:** Jul 11, 2020 14:20:57 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I strongly object to this project as it is not appropriate in this residential area. High care requires high level traffic to look after potential residents. The underhand way in which this has got to this stage is offensive to ratepayers and at the least questionable.

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**Respondent No:** 73

**Responded At:** Jul 12, 2020 12:24:02 pm

**Last Seen:** Jul 12, 2020 04:19:12 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Owner of a property

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Traffic congestion around small residential streets. Too high. Obtrusive windows overlooking issues. Overshadowing issues. Parking problems. Noise pollution 24/7. I don't feel safe to allow my children to cycle and roam streets especially free play at Mason Gardens. Would prefer that Mason Gardens be used by mainly residents and neighbors.

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Respondent No: 74

Responded At: Jul 13, 2020 09:58:48 am

Last Seen: Jul 12, 2020 23:11:22 pm

IP Address:

Q1. Your name:

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Q2. Your address:

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Q3. Your email address:

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Q4. Your telephone number:

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Q5. State how your interests are affected (select all relevant boxes)  Owner of a property

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Q6. Address of the property affected (if applicable)  not answered

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Q7. My response to the proposal:  I object to the proposal

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Q8. Submission : Please give your comments relating to this item in full below.

City of Nedlands 71 Stirling Highway Nedlands 6009 WA Re Opposition to Planned High Care Multi Story Development – Betty Street and Doonan Road Attn : The Mayor, CEO and Councillors of City of Nedlands Dear Sirs and Madams Firstly, I have owned my property in  for over 25 years, and resided in the home for the majority of that period. My children went to East Claremont Primary School, and hence have had a long association with the Nedlands area. In addition to this, for the past ten years I have been continuously involved with Aged Care Facilities in several states, for the long term care of my mother, father, relatives and family friends. In all cases, the facilities have been at most two stories, and a considerable distance from standard residential homes. Moreover, to my reckoning, I have visited these facilities on over 250 occasions, ranging from 8AM to 10PM, so I have observed the typical daily operations of these aged care homes, in relation to staff, visitor and contractor movements. Succinctly, I am very strongly opposed to the current High Care multi story development proposed for the site between Doonan Road and Betty Street, south of Princess Road. Here are the reasons why, in no particular order : • The structure proposed clearly does not in any way blend in with the largely residential aspect of the neighbourhood • The setback from the road is not the 9 metre mandatory distance in conventional houses • The parking bay allocation of 26 is completely inadequate. With 24 hour coverage for the residents, there will be overlap of necessary staff, including Registered Nurses, Administration and Management personnel, Kitchen staff and general carers. The most likely form of transport to the site will be by car, hence there will be overflow parking in the street and surrounding areas. On weekdays and weekend, where it you would expect 30-50% of the residents will have visitors, this will put extra pressure on parking. • The regular requirement to have trucks or vans arriving with catering and medical supplies for the proposed 96 residents will also create increased traffic flow and congestion in the streets. In addition to this the removal of waste, via truck, and the occasional requirement of fuel for the generators will create logistical headaches for the neighbours close by the facility. • The air conditioning system, most likely to be on the roof of the complex, is likely to be noisy and will require regular service from air conditioning / water treatment companies. The real estate value of the adjacent houses is likely to drop significantly due to the congestion in the area, with prospective home owners no doubt preferring to reside in quieter streets with less noise and work related traffic. I urge the council to not approve the plan for the proposed facility, in its current format.

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**Respondent No:** 75

**Responded At:** Jul 13, 2020 16:46:12 pm

**Last Seen:** Jul 13, 2020 08:26:06 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the current proposal for a number of reasons: 1. I believe the scale of the development is inappropriate in the context of a residential area with houses which are otherwise limited to single or two storeys. 2. I believe the density of accommodation and consequent population will bring an unacceptable level of disruption to the area from the required number of staff, number of visitors, required support for food delivery, waste removal and other services. 3. An aged care facility in a residential area would beneficially have a greater variety of accommodation including independent units and apartment style in addition to nursing support 'hospital' style accommodation. This development merely appears to squeeze in as many hospital style rooms as possible so offers no ability to progressively deal with deterioration over time in the one location. 4. The park opposite is a recreational space for the community and the proposed development will provide an unsightly 'bulk' when viewed from and across the park. 5. The proposed development does not appear to comply with the set-back constraints which have been applied to other properties in the area. 6. The proposed development does not appear to comply with the plot ratio constraints which have been applied to other properties in the area. 7. The proposed development does not appear to comply with height limitations which have been applied to other properties in the area. 8. The proposed development is likely (or will inevitably) result in an unacceptable level of street parking in a residential area as the current design provides a woeful shortage of parking on-site. 9. I believe the current proposal to be driven entirely by profit seeking opportunism rather than any consideration of the local community.

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**Respondent No:** 76

**Responded At:** Jul 14, 2020 13:22:47 pm

**Last Seen:** Jul 14, 2020 05:20:48 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Owner of a property

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I strongly object to the development application for a Residential Aged Care Facility located at 73-75 Doonan Road and 16-18 Betty Street, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of this local, low density residential area. Planning Objections The manner in which Council adopted the Residential Aged Care Facilities Local Planning Policy ('LPP') on 26 April 2020 is highly inappropriate, without publicly advertising major amendments made to the density, height and plot ratio. A residential density coding of R80 as imposed by the LPP is not acceptable or justified at the subject site. It is completely out of context with a transition from the neighbouring R12.5 and R10 zoned properties. A Local Planning Policy imposing density is not appropriate. Density should be imposed via a scheme amendment to LPS3. The proposed development is commercial in nature, operating 24/7 and is not suited to a residential area. The proposed development is not compatible with the existing amenity surrounding / abutting development due to the height, scale and bulk of the development. The proposed development therefore does not comply with Clause 3.1 of the LPP which states "...and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking". In accordance with the zoning table of LPS 3, 'Residential Aged Care Facility' is allocated an 'A' use within the 'Residential' zone, meaning the use is not permitted unless the local government has exercised its discretion by granting development approval. This is an unusual application of additional use provisions given a 'Residential Aged Care Facility' is already a contemplated use within the 'Residential' zone. Due to the removal of the proposed special use provisions in LPS 3, no development standards are applicable to the subject site except for the car parking requirements as outlined in LPS 3. A scheme amendment should be initiated to guide appropriate density. Given the increased building height and plot ratio associated with this modification will facilitate increased bulk and scale for any development proposed, we are of the view the modifications to the draft LPP are not minor and are in fact, significant in nature particularly in relation to the locality of surrounding residential area. Council has not followed the appropriate process in the adoption of LPP. On this basis we question the validity of the adopted LPP. There is absolutely no justification for the application of a R80 density coding, given the significantly lower R10/R12.5 density coding of the surrounding locality. The effect of the local planning policy is that it imposes a higher density coding without the initiation of a scheme amendment to LPS3. The purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City, however instead it has imposed an R-coding as a mechanism to deal with scale, bulk and built form. This is not appropriate as the imposition of an R80 R-coding immediately adjacent to properties subject to an R12.5 density coding will result in significant conflict with respect to scale, bulk and streetscape impacts. Pursuant to Schedule 2, Part 9, Clause 67(m) of the Regulations, the proposed development is not compatible with the surrounding residential neighbourhood and particularly the adjoining land

zoned R12.5. In April 2016, the community was consulted on the proposed refurbishment of Melvista Lodge and the development of a 2-storey aged care on adjacent lots at 73-75 Doonan Road and 16-18 Betty Street. What is now proposed is completely different with a 4 storey plus basement and roof (height approx. 17 metres), 90 bed high care, aged care facility on residential zoned lots and no longer includes the refurbishment of the Melvista Lodge. The community consultation on the new proposal from the developer and City of Nedlands has been mostly non-existent. Clause 5.1 of the LPP states "Consultation with affected landowners will be undertaken in accordance with the City's Local Planning Policy-Consultation of Planning Proposals". The consultation by the Developer with the Community, undertaken on a previous scheme, therefore breaches the LPP – Consultation of Planning Proposals. The proposed development at R80, with a plot ratio of 1.0 will significantly impact the adjoining land and surrounding low density residential neighbourhood. Clause 4.6.2 of the LPP states "A minimum of twenty-five per cent (25%) of the site area is to be landscaped". The proposed development does not comply with this requirement of the LPP. The set back of the boundary on 71 Doonan Road is non compliant with the LPP Clause 4.5.2 which requires a 7.5m set back and permanent screening to 75% obscure. The proposed plan has a 6.4m setback and NO screening. The purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City. The LPP makes no delineation between differing models of care (e.g. independent living units, low care, high care). The planning guidelines set out in the LPP, as drafted, applies the same planning conditions irrespective of the model of care. Different models of care have differing levels of servicing. This has not been considered in the application of the LPP. This has resulted in a High Care facility with an inappropriate density being located in a precinct unsuited to the facility function. The LPP should be redrafted to reflect the specific function and nature of aged care models of care, with appropriate planning of such facilities contextually. There was no development control plan applied to this land at the time of its rezoning. This in effect meant anything could have been built. The rushed endorsement of an R80 equivalent zoning without community consultation has denied the community the opportunity to comment on the appropriateness of this density in a residential zone. Design Objections The built form is a highly inappropriate in terms of scale and size to adjoining properties with box scale of building of approx. 70m overall length x 32m overall width and overall height of approx 17m The development includes large, bland featureless walls measuring 35 metres in length (running east/west), a scale that would typically be found in a mixed use or town/activity centre environment. The proposed development, should it be constructed as proposed, would result in detrimental impacts to the amenity and character of the low-density residential neighbourhood. The four-storey development with a proposed plot ratio of 1.0 would result in a scale of development which is not compatible with the amenity of the locality and is not suitable within a low-density residential neighbourhood. The proposed development will significantly impact the visual amenity of all residential lots to the north on Doonan Road and Betty Street, up to Princess Road, particularly when the development is viewed from private outdoor areas. The Developer's proposal, with its nominated function, size and density, has not considered any technical issues and will have a material negative impact to the amenity of the locality. Building massing and scale is disproportionate to the surrounding urban vernacular. The mass and height are disrespectful to the scale and pitch lines from the adjoining properties with a consequential negative impact to the Betty Street and Doonan Road streetscapes. Its verticality will project as a dominant insertion on the residential neighbourhood. As a "for-profit" commercial operation it will damage the residential cohesion of the suburb of Nedlands. Clause 3.1 of the LPP states "..... design of residential aged care facilities are of a high quality and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking." The proposed development is therefore non-compliant with clause 3.1 of the LPP. Building density provides a poor level of amenity for residents and patients with very limited access to outdoor spaces. Lack of green areas for the residents. The LPP requires 25% of the site to be landscaped. The proposal is nowhere near this and hence it is non compliant with the flawed LPP. The facility provides a poor work environment for nursing staff. No nursing stations or staff lounges/breakout spaces are provided for staff. Ramp/through access with a 4.5m high boundary wall on southern boundary will be highly visible from Doonan and Betty Streets and is aesthetically ugly along with inappropriately high unfriendly front boundary walls close to 2m near southern boundaries on Doonan and Betty Streets. These front boundary walls are impacted further by the proposed 2.5m setbacks beyond the current street line sets backs of 9m making it impossible to see down the street. This will result in the streetscape significantly altered with the proposed development jutting out 6.5m beyond the existing street line, Residents reversing out of their driveway will have no line of sight, keeping in mind a pedestrian footpath runs down the east side of Doonan and west side of Betty making this impossible to ensure the safety of any family walking down the street to Masons Gardens, or car driving up the street. The visual projection of the development on the north facing Masons Gardens vista will be

overbearing and detrimental to the urban fabric of the Betty Street – Doonan Road hillscape and Mason Gardens Precinct. The proposed development is not setting a target for environmental sustainability. The development is taking a just above minimum approach, proposing to exceed Part J of the National Construction Code by a stated 10%. This is an inadequate attempt to demonstrate environmental sustainability credentials. As a minimum a Green Star 6-star standard should be set, and consideration should be given to a Passive House rating. This facility will have a significant carbon footprint that will represent a substantial increase over the carbon footprint of the existing three (3) residences. The Developer has no stated approach to operation of the facility in the instance of a required lockdown nor a stated approach of how to protect vulnerable patients to cross infection from air borne viruses. This is an irresponsible approach to quality aged care services in a post COVID 19 environment where a duty of care exists to protect patients who are in a vulnerable position. The City of Nedlands would be in breach of your duty of care now with the foreknowledge that this facility presents an unacceptable risk and has not considered a COVID safe design. The proposed development proposes a density of occupancy that maximises the built form on the available land area, leaving limited open space for residents/patients. The LPP, clause 4.6.2 requires 25% of the site area to be landscaped. This has not been provided. Furthermore, the Review of Innovative Models of Aged Care, Research Paper 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety recommended respite is provided in settings aligned to a person's background and offering structured activities. The report further recommends small scale domestic models of aged care where there is an emphasis on providing person centred care models. The proposed developments design and density is not aligned to the objectives of the Royal Commission. At ninety (90) beds of non-ambulatory patients over four (4) occupied levels, safe evacuation has been poorly considered. Safe evacuation should necessitate a sprinkler protected building with a zoned smoke management system and designated safe zones. Brigade turn out points for fire truck parking and access to brigade booster points have not been considered in the design. Evacuation of 90 non-ambulatory residents is a risk. Brigade access to non-sprinklered areas, such as the roof plantroom, with access only available along Betty Street and Doonan Road for aerial firefighting, has not been considered. No consideration appears to have been given for acoustic treatment for roof located air conditioning plant and roof discharges. Lifts in the building are to be used for vertical movement of food services, visitors, patients, maintenance personnel and removal of deceased patients. This is an unhygienic practice and demonstrates poor design practice in this facility. Good design practice would separate different traffic streams in a facility of this size and density, with the minimum provision of a dedicated goods lift. The car parking provisions are significantly underestimated. This will result in substantial on street parking to Betty St, Doonan Rd, Melvista Ave, Granby Cres and surrounding roads. Staffing numbers for the Wellness Centre (3 treatment bays + hair salon – circa 4 staff), full commercial kitchen for up 540 food services per day (circa 4-5 staff), facilities manager (1 staff), full laundry (circa 2 staff), on site admin (circa 7 staff), on-site coffee shop (1 staff), cleaning staff (circa 3-4), orderlies and support staff (circa 2), plus nursing and staff for 90 patients (minimum 15 staff) significantly exceeds carparking allowances. Shift changeover of nursing staff, visitors and maintenance staff further results in carparking being significantly undersized and inadequate for a facility of this size and density. Grease trap for the kitchen will require truck access for pumping out the grease trap. This does not appear to have been considered in the design. Inadequate on-site parking can result in off-site parking for nurses for night shifts. This can result in unsafe practices and security concerns for nursing staff accessing the facility at night having to park in unsecured/unmonitored locations. No design provision is shown for kitchen exhaust discharges, carpark ventilation discharges, generator exhaust discharge. Discharges from the facility will adversely impact neighbours and have not been considered appropriately. Discharge stacks will also extend beyond the roof line creating further visual impact. Truck vehicular access for food delivery, waste removal, medical gas bottle replenishment, diesel fuel delivery, maintenance personnel for mechanical, electrical, fire and communications plant will result in significant increase to truck movements on Doonan Road and Betty Street. Inadequate provision has been made for replacement of roof top air conditioning plant. Access for large plant can only be made via crane access from Betty Street or Doonan Road. Light spill for night-time access to carparking and pedestrian entrances will result in light pollution to adjoining neighbours. The renders and plans being promoted by the Developer do not correctly illustrate the upper levels and roof form which will be highly visible. These images and plans are misleading. In addition, the elevations do not show the upper level in bold, again misleading. Subterranean courtyards on the eastern/western boundaries/northern edge - Doonan Road/Betty Street are unsightly/dark and out of character with the wide, large verges of the suburb. The developer, Oryx, is inexperienced. It is noted that the Developer has operated only one aged care facility to date, the recently acquired hotel, The Richardson in West Perth. Following acquisition that was subsequently refurbished to accommodate aged care. Only 5 of the direct neighbours were afforded a one on one meeting with the Developer's consultants on the week of 22 June 2020. This was the first time the

neighbours had been approached regarding this proposal. The Developer was not present at the resident meetings with representation being made by their Stakeholder Engagement Consultant, Creating Communities, and Town Planning Consultant, Planning Solutions. Sale of Land Objections 75 Doonan Road was sold by private treaty to the developer before the land was designated 'special use' allowing aged care. The land should have been offered to the open market, particularly when it was widely known the owners of Melvista Lodge directly to the south were also interested in purchasing the land. The land was sold as a Residential R10/R12.5 lot when the City knew its intent was always to redesignate the land. Why would the City sell land to a developer, prior to its redesignation. Why did they not designate it for aged care use first and by inference, sell the land at a much higher price? How have the City's ratepayers benefited from this sale? We note the developer paid \$2.6 million for the last residential piece of land required for this proposed development leaving the sale of the land by The City in question. Technical Reports Objections The acoustics technical report has not calculated the cumulative noise impact of ventilation systems with the air-cooled condensers. Significant ventilation systems will be required for the kitchen exhaust, evaporative kitchen make up, toilet exhausts, laundry exhausts and flues. To determine the full impact of the facility on adjoining residences, all noise sources should be defined and calculated on a cumulative basis. The Sustainability Report does not consider any modelling of obnoxious discharges from kitchen, toilet and laundry exhausts and their impact on the surrounding properties. Dispersion modelling and CFD modelling should be undertaken to determine that there is no undue impact, as required by clause 3.1 of the LPP. The Sustainability Report has not considered any heat island impact on the surrounding properties as a result of rejecting circa 700 - 800 kW of heat from the facility to determine that there is no undue impact, as required by clause 3.1 of the LPP. The Sustainability Report has not considered glare and reflectance to properties on the east in the morning and west in the evening to determine that there is no undue impact, as required by clause 3.1 of the LPP. The Transport Impact Statement (TIS) has not calculated the total number of staff or visitor numbers in its car parking assessment for a facility of this nature. The TIS has relied on an allowance of 1 car bay per 4 beds. A high dependency aged care facility will have a significant staffing requirement that will exceed this requirement. It will also have significant visitor numbers. The TIS has made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment of carparking and traffic movements. Developer's Traffic Report also provides very little detail on the type of vehicle movements and their frequency and times during the week. This detail is also needed to form proper considered assessment of traffic movements and noise levels, which detail is also wholly lacking in the Developer's Transport Impact Statement and Acoustic Report.

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**Respondent No:** 77

**Responded At:** Jul 14, 2020 13:46:01 pm

**Last Seen:** Jul 14, 2020 05:23:49 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I strongly object to the development application for a Residential Aged Care Facility located at 73-75 Doonan Road and 16-18 Betty Street, Nedlands. The proposed development is too big for the area being a low density residential area. 1.0 Planning Objections The residential density coding of R80 as imposed by the LPP is not acceptable or justified at the subject site. It is completely out of context with a transition from the neighbouring R12.5 and R10 zoned properties. The manner in which Council adopted the Residential Aged Care Facilities Local Planning Policy ('LPP') on 26 April 2020 was made without publicly advertising major amendments made to the density, height and plot ratio. A Local Planning Policy imposing density is not appropriate. Density should be imposed via a scheme amendment to LPS3. The proposed development is a commercial venture which will require operations 24/7 impacting on surrounding residential amenity. The proposed development is not compatible with the existing amenity surrounding / abutting development due to the height, scale and bulk of the development. The proposed development therefore does not comply with Clause 3.1 of the LPP which states "...and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking". In accordance with the zoning table of LPS 3, 'Residential Aged Care Facility' is allocated an 'A' use within the 'Residential' zone, meaning the use is not permitted unless the local government has exercised its discretion by granting development approval. This is an unusual application of additional use provisions given a 'Residential Aged Care Facility' is already a contemplated use within the 'Residential' zone. Due to the removal of the proposed special use provisions in LPS 3, no development standards are applicable to the subject site except for the car parking requirements as outlined in LPS 3. A scheme amendment should be initiated to guide appropriate density. Given the increased building height and plot ratio associated with this modification will facilitate increased bulk and scale for any development proposed, we are of the view the modifications to the draft LPP are not minor and are in fact, significant in nature particularly in relation to the locality of surrounding residential area. Council has not followed the appropriate process in the adoption of LPP and therefore the validity of the adopted LPP is questionable. The effect of the local planning policy is that it imposes a higher density coding without the initiation of a scheme amendment to LPS3. The purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City, however instead it has imposed an R-coding as a mechanism to deal with scale, bulk and built form. This is not appropriate as the imposition of an R80 R-coding immediately adjacent to properties subject to an R12.5 density coding will result in significant conflict with respect to scale, bulk and streetscape impacts. Pursuant to Schedule 2, Part 9, Clause 67(m) of the Regulations, the proposed development is not compatible with the surrounding residential neighbourhood and particularly the adjoining land zoned R12.5. In April 2016, the community was consulted on the proposed refurbishment of Melvista Lodge and the development of a 2-storey aged care on adjacent lots at 73-75 Doonan Road and 16-18 Betty Street. What is now proposed is a different

project to that consulted about previously and no longer includes the refurbishment of the Melvista Lodge. The community consultation on the new proposal from the developer and City of Nedlands has been mostly non-existent. Clause 5.1 of the LPP states "Consultation with affected landowners will be undertaken in accordance with the City's Local Planning Policy- Consultation of Planning Proposals". The consultation by the Developer with the Community, undertaken on a previous scheme, therefore breaches the LPP – Consultation of Planning Proposals. The proposed development at R80, with a plot ratio of 1.0 will significantly impact the adjoining land and surrounding low density residential neighbourhood. Clause 4.6.2 of the LPP states "A minimum of twenty-five per cent (25%) of the site area is to be landscaped". The proposed development does not comply with this requirement of the LPP. The set back of the boundary on 71 Doonan Road is non compliant with the LPP Clause 4.5.2 which requires a 7.5m set back and permanent screening to 75% obscure. The proposed plan has a 6.4m setback and NO screening. The purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City. The LPP makes no delineation between differing models of care (e.g. independent living units, low care, high care). The planning guidelines set out in the LPP, as drafted, applies the same planning conditions irrespective of the model of care. Different models of care have differing levels of servicing. This has not been considered in the application of the LPP. This has resulted in a High Care facility with an inappropriate density being located in a precinct unsuited to the facility function. The LPP should be redrafted to reflect the specific function and nature of aged care models of care, with appropriate planning of such facilities contextually. There was no development control plan applied to this land at the time of its rezoning. This in effect meant anything could have been built. The rushed endorsement of an R80 equivalent zoning without community consultation has denied the community the opportunity to comment on the appropriateness of this density in a residential zone. The four-storey development would result in a scale of development which is not compatible with the amenity of the locality and is not suitable within a low-density residential neighbourhood. The proposed development will significantly impact the visual amenity of all residential lots to the north on Doonan Road and Betty Street, up to Princess Road, particularly when the development is viewed from private outdoor areas. The Developer's proposal, with its nominated function, size and density, has not considered any technical issues and will have a material negative impact to the amenity of the locality. Building massing and scale is disproportionate to the surrounding urban vernacular. The mass and height are disrespectful to the scale and pitch lines from the adjoining properties with a consequential negative impact to the Betty Street and Doonan Road streetscapes. Its verticality will project as a dominant insertion on the residential neighbourhood. As a "for-profit" commercial operation it will damage the residential cohesion of the suburb of Nedlands. Clause 3.1 of the LPP states "..... design of residential aged care facilities are of a high quality and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking." The proposed development is therefore non-compliant with clause 3.1 of the LPP. Building density provides a poor level of amenity for residents and patients with very limited access to outdoor spaces. Lack of green areas for the residents. The LPP requires 25% of the site to be landscaped. The proposal is nowhere near this and hence it is non compliant with the flawed LPP. Ramp/through access with a 4.5m high boundary wall on southern boundary will be aesthetically displeasing along with inappropriately high front boundary walls close to 2m near southern boundaries on Doonan and Betty Streets. These front boundary walls are impacted further by the proposed 2.5m setbacks beyond the current street line sets backs of 9m making it impossible to see down the street. This will result in the streetscape significantly altered with the proposed development jutting out 6.5m beyond the existing street line, Residents reversing out of driveways will have no line of sight, keeping in mind a pedestrian footpath runs down the east side of Doonan and west side of Betty making this impossible to ensure the safety of any family walking down the street to Masons Gardens, or car driving up the street. The visual projection of the development on the north facing Masons Gardens vista will be overbearing and detrimental to the urban fabric of the Betty Street – Doonan Road hillscape and Mason Gardens Precinct. The Developer has no stated approach to operation of the facility in the instance of a required lockdown. This is an irresponsible approach to quality aged care services in a post COVID 19 environment where a duty of care exists to protect patients who are in a vulnerable position. The City of Nedlands would be in breach of your duty of care now with the foreknowledge that this facility presents an unacceptable risk and has not considered a COVID safe design. Brigade access to non-sprinklered areas, such as the roof plantroom, with access only available along Betty Street and Doonan Road for aerial firefighting, has not been considered. No consideration appears to have been given for acoustic treatment for roof located air conditioning plant and roof discharges. Lifts in the building are to be used for vertical movement of food services, visitors, patients, maintenance personnel and removal of deceased patients. This is an unhygienic practice and demonstrates poor design practice in this facility. There should be a minimum provision of a

dedicated goods lift. The car parking provisions are significantly underestimated. This will result in substantial on street parking to Betty St, Doonan Rd, Melvista Ave, Granby Cres and surrounding roads. Staffing numbers for the Wellness Centre (3 treatment bays + hair salon – circa 4 staff), full commercial kitchen for up to 540 food services per day (circa 4-5 staff), facilities manager (1 staff), full laundry (circa 2 staff), on site admin (circa 7 staff), on-site coffee shop (1 staff), cleaning staff (circa 3-4), orderlies and support staff (circa 2), plus nursing and staff for 90 patients (minimum 15 staff) significantly exceeds carparking allowances. Shift changeover of nursing staff, visitors and maintenance staff further results in carparking being significantly undersized and inadequate for a facility of this size and density. No design provision is shown for kitchen exhaust discharges, carpark ventilation discharges, generator exhaust discharge. Discharges from the facility will adversely impact neighbours and have not been considered appropriately. Discharge stacks will also extend beyond the roof line creating further visual impact. Truck vehicular access for food delivery, waste removal, medical gas bottle replenishment, diesel fuel delivery, maintenance personnel for mechanical, electrical, fire and communications plant will result in significant increase to truck movements on Doonan Road and Betty Street. Inadequate provision has been made for replacement of roof top air conditioning plant. Access for large plant can only be made via crane access from Betty Street or Doonan Road. Light spill for night-time access to carparking and pedestrian entrances will result in light pollution to adjoining neighbours. The renders and plans being promoted by the Developer do not correctly illustrate the upper levels and roof form which will be highly visible. These images and plans are misleading. In addition, the elevations do not show the upper level. Subterranean courtyards on the eastern/western boundaries/northern edge - Doonan Road/Betty Street are unsightly/dark and out of character with the wide, large verges of the suburb. Only 5 of the direct neighbours were afforded a one on one meeting with the Developer's consultants on the week of 22 June 2020. This was the first time the neighbours had been approached regarding this proposal. The Developer was not present at the resident meetings with representation being made by their Stakeholder Engagement Consultant, Creating Communities, and Town Planning Consultant, Planning Solutions. 75 Doonan Road was sold by private treaty to the developer before the land was designated 'special use' allowing aged care. The land was sold as a Residential R10/R12.5 lot when the City knew its intent was always to redesignate the land. The acoustics technical report has not calculated the cumulative noise impact of ventilation systems with the air-cooled condensers. Significant ventilation systems will be required for the kitchen exhaust, evaporative kitchen make up, toilet exhausts, laundry exhausts and flues. To determine the full impact of the facility on adjoining residences, all noise sources should be defined and calculated on a cumulative basis. The Sustainability Report does not consider any modelling of discharges from kitchen, toilet and laundry exhausts and their impact on the surrounding properties. Dispersion modelling and CFD modelling should be undertaken to determine that there is no undue impact, as required by clause 3.1 of the LPP. The Sustainability Report has not considered any heat island impact on the surrounding properties as a result of rejecting circa 700 - 800 kW of heat from the facility to determine that there is no undue impact, as required by clause 3.1 of the LPP. The Sustainability Report has not considered glare and reflectance to properties on the east in the morning and west in the evening to determine that there is no undue impact, as required by clause 3.1 of the LPP. The Transport Impact Statement (TIS) has not calculated the total number of staff or visitor numbers in its car parking assessment for a facility of this nature. The TIS has relied on an allowance of 1 car bay per 4 beds. A high dependency aged care facility will have a significant staffing requirement that will exceed this requirement. It will also have significant visitor numbers. The TIS has made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment of carparking and traffic movements. Developer's Traffic Report also provides very little detail on the type of vehicle movements and their frequency and times during the week. This detail is also needed to form proper considered assessment of traffic movements and noise levels, which detail is also wholly lacking in the Developer's Transport Impact Statement and Acoustic Report.

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**Respondent No:** 78

**Responded At:** Jul 14, 2020 13:46:58 pm

**Last Seen:** Jul 14, 2020 05:29:58 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the proposal. This development lacks community consultation (the statements within the 'promotional material' distributed by the developer are misleading) The height and size of this development on a quiet residential street is frankly ridiculous. In an area of Nedlands where residential properties are not allowed to subdivide, there is now the potential to have 90 residents (and dozens of additional staff) occupying what was otherwise 4 residential blocks of land. This level of density appears in excess of other age care facilities within the area. Having recently purchased and moved to Nedlands, it is disappointing that there was no easily available information associated with this proposal at the time (as I would have been unlikely to have purchased on the street knowing this was occurring). In addition to the obvious increases to traffic from service vehicles, 24 hour carers and employees accessing the facility from Doonan Rd and Betty St, the proposal also provides for some facilities that will be accessible to outside members of the public. Will these customers be parking on the street? Again, there appears to be a lack of community consultation regarding the development of commercial facilities on a quiet residential street. Will the existing age care facility be revamped as part of 'the next stage' of this development and subsequently transitioning the facility to an even larger facility? The one positive part of this development is that the Council will be able to reduce their tree planting efforts as this monstrosity will provide ample shade for the entire street!

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**Respondent No:** 79

**Login:**

**Responded At:** Jul 14, 2020 14:25:23 pm

**Last Seen:** Jul 14, 2020 06:17:50 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**  Owner of a property

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Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Can you please explain how and why this proposal , which is so obviously 'below par' and does not merit the time and consideration of council officers, let alone rate payer, get into the process ? There are disastrous deficiencies in the concept design, very easy to pick up. And why has the process of bringing this forward been so under-hand, sly, and totally unsatisfactory ? Why have to all get angry and concerned and give our valuable time to stop this. We need clear and detailed answers, and will not rest until we get to the bottom of this. Hope to hear from you very soon

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**Respondent No:** 80

**Responded At:** Jul 14, 2020 14:27:41 pm

**Last Seen:** Jul 14, 2020 06:24:33 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I strongly object to the development application for a Residential Aged Care Facility located at 73-75 Doonan Road and 16-18 Betty Street, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of this local, low density residential area.

1.0 Planning Objections

1.1 The manner in which Council adopted the Residential Aged Care Facilities Local Planning Policy ('LPP') on 26 April 2020 is highly inappropriate, without publicly advertising major amendments made to the density, height and plot ratio.

1.2 A residential density coding of R80 as imposed by the LPP is not acceptable or justified at the subject site. It is completely out of context with a transition from the neighbouring R12.5 and R10 zoned properties.

1.3 A Local Planning Policy imposing density is not appropriate. Density should be imposed via a scheme amendment to LPS3.

1.4 The proposed development is commercial in nature, operating 24/7 and is not suited to a residential area.

1.5 The proposed development is not compatible with the existing amenity surrounding / abutting development due to the height, scale and bulk of the development. The proposed development therefore does not comply with Clause 3.1 of the LPP which states "...and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking".

1.6 In accordance with the zoning table of LPS 3, 'Residential Aged Care Facility' is allocated an 'A' use within the 'Residential' zone, meaning the use is not permitted unless the local government has exercised its discretion by granting development approval. This is an unusual application of additional use provisions given a 'Residential Aged Care Facility' is already a contemplated use within the 'Residential' zone.

1.7 Due to the removal of the proposed special use provisions in LPS 3, no development standards are applicable to the subject site except for the car parking requirements as outlined in LPS 3. A scheme amendment should be initiated to guide appropriate density.

1.8 Given the increased building height and plot ratio associated with this modification will facilitate increased bulk and scale for any development proposed, we are of the view the modifications to the draft LPP are not minor and are in fact, significant in nature particularly in relation to the locality of surrounding residential area.

1.9 Council has not followed the appropriate process in the adoption of LPP. On this basis we question the validity of the adopted LPP.

1.10 There is absolutely no justification for the application of a R80 density coding, given the significantly lower R10/R12.5 density coding of the surrounding locality.

1.11 The effect of the local planning policy is that it imposes a higher density coding without the initiation of a scheme amendment to LPS3.

1.12 The purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City, however instead it has imposed an R-coding as a mechanism to deal with scale, bulk and built form. This is not appropriate as the imposition of an R80 R-coding immediately adjacent to properties subject to an R12.5 density coding will result in significant conflict with respect to scale, bulk and streetscape impacts.

1.13 Pursuant to Schedule 2, Part 9, Clause 67(m) of the Regulations, the proposed development is not compatible with the surrounding residential neighbourhood and

particularly the adjoining land zoned R12.5. 1.14 In April 2016, the community was consulted on the proposed refurbishment of Melvista Lodge and the development of a 2-storey aged care on adjacent lots at 73-75 Doonan Road and 16-18 Betty Street. What is now proposed is completely different with a 4 storey plus basement and roof (height approx. 17 metres), 90 bed high care, aged care facility on residential zoned lots and no longer includes the refurbishment of the Melvista Lodge. The community consultation on the new proposal from the developer and City of Nedlands has been mostly non-existent. Clause 5.1 of the LPP states "Consultation with affected landowners will be undertaken in accordance with the City's Local Planning Policy- Consultation of Planning Proposals". The consultation by the Developer with the Community, undertaken on a previous scheme, therefore breaches the LPP – Consultation of Planning Proposals. 1.15 The proposed development at R80, with a plot ratio of 1.0 will significantly impact the adjoining land and surrounding low density residential neighbourhood. 1.16 Clause 4.6.2 of the LPP states "A minimum of twenty-five per cent (25%) of the site area is to be landscaped". The proposed development does not comply with this requirement of the LPP. 1.17 The set back of the boundary on 71 Doonan Road is non compliant with the LPP Clause 4.5.2 which requires a 7.5m set back and permanent screening to 75% obscure. The proposed plan has a 6.4m setback and NO screening. 1.18 The purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City. The LPP makes no delineation between differing models of care (e.g. independent living units, low care, high care). 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### 3.0 Sale of Land Objections

#### 3.1 75 Doonan Road

was sold by private treaty to the developer before the land was designated 'special use' allowing aged care. The land should have been offered to the open market, particularly when it was widely known the owners of Melvista Lodge directly to the south were also interested in purchasing the land.

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The land was sold as a Residential R10/R12.5 lot when the City knew its intent was always to redesignate the land. Why would the City sell land to a developer, prior to its redesignation. Why did they not designate it for aged care use first and by inference, sell the land at a much higher price? How have the City's ratepayers benefited from this sale? We note the developer paid \$2.6 million for the last residential piece of land required for this proposed development leaving the sale of the land by The City in question.

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#### 4.2

The Sustainability Report does not consider any modelling of obnoxious discharges from kitchen, toilet and laundry exhausts and their impact on the surrounding properties. Dispersion modelling and CFD modelling should be undertaken to determine that there is no undue impact, as required by clause 3.1 of the LPP.

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The Sustainability Report has not considered glare and reflectance to properties on the east in the morning and west in the evening to determine that there is no undue impact, as required by clause 3.1 of the LPP.

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#### 4.6

Developer's Traffic Report also provides very little detail on the type of vehicle movements and their frequency and times during the week. This detail is also needed to form proper considered assessment of traffic movements and noise levels, which detail is also wholly lacking in the Developer's Transport Impact Statement and Acoustic Report.

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**Respondent No:** 81

**Responded At:** Jul 14, 2020 14:42:29 pm

**Last Seen:** Jul 14, 2020 06:40:33 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

---

Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Way too high density for this area. SCRAP IT!!

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**Respondent No:** 82

**Responded At:** Jul 14, 2020 15:12:35 pm

**Last Seen:** Jul 14, 2020 06:48:35 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

This is a proposed large commercial enterprise in a residential area and therefore unsuitable for the location. There will be increased traffic in all surrounding streets, with increased noise, lighting, service vehicles, pedestrian traffic, parking issues and fumes due to the 24/7 operation. This is opposite a recreational park and day care centre used by families of the surrounding area. The nature of the business in my opinion will result in severe reduction in amenity of the locality.

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**Respondent No:** 83

**Responded At:** Jul 14, 2020 15:40:50 pm

**Last Seen:** Jul 14, 2020 07:31:59 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I/We strongly object to the development application for a Residential Aged Care Facility located at 73-75 Doonan Road and 16-18 Betty Street, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of this local, low density residential area.

1.0 Planning Objections

1.1 The manner in which Council adopted the Residential Aged Care Facilities Local Planning Policy ('LPP') on 26 April 2020 is highly inappropriate, without publicly advertising major amendments made to the density, height and plot ratio.

1.2 A residential density coding of R80 as imposed by the LPP is not acceptable or justified at the subject site. It is completely out of context with a transition from the neighbouring R12.5 and R10 zoned properties.

1.3 A Local Planning Policy imposing density is not appropriate. Density should be imposed via a scheme amendment to LPS3.

1.4 The proposed development is commercial in nature, operating 24/7 and is not suited to a residential area.

1.5 The proposed development is not compatible with the existing amenity surrounding / abutting development due to the height, scale and bulk of the development. The proposed development therefore does not comply with Clause 3.1 of the LPP which states "...and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking".

1.6 In accordance with the zoning table of LPS 3, 'Residential Aged Care Facility' is allocated an 'A' use within the 'Residential' zone, meaning the use is not permitted unless the local government has exercised its discretion by granting development approval. This is an unusual application of additional use provisions given a 'Residential Aged Care Facility' is already a contemplated use within the 'Residential' zone.

1.7 Due to the removal of the proposed special use provisions in LPS 3, no development standards are applicable to the subject site except for the car parking requirements as outlined in LPS 3. A scheme amendment should be initiated to guide appropriate density.

1.8 Given the increased building height and plot ratio associated with this modification will facilitate increased bulk and scale for any development proposed, we are of the view the modifications to the draft LPP are not minor and are in fact, significant in nature particularly in relation to the locality of surrounding residential area.

1.9 Council has not followed the appropriate process in the adoption of LPP. On this basis we question the validity of the adopted LPP.

1.10 There is absolutely no justification for the application of a R80 density coding, given the significantly lower R10/R12.5 density coding of the surrounding locality.

1.11 The effect of the local planning policy is that it imposes a higher density coding without the initiation of a scheme amendment to LPS3.

1.12 The purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City, however instead it has imposed an R-coding as a mechanism to deal with scale, bulk and built form. This is not appropriate as the imposition of an R80 R-coding immediately adjacent to properties subject to an R12.5 density coding will result in significant conflict with respect to scale, bulk and streetscape impacts.

1.13 Pursuant to Schedule 2, Part 9, Clause 67(m) of the Regulations, the proposed development is not compatible with the surrounding residential neighbourhood and

particularly the adjoining land zoned R12.5. 1.14 In April 2016, the community was consulted on the proposed refurbishment of Melvista Lodge and the development of a 2-storey aged care on adjacent lots at 73-75 Doonan Road and 16-18 Betty Street. What is now proposed is completely different with a 4 storey plus basement and roof (height approx. 17 metres), 90 bed high care, aged care facility on residential zoned lots and no longer includes the refurbishment of the Melvista Lodge. The community consultation on the new proposal from the developer and City of Nedlands has been mostly non-existent. Clause 5.1 of the LPP states "Consultation with affected landowners will be undertaken in accordance with the City's Local Planning Policy- Consultation of Planning Proposals". 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#### 3.1 75 Doonan Road

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**Respondent No:** 84

**Responded At:** Jul 14, 2020 16:06:33 pm

**Last Seen:** Jul 14, 2020 07:53:34 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Owner of a property

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I strongly object to the development application for a Residential Aged Care Facility located at 73-75 Doonan Road and 16-18 Betty Street, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of this local, low density residential area. There have been several submissions made with significant detail, but my objection is specific to traffic. As a cyclist, I use Melvista Avenue to avoid Stirling Highway and Princess Road owing to the heavy traffic on the former and the rat-run traffic on the latter. As the development is between Princess and Melvista, the construction traffic, and permanent traffic from employees, visitors and deliveries will significantly increase traffic on Melvista and Princess. Futhermore, it is apparent that there will not be enough parking meaning street parking will spill onto Melvista making the street more dangerous for cycling. Furthermore, access to the construction site for the style of building being considered is inappropriate. I do not oppose this sort of facility in our fair town, but it needs to be on major transport routes such as Stirling Highway and/or the railway

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**Respondent No:** 85

**Responded At:** Jul 14, 2020 16:21:34 pm

**Last Seen:** Jul 14, 2020 08:03:24 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I strongly object to the development application for a Residential Aged Care Facility located at 73-75 Doonan Road and 16-18 Betty Street, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of this local, low density residential area. 1.0 Planning Objections 1.1 The manner in which Council adopted the Residential Aged Care Facilities Local Planning Policy ('LPP') on 26 April 2020 is highly inappropriate, without publicly advertising major amendments made to the density, height and plot ratio. 1.2 A residential density coding of R80 as imposed by the LPP is not acceptable or justified at the subject site. It is completely out of context with a transition from the neighbouring R12.5 and R10 zoned properties. 1.3 A Local Planning Policy imposing density is not appropriate. Density should be imposed via a scheme amendment to LPS3. 1.4 The proposed development is commercial in nature, operating 24/7 and is not suited to a residential area. 1.5 The proposed development is not compatible with the existing amenity surrounding / abutting development due to the height, scale and bulk of the development. The proposed development therefore does not comply with Clause 3.1 of the LPP which states "...and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking". 1.6 In accordance with the zoning table of LPS 3, 'Residential Aged Care Facility' is allocated an 'A' use within the 'Residential' zone, meaning the use is not permitted unless the local government has exercised its discretion by granting development approval. This is an unusual application of additional use provisions given a 'Residential Aged Care Facility' is already a contemplated use within the 'Residential' zone. 1.7 Due to the removal of the proposed special use provisions in LPS 3, no development standards are applicable to the subject site except for the car parking requirements as outlined in LPS 3. A scheme amendment should be initiated to guide appropriate density. 1.8 Given the increased building height and plot ratio associated with this modification will facilitate increased bulk and scale for any development proposed, we are of the view the modifications to the draft LPP are not minor and are in fact, significant in nature particularly in relation to the locality of surrounding residential area. 1.9 Council has not followed the appropriate process in the adoption of LPP. On this basis we question the validity of the adopted LPP. 1.10 There is absolutely no justification for the application of a R80 density coding, given the significantly lower R10/R12.5 density coding of the surrounding locality. 1.11 The effect of the local planning policy is that it imposes a higher density coding without the initiation of a scheme amendment to LPS3. 1.12 The purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City, however instead it has imposed an R-coding as a mechanism to deal with scale, bulk and built form. This is not appropriate as the imposition of an R80 R-coding immediately adjacent to properties subject to an R12.5 density coding will result in significant conflict with respect to scale, bulk and streetscape impacts. 1.13 Pursuant to Schedule 2, Part 9, Clause

67(m) of the Regulations, the proposed development is not compatible with the surrounding residential neighbourhood and particularly the adjoining land zoned R12.5. 1.14 In April 2016, the community was consulted on the proposed refurbishment of Melvista Lodge and the development of a 2-storey aged care on adjacent lots at 73-75 Doonan Road and 16-18 Betty Street. What is now proposed is completely different with a 4 storey plus basement and roof (height approx. 17 metres), 90 bed high care, aged care facility on residential zoned lots and no longer includes the refurbishment of the Melvista Lodge. The community consultation on the new proposal from the developer and City of Nedlands has been mostly non-existent. Clause 5.1 of the LPP states "Consultation with affected landowners will be undertaken in accordance with the City's Local Planning Policy- Consultation of Planning Proposals". The consultation by the Developer with the Community, undertaken on a previous scheme, therefore breaches the LPP – Consultation of Planning Proposals. 1.15 The proposed development at R80, with a plot ratio of 1.0 will significantly impact the adjoining land and surrounding low density residential neighbourhood. 1.16 Clause 4.6.2 of the LPP states "A minimum of twenty-five per cent (25%) of the site area is to be landscaped". The proposed development does not comply with this requirement of the LPP. 1.17 The set back of the boundary on 71 Doonan Road is non compliant with the LPP Clause 4.5.2 which requires a 7.5m set back and permanent screening to 75% obscure. The proposed plan has a 6.4m setback and NO screening. 1.18 The purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City. The LPP makes no delineation between differing models of care (e.g. independent living units, low care, high care). The planning guidelines set out in the LPP, as drafted, applies the same planning conditions irrespective of the model of care. Different models of care have differing levels of servicing. This has not been considered in the application of the LPP. This has resulted in a High Care facility with an inappropriate density being located in a precinct unsuited to the facility function. The LPP should be redrafted to reflect the specific function and nature of aged care models of care, with appropriate planning of such facilities contextually. 1.19 There was no development control plan applied to this land at the time of its rezoning. This in effect meant anything could have been built. The rushed endorsement of an R80 equivalent zoning without community consultation has denied the community the opportunity to comment on the appropriateness of this density in a residential zone. 2.0 Design Objections 2.1 The built form is a highly inappropriate in terms of scale and size to adjoining properties with box scale of building of approx. 70m overall length x 32m overall width and overall height of approx 17m 2.2 The development includes large, bland featureless walls measuring 35 metres in length (running east/west), a scale that would typically be found in a mixed use or town/activity centre environment. 2.3 The proposed development, should it be constructed as proposed, would result in detrimental impacts to the amenity and character of the low-density residential neighbourhood. 2.4 The four-storey development with a proposed plot ratio of 1.0 would result in a scale of development which is not compatible with the amenity of the locality and is not suitable within a low-density residential neighbourhood. 2.5 The proposed development will significantly impact the visual amenity of all residential lots to the north on Doonan Road and Betty Street, up to Princess Road, particularly when the development is viewed from private outdoor areas. 2.6 The Developer's proposal, with its nominated function, size and density, has not considered any technical issues and will have a material negative impact to the amenity of the locality. 2.7 Building massing and scale is disproportionate to the surrounding urban vernacular. The mass and height are disrespectful to the scale and pitch lines from the adjoining properties with a consequential negative impact to the Betty Street and Doonan Road streetscapes. Its verticality will project as a dominant insertion on the residential neighbourhood. As a "for-profit" commercial operation it will damage the residential cohesion of the suburb of Nedlands. Clause 3.1 of the LPP states "..... design of residential aged care facilities are of a high quality and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking." The proposed development is therefore non-compliant with clause 3.1 of the LPP. 2.8 Building density provides a poor level of amenity for residents and patients with very limited access to outdoor spaces. Lack of green areas for the residents. The LPP requires 25% of the site to be landscaped. The proposal is nowhere near this and hence it is non compliant with the flawed LPP. 2.9 The facility provides a poor work environment for nursing staff. No nursing stations or staff lounges/breakout spaces are provided for staff. 2.10 Ramp/through access with a 4.5m high boundary wall on southern boundary will be highly visible from Doonan and Betty Streets and is aesthetically ugly along with inappropriately high unfriendly front boundary walls close to 2m near southern boundaries on Doonan and Betty Streets. 2.11 These front boundary walls are impacted further by the proposed 2.5m setbacks beyond the current street line sets backs of 9m making it impossible to see down the street. This will result in the streetscape significantly altered with the proposed development jutting out 6.5m beyond the existing street line, Residents reversing out of their driveway will have no line of sight, keeping in mind a pedestrian footpath runs down the east side of Doonan and west side of Betty making this impossible to ensure the safety of any family walking down the street to Masons Gardens, or car driving up the

street. 2.12 The visual projection of the development on the north facing Masons Gardens vista will be overbearing and detrimental to the urban fabric of the Betty Street – Doonan Road hillscape and Mason Gardens Precinct. 2.13 The proposed development is not setting a target for environmental sustainability. The development is taking a just above minimum approach, proposing to exceed Part J of the National Construction Code by a stated 10%. This is an inadequate attempt to demonstrate environmental sustainability credentials. As a minimum a Green Star 6-star standard should be set, and consideration should be given to a Passive House rating. This facility will have a significant carbon footprint that will represent a substantial increase over the carbon footprint of the existing three (3) residences. 2.14 The Developer has no stated approach to operation of the facility in the instance of a required lockdown nor a stated approach of how to protect vulnerable patients to cross infection from air borne viruses. This is an irresponsible approach to quality aged care services in a post COVID 19 environment where a duty of care exists to protect patients who are in a vulnerable position. The City of Nedlands would be in breach of your duty of care now with the foreknowledge that this facility presents an unacceptable risk and has not considered a COVID safe design. 2.15 The proposed development proposes a density of occupancy that maximises the built form on the available land area, leaving limited open space for residents/patients. The LPP, clause 4.6.2 requires 25% of the site area to be landscaped. This has not been provided. Furthermore, the Review of Innovative Models of Aged Care, Research Paper 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety recommended respite is provided in settings aligned to a person's background and offering structured activities. The report further recommends small scale domestic models of aged care where there is an emphasis on providing person centred care models. The proposed developments design and density is not aligned to the objectives of the Royal Commission. 2.16 At ninety (90) beds of non-ambulatory patients over four (4) occupied levels, safe evacuation has been poorly considered. Safe evacuation should necessitate a sprinkler protected building with a zoned smoke management system and designated safe zones. Brigade turn out points for fire truck parking and access to brigade booster points have not been considered in the design. Evacuation of 90 non-ambulatory residents is a risk. 2.17 Brigade access to non-sprinklered areas, such as the roof plantroom, with access only available along Betty Street and Doonan Road for aerial firefighting, has not been considered. 2.18 No consideration appears to have been given for acoustic treatment for roof located air conditioning plant and roof discharges. 2.19 Lifts in the building are to be used for vertical movement of food services, visitors, patients, maintenance personnel and removal of deceased patients. This is an unhygienic practice and demonstrates poor design practice in this facility. Good design practice would separate different traffic streams in a facility of this size and density, with the minimum provision of a dedicated goods lift. 2.20 The car parking provisions are significantly underestimated. This will result in substantial on street parking to Betty St, Doonan Rd, Melvista Ave, Granby Cres and surrounding roads. Staffing numbers for the Wellness Centre (3 treatment bays + hair salon – circa 4 staff), full commercial kitchen for up 540 food services per day (circa 4-5 staff), facilities manager (1 staff), full laundry (circa 2 staff), on site admin (circa 7 staff), on-site coffee shop (1 staff), cleaning staff (circa 3-4), orderlies and support staff (circa 2), plus nursing and staff for 90 patients (minimum 15 staff) significantly exceeds car parking allowances. Shift changeover of nursing staff, visitors and maintenance staff further results in carparking being significantly undersized and inadequate for a facility of this size and density. 2.21 Grease trap for the kitchen will require truck access for pumping out the grease trap. This does not appear to have been considered in the design. 2.22 Inadequate on-site parking can result in off-site parking for nurses for night shifts. This can result in unsafe practices and security concerns for nursing staff accessing the facility at night having to park in unsecured/unmonitored locations. 2.23 No design provision is shown for kitchen exhaust discharges, carpark ventilation discharges, generator exhaust discharge. Discharges from the facility will adversely impact neighbours and have not been considered appropriately. Discharge stacks will also extend beyond the roof line creating further visual impact. 2.24 Truck vehicular access for food delivery, waste removal, medical gas bottle replenishment, diesel fuel delivery, maintenance personnel for mechanical, electrical, fire and communications plant will result in significant increase to truck movements on Doonan Road and Betty Street. 2.25 Inadequate provision has been made for replacement of roof top air conditioning plant. Access for large plant can only be made via crane access from Betty Street or Doonan Road. 2.26 Light spill for night-time access to carparking and pedestrian entrances will result in light pollution to adjoining neighbours. 2.27 The renders and plans being promoted by the Developer do not correctly illustrate the upper levels and roof form which will be highly visible. These images and plans are misleading. In addition, the elevations do not show the upper level in bold, again misleading. 2.28 Subterranean courtyards on the eastern/western boundaries/northern edge - Doonan Road/Betty Street are unsightly/dark and out of character with the wide, large verges of the suburb. 2.29 The developer, Oryx, is inexperienced. It is noted that the Developer has operated only one aged care facility to date, the

recently acquired hotel, The Richardson in West Perth. Following acquisition that was subsequently refurbished to accommodate aged care. 2.30 Only 5 of the direct neighbours were afforded a one on one meeting with the Developer's consultants on the week of 22 June 2020. This was the first time the neighbours had been approached regarding this proposal. The Developer was not present at the resident meetings with representation being made by their Stakeholder Engagement Consultant, Creating Communities, and Town Planning Consultant, Planning Solutions. 3.0 Sale of Land Objections 3.1 75 Doonan Road was sold by private treaty to the developer before the land was designated 'special use' allowing aged care. The land should have been offered to the open market, particularly when it was widely known the owners of Melvista Lodge directly to the south were also interested in purchasing the land. 3.2 The land was sold as a Residential R10/R12.5 lot when the City knew its intent was always to redesignate the land. Why would the City sell land to a developer, prior to its redesignation. Why did they not designate it for aged care use first and by inference, sell the land at a much higher price? How have the City's ratepayers benefited from this sale? We note the developer paid \$2.6 million for the last residential piece of land required for this proposed development leaving the sale of the land by The City in question. 4.0 Technical Reports Objections 4.1 The acoustics technical report has not calculated the cumulative noise impact of ventilation systems with the air-cooled condensers. Significant ventilation systems will be required for the kitchen exhaust, evaporative kitchen make up, toilet exhausts, laundry exhausts and flues. To determine the full impact of the facility on adjoining residences, all noise sources should be defined and calculated on a cumulative basis. 4.2 The Sustainability Report does not consider any modelling of obnoxious discharges from kitchen, toilet and laundry exhausts and their impact on the surrounding properties. Dispersion modelling and CFD modelling should be undertaken to determine that there is no undue impact, as required by clause 3.1 of the LPP. 4.3 The Sustainability Report has not considered any heat island impact on the surrounding properties as a result of rejecting circa 700 - 800 kW of heat from the facility to determine that there is no undue impact, as required by clause 3.1 of the LPP. 4.4 The Sustainability Report has not considered glare and reflectance to properties on the east in the morning and west in the evening to determine that there is no undue impact, as required by clause 3.1 of the LPP. 4.5 The Transport Impact Statement (TIS) has not calculated the total number of staff or visitor numbers in its car parking assessment for a facility of this nature. The TIS has relied on an allowance of 1 car bay per 4 beds. A high dependency aged care facility will have a significant staffing requirement that will exceed this requirement. It will also have significant visitor numbers. The TIS has made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment of carparking and traffic movements. 4.6 Developer's Traffic Report also provides very little detail on the type of vehicle movements and their frequency and times during the week. This detail is also needed to form proper considered assessment of traffic movements and noise levels, which detail is also wholly lacking in the Developer's Transport Impact Statement and Acoustic Report. Summary This proposal is totally inappropriate in a residential setting and will have a negative impact on this community. A revised more community sensitive proposal should be required to be submitted by the developer. This proposal as an aged care facility has no ability to succeed as a business in its present form and will require major changes to its design and function which will only occur after approval. This building will be a fire trap for the inhabitants and a full assessment by independent fire experts should be undertaken.

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**Respondent No:** 86

**Responded At:** Jul 14, 2020 16:57:22 pm

**Last Seen:** Jul 14, 2020 08:49:21 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

A five story building in a residential street is inappropriate. This development has not considered the local stakeholders opinions or the ongoing impact to the immediate neighbourhoods. There are better locations close to Hollywood hospital to site such a facility.

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**Respondent No:** 87

**Responded At:** Jul 14, 2020 17:05:37 pm

**Last Seen:** Jul 14, 2020 08:41:53 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Other
<input type="checkbox"/>	Owner of a property

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

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bulk and streetscape impacts. 1.13 Pursuant to Schedule 2, Part 9, Clause 67(m) of the Regulations, the proposed development is not compatible with the surrounding residential neighbourhood and particularly the adjoining land zoned R12.5. 1.14 In April 2016, the community was consulted on the proposed refurbishment of Melvista Lodge and the development of a 2-storey aged care on adjacent lots at 73-75 Doonan Road and 16-18 Betty Street. What is now proposed is completely different with a 4 storey plus basement and roof (height approx. 17 metres), 90 bed high care, aged care facility on residential zoned lots and no longer includes the refurbishment of the Melvista Lodge. The community consultation on the new proposal from the developer and City of Nedlands has been mostly non-existent. Clause 5.1 of the LPP states "Consultation with affected landowners will be undertaken in accordance with the City's Local Planning Policy- Consultation of Planning Proposals". 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Access for large plant can only be made via crane access from Betty Street or Doonan Road. 2.26 Light spill for night-time access to carparking and pedestrian entrances will result in light pollution to adjoining neighbours. 2.27 The renders and plans being promoted by the Developer do not correctly illustrate the upper levels and roof form which will be highly visible. These images and plans are misleading. In addition, the elevations do not show the upper level in bold, again misleading. 2.28 Subterranean courtyards on the eastern/western boundaries/northern edge - Doonan Road/Betty Street are unsightly/dark and out of character with the wide, large verges of the suburb. 2.29



The developer, Oryx, is inexperienced. It is noted that the Developer has operated only one aged care facility to date, the recently acquired hotel, The Richardson in West Perth. Following acquisition that was subsequently refurbished to accommodate aged care.

2.30 Only 5 of the direct neighbours were afforded a one on one meeting with the Developer's consultants on the week of 22 June 2020. This was the first time the neighbours had been approached regarding this proposal. The Developer was not present at the resident meetings with representation being made by their Stakeholder Engagement Consultant, Creating Communities, and Town Planning Consultant, Planning Solutions.

3.0 Sale of Land

3.1 75 Doonan Road was sold by private treaty to the developer before the land was designated 'special use' allowing aged care. The land should have been offered to the open market, particularly when it was widely known the owners of Melvista Lodge directly to the south were also interested in purchasing the land.

3.2 The land was sold as a Residential R10/R12.5 lot when the City knew its intent was always to redesignate the land. Why would the City sell land to a developer, prior to its redesignation. Why did they not designate it for aged care use first and by inference, sell the land at a much higher price? How have the City's ratepayers benefited from this sale? We note the developer paid \$2.6 million for the last residential piece of land required for this proposed development leaving the sale of the land by The City in question.

4.0 Technical Reports Objections

4.1 The acoustics technical report has not calculated the cumulative noise impact of ventilation systems with the air-cooled condensers. Significant ventilation systems will be required for the kitchen exhaust, evaporative kitchen make up, toilet exhausts, laundry exhausts and flues. To determine the full impact of the facility on adjoining residences, all noise sources should be defined and calculated on a cumulative basis.

4.2 The Sustainability Report does not consider any modelling of obnoxious discharges from kitchen, toilet and laundry exhausts and their impact on the surrounding properties. Dispersion modelling and CFD modelling should be undertaken to determine that there is no undue impact, as required by clause 3.1 of the LPP.

4.3 The Sustainability Report has not considered any heat island impact on the surrounding properties as a result of rejecting circa 700 - 800 kW of heat from the facility to determine that there is no undue impact, as required by clause 3.1 of the LPP.

4.4 The Sustainability Report has not considered glare and reflectance to properties on the east in the morning and west in the evening to determine that there is no undue impact, as required by clause 3.1 of the LPP.

4.5 The Transport Impact Statement (TIS) has not calculated the total number of staff or visitor numbers in its car parking assessment for a facility of this nature. The TIS has relied on an allowance of 1 car bay per 4 beds. A high dependency aged care facility will have a significant staffing requirement that will exceed this requirement. It will also have significant visitor numbers. The TIS has made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment of carparking and traffic movements.

4.6 Developer's Traffic Report also provides very little detail on the type of vehicle movements and their frequency and times during the week. This detail is also needed to form proper considered assessment of traffic movements and noise levels, which detail is also wholly lacking in the Developer's Transport Impact Statement and Acoustic Report.

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**Respondent No:** 88

**Responded At:** Jul 14, 2020 17:14:22 pm

**Last Seen:** Jul 14, 2020 08:35:57 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Sadly residents are presented with a seemingly fait accompli by developers whose lust for profits exceeds their sense of fairness & what constitutes as a moderate initial development proposal becomes overwhelming in scale with a total lack of consideration for surrounding homes. As with proposals for Broadway Nedlands & Dalkeith, developers seem intent on cramming as many concrete levels onto developments with total disregard for traffic congestion in narrow streets & generally destroying leafy treed suburbs with high rise concrete structures, which are at odds with climate change recommendations. Buildings generate heat & emissions as do cars & there would be a considerable increase in both for the surrounding residents. I would urge the council to vociferously condemn this outrageous, greed-driven proposal & would hope that a height more suitable to the area can be negotiated.

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**Respondent No:** 89

**Responded At:** Jul 14, 2020 20:10:40 pm

**Last Seen:** Jul 23, 2020 11:41:24 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

We strongly object to the development application for a Residential Aged Care Facility located at 73-75 Doonan Road and 16-18 Betty Street, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of this local, low density residential area. 1.0 Planning Objections 1.1 The manner in which Council adopted the Residential Aged Care Facilities Local Planning Policy ('LPP') on 26 April 2020 is highly inappropriate, without publicly advertising major amendments made to the density, height and plot ratio. 1.2 A residential density coding of R80 as imposed by the LPP is not acceptable or justified at the subject site. It is completely out of context with a transition from the neighbouring R12.5 and R10 zoned properties. 1.3 A Local Planning Policy imposing density is not appropriate. Density should be imposed via a scheme amendment to LPS3. 1.4 The proposed development is commercial in nature, operating 24/7 and is not suited to a residential area. 1.5 The proposed development is not compatible with the existing amenity surrounding / abutting development due to the height, scale and bulk of the development. The proposed development therefore does not comply with Clause 3.1 of the LPP which states "...and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking". 1.6 In accordance with the zoning table of LPS 3, 'Residential Aged Care Facility' is allocated an 'A' use within the 'Residential' zone, meaning the use is not permitted unless the local government has exercised its discretion by granting development approval. This is an unusual application of additional use provisions given a 'Residential Aged Care Facility' is already a contemplated use within the 'Residential' zone. 1.7 Due to the removal of the proposed special use provisions in LPS 3, no development standards are applicable to the subject site except for the car parking requirements as outlined in LPS 3. A scheme amendment should be initiated to guide appropriate density. 1.8 Given the increased building height and plot ratio associated with this modification will facilitate increased bulk and scale for any development proposed, we are of the view the modifications to the draft LPP are not minor and are in fact, significant in nature particularly in relation to the locality of surrounding residential area. 1.9 Council has not followed the appropriate process in the adoption of LPP. On this basis we question the validity of the adopted LPP. 1.10 There is absolutely no justification for the application of a R80 density coding, given the significantly lower R10/R12.5 density coding of the surrounding locality. 1.11 The effect of the local planning policy is that it imposes a higher density coding without the initiation of a scheme amendment to LPS3. 1.12 The purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City, however instead it has imposed an R-coding as a mechanism to deal with scale, bulk and built form. This is not appropriate as the imposition of an R80 R-coding immediately adjacent to properties subject to an R12.5 density coding will result in significant conflict with respect to scale, bulk and streetscape impacts. 1.13 Pursuant to Schedule 2, Part 9, Clause 67(m) of the Regulations, the proposed development is not compatible with the surrounding residential neighbourhood and

particularly the adjoining land zoned R12.5. 1.14 In April 2016, the community was consulted on the proposed refurbishment of Melvista Lodge and the development of a 2-storey aged care on adjacent lots at 73-75 Doonan Road and 16-18 Betty Street. What is now proposed is completely different with a 4 storey plus basement and roof (height approx. 17 metres), 90 bed high care, aged care facility on residential zoned lots and no longer includes the refurbishment of the Melvista Lodge. The community consultation on the new proposal from the developer and City of Nedlands has been mostly non-existent. Clause 5.1 of the LPP states "Consultation with affected landowners will be undertaken in accordance with the City's Local Planning Policy- Consultation of Planning Proposals". The consultation by the Developer with the Community, undertaken on a previous scheme, therefore breaches the LPP – Consultation of Planning Proposals. 1.15 The proposed development at R80, with a plot ratio of 1.0 will significantly impact the adjoining land and surrounding low density residential neighbourhood. 1.16 Clause 4.6.2 of the LPP states "A minimum of twenty-five per cent (25%) of the site area is to be landscaped". The proposed development does not comply with this requirement of the LPP. 1.17 The set back of the boundary on 71 Doonan Road is non compliant with the LPP Clause 4.5.2 which requires a 7.5m set back and permanent screening to 75% obscure. The proposed plan has a 6.4m setback and NO screening. 1.18 The purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City. The LPP makes no delineation between differing models of care (e.g. independent living units, low care, high care). The planning guidelines set out in the LPP, as drafted, applies the same planning conditions irrespective of the model of care. Different models of care have differing levels of servicing. This has not been considered in the application of the LPP. This has resulted in a High Care facility with an inappropriate density being located in a precinct unsuited to the facility function. The LPP should be redrafted to reflect the specific function and nature of aged care models of care, with appropriate planning of such facilities contextually. 1.19 There was no development control plan applied to this land at the time of its rezoning. This in effect meant anything could have been built. The rushed endorsement of an R80 equivalent zoning without community consultation has denied the community the opportunity to comment on the appropriateness of this density in a residential zone. This residential area simply hasn't been designed to manage the impact of something of this scale. There are other areas within the western suburbs that would be better suited for this establishment.

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**Respondent No:** 90

**Responded At:** Jul 14, 2020 21:06:58 pm

**Last Seen:** Jul 14, 2020 12:43:42 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I wish to express my objections to the proposed development, 16/18 Betty St and 73/75 Doonan St for a range of reasons. The proposed development does not fit the ambience of the area, has not been widely consulted and will create many problems for the immediate surrounding area and the suburb in general. It is inappropriate for the low density residential nature of Nedlands/Dalkeith and in particular this specific area of Nedlands/Dalkeith. It appears that this project has been propelled through the processes in a less open and a somewhat covert manner and hence needs to be halted and undertaken in a more consultative way with the neighbourhood and the public. A lower density accommodation within the concept of aged care should be put forward for discussion and reconsideration.

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**Respondent No:** 91

**Responded At:** Jul 15, 2020 06:57:47 am

**Last Seen:** Jul 14, 2020 22:53:24 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

We strongly object to the development application for a Residential Aged Care Facility located at 73-75 Doonan Road and 16-18 Betty Street, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of this local, low density residential area. 1.0 Planning Objections 1.1 The manner in which Council adopted the Residential Aged Care Facilities Local Planning Policy ('LPP') on 26 April 2020 is highly inappropriate, without publicly advertising major amendments made to the density, height and plot ratio. 1.2 A residential density coding of R80 as imposed by the LPP is not acceptable or justified at the subject site. It is completely out of context with a transition from the neighbouring R12.5 and R10 zoned properties. 1.3 A Local Planning Policy imposing density is not appropriate. Density should be imposed via a scheme amendment to LPS3. 1.4 The proposed development is commercial in nature, operating 24/7 and is not suited to a residential area. 1.5 The proposed development is not compatible with the existing amenity surrounding / abutting development due to the height, scale and bulk of the development. The proposed development therefore does not comply with Clause 3.1 of the LPP which states "...and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking". 1.6 In accordance with the zoning table of LPS 3, 'Residential Aged Care Facility' is allocated an 'A' use within the 'Residential' zone, meaning the use is not permitted unless the local government has exercised its discretion by granting development approval. This is an unusual application of additional use provisions given a 'Residential Aged Care Facility' is already a contemplated use within the 'Residential' zone. 1.7 Due to the removal of the proposed special use provisions in LPS 3, no development standards are applicable to the subject site except for the car parking requirements as outlined in LPS 3. A scheme amendment should be initiated to guide appropriate density. 1.8 Given the increased building height and plot ratio associated with this modification will facilitate increased bulk and scale for any development proposed, we are of the view the modifications to the draft LPP are not minor and are in fact, significant in nature particularly in relation to the locality of surrounding residential area. 1.9 Council has not followed the appropriate process in the adoption of LPP. On this basis we question the validity of the adopted LPP. 1.10 There is absolutely no justification for the application of a R80 density coding, given the significantly lower R10/R12.5 density coding of the surrounding locality. 1.11 The effect of the local planning policy is that it imposes a higher density coding without the initiation of a scheme amendment to LPS3. 1.12 The purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City, however instead it has imposed an R-coding as a mechanism to deal with scale, bulk and built form. This is not appropriate as the imposition of an R80 R-coding immediately adjacent to properties subject to an R12.5 density coding will result in significant conflict with respect to scale, bulk and streetscape impacts. 1.13 Pursuant to Schedule 2, Part 9, Clause 67(m) of the Regulations, the proposed development is not compatible with the surrounding residential neighbourhood and

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The rushed endorsement of an R80 equivalent zoning without community consultation has denied the community the opportunity to comment on the appropriateness of this density in a residential zone. 2.0 Design Objections 2.1 The built form is a highly inappropriate in terms of scale and size to adjoining properties with box scale of building of approx. 70m overall length x 32m overall width and overall height of approx 17m 2.2 The development includes large, bland featureless walls measuring 35 metres in length (running east/west), a scale that would typically be found in a mixed use or town/activity centre environment. 2.3 The proposed development, should it be constructed as proposed, would result in detrimental impacts to the amenity and character of the low-density residential neighbourhood. 2.4 The four-storey development with a proposed plot ratio of 1.0 would result in a scale of development which is not compatible with the amenity of the locality and is not suitable within a low-density residential neighbourhood. 2.5 The proposed development will significantly impact the visual amenity of all residential lots to the north on Doonan Road and Betty Street, up to Princess Road, particularly when the development is viewed from private outdoor areas. 2.6 The Developer's proposal, with its nominated function, size and density, has not considered any technical issues and will have a material negative impact to the amenity of the locality. 2.7 Building massing and scale is disproportionate to the surrounding urban vernacular. The mass and height are disrespectful to the scale and pitch lines from the adjoining properties with a consequential negative impact to the Betty Street and Doonan Road streetscapes. Its verticality will project as a dominant insertion on the residential neighbourhood. As a "for-profit" commercial operation it will damage the residential cohesion of the suburb of Nedlands. Clause 3.1 of the LPP states "..... design of residential aged care facilities are of a high quality and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking." The proposed development is therefore non-compliant with clause 3.1 of the LPP. 2.8 Building density provides a poor level of amenity for residents and patients with very limited access to outdoor spaces. Lack of green areas for the residents. The LPP requires 25% of the site to be landscaped. The proposal is nowhere near this and hence it is non compliant with the flawed LPP. 2.9 The facility provides a poor work environment for nursing staff. No nursing stations or staff lounges/breakout spaces are provided for staff. 2.10 Ramp/through access with a 4.5m high boundary wall on southern boundary will be highly visible from Doonan and Betty Streets and is aesthetically ugly along with inappropriately high unfriendly front boundary walls close to 2m near southern boundaries on Doonan and Betty Streets. 2.11 These front boundary walls are impacted further by the proposed 2.5m setbacks beyond the current street line sets backs of 9m making it impossible to see down the street. This will result in the streetscape significantly altered with the proposed development jutting out 6.5m beyond the existing street line, Residents reversing out of their driveway will have no line of sight, keeping in mind a pedestrian footpath runs down the east side of Doonan and west side of Betty making this impossible to ensure the safety of any family walking down the street to Masons Gardens, or car driving up the

street. 2.12 The visual projection of the development on the north facing Masons Gardens vista will be overbearing and detrimental to the urban fabric of the Betty Street – Doonan Road hillscape and Mason Gardens Precinct. 2.13 The proposed development is not setting a target for environmental sustainability. The development is taking a just above minimum approach, proposing to exceed Part J of the National Construction Code by a stated 10%. This is an inadequate attempt to demonstrate environmental sustainability credentials. As a minimum a Green Star 6-star standard should be set, and consideration should be given to a Passive House rating. This facility will have a significant carbon footprint that will represent a substantial increase over the carbon footprint of the existing three (3) residences. 2.14 The Developer has no stated approach to operation of the facility in the instance of a required lockdown nor a stated approach of how to protect vulnerable patients to cross infection from air borne viruses. This is an irresponsible approach to quality aged care services in a post COVID 19 environment where a duty of care exists to protect patients who are in a vulnerable position. The City of Nedlands would be in breach of your duty of care now with the foreknowledge that this facility presents an unacceptable risk and has not considered a COVID safe design. 2.15 The proposed development proposes a density of occupancy that maximises the built form on the available land area, leaving limited open space for residents/patients. The LPP, clause 4.6.2 requires 25% of the site area to be landscaped. This has not been provided. Furthermore, the Review of Innovative Models of Aged Care, Research Paper 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety recommended respite is provided in settings aligned to a person's background and offering structured activities. The report further recommends small scale domestic models of aged care where there is an emphasis on providing person centred care models. The proposed developments design and density is not aligned to the objectives of the Royal Commission. 2.16 At ninety (90) beds of non-ambulatory patients over four (4) occupied levels, safe evacuation has been poorly considered. Safe evacuation should necessitate a sprinkler protected building with a zoned smoke management system and designated safe zones. Brigade turn out points for fire truck parking and access to brigade booster points have not been considered in the design. Evacuation of 90 non-ambulatory residents is a risk. 2.17 Brigade access to non-sprinklered areas, such as the roof plantroom, with access only available along Betty Street and Doonan Road for aerial firefighting, has not been considered. 2.18 No consideration appears to have been given for acoustic treatment for roof located air conditioning plant and roof discharges. 2.19 Lifts in the building are to be used for vertical movement of food services, visitors, patients, maintenance personnel and removal of deceased patients. This is an unhygienic practice and demonstrates poor design practice in this facility. Good design practice would separate different traffic streams in a facility of this size and density, with the minimum provision of a dedicated goods lift. 2.20 The car parking provisions are significantly underestimated. This will result in substantial on street parking to Betty St, Doonan Rd, Melvista Ave, Granby Cres and surrounding roads. Staffing numbers for the Wellness Centre (3 treatment bays + hair salon – circa 4 staff), full commercial kitchen for up 540 food services per day (circa 4-5 staff), facilities manager (1 staff), full laundry (circa 2 staff), on site admin (circa 7 staff), on-site coffee shop (1 staff), cleaning staff (circa 3-4), orderlies and support staff (circa 2), plus nursing and staff for 90 patients (minimum 15 staff) significantly exceeds car parking allowances. Shift changeover of nursing staff, visitors and maintenance staff further results in carparking being significantly undersized and inadequate for a facility of this size and density. 2.21 Grease trap for the kitchen will require truck access for pumping out the grease trap. This does not appear to have been considered in the design. 2.22 Inadequate on-site parking can result in off-site parking for nurses for night shifts. 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Access for large plant can only be made via crane access from Betty Street or Doonan Road. 2.26 Light spill for night-time access to carparking and pedestrian entrances will result in light pollution to adjoining neighbours. 2.27 The renders and plans being promoted by the Developer do not correctly illustrate the upper levels and roof form which will be highly visible. These images and plans are misleading. In addition, the elevations do not show the upper level in bold, again misleading. 2.28 Subterranean courtyards on the eastern/western boundaries/northern edge - Doonan Road/Betty Street are unsightly/dark and out of character with the wide, large verges of the suburb. 2.29 The developer, Oryx, is inexperienced. It is noted that the Developer has operated only one aged care facility to date, the recently acquired hotel, The Richardson in West Perth. Following acquisition that was subsequently refurbished to



accommodate aged care. 2.30 Only 5 of the direct neighbours were afforded a one on one meeting with the Developer's consultants on the week of 22 June 2020. This was the first time the neighbours had been approached regarding this proposal. The Developer was not present at the resident meetings with representation being made by their Stakeholder Engagement Consultant, Creating Communities, and Town Planning Consultant, Planning Solutions.

### 3.0 Sale of Land

#### 3.1 75 Doonan Road

was sold by private treaty to the developer before the land was designated 'special use' allowing aged care. The land should have been offered to the open market, particularly when it was widely known the owners of Melvista Lodge directly to the south were also interested in purchasing the land.

#### 3.2

The land was sold as a Residential R10/R12.5 lot when the City knew its intent was always to redesignate the land. Why would the City sell land to a developer, prior to its redesignation. Why did they not designate it for aged care use first and by inference, sell the land at a much higher price? How have the City's ratepayers benefited from this sale? We note the developer paid \$2.6 million for the last residential piece of land required for this proposed development leaving the sale of the land by The City in question.

### 4.0 Technical Reports

#### 4.1

The acoustics technical report has not calculated the cumulative noise impact of ventilation systems with the air-cooled condensers. Significant ventilation systems will be required for the kitchen exhaust, evaporative kitchen make up, toilet exhausts, laundry exhausts and flues. To determine the full impact of the facility on adjoining residences, all noise sources should be defined and calculated on a cumulative basis.

#### 4.2

The Sustainability Report does not consider any modelling of obnoxious discharges from kitchen, toilet and laundry exhausts and their impact on the surrounding properties. Dispersion modelling and CFD modelling should be undertaken to determine that there is no undue impact, as required by clause 3.1 of the LPP.

#### 4.3

The Sustainability Report has not considered any heat island impact on the surrounding properties as a result of rejecting circa 700 - 800 kW of heat from the facility to determine that there is no undue impact, as required by clause 3.1 of the LPP.

#### 4.4

The Sustainability Report has not considered glare and reflectance to properties on the east in the morning and west in the evening to determine that there is no undue impact, as required by clause 3.1 of the LPP.

#### 4.5

The Transport Impact Statement (TIS) has not calculated the total number of staff or visitor numbers in its car parking assessment for a facility of this nature. The TIS has relied on an allowance of 1 car bay per 4 beds. A high dependency aged care facility will have a significant staffing requirement that will exceed this requirement. It will also have significant visitor numbers. The TIS has made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment of carparking and traffic movements.

#### 4.6

Developer's Traffic Report also provides very little detail on the type of vehicle movements and their frequency and times during the week. This detail is also needed to form proper considered assessment of traffic movements and noise levels, which detail is also wholly lacking in the Developer's Transport Impact Statement and Acoustic Report.

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**Respondent No:** 92

**Responded At:** Jul 15, 2020 09:49:01 am

**Last Seen:** Jul 15, 2020 01:45:58 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I/We strongly object to the development application for a Residential Aged Care Facility located at 73-75 Doonan Road and 16-18 Betty Street, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of this local, low density residential area. 1.0 Planning Objections 1.1 The manner in which Council adopted the Residential Aged Care Facilities Local Planning Policy ('LPP') on 26 April 2020 is highly inappropriate, without publicly advertising major amendments made to the density, height and plot ratio. 1.2 A residential density coding of R80 as imposed by the LPP is not acceptable or justified at the subject site. It is completely out of context with a transition from the neighbouring R12.5 and R10 zoned properties. 1.3 A Local Planning Policy imposing density is not appropriate. Density should be imposed via a scheme amendment to LPS3. 1.4 The proposed development is commercial in nature, operating 24/7 and is not suited to a residential area. 1.5 The proposed development is not compatible with the existing amenity surrounding / abutting development due to the height, scale and bulk of the development. The proposed development therefore does not comply with Clause 3.1 of the LPP which states "...and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking". 1.6 In accordance with the zoning table of LPS 3, 'Residential Aged Care Facility' is allocated an 'A' use within the 'Residential' zone, meaning the use is not permitted unless the local government has exercised its discretion by granting development approval. This is an unusual application of additional use provisions given a 'Residential Aged Care Facility' is already a contemplated use within the 'Residential' zone. 1.7 Due to the removal of the proposed special use provisions in LPS 3, no development standards are applicable to the subject site except for the car parking requirements as outlined in LPS 3. A scheme amendment should be initiated to guide appropriate density. 1.8 Given the increased building height and plot ratio associated with this modification will facilitate increased bulk and scale for any development proposed, we are of the view the modifications to the draft LPP are not minor and are in fact, significant in nature particularly in relation to the locality of surrounding residential area. 1.9 Council has not followed the appropriate process in the adoption of LPP. On this basis we question the validity of the adopted LPP. 1.10 There is absolutely no justification for the application of a R80 density coding, given the significantly lower R10/R12.5 density coding of the surrounding locality. 1.11 The effect of the local planning policy is that it imposes a higher density coding without the initiation of a scheme amendment to LPS3. 1.12 The purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City, however instead it has imposed an R-coding as a mechanism to deal with scale, bulk and built form. This is not appropriate as the imposition of an R80 R-coding immediately adjacent to properties subject to an R12.5 density coding will result in significant conflict with respect to scale, bulk and streetscape impacts. 1.13 Pursuant to Schedule 2, Part 9, Clause

67(m) of the Regulations, the proposed development is not compatible with the surrounding residential neighbourhood and particularly the adjoining land zoned R12.5. 1.14 In April 2016, the community was consulted on the proposed refurbishment of Melvista Lodge and the development of a 2-storey aged care on adjacent lots at 73-75 Doonan Road and 16-18 Betty Street. What is now proposed is completely different with a 4 storey plus basement and roof (height approx. 17 metres), 90 bed high care, aged care facility on residential zoned lots and no longer includes the refurbishment of the Melvista Lodge. The community consultation on the new proposal from the developer and City of Nedlands has been mostly non-existent. Clause 5.1 of the LPP states "Consultation with affected landowners will be undertaken in accordance with the City's Local Planning Policy- Consultation of Planning Proposals". The consultation by the Developer with the Community, undertaken on a previous scheme, therefore breaches the LPP – Consultation of Planning Proposals. 1.15 The proposed development at R80, with a plot ratio of 1.0 will significantly impact the adjoining land and surrounding low density residential neighbourhood. 1.16 Clause 4.6.2 of the LPP states "A minimum of twenty-five per cent (25%) of the site area is to be landscaped". The proposed development does not comply with this requirement of the LPP. 1.17 The set back of the boundary on 71 Doonan Road is non compliant with the LPP Clause 4.5.2 which requires a 7.5m set back and permanent screening to 75% obscure. The proposed plan has a 6.4m setback and NO screening. 1.18 The purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City. The LPP makes no delineation between differing models of care (e.g. independent living units, low care, high care). The planning guidelines set out in the LPP, as drafted, applies the same planning conditions irrespective of the model of care. Different models of care have differing levels of servicing. This has not been considered in the application of the LPP. This has resulted in a High Care facility with an inappropriate density being located in a precinct unsuited to the facility function. The LPP should be redrafted to reflect the specific function and nature of aged care models of care, with appropriate planning of such facilities contextually. 1.1 There was no development control plan applied to this land at the time of its rezoning. This in effect meant anything could have been built. The rushed endorsement of an R80 equivalent zoning without community consultation has denied the community the opportunity to comment on the appropriateness of this density in a residential zone. 2.0 Design Objections 2.1 The built form is a highly inappropriate in terms of scale and size to adjoining properties with box scale of building of approx. 70m overall length x 32m overall width and overall height of approx 17m 2.2 The development includes large, bland featureless walls measuring 35 metres in length (running east/west), a scale that would typically be found in a mixed use or town/activity centre environment. 2.3 The proposed development, should it be constructed as proposed, would result in detrimental impacts to the amenity and character of the low-density residential neighbourhood. 2.4 The four-storey development with a proposed plot ratio of 1.0 would result in a scale of development which is not compatible with the amenity of the locality and is not suitable within a low-density residential neighbourhood. 2.5 The proposed development will significantly impact the visual amenity of all residential lots to the north on Doonan Road and Betty Street, up to Princess Road, particularly when the development is viewed from private outdoor areas. 2.6 The Developer's proposal, with its nominated function, size and density, has not considered any technical issues and will have a material negative impact to the amenity of the locality. 2.7 Building massing and scale is disproportionate to the surrounding urban vernacular. The mass and height are disrespectful to the scale and pitch lines from the adjoining properties with a consequential negative impact to the Betty Street and Doonan Road streetscapes. Its verticality will project as a dominant insertion on the residential neighbourhood. As a "for-profit" commercial operation it will damage the residential cohesion of the suburb of Nedlands. Clause 3.1 of the LPP states "..... design of residential aged care facilities are of a high quality and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking." The proposed development is therefore non-compliant with clause 3.1 of the LPP. 2.8 Building density provides a poor level of amenity for residents and patients with very limited access to outdoor spaces. Lack of green areas for the residents. The LPP requires 25% of the site to be landscaped. The proposal is nowhere near this and hence it is non compliant with the flawed LPP. 2.9 The facility provides a poor work environment for nursing staff. No nursing stations or staff lounges/breakout spaces are provided for staff. 2.10 Ramp/through access with a 4.5m high boundary wall on southern boundary will be highly visible from Doonan and Betty Streets and is aesthetically ugly along with inappropriately high unfriendly front boundary walls close to 2m near southern boundaries on Doonan and Betty Streets. 2.11 These front boundary walls are impacted further by the proposed 2.5m setbacks beyond the current street line sets backs of 9m making it impossible to see down the street. This will result in the streetscape significantly altered with the proposed development jutting out 6.5m beyond the existing street line, Residents reversing out of their driveway will have no line of sight, keeping in mind a pedestrian footpath runs down the east side of Doonan and west side of Betty

making this impossible to ensure the safety of any family walking down the street to Masons Gardens, or car driving up the street. 2.12 The visual projection of the development on the north facing Masons Gardens vista will be overbearing and detrimental to the urban fabric of the Betty Street – Doonan Road hillscape and Mason Gardens Precinct. 2.13 The proposed development is not setting a target for environmental sustainability. The development is taking a just above minimum approach, proposing to exceed Part J of the National Construction Code by a stated 10%. This is an inadequate attempt to demonstrate environmental sustainability credentials. As a minimum a Green Star 6-star standard should be set, and consideration should be given to a Passive House rating. This facility will have a significant carbon footprint that will represent a substantial increase over the carbon footprint of the existing three (3) residences. 2.14 The Developer has no stated approach to operation of the facility in the instance of a required lockdown nor a stated approach of how to protect vulnerable patients to cross infection from air borne viruses. This is an irresponsible approach to quality aged care services in a post COVID 19 environment where a duty of care exists to protect patients who are in a vulnerable position. The City of Nedlands would be in breach of your duty of care now with the foreknowledge that this facility presents an unacceptable risk and has not considered a COVID safe design. 2.15 The proposed development proposes a density of occupancy that maximises the built form on the available land area, leaving limited open space for residents/patients. The LPP, clause 4.6.2 requires 25% of the site area to be landscaped. This has not been provided. Furthermore, the Review of Innovative Models of Aged Care, Research Paper 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety recommended respite is provided in settings aligned to a person's background and offering structured activities. The report further recommends small scale domestic models of aged care where there is an emphasis on providing person centred care models. The proposed developments design and density is not aligned to the objectives of the Royal Commission. 2.16 At ninety (90) beds of non-ambulatory patients over four (4) occupied levels, safe evacuation has been poorly considered. Safe evacuation should necessitate a sprinkler protected building with a zoned smoke management system and designated safe zones. Brigade turn out points for fire truck parking and access to brigade booster points have not been considered in the design. Evacuation of 90 non-ambulatory residents is a risk. 2.17 Brigade access to non-sprinklered areas, such as the roof plantroom, with access only available along Betty Street and Doonan Road for aerial firefighting, has not been considered. 2.18 No consideration appears to have been given for acoustic treatment for roof located air conditioning plant and roof discharges. 2.19 Lifts in the building are to be used for vertical movement of food services, visitors, patients, maintenance personnel and removal of deceased patients. This is an unhygienic practice and demonstrates poor design practice in this facility. Good design practice would separate different traffic streams in a facility of this size and density, with the minimum provision of a dedicated goods lift. 2.20 The car parking provisions are significantly underestimated. This will result in substantial on street parking to Betty St, Doonan Rd, Melvista Ave, Granby Cres and surrounding roads. Staffing numbers for the Wellness Centre (3 treatment bays + hair salon – circa 4 staff), full commercial kitchen for up 540 food services per day (circa 4-5 staff), facilities manager (1 staff), full laundry (circa 2 staff), on site admin (circa 7 staff), on-site coffee shop (1 staff), cleaning staff (circa 3-4), orderlies and support staff (circa 2), plus nursing and staff for 90 patients (minimum 15 staff) significantly exceeds carparking allowances. Shift changeover of nursing staff, visitors and maintenance staff further results in carparking being significantly undersized and inadequate for a facility of this size and density. 2.21 Grease trap for the kitchen will require truck access for pumping out the grease trap. This does not appear to have been considered in the design. 2.22 Inadequate on-site parking can result in off-site parking for nurses for night shifts. This can result in unsafe practices and security concerns for nursing staff accessing the facility at night having to park in unsecured/unmonitored locations. 2.23 No design provision is shown for kitchen exhaust discharges, carpark ventilation discharges, generator exhaust discharge. Discharges from the facility will adversely impact neighbours and have not been considered appropriately. Discharge stacks will also extend beyond the roof line creating further visual impact. 2.24 Truck vehicular access for food delivery, waste removal, medical gas bottle replenishment, diesel fuel delivery, maintenance personnel for mechanical, electrical, fire and communications plant will result in significant increase to truck movements on Doonan Road and Betty Street. 2.25 Inadequate provision has been made for replacement of roof top air conditioning plant. Access for large plant can only be made via crane access from Betty Street or Doonan Road. 2.26 Light spill for night-time access to carparking and pedestrian entrances will result in light pollution to adjoining neighbours. 2.27 The renders and plans being promoted by the Developer do not correctly illustrate the upper levels and roof form which will be highly visible. These images and plans are misleading. In addition, the elevations do not show the upper level in bold, again misleading. 2.28 Subterranean courtyards on the eastern/western boundaries/northern edge - Doonan Road/Betty Street are unsightly/dark and out of character with the wide, large verges of the suburb. 2.29 The developer, Oryx, is inexperienced. It is noted that the Developer has operated only one aged care facility to date, the

recently acquired hotel, The Richardson in West Perth. Following acquisition that was subsequently refurbished to accommodate aged care. 2.30 Only 5 of the direct neighbours were afforded a one on one meeting with the Developer's consultants on the week of 22 June 2020. This was the first time the neighbours had been approached regarding this proposal. The Developer was not present at the resident meetings with representation being made by their Stakeholder Engagement Consultant, Creating Communities, and Town Planning Consultant, Planning Solutions. 3.0 Sale of Land Objections 3.1 75 Doonan Road was sold by private treaty to the developer before the land was designated 'special use' allowing aged care. The land should have been offered to the open market, particularly when it was widely known the owners of Melvista Lodge directly to the south were also interested in purchasing the land. 3.2 The land was sold as a Residential R10/R12.5 lot when the City knew its intent was always to redesignate the land. Why would the City sell land to a developer, prior to its redesignation. Why did they not designate it for aged care use first and by inference, sell the land at a much higher price? How have the City's ratepayers benefited from this sale? We note the developer paid \$2.6 million for the last residential piece of land required for this proposed development leaving the sale of the land by The City in question. 4.0 Technical Reports Objections 4.1 The acoustics technical report has not calculated the cumulative noise impact of ventilation systems with the air-cooled condensers. Significant ventilation systems will be required for the kitchen exhaust, evaporative kitchen make up, toilet exhausts, laundry exhausts and flues. To determine the full impact of the facility on adjoining residences, all noise sources should be defined and calculated on a cumulative basis. 4.2 The Sustainability Report does not consider any modelling of obnoxious discharges from kitchen, toilet and laundry exhausts and their impact on the surrounding properties. Dispersion modelling and CFD modelling should be undertaken to determine that there is no undue impact, as required by clause 3.1 of the LPP. 4.3 The Sustainability Report has not considered any heat island impact on the surrounding properties as a result of rejecting circa 700 - 800 kW of heat from the facility to determine that there is no undue impact, as required by clause 3.1 of the LPP. 4.4 The Sustainability Report has not considered glare and reflectance to properties on the east in the morning and west in the evening to determine that there is no undue impact, as required by clause 3.1 of the LPP. 4.5 The Transport Impact Statement (TIS) has not calculated the total number of staff or visitor numbers in its car parking assessment for a facility of this nature. The TIS has relied on an allowance of 1 car bay per 4 beds. A high dependency aged care facility will have a significant staffing requirement that will exceed this requirement. It will also have significant visitor numbers. The TIS has made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment of carparking and traffic movements. 4.6 Developer's Traffic Report also provides very little detail on the type of vehicle movements and their frequency and times during the week. This detail is also needed to form proper considered assessment of traffic movements and noise levels, which detail is also wholly lacking in the Developer's Transport Impact Statement and Acoustic Report.

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**Respondent No:** 93

**Responded At:** Jul 15, 2020 11:11:10 am

**Last Seen:** Jul 15, 2020 03:05:57 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I wish to lodge my strong objection to the proposed development behind Melvista Lodge. This is a totally inappropriate structure in a quiet residential area - of narrow streets and predominantly modest single storey homes. The adverse effect on residents, combined with the increase in traffic alone makes this proposal unacceptable.

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**Respondent No:** 94

**Responded At:** Jul 15, 2020 12:52:03 pm

**Last Seen:** Jul 15, 2020 03:40:19 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**

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Q8. **Submission : Please give your comments relating to this item in full below.**

As the development proposal currently stands, it is not compatible with its surrounding residential environment. Knowing that Melvista Lodge will be developed in the future, there should be a holistic approach taken for both sites so that the impact on the community is considered. I am very concerned about the traffic and parking impact and the amenity of Masons Garden which is frequented by the whole community. The bulk and scale of the proposed building is not in keeping with its surrounds. I support an aged care facility for both sites that respect the surrounding properties and give suitable outdoor space to the residents within the development. I do hope the council will consider the community concerns and address them so that we can have an aged care facility in keeping with the area. Thank you.

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**Respondent No:** 95

**Responded At:** Jul 15, 2020 14:54:03 pm

**Last Seen:** Jul 15, 2020 06:18:00 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)** Other

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object very strongly to the development application for a Residential Aged Care Facility at 73 and 75 Doonan Rd and 16 and 18 Betty St for the following reasons: 1. The rezoning of the four blocks from single residential to R80 for a multi-storey, commercial development in a residential area is outrageous. The aged care facility, which will operate 24/7, is entirely unsuitable for a residential area. The multi-storey development is planned to be constructed adjacent to residential homes, with no buffer, and will tower over the surrounding houses, in particular, the two houses on the north-eastern boundary. The planned development is totally incompatible with the surrounding area. 2. The built form of the development is highly inappropriate in terms of scale, size and setbacks with the adjoining properties. Thus, if approved, it will result in a scale of development which will have a highly detrimental impact on the amenity and character of the low-density residential neighbourhood. 3. I have been a resident of Sutcliffe Street for over 40 years and walk daily around Masons Gardens and its environs. Currently, the view from Masons Gardens is one of trees, family dwellings and nature. If this development is allowed to proceed, Masons Gardens will be overshadowed and dominated by this four to five storey monolith, completely wrecking the natural environment of the area. 4. Aside from the visual pollution, a development of this scale and size will cause considerable air, noise and traffic pollution. It will operate 24/7 and the surrounding area will be subjected to the noise and air pollution from the ventilation systems and vehicular movement. Trucks will be backing in and out of the facility, with their attendant beeping noise and exhaust pollution, multiple times a day, not only impacting Betty St and Doonan Rd, but also surrounding suburban streets. 5. Car parking will be a massive problem. Inadequate provision has been made for parking for staff, visitors, delivery vehicles etc, which will result in congestion on the streets in the surrounding neighbourhood and impact on Masons Gardens, a peaceful park enjoyed by families. 6. For the above reasons, I am totally opposed to the development proposal and I urge the council not to approve it. We live in a delightful, peaceful, friendly, residential neighbourhood and the construction of a four to five storey aged care facility, with all its attendant vehicle traffic, visual, air and noise pollution, is completely inappropriate and will ruin the green and tranquil ambiance that all the families in the area have enjoyed up until now.

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**Respondent No:** 96

**Responded At:** Jul 15, 2020 15:01:06 pm

**Last Seen:** Jul 09, 2020 21:54:50 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Objections to 16 & 18 Betty St and 73 & 75 Doonan Rd proposed Residential Aged Care Facility. There are many reasons why this DA should be rejected. They are discussed in three groups. First, fair and reasonable due process was not followed. Second, the proposed development is out of keeping with its local environment and does not comply with the planning scheme and local planning policy. Third, the development itself is inappropriate in scale and quality from the point of view of its proposed residents, staff and the wider community.

1. Fair and reasonable due process not followed. 1.1. When the Nedlands Local Planning Scheme 3 (LPS 3) was adopted in April 2019, it included a Special Use zone for residential aged care development which included four residential blocks north of the existing Melvista Homes. This proposed rezoning was not advertised to the local neighbours or at the sites of the four affected blocks. 1.2. Inadequate and misleading community consultation. An open day was held at Mason's Gardens on 30 April 2016, when plans for a two-storey development were shown, bearing no resemblance to the current proposal. Since then, until 15 June 2020, there was no communication with the immediately adjacent neighbours or the wider affected community. 1.3. Sale of 75 Doonan Rd by City of Nedlands to developer-related entity Dueke Investments by private treaty, agreed 28 Nov 2017 and settled 20 June 2018. Future rezoning of this land (increasing its potential value) was anticipated by the Nedlands Council, and its proposed use by the investor was known, but this proposed use was not advertised to the public. 1.4. Significant amendments to the proposed Residential Aged Care Facility Local Planning Policy (LPP) were made without re-advertising to the public. This LPP was advertised for comment in January and February 2020. When it was considered at the Council Meeting on 28 April 2020, the table for lots over 2000 sq m (item 4.2.4) had been changed from the originally advertised R-coding or R60 to R80, from a building height of 3 storeys to 4 storeys and from a plot ratio of 0.8 to 1.0. These changes are significant and the LPP should have been re-advertised for public comment with this change incorporated. Some of the councillors were clearly uncomfortable with this change and moved to amend the height limit from 4 storeys to the originally advertised 3 storeys, but they were narrowly outvoted. The local government clearly considered these unadvertised changes to be a "minor amendment" (PD Act 2005, Schedule 2, Part 2, Clause 5 (2)), but the neighbours would disagree. 1.5. The LPP covers all of the residential aged care facilities within the City. Some are in higher density and hospital precincts (eg between Monash and Karella, near Hollywood Hospital, A3 in the LPS 3). That site is adjacent to R20 and R40 residential land, and even that has a 3-storey height limit where development has a residential interface. The current DA proposal is in a quiet residential street, zoned R12.5, but the LPP allows 4 storeys. It is inappropriate for one single policy to cover these greatly different circumstances. The residential aged care LPP, apart from being adopted under improper circumstances, is not fit for purpose. It should be rescinded. A scheme amendment and local development plan should be prepared, appropriate to this specific site. 1.6. During the period of advertising for public comment, the Director of

Planning of the City of Nedlands was quoted, in the local Post newspaper (4 July 2020), as saying that there was “little point in neighbours objecting to Oryx’s plans because they were fully compliant with a planning policy adopted in April. That means there is nothing to object to.” A statement like this (if he was correctly quoted) from the planning director surely prejudices and undermines the entire public consultation process. It is also untrue (see below).

2. Inappropriate to local environment and not compliant with City of Nedlands Residential Aged Care Facilities Local Planning Policy (LPP). Even recognising that the LPP is flawed (see 1.4 and 1.5 above), the proposal does not comply with it.

2.1. The proposed development does not comply with 4.3 of the LPP (“...shall be designed to reflect a residential appearance from the street(s)...”). The appearance from the street is that of a large commercial institution. Adjacent houses are one- and two-storeys high; this will be four storeys, not including a basement and an extra height of 2.3m on the roof for plant. Adjacent houses have setbacks of 9m; this will have balconies jutting out set back 2.5m.

2.2. It does not appear to comply with 4.6.2 of the LPP (“A minimum of 25% of the site area is to be landscaped...”). Whilst the development application report claims that nearly 31% of the site is landscaped, this is not evident on review of the plans and needs to be substantiated.

2.3. It does not comply with 4.6.3 of the LPP (“...designed to maximise the retention of existing mature trees on the site...”). There are two large mature eucalypts within 2-3m of the Eastern boundary of the site which could certainly have been retained if this clause of the LPP had been considered at all. It has been designed only to maximise density and profit.

2.4. It does not comply with 4.6.4 of the LPP which states that “Where a vehicle access way... is located adjacent to any residential property...it shall be setback [sic] behind a planted perimeter strip of at least 1.0metre in width between the ... vehicular access way and any adjoining residential properties.” The plans show only a very narrow (200-300mm) row of planters between the driveways and the adjacent residential properties at Melvista Lodge to the south. The compliance explanation to this point made on p25 of the development application report appears deliberately misleading.

2.5. It does not comply with the plot ratio requirement (1.0) set out in the table in 4.2.4 of the LPP. Plot ratio is defined in LPS 3 (p26) as the ratio of floor area of a building to an area of land within the boundaries of the lot. Floor area in the LPS 3 (p 25) has meaning given in the Building Code. In the Building Code (National Construction Code, Vol 1) Floor Area is defined as the total area of all storeys, and within the storey, the areas of all the floors of that storey, measured over the enclosing walls. The plot ratio of 1.0 claimed in the plans greatly underestimates the true plot ratio as defined in LPS 3 by excluding all the common areas, reception, gym, dementia ward etc from the calculation of floor area, although these should be included, following, as required by LPS 3, the definition of floor area given in the Building Code.

2.6. It does not comply with 6.2 of the LPP. Hours of visitation are barely mentioned and staff numbers are not addressed at all. Staff numbers will be high (according to a recent review in the Medical Journal of Australia (MJA), 15 June 2020, Australian residential aged care generally is significantly understaffed).

2.7. The proposed development includes a café. This is an “X” (forbidden) use in a residential zone. It also includes a “wellness centre” offering physiotherapy, a hair salon and consulting room to “external customers”: this appears to be a medical centre, another forbidden use (in LPS 3) in a residential zone.

3. Inappropriate scale for aged care. With the pending lessons of the Royal Commission into aged care, the final report of which is due in a few months, and following the ravages Covid-19 has wreaked on the occupants of high-density aged care institutions around the world, it seems negligent to proceed with a high-density commercial institution like the one proposed here. When there is another influenza or corona-virus-like outbreak, it will spread quickly. If there is a fire, how will 90 non-ambulant or semi-ambulant occupants be brought down to safety in time? Apart from the risks, who among us would really be happy to spend our last years in a place like this, really more like a hospital? The scale is massive. There is no garden. The large trees have been felled. The “dementia ward” is virtually subterranean, looking out onto a high retaining wall. The same lifts which bring up the food bring down the bodies. From the point of view of the many nursing staff, it is hard to imagine that this will be a pleasant place to work. Because this is solely a high-care institution, presumably an end-stage referral centre for residents of the Oryx’s other aged-care homes, there will be no mix of independent elderly and low-care residents. More than 80% of residents will need help with activities of daily living (getting dressed, showering, using the toilet) according to the same recent MJA article quoted above. Yet there are no nurses’ stations and the upper floors do not have adequate utility rooms. The on-site parking will be quite inadequate for staff, visitors, occasional users of the “wellness centre” and café, so the overlapping shifts of nursing staff and carers will be obliged to park off-site. A better outcome for all concerned (residents, staff and the wider neighbouring community) would be for the entire Special Use zone (including the site on which Melvista Lodge is situated) to be used to build a sympathetic one- or two-storey residential aged-care facility, similar to that nearby in Bay Rd, Claremont, ideally with a mix of independent living, low-care and high-care (truly serving the population south of the Stirling Highway), space for a garden, retention of mature trees and

adequate on-site parking, with driveway access from Melvista Rd. The current proposal does none of these things. It should be rejected.

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**Respondent No:** 97

**Responded At:** Jul 15, 2020 15:19:27 pm

**Last Seen:** Jul 15, 2020 07:13:16 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the development as per the objections detailed by      in her submission OBJECTION DOCUMENT FOR AGED CARE DEVELOPMENT OVERLOOKING MASONS GARDENS

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**Respondent No:** 98

**Responded At:** Jul 15, 2020 19:43:47 pm

**Last Seen:** Jul 15, 2020 11:38:39 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

The proposed site is too large, in size (4 storey building) and capacity (90 residents plus carers and health workers). Also, 26 parking bays cannot accommodate the likely number of carers and visitors. Surely there will be a lot of extra traffic as well, in normally quiet and peaceful residential streets.

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**Respondent No:** 99

**Responded At:** Jul 15, 2020 20:48:11 pm

**Last Seen:** Jul 15, 2020 12:46:05 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I strongly object to the development application for a Residential Aged Care Facility located at 73-75 Doonan Road and 16-18 Betty Street, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of this local, low density residential area. SAMPLE SUBMISSION POINTS 1.0 Planning Objections 1.1 The manner in which Council adopted the Residential Aged Care Facilities Local Planning Policy ('LPP') on 26 April 2020 is highly inappropriate, without publicly advertising major amendments made to the density, height and plot ratio. 1.2 A residential density coding of R80 as imposed by the LPP is not acceptable or justified at the subject site. It is completely out of context with a transition from the neighbouring R12.5 and R10 zoned properties. 1.3 A Local Planning Policy imposing density is not appropriate. Density should be imposed via a scheme amendment to LPS3. 1.4 The proposed development is commercial in nature, operating 24/7 and is not suited to a residential area. 1.5 The proposed development is not compatible with the existing amenity surrounding / abutting development due to the height, scale and bulk of the development. The proposed development therefore does not comply with Clause 3.1 of the LPP which states "...and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking". 1.6 In accordance with the zoning table of LPS 3, 'Residential Aged Care Facility' is allocated an 'A' use within the 'Residential' zone, meaning the use is not permitted unless the local government has exercised its discretion by granting development approval. This is an unusual application of additional use provisions given a 'Residential Aged Care Facility' is already a contemplated use within the 'Residential' zone. 1.7 Due to the removal of the proposed special use provisions in LPS 3, no development standards are applicable to the subject site except for the car parking requirements as outlined in LPS 3. A scheme amendment should be initiated to guide appropriate density. 1.8 Given the increased building height and plot ratio associated with this modification will facilitate increased bulk and scale for any development proposed, we are of the view the modifications to the draft LPP are not minor and are in fact, significant in nature particularly in relation to the locality of surrounding residential area. 1.9 Council has not followed the appropriate process in the adoption of LPP. On this basis we question the validity of the adopted LPP. 1.10 There is absolutely no justification for the application of a R80 density coding, given the significantly lower R10/R12.5 density coding of the surrounding locality. 1.11 The effect of the local planning policy is that it imposes a higher density coding without the initiation of a scheme amendment to LPS3. 1.12 The purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City, however instead it has imposed an R-coding as a mechanism to deal with scale, bulk and built form. This is not appropriate as the imposition of an R80 R-coding immediately adjacent to properties subject to an R12.5 density coding will result in significant conflict with respect to scale, bulk and streetscape impacts. 1.13 Pursuant to Schedule 2, Part 9, Clause 67(m) of the Regulations, the proposed

development is not compatible with the surrounding residential neighbourhood and particularly the adjoining land zoned R12.5. 1.14 In April 2016, the community was consulted on the proposed refurbishment of Melvista Lodge and the development of a 2-storey aged care on adjacent lots at 73-75 Doonan Road and 16-18 Betty Street. What is now proposed is completely different with a 4 storey plus basement and roof (height approx. 17 metres), 90 bed high care, aged care facility on residential zoned lots and no longer includes the refurbishment of the Melvista Lodge. The community consultation on the new proposal from the developer and City of Nedlands has been mostly non-existent. Clause 5.1 of the LPP states "Consultation with affected landowners will be undertaken in accordance with the City's Local Planning Policy- Consultation of Planning Proposals". The consultation by the Developer with the Community, undertaken on a previous scheme, therefore breaches the LPP – Consultation of Planning Proposals. 1.15 The proposed development at R80, with a plot ratio of 1.0 will significantly impact the adjoining land and surrounding low density residential neighbourhood. 1.16 Clause 4.6.2 of the LPP states "A minimum of twenty-five per cent (25%) of the site area is to be landscaped". The proposed development does not comply with this requirement of the LPP. 1.17 The set back of the boundary on 71 Doonan Road is non compliant with the LPP Clause 4.5.2 which requires a 7.5m set back and permanent screening to 75% obscure. The proposed plan has a 6.4m setback and NO screening. 1.18 The purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City. The LPP makes no delineation between differing models of care (e.g. independent living units, low care, high care). The planning guidelines set out in the LPP, as drafted, applies the same planning conditions irrespective of the model of care. Different models of care have differing levels of servicing. This has not been considered in the application of the LPP. This has resulted in a High Care facility with an inappropriate density being located in a precinct unsuited to the facility function. The LPP should be redrafted to reflect the specific function and nature of aged care models of care, with appropriate planning of such facilities contextually. 1.1 There was no development control plan applied to this land at the time of its rezoning. This in effect meant anything could have been built. The rushed endorsement of an R80 equivalent zoning without community consultation has denied the community the opportunity to comment on the appropriateness of this density in a residential zone. 2.0 Design Objections 2.1 The built form is a highly inappropriate in terms of scale and size to adjoining properties with box scale of building of approx. 70m overall length x 32m overall width and overall height of approx 17m 2.2 The development includes large, bland featureless walls measuring 35 metres in length (running east/west), a scale that would typically be found in a mixed use or town/activity centre environment. 2.3 The proposed development, should it be constructed as proposed, would result in detrimental impacts to the amenity and character of the low-density residential neighbourhood. 2.4 The four-storey development with a proposed plot ratio of 1.0 would result in a scale of development which is not compatible with the amenity of the locality and is not suitable within a low-density residential neighbourhood. 2.5 The proposed development will significantly impact the visual amenity of all residential lots to the north on Doonan Road and Betty Street, up to Princess Road, particularly when the development is viewed from private outdoor areas. 2.6 The Developer's proposal, with its nominated function, size and density, has not considered any technical issues and will have a material negative impact to the amenity of the locality. 2.7 Building massing and scale is disproportionate to the surrounding urban vernacular. The mass and height are disrespectful to the scale and pitch lines from the adjoining properties with a consequential negative impact to the Betty Street and Doonan Road streetscapes. Its verticality will project as a dominant insertion on the residential neighbourhood. As a "for-profit" commercial operation it will damage the residential cohesion of the suburb of Nedlands. Clause 3.1 of the LPP states "..... design of residential aged care facilities are of a high quality and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking." The proposed development is therefore non-compliant with clause 3.1 of the LPP. 2.8 Building density provides a poor level of amenity for residents and patients with very limited access to outdoor spaces. Lack of green areas for the residents. The LPP requires 25% of the site to be landscaped. The proposal is nowhere near this and hence it is non compliant with the flawed LPP. 2.9 The facility provides a poor work environment for nursing staff. No nursing stations or staff lounges/breakout spaces are provided for staff. 2.10 Ramp/through access with a 4.5m high boundary wall on southern boundary will be highly visible from Doonan and Betty Streets and is aesthetically ugly along with inappropriately high unfriendly front boundary walls close to 2m near southern boundaries on Doonan and Betty Streets. 2.11 These front boundary walls are impacted further by the proposed 2.5m setbacks beyond the current street line sets backs of 9m making it impossible to see down the street. This will result in the streetscape significantly altered with the proposed development jutting out 6.5m beyond the existing street line, Residents reversing out of their driveway will have no line of sight, keeping in mind a pedestrian footpath runs down the east side of Doonan and west side of Betty making this

impossible to ensure the safety of any family walking down the street to Masons Gardens, or car driving up the street. 2.12 The visual projection of the development on the north facing Masons Gardens vista will be overbearing and detrimental to the urban fabric of the Betty Street – Doonan Road hillscape and Mason Gardens Precinct. 2.13 The proposed development is not setting a target for environmental sustainability. The development is taking a just above minimum approach, proposing to exceed Part J of the National Construction Code by a stated 10%. This is an inadequate attempt to demonstrate environmental sustainability credentials. As a minimum a Green Star 6-star standard should be set, and consideration should be given to a Passive House rating. This facility will have a significant carbon footprint that will represent a substantial increase over the carbon footprint of the existing three (3) residences. 2.14 The Developer has no stated approach to operation of the facility in the instance of a required lockdown nor a stated approach of how to protect vulnerable patients to cross infection from air borne viruses. This is an irresponsible approach to quality aged care services in a post COVID 19 environment where a duty of care exists to protect patients who are in a vulnerable position. The City of Nedlands would be in breach of your duty of care now with the foreknowledge that this facility presents an unacceptable risk and has not considered a COVID safe design. 2.15 The proposed development proposes a density of occupancy that maximises the built form on the available land area, leaving limited open space for residents/patients. The LPP, clause 4.6.2 requires 25% of the site area to be landscaped. This has not been provided. Furthermore, the Review of Innovative Models of Aged Care, Research Paper 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety recommended respite is provided in settings aligned to a person's background and offering structured activities. The report further recommends small scale domestic models of aged care where there is an emphasis on providing person centred care models. The proposed developments design and density is not aligned to the objectives of the Royal Commission. 2.16 At ninety (90) beds of non-ambulatory patients over four (4) occupied levels, safe evacuation has been poorly considered. Safe evacuation should necessitate a sprinkler protected building with a zoned smoke management system and designated safe zones. Brigade turn out points for fire truck parking and access to brigade booster points have not been considered in the design. Evacuation of 90 non-ambulatory residents is a risk. 2.17 Brigade access to non-sprinklered areas, such as the roof plantroom, with access only available along Betty Street and Doonan Road for aerial firefighting, has not been considered. 2.18 No consideration appears to have been given for acoustic treatment for roof located air conditioning plant and roof discharges. 2.19 Lifts in the building are to be used for vertical movement of food services, visitors, patients, maintenance personnel and removal of deceased patients. This is an unhygienic practice and demonstrates poor design practice in this facility. Good design practice would separate different traffic streams in a facility of this size and density, with the minimum provision of a dedicated goods lift. 2.20 The car parking provisions are significantly underestimated. This will result in substantial on street parking to Betty St, Doonan Rd, Melvista Ave, Granby Cres and surrounding roads. Staffing numbers for the Wellness Centre (3 treatment bays + hair salon – circa 4 staff), full commercial kitchen for up 540 food services per day (circa 4-5 staff), facilities manager (1 staff), full laundry (circa 2 staff), on site admin (circa 7 staff), on-site coffee shop (1 staff), cleaning staff (circa 3-4), orderlies and support staff (circa 2), plus nursing and staff for 90 patients (minimum 15 staff) significantly exceeds carparking allowances. Shift changeover of nursing staff, visitors and maintenance staff further results in carparking being significantly undersized and inadequate for a facility of this size and density. 2.21 Grease trap for the kitchen will require truck access for pumping out the grease trap. This does not appear to have been considered in the design. 2.22 Inadequate on-site parking can result in off-site parking for nurses for night shifts. This can result in unsafe practices and security concerns for nursing staff accessing the facility at night having to park in unsecured/unmonitored locations. 2.23 No design provision is shown for kitchen exhaust discharges, carpark ventilation discharges, generator exhaust discharge. Discharges from the facility will adversely impact neighbours and have not been considered appropriately. Discharge stacks will also extend beyond the roof line creating further visual impact. 2.24 Truck vehicular access for food delivery, waste removal, medical gas bottle replenishment, diesel fuel delivery, maintenance personnel for mechanical, electrical, fire and communications plant will result in significant increase to truck movements on Doonan Road and Betty Street. 2.25 Inadequate provision has been made for replacement of roof top air conditioning plant. Access for large plant can only be made via crane access from Betty Street or Doonan Road. 2.26 Light spill for night-time access to carparking and pedestrian entrances will result in light pollution to adjoining neighbours. 2.27 The renders and plans being promoted by the Developer do not correctly illustrate the upper levels and roof form which will be highly visible. These images and plans are misleading. In addition, the elevations do not show the upper level in bold, again misleading. 2.28 Subterranean courtyards on the eastern/western boundaries/northern edge - Doonan Road/Betty Street are unsightly/dark and out of character with the wide, large verges of the suburb. 2.29 The developer, Oryx, is inexperienced. It is noted that the Developer has operated only one aged care facility to date, the



recently acquired hotel, The Richardson in West Perth. Following acquisition that was subsequently refurbished to accommodate aged care. 2.30 Only 5 of the direct neighbours were afforded a one on one meeting with the Developer's consultants on the week of 22 June 2020. This was the first time the neighbours had been approached regarding this proposal. The Developer was not present at the resident meetings with representation being made by their Stakeholder Engagement Consultant, Creating Communities, and Town Planning Consultant, Planning Solutions. 3.0 Sale of Land Objections 3.1 75 Doonan Road was sold by private treaty to the developer before the land was designated 'special use' allowing aged care. The land should have been offered to the open market, particularly when it was widely known the owners of Melvista Lodge directly to the south were also interested in purchasing the land. 3.2 The land was sold as a Residential R10/R12.5 lot when the City knew its intent was always to redesignate the land. Why would the City sell land to a developer, prior to its redesignation. Why did they not designate it for aged care use first and by inference, sell the land at a much higher price? How have the City's ratepayers benefited from this sale? We note the developer paid \$2.6 million for the last residential piece of land required for this proposed development leaving the sale of the land by The City in question. 4.0 Technical Reports Objections 4.1 The acoustics technical report has not calculated the cumulative noise impact of ventilation systems with the air-cooled condensers. Significant ventilation systems will be required for the kitchen exhaust, evaporative kitchen make up, toilet exhausts, laundry exhausts and flues. To determine the full impact of the facility on adjoining residences, all noise sources should be defined and calculated on a cumulative basis. 4.2 The Sustainability Report does not consider any modelling of obnoxious discharges from kitchen, toilet and laundry exhausts and their impact on the surrounding properties. Dispersion modelling and CFD modelling should be undertaken to determine that there is no undue impact, as required by clause 3.1 of the LPP. 4.3 The Sustainability Report has not considered any heat island impact on the surrounding properties as a result of rejecting circa 700 - 800 kW of heat from the facility to determine that there is no undue impact, as required by clause 3.1 of the LPP. 4.4 The Sustainability Report has not considered glare and reflectance to properties on the east in the morning and west in the evening to determine that there is no undue impact, as required by clause 3.1 of the LPP. 4.5 The Transport Impact Statement (TIS) has not calculated the total number of staff or visitor numbers in its car parking assessment for a facility of this nature. The TIS has relied on an allowance of 1 car bay per 4 beds. A high dependency aged care facility will have a significant staffing requirement that will exceed this requirement. It will also have significant visitor numbers. The TIS has made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment of carparking and traffic movements. 4.6 Developer's Traffic Report also provides very little detail on the type of vehicle movements and their frequency and times during the week. This detail is also needed to form proper considered assessment of traffic movements and noise levels, which detail is also wholly lacking in the Developer's Transport Impact Statement and Acoustic Report.

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**Respondent No:** 100

**Responded At:** Jul 15, 2020 21:36:04 pm

**Last Seen:** Jul 15, 2020 13:20:36 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Other

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

We have major objections to the proposed development on 16 & 18 Betty Street and 73 & 75 Doonan Road Nedlands. These are our key concerns: 1) Increased traffic - Betty and Doonan Streets are quiet areas and with a proposed large nursing home in the area, it will increase the traffic substantially from its current form. With an increase in cars along these streets, this will mean that people will be forced to take back lanes to exit and increase the traffic in the local area. It then flows on to become a dangerous area for children, who may be walking to school. 2) It is inconsistent with the character and history of Nedlands - Nedlands is a suburb of neighbours and neighbourhoods where strong community spirit is fostered daily through spontaneous interactions occurring in the front yard or when walking through the neighbourhood. We are not opposed to nursing homes but this is a very large one where neighbours would be unlikely to interact. Furthermore, due to the safety concerns we will shortly outline below, it would lead to people being less willing to take a stroll around the neighbourhood, leading to an erosion of community spirit. 3) Overall decreased value of properties in surrounding areas - this proposed development would definitely cause a decreased value of the properties in the area, particularly those close to this proposed development. 4) Increased safety concerns – With an increased number of people in the area, it may pose safety concerns for those living around the area 5) Privacy issues - this follows on our comments with the increased number of people that would influx the area along with our concerns with safety. Why could not the current nursing home close by not be renovated? Why is there a new large development taking place in this proposed location instead? We would be extremely disappointed if this proposed development was to proceed.

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**Respondent No:** 101

**Responded At:** Jul 16, 2020 11:55:20 am

**Last Seen:** Jul 16, 2020 03:48:02 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Don't think an overly densified aged care with Four (4) storey units in a residential area is a good plan. It would be better suited to somewhere near a hospital and other care facilities.

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**Respondent No:** 102

**Responded At:** Jul 16, 2020 12:57:24 pm

**Last Seen:** Jul 16, 2020 04:53:12 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property

Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**

I object to the proposal

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**Q8. Submission : Please give your comments relating to this item in full below.**

Objection to For Profit 4/5 storey Aged Persons Hospital and Care facility at 16 and 18 Betty and 73 and 75 Doonan Road, Nedlands Dear Nedlands Council, My name is \_\_\_\_\_ and I am 71 years old. I have lived with my family for over 40 years at \_\_\_\_\_ and hope to go on living there for many years to come. A quiet, peaceful place As a family, we have enjoyed the quiet serenity and peace of Masons Gardens right throughout this 40-year period and I walk in that park pretty much every day. The park is in a beautiful tranquil, low rise setting. Everywhere you look, when enjoying the park, provides a gentle very green and unobtrusive vista. Many old folks use this park and enjoy the same. When I am old, I hope to continue to do the same. Walk in the park and enjoy the pleasant, unobtrusive vista on all sides as has been the case for over 60 years. Commercial high-rise domination It is totally abhorrent that you are allowing a massive 4/5 storey commercial development, with reduced setbacks, adjacent to this serene and special park. From the park, your planned commercial development will appear to be 6 or 7 stories - as it is elevated up Betty Street and Doonan Road. It will actually appear higher and more overpowering, from Masons Gardens, as the park drops down away from Melvista Road. It will be a compete eyesore. It will destroy the ambience of our beautiful park completely. Traffic impacts The traffic generated by this large facility will impact Melvista Road and surrounding streets significantly, again destroying the ambience of our beautiful park and neighbourhood. The carparking for this overpowering development has not been fully addressed – obviously Masons Gardens is in the developer’s sight with respect to extra parking and truck turning bays etc. This must not be allowed to happen. The residents of your badly planned monstrosity will not benefit from being near the park. OK perhaps a few along the front may – but only a small number. I do not understand how the greed of some profit hungry unproven development group can dominate your thinking and actions. What leverage do they have over the Council to allow this to proceed against a huge tide of local public opinion against it. Surely the Council should be acting in the best interests of its rate payers and not some developer throwing \$\$ about. We have many hospital beds in our area – more than enough to cater for demand – which, they say, is dropping as more folks stay at home – as we plan to do. COVID – 19 issues It has been shown recently that COVID-19 pandemic ramifications mean dense compact development for old susceptible folks is completely contrary to how old folks care homes should be designed and laid out. Your own common sense must see this and legislation is changing soon to ensure that common sense prevails. Please rezone the area in question back to the 2 storey, 10 metre height limit and ensure the developers apply the new spacing rules for susceptible old folks in care. This is what 95% of the folks in this locale want. Please ensure you carry out the wishes of your ratepayers and please don’t give way to another money hungry unproven development group with its own bank account as it’s number one priority. Please do what we, your ratepaying customers, want. Please help us maintain Masons Gardens and its surrounds as it was planned to be by your predecessors

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**Respondent No:** 103

**Responded At:** Jul 16, 2020 14:18:40 pm

**Last Seen:** Jul 16, 2020 06:00:42 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

My objection is due increased traffic flow into the residential areas via Dalkeith Road and Stirling Highway as an ingress and egress to the area. Additionally, the height of the development is not in keeping with the area and will detract from the views and amenity of Mason Gardens. As someone who has been on aged care boards, this development in its current form will have a detrimental impact on the amenity of the area. It is not about not having aged care - but the site is totally wrong. It is also not comparable to Melvista Lodge (accommodation for over 55 year olds) to say that it is alright to put another "aged care" facility into the area. It is not a hospital or high care precinct. This development should be over towards Monash Road / Smyth Road / Hampden Rad precinct. The developers have not gone there because of the higher site costs and parking restrictions. A 90 room facility will require a lot of staffing and deliveries - 24 / 7. There is a shortage of parking in the area already. The TransPerth bus has trouble working through the parking along Doonan Street and Dalkeith Road because of parking. more than the 24 bays (excluding the ACROD Bays)

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**Respondent No:** 104

**Responded At:** Jul 16, 2020 15:38:16 pm

**Last Seen:** Jul 16, 2020 07:49:48 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I strongly object to the proposed development application for a residential aged care facility at 16-18 Betty Street and 73-75 Doonan Road. It is entirely incongruous with the predominantly residential nature of the area and does not comply with the State Planning Policies, Local Planning Policies or safe aged care design practices. It would not benefit potential future residents or the local community in any way and due process was not followed, as significant modifications to function, density, height and plot ratio were carried out after community consultation. The process was not transparent and this in itself is highly objectionable. The proposed development does not transition with neighbouring properties. It does not comply with the required setbacks or provide any screening, as outlined in the Local Planning Policy. It is a 24/7 commercial operation, which would negatively impact the amenity of the local community with excessive bulk and scale, noise pollution, traffic and parking issues. There has been no attempt to reduce the impact of large, featureless walls which are inappropriate in a residential area and will significantly detract from the visual amenity of surrounding residents, and people who use the nearby park (Mason's Gardens). Parking in the area will be adversely impacted, and since visitors and staff will be coming and going 24 hours a day, nearby residents will suffer from the associated noise. A café, hair salon, physiotherapy services are also included in the proposed development - these are not permitted in a residential zone, and will reduce the amenity of the neighbourhood. The proposed development makes no allowance for kitchen exhaust, carpark ventilation or the visual impact of discharge stacks on the neighbourhood. Additional noise from maintenance, emergency vehicles, the associated air conditioning and plant associated with a large commercial structure are also not accounted for: there should be no place for this disturbance in a long-established, residential environment. The building itself does not comply with the Local Planning Policy requirement of 25% landscaping, and staff and residents would have extremely poor access to outdoor spaces, significantly reducing their quality of life and health. There are also safety concerns with evacuation and lockdown procedures, particularly for non-ambulant residents (of which there will be many), and the increase in density directly opposes the Royal Commission into Aged Care Quality and Safety's recommendation for small scale aged care facilities, which limit the spread of infection. The proposed development represents an unacceptable risk, in terms of density and management/operational practices. Any development which has such adverse effects on the amenity of the surrounding community, and potential residents of the establishment itself, should obviously be rejected.

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**Respondent No:** 105

**Responded At:** Jul 16, 2020 15:43:42 pm

**Last Seen:** Jul 16, 2020 07:53:03 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I strongly object to the proposed development application for a residential aged care facility at 16-18 Betty Street and 73-75 Doonan Road. It is entirely incongruous with the predominantly residential nature of the area and does not comply with the State Planning Policies, Local Planning Policies or safe aged care design practices. It would not benefit potential future residents or the local community in any way and due process was not followed, as significant modifications to function, density, height and plot ratio were carried out after community consultation. The process was not transparent and this in itself is highly objectionable. The proposed development does not transition with neighbouring properties. It does not comply with the required setbacks or provide any screening, as outlined in the Local Planning Policy. It is a 24/7 commercial operation, which would negatively impact the amenity of the local community with excessive bulk and scale, noise pollution, traffic and parking issues. There has been no attempt to reduce the impact of large, featureless walls which are inappropriate in a residential area and will significantly detract from the visual amenity of surrounding residents, and people who use the nearby park (Mason's Gardens). Parking in the area will be adversely impacted, and since visitors and staff will be coming and going 24 hours a day, nearby residents will suffer from the associated noise. A café, hair salon, physiotherapy services are also included in the proposed development - these are not permitted in a residential zone, and will reduce the amenity of the neighbourhood. The proposed development makes no allowance for kitchen exhaust, carpark ventilation or the visual impact of discharge stacks on the neighbourhood. Additional noise from maintenance, emergency vehicles, the associated air conditioning and plant associated with a large commercial structure are also not accounted for: there should be no place for this disturbance in a long-established, residential environment. The building itself does not comply with the Local Planning Policy requirement of 25% landscaping, and staff and residents would have extremely poor access to outdoor spaces, significantly reducing their quality of life and health. There are also safety concerns with evacuation and lockdown procedures, particularly for non-ambulant residents (of which there will be many), and the increase in density directly opposes the Royal Commission into Aged Care Quality and Safety's recommendation for small scale aged care facilities, which limit the spread of infection. The proposed development represents an unacceptable risk, in terms of density and management/operational practices. Any development which has such adverse effects on the amenity of the surrounding community, and potential residents of the establishment itself, should obviously be rejected.

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**Respondent No:** 106

**Responded At:** Jul 16, 2020 16:16:06 pm

**Last Seen:** Jul 16, 2020 08:15:01 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I strongly object to the proposed development application for a residential aged care facility at 16-18 Betty Street and 73-75 Doonan Road. It is entirely incongruous with the predominantly residential nature of the area and does not comply with the State Planning Policies, Local Planning Policies or safe aged care design practices. It would not benefit potential future residents or the local community in any way and due process was not followed, as significant modifications to function, density, height and plot ratio were carried out after community consultation. The process was not transparent and this in itself is highly objectionable. The proposed development does not transition with neighbouring properties. It does not comply with the required setbacks or provide any screening, as outlined in the Local Planning Policy. It is a 24/7 commercial operation, which would negatively impact the amenity of the local community with excessive bulk and scale, noise pollution, traffic and parking issues. There has been no attempt to reduce the impact of large, featureless walls which are inappropriate in a residential area and will significantly detract from the visual amenity of surrounding residents, and people who use the nearby park (Mason's Gardens). Parking in the area will be adversely impacted, and since visitors and staff will be coming and going 24 hours a day, nearby residents will suffer from the associated noise. A café, hair salon, physiotherapy services are also included in the proposed development - these are not permitted in a residential zone, and will reduce the amenity of the neighbourhood. The proposed development makes no allowance for kitchen exhaust, carpark ventilation or the visual impact of discharge stacks on the neighbourhood. Additional noise from maintenance, emergency vehicles, the associated air conditioning and plant associated with a large commercial structure are also not accounted for: there should be no place for this disturbance in a long-established, residential environment. The building itself does not comply with the Local Planning Policy requirement of 25% landscaping, and staff and residents would have extremely poor access to outdoor spaces, significantly reducing their quality of life and health. There are also safety concerns with evacuation and lockdown procedures, particularly for non-ambulant residents (of which there will be many), and the increase in density directly opposes the Royal Commission into Aged Care Quality and Safety's recommendation for small scale aged care facilities, which limit the spread of infection. The proposed development represents an unacceptable risk, in terms of density and management/operational practices. Any development which has such adverse effects on the amenity of the surrounding community, and potential residents of the establishment itself, should obviously be rejected.

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**Respondent No:** 107

**Responded At:** Jul 16, 2020 16:18:01 pm

**Last Seen:** Jul 16, 2020 08:13:31 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the proposal given: the size is far too large compared to the surrounding areas; it will totally overshadow neighbouring homes and ruin the street scape of the area; it does not provide sufficient green space; it will increase traffic in narrow streets that cannot cope with it; it will be a 24hr business operating in a quiet neighbourhood area; it is on a steep area which will make it difficult for elderly people to walk along. I am not opposed to aged care but this proposal is not appropriate for the area of Nedlands.

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**Respondent No:** 108

**Responded At:** Jul 16, 2020 16:23:05 pm

**Last Seen:** Jul 16, 2020 08:21:40 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

---

Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I strongly object to the proposed development application for a residential aged care facility at 16-18 Betty Street and 73-75 Doonan Road. It is entirely incongruous with the predominantly residential nature of the area and does not comply with the State Planning Policies, Local Planning Policies or safe aged care design practices. It would not benefit potential future residents or the local community in any way and due process was not followed, as significant modifications to function, density, height and plot ratio were carried out after community consultation. The process was not transparent and this in itself is highly objectionable. The proposed development does not transition with neighbouring properties. It does not comply with the required setbacks or provide any screening, as outlined in the Local Planning Policy. It is a 24/7 commercial operation, which would negatively impact the amenity of the local community with excessive bulk and scale, noise pollution, traffic and parking issues. There has been no attempt to reduce the impact of large, featureless walls which are inappropriate in a residential area and will significantly detract from the visual amenity of surrounding residents, and people who use the nearby park (Mason's Gardens). Parking in the area will be adversely impacted, and since visitors and staff will be coming and going 24 hours a day, nearby residents will suffer from the associated noise. A café, hair salon, physiotherapy services are also included in the proposed development - these are not permitted in a residential zone, and will reduce the amenity of the neighbourhood. The proposed development makes no allowance for kitchen exhaust, carpark ventilation or the visual impact of discharge stacks on the neighbourhood. Additional noise from maintenance, emergency vehicles, the associated air conditioning and plant associated with a large commercial structure are also not accounted for: there should be no place for this disturbance in a long-established, residential environment. The building itself does not comply with the Local Planning Policy requirement of 25% landscaping, and staff and residents would have extremely poor access to outdoor spaces, significantly reducing their quality of life and health. There are also safety concerns with evacuation and lockdown procedures, particularly for non-ambulant residents (of which there will be many), and the increase in density directly opposes the Royal Commission into Aged Care Quality and Safety's recommendation for small scale aged care facilities, which limit the spread of infection. The proposed development represents an unacceptable risk, in terms of density and management/operational practices. Any development which has such adverse effects on the amenity of the surrounding community, and potential residents of the establishment itself, should obviously be rejected.

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**Respondent No:** 109

**Responded At:** Jul 16, 2020 16:30:54 pm

**Last Seen:** Jul 16, 2020 07:42:57 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

1. The manner in which Council adopted the Residential Aged Care Facilities Local Planning Policy on 26th April 2020, without publically advertising major amendments made to the density, height and plot ratio is abhorrent, 2. The proposed development is commercial in nature, operating 24/7 and is not suited to a residential area 3.The facility provides a poor work environment for nursing staff. No nursing stations or staff lounges/breakout spaces are provided for staff 4.Ramp/through access with a 4.5m high boundary wall on the Southern boundary will be highly visible from both Betty Street and Doonan Road and is aesthetically ugly along with inappropriately high unfriendly front boundary walls close to 2m near southern boundaries on Betty Street and Doonan Road. 5. These front boundary walls are further impacted by the 2.5m setbacks beyond the current street line setbacks of 9m making it impossible to see down the street. This will result in the streetscape being significantly altered with the proposed development jutting out 6.5m beyond the existing street line. Residents reversing out of their driveways will have NO line of sight, bearing in mind a pedestrian footpath runs down the West side of Betty Street making it impossible to ensure the safety of any family walking on the footpath to Mason Gardens or cars driving up the street. 6.The visual projection of the development on the North facing Masons Gardens vista will be overbearing and detrimental to the urban fabric of the Betty Street/ Doonan Road hillscape and the Masons Gardens precinct. 7. The built form is highly inappropriate in terms of scale and size when compared to adjoining properties, with box scale of building of approx. 70m overall length, 321m overall width and an overall height of approx. 17m. 8. The development includes large, bland featureless walls measuring 35m in length (running East/West) a scale that would typically be found in a mixed use or town/activity centre environment. 9. The proposed development, should it be approved and constructed as proposed, would result in detrimental impacts of the amenity and character of the low density residential neighbourhood. 10. It would appear that the developer has not given any consideration to the traffic or safety features of the residents. Buses and cars currently have problems negotiating the narrow Betty Street and Doonan Road. Parking of staff and visitors vehicles is completely inadequate. 11. Fire Brigade access to non-sprinklered areas, such as the roof platform, with access only available along Betty Street and Doonan Road for aerial firefighting, has not been considered. 12. Truck vehicular access for food delivery, waste removal, medical gas bottle replenishment, diesel fuel delivery, maintenance personnel for mechanical, electrical, fire and communications plant will result in significant increase in truck movements in Betty Street and Doonan Road.

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**Respondent No:** 110

**Responded At:** Jul 16, 2020 21:39:19 pm

**Last Seen:** Jul 16, 2020 13:35:38 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I believe this is the wrong area for a high care facility, especially given its non-compliance with the LPP

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**Respondent No:** 111

**Responded At:** Jul 17, 2020 08:36:40 am

**Last Seen:** Jul 17, 2020 00:26:30 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property
Occupier of a property

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

As a local rate payer, i believe the proposed development to be completely out of keeping with the long established characteristics of our local area. I am not opposed to the development of an aged care facility but rather the scale of this proposed building. I would expect a 2-3 storey development not a 3/4 one. As such I feel compelled to express my concern about the manner in which I have been advised of the development and the disappointment with the communication I have received from the local council prior to this time. I hope to put on hold any building proceedings until all concerns are addressed and dueIn summary, as local rate payers, we believe the proposed development to be completely out of keeping with the long established characteristics of our local area. As such we feel compelled to express our concerns about the manner in which we have arrived at this point, our disappointment with the communication we have received from the local council and the apparent finality of the decision- making process. We hope to put on hold any building proceedings until all concerns are addressed and due process followed. process followed and advocate that the scale of the development be seriously reviewed.

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**Respondent No:** 112

**Responded At:** Jul 17, 2020 09:10:19 am

**Last Seen:** Jul 17, 2020 01:05:52 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Not appropriate for the middle of a suburb. Not appropriate surrounding infrastructure. Not a welcome addition. Adds no value to the community. Too tall and occupancy is too high.

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**Respondent No:** 113

**Responded At:** Jul 17, 2020 09:18:21 am

**Last Seen:** Jul 17, 2020 01:16:39 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property
Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I strongly object to the development application for a Residential Aged Care Facility located at 73-75 Doonan Road and 16-18 Betty Street, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of this local, low density residential area. 1.0 Planning Objections 1.1 The manner in which Council adopted the Residential Aged Care Facilities Local Planning Policy ('LPP') on 26 April 2020 is highly inappropriate, without publicly advertising major amendments made to the density, height and plot ratio. 1.2 A residential density coding of R80 as imposed by the LPP is not acceptable or justified at the subject site. It is completely out of context with a transition from the neighbouring R12.5 and R10 zoned properties. 1.3 A Local Planning Policy imposing density is not appropriate. Density should be imposed via a scheme amendment to LPS3. 1.4 The proposed development is commercial in nature, operating 24/7 and is not suited to a residential area. 1.5 The proposed development is not compatible with the existing amenity surrounding / abutting development due to the height, scale and bulk of the development. The proposed development therefore does not comply with Clause 3.1 of the LPP which states "...and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking". 1.6 In accordance with the zoning table of LPS 3, 'Residential Aged Care Facility' is allocated an 'A' use within the 'Residential' zone, meaning the use is not permitted unless the local government has exercised its discretion by granting development approval. This is an unusual application of additional use provisions given a 'Residential Aged Care Facility' is already a contemplated use within the 'Residential' zone. 1.7 Due to the removal of the proposed special use provisions in LPS 3, no development standards are applicable to the subject site except for the car parking requirements as outlined in LPS 3. A scheme amendment should be initiated to guide appropriate density. 1.8 Given the increased building height and plot ratio associated with this modification will facilitate increased bulk and scale for any development proposed, we are of the view the modifications to the draft LPP are not minor and are in fact, significant in nature particularly in relation to the locality of surrounding residential area. 1.9 Council has not followed the appropriate process in the adoption of LPP. On this basis we question the validity of the adopted LPP. 1.10 There is absolutely no justification for the application of a R80 density coding, given the significantly lower R10/R12.5 density coding of the surrounding locality. 1.11 The effect of the local planning policy is that it imposes a higher density coding without the initiation of a scheme amendment to LPS3. 1.12 The purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City, however instead it has imposed an R-coding as a mechanism to deal with scale, bulk and built form. This is not appropriate as the imposition of an R80 R-coding immediately adjacent to properties subject to an R12.5 density coding will result in significant conflict with respect to scale, bulk and streetscape impacts. 1.13 Pursuant to Schedule 2, Part 9, Clause



67(m) of the Regulations, the proposed development is not compatible with the surrounding residential neighbourhood and particularly the adjoining land zoned R12.5. 1.14 In April 2016, the community was consulted on the proposed refurbishment of Melvista Lodge and the development of a 2-storey aged care on adjacent lots at 73-75 Doonan Road and 16-18 Betty Street. What is now proposed is completely different with a 4 storey plus basement and roof (height approx. 17 metres), 90 bed high care, aged care facility on residential zoned lots and no longer includes the refurbishment of the Melvista Lodge. The community consultation on the new proposal from the developer and City of Nedlands has been mostly non-existent. Clause 5.1 of the LPP states "Consultation with affected landowners will be undertaken in accordance with the City's Local Planning Policy- Consultation of Planning Proposals". The consultation by the Developer with the Community, undertaken on a previous scheme, therefore breaches the LPP – Consultation of Planning Proposals. 1.15 The proposed development at R80, with a plot ratio of 1.0 will significantly impact the adjoining land and surrounding low density residential neighbourhood. 1.16 Clause 4.6.2 of the LPP states "A minimum of twenty-five per cent (25%) of the site area is to be landscaped". The proposed development does not comply with this requirement of the LPP. 1.17 The set back of the boundary on 71 Doonan Road is non compliant with the LPP Clause 4.5.2 which requires a 7.5m set back and permanent screening to 75% obscure. The proposed plan has a 6.4m setback and NO screening. 1.18 The purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City. The LPP makes no delineation between differing models of care (e.g. independent living units, low care, high care). The planning guidelines set out in the LPP, as drafted, applies the same planning conditions irrespective of the model of care. Different models of care have differing levels of servicing. This has not been considered in the application of the LPP. This has resulted in a High Care facility with an inappropriate density being located in a precinct unsuited to the facility function. The LPP should be redrafted to reflect the specific function and nature of aged care models of care, with appropriate planning of such facilities contextually. 1.19 There was no development control plan applied to this land at the time of its rezoning. This in effect meant anything could have been built. The rushed endorsement of an R80 equivalent zoning without community consultation has denied the community the opportunity to comment on the appropriateness of this density in a residential zone. 2.0 Design Objections 2.1 The built form is a highly inappropriate in terms of scale and size to adjoining properties with box scale of building of approx. 70m overall length x 32m overall width and overall height of approx 17m 2.2 The development includes large, bland featureless walls measuring 35 metres in length (running east/west), a scale that would typically be found in a mixed use or town/activity centre environment. 2.3 The proposed development, should it be constructed as proposed, would result in detrimental impacts to the amenity and character of the low-density residential neighbourhood. 2.4 The four-storey development with a proposed plot ratio of 1.0 would result in a scale of development which is not compatible with the amenity of the locality and is not suitable within a low-density residential neighbourhood. 2.5 The proposed development will significantly impact the visual amenity of all residential lots to the north on Doonan Road and Betty Street, up to Princess Road, particularly when the development is viewed from private outdoor areas. 2.6 The Developer's proposal, with its nominated function, size and density, has not considered any technical issues and will have a material negative impact to the amenity of the locality. 2.7 Building massing and scale is disproportionate to the surrounding urban vernacular. The mass and height are disrespectful to the scale and pitch lines from the adjoining properties with a consequential negative impact to the Betty Street and Doonan Road streetscapes. Its verticality will project as a dominant insertion on the residential neighbourhood. As a "for-profit" commercial operation it will damage the residential cohesion of the suburb of Nedlands. Clause 3.1 of the LPP states "..... design of residential aged care facilities are of a high quality and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking." The proposed development is therefore non-compliant with clause 3.1 of the LPP. 2.8 Building density provides a poor level of amenity for residents and patients with very limited access to outdoor spaces. Lack of green areas for the residents. The LPP requires 25% of the site to be landscaped. The proposal is nowhere near this and hence it is non compliant with the flawed LPP. 2.9 The facility provides a poor work environment for nursing staff. No nursing stations or staff lounges/breakout spaces are provided for staff. 2.10 Ramp/through access with a 4.5m high boundary wall on southern boundary will be highly visible from Doonan and Betty Streets and is aesthetically ugly along with inappropriately high unfriendly front boundary walls close to 2m near southern boundaries on Doonan and Betty Streets. 2.11 These front boundary walls are impacted further by the proposed 2.5m setbacks beyond the current street line sets backs of 9m making it impossible to see down the street. This will result in the streetscape significantly altered with the proposed development jutting out 6.5m beyond the existing street line, Residents reversing out of their driveway will have no line of sight, keeping in mind a pedestrian footpath runs down the east side of Doonan and west side of Betty making this impossible to ensure the safety of any family walking down the street to Masons Gardens, or car driving up the

street. 2.12 The visual projection of the development on the north facing Masons Gardens vista will be overbearing and detrimental to the urban fabric of the Betty Street – Doonan Road hillscape and Mason Gardens Precinct. 2.13 The proposed development is not setting a target for environmental sustainability. The development is taking a just above minimum approach, proposing to exceed Part J of the National Construction Code by a stated 10%. This is an inadequate attempt to demonstrate environmental sustainability credentials. As a minimum a Green Star 6-star standard should be set, and consideration should be given to a Passive House rating. This facility will have a significant carbon footprint that will represent a substantial increase over the carbon footprint of the existing three (3) residences. 2.14 The Developer has no stated approach to operation of the facility in the instance of a required lockdown nor a stated approach of how to protect vulnerable patients to cross infection from air borne viruses. This is an irresponsible approach to quality aged care services in a post COVID 19 environment where a duty of care exists to protect patients who are in a vulnerable position. The City of Nedlands would be in breach of your duty of care now with the foreknowledge that this facility presents an unacceptable risk and has not considered a COVID safe design. 2.15 The proposed development proposes a density of occupancy that maximises the built form on the available land area, leaving limited open space for residents/patients. The LPP, clause 4.6.2 requires 25% of the site area to be landscaped. This has not been provided. Furthermore, the Review of Innovative Models of Aged Care, Research Paper 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety recommended respite is provided in settings aligned to a person's background and offering structured activities. The report further recommends small scale domestic models of aged care where there is an emphasis on providing person centred care models. The proposed developments design and density is not aligned to the objectives of the Royal Commission. 2.16 At ninety (90) beds of non-ambulatory patients over four (4) occupied levels, safe evacuation has been poorly considered. Safe evacuation should necessitate a sprinkler protected building with a zoned smoke management system and designated safe zones. Brigade turn out points for fire truck parking and access to brigade booster points have not been considered in the design. Evacuation of 90 non-ambulatory residents is a risk. 2.17 Brigade access to non-sprinklered areas, such as the roof plantroom, with access only available along Betty Street and Doonan Road for aerial firefighting, has not been considered. 2.18 No consideration appears to have been given for acoustic treatment for roof located air conditioning plant and roof discharges. 2.19 Lifts in the building are to be used for vertical movement of food services, visitors, patients, maintenance personnel and removal of deceased patients. This is an unhygienic practice and demonstrates poor design practice in this facility. Good design practice would separate different traffic streams in a facility of this size and density, with the minimum provision of a dedicated goods lift. 2.20 The car parking provisions are significantly underestimated. This will result in substantial on street parking to Betty St, Doonan Rd, Melvista Ave, Granby Cres and surrounding roads. Staffing numbers for the Wellness Centre (3 treatment bays + hair salon – circa 4 staff), full commercial kitchen for up 540 food services per day (circa 4-5 staff), facilities manager (1 staff), full laundry (circa 2 staff), on site admin (circa 7 staff), on-site coffee shop (1 staff), cleaning staff (circa 3-4), orderlies and support staff (circa 2), plus nursing and staff for 90 patients (minimum 15 staff) significantly exceeds car parking allowances. Shift changeover of nursing staff, visitors and maintenance staff further results in carparking being significantly undersized and inadequate for a facility of this size and density. 2.21 Grease trap for the kitchen will require truck access for pumping out the grease trap. This does not appear to have been considered in the design. 2.22 Inadequate on-site parking can result in off-site parking for nurses for night shifts. This can result in unsafe practices and security concerns for nursing staff accessing the facility at night having to park in unsecured/unmonitored locations. 2.23 No design provision is shown for kitchen exhaust discharges, carpark ventilation discharges, generator exhaust discharge. Discharges from the facility will adversely impact neighbours and have not been considered appropriately. Discharge stacks will also extend beyond the roof line creating further visual impact. 2.24 Truck vehicular access for food delivery, waste removal, medical gas bottle replenishment, diesel fuel delivery, maintenance personnel for mechanical, electrical, fire and communications plant will result in significant increase to truck movements on Doonan Road and Betty Street. 2.25 Inadequate provision has been made for replacement of roof top air conditioning plant. Access for large plant can only be made via crane access from Betty Street or Doonan Road. 2.26 Light spill for night-time access to carparking and pedestrian entrances will result in light pollution to adjoining neighbours. 2.27 The renders and plans being promoted by the Developer do not correctly illustrate the upper levels and roof form which will be highly visible. These images and plans are misleading. In addition, the elevations do not show the upper level in bold, again misleading. 2.28 Subterranean courtyards on the eastern/western boundaries/northern edge - Doonan Road/Betty Street are unsightly/dark and out of character with the wide, large verges of the suburb. 2.29 The developer, Oryx, is inexperienced. It is noted that the Developer has operated only one aged care facility to date, the

recently acquired hotel, The Richardson in West Perth. Following acquisition that was subsequently refurbished to accommodate aged care. 2.30 Only 5 of the direct neighbours were afforded a one on one meeting with the Developer's consultants on the week of 22 June 2020. This was the first time the neighbours had been approached regarding this proposal. The Developer was not present at the resident meetings with representation being made by their Stakeholder Engagement Consultant, Creating Communities, and Town Planning Consultant, Planning Solutions. 3.0 Sale of Land Objections 3.1 75 Doonan Road was sold by private treaty to the developer before the land was designated 'special use' allowing aged care. The land should have been offered to the open market, particularly when it was widely known the owners of Melvista Lodge directly to the south were also interested in purchasing the land. 3.2 The land was sold as a Residential R10/R12.5 lot when the City knew its intent was always to redesignate the land. Why would the City sell land to a developer, prior to its redesignation. Why did they not designate it for aged care use first and by inference, sell the land at a much higher price? How have the City's ratepayers benefited from this sale? We note the developer paid \$2.6 million for the last residential piece of land required for this proposed development leaving the sale of the land by The City in question. 4.0 Technical Reports Objections 4.1 The acoustics technical report has not calculated the cumulative noise impact of ventilation systems with the air-cooled condensers. Significant ventilation systems will be required for the kitchen exhaust, evaporative kitchen make up, toilet exhausts, laundry exhausts and flues. To determine the full impact of the facility on adjoining residences, all noise sources should be defined and calculated on a cumulative basis. 4.2 The Sustainability Report does not consider any modelling of obnoxious discharges from kitchen, toilet and laundry exhausts and their impact on the surrounding properties. Dispersion modelling and CFD modelling should be undertaken to determine that there is no undue impact, as required by clause 3.1 of the LPP. 4.3 The Sustainability Report has not considered any heat island impact on the surrounding properties as a result of rejecting circa 700 - 800 kW of heat from the facility to determine that there is no undue impact, as required by clause 3.1 of the LPP. 4.4 The Sustainability Report has not considered glare and reflectance to properties on the east in the morning and west in the evening to determine that there is no undue impact, as required by clause 3.1 of the LPP. 4.5 The Transport Impact Statement (TIS) has not calculated the total number of staff or visitor numbers in its car parking assessment for a facility of this nature. The TIS has relied on an allowance of 1 car bay per 4 beds. A high dependency aged care facility will have a significant staffing requirement that will exceed this requirement. It will also have significant visitor numbers. The TIS has made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment of carparking and traffic movements. 4.6 Developer's Traffic Report also provides very little detail on the type of vehicle movements and their frequency and times during the week. This detail is also needed to form proper considered assessment of traffic movements and noise levels, which detail is also wholly lacking in the Developer's Transport Impact Statement and Acoustic Report.

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**Respondent No:** 114

**Responded At:** Jul 17, 2020 09:56:24 am

**Last Seen:** Jul 17, 2020 01:52:47 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)**  Owner of a property  
 Other

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I feel the bulk is excessive for the neighbourhood.

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**Respondent No:** 115

**Responded At:** Jul 17, 2020 11:42:46 am

**Last Seen:** Jul 17, 2020 03:40:39 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. My objection is made on the following grounds: 1 The proposal is inconsistent with the Residential Aged Care Facilities Local Planning Policy because of the undue impact it will have on the residential amenity of the area. 2 The height, bulk and scale of a four-storey development proposal is incompatible with the locality and surrounding developments. 3 The proposal will result in unacceptable increases in noise, traffic, odours, car parking congestion and light pollution. 4 The proposal fails to adequately manage or mitigate the impacts it will have on the existing and future residential amenity. 5 The design of the proposal is imposing and unsympathetic to the existing character of the area. Not only does that have aesthetic implications, the contrast in setbacks affects sight lines, and therefore vehicle and pedestrian safety. 6 The car parking and traffic assessments do not adequately take into account the realistic vehicle movements the proposal will generate.

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**Respondent No:** 116

**Responded At:** Jul 17, 2020 12:22:28 pm

**Last Seen:** Jul 17, 2020 04:15:24 am

**IP Address:**

Q1. **Your name:**

Q2. **Your address:**

Q3. **Your email address:**

Q4. **Your telephone number:**

Q5. **State how your interests are affected (select all relevant boxes)** Other

Q6. **Address of the property affected (if applicable)**

Q7. **My response to the proposal:** I object to the proposal

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were NOT advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. To the extent the decision maker chooses to rely on significant and unadvertised provisions of the Policy, I further object as follows: 1 The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. 2 The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. 3 The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 4 Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. 5 The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and pedestrian safety. 6 Notwithstanding claims made by the developer, the community does not support this proposal and has not been properly consulted. I urge you not to support this proposal. Proforma additional paragraphs, to be added as relevant to the objector if desired: 7 Policy objectives 7.1 One of the primary objectives of the Policy is – “to ensure the appearance and design of residential aged care facilities are of high quality and do not have an undue impact on the residential amenity by way of building bulk and scale, noise, traffic or parking”. The proposal fundamentally conflicts with this objective given the stark and jarring contrast between the surrounding R10 and R12.5 locality and the proposed four storey R80 development. The number of residents proposed to be accommodated will increase the residential capacity of the site by over 1000%. The consequential visual impacts, noise, traffic and parking that will flow from such an intensification will destroy the residential amenity of the locality. 8 Compatibility with setting (bulk, scale and height) 8.1 The Site is surrounded by low density residential development. The land immediately to its east and west is R10 and the land to its north is R12.5. The contrast between the existing density and the proposed R80 coding will be sharp, and the proposed plot ratio is wholly incompatible with the broader setting. 8.2 The bulk and scale of the proposal is imposing in its context. The proposal makes no attempt to mitigate the visual impact of its northern and southern walls, which are large and bland, on the adjacent neighbours and streetscape. 8.3 The

depicted bulk and scale of the Melvista Lodge land (immediately to the South of the Site) in the development application plans is misleading. There are no such plans proposed or prepared, and the proposal is inconsistent with its setting in that regard. Redevelopment of Melvista Lodge is not likely or imminent given the nature of the landholdings there. 8.4 The proposed street frontage setbacks of 2.5 metres undermine line of sight in the context of the surrounding residential developments which have 9 metre setbacks. This has safety implications for drivers and pedestrians using Doonan Road and Betty Street. The design has complete disregard for its setting. 9 Amenity 9.1 The proposal fails to take into account the existing and future character of the locality. The City has a new local planning scheme, and whilst higher density has been provided for elsewhere, this locality preserved its low density coding. There is a clear intention and understanding that the low density residential nature of the area will be maintained. A high rise intensive aged care development completely undermines that intention. 9.2 The proposal will significantly diminish visual amenity of the area due to its size, scale and design. It is not in keeping with the character or streetscape in the locality. 9.3 The proposal represents a significant intensification in how the site will look and operate. It increases the number of people living on the site by over 1000%. The level of staffing and services required to accommodate 90 high needs aged care residents must not be understated. The cumulative impact of 90 residents, combined with the servicing and operational requirements of the facility and movement of staff, visitors and deliveries, will result in a substantial increase in: 9.3.1 noise from traffic movements, at all hours of the day, to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users; 9.3.2 noise generated from the operations of the proposal, including air-conditioning, services, and an intensive increase of population and people movement; 9.3.3 light spill from 24 hour a day operations; and 9.3.4 odours generated from the operations of the proposal, including catering, laundry and servicing. 9.4 No management plans have been provided to show how the detrimental amenity impacts which will arise from such an intensified use will be mitigated, particularly given its hours of operation. No development condition will be validly capable of managing those impacts. 10 Traffic 10.1 The proposal will result in a significant increase in vehicle movements to and from the site, at all hours of the day. 10.2 The Traffic Impact Statement made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment traffic movements. 10.3 The Transport Impact Statement provides very little detail on the type of vehicle movements and the frequency and timings of those movements. This detail is essential to form a properly considered assessment of traffic movements and their impacts, and the document therefore cannot be relied upon. 11 Car Parking 11.1 The amount of administrative, catering, cleaning, medical, allied health and maintenance staff required to support an intensive 90-bed high care facility will not be supported by 26 bays, particularly given no parking allowances have been made for deliveries, visitors of residents, or the Wellness Centre staff and visitors. 11.2 The surrounding streets are not capable of supporting the street car parking which will necessarily arise due to the lack of sufficient on-site car parking. 12 Community consultation 12.1 The developer relies on consultation it conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different from what is proposed. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed. 12.2 Immediately affected residents have either never been contacted or have only recently been informed about the extent of the proposal. 13 Other 13.1 Clause 4.6.2 of the Policy states – “a minimum of twenty-five per cent (25%) of the site area is to be landscaped”. The proposed development does not comply with this requirement of the Policy. 13.2 The proposal will have a significant carbon footprint, and only just exceeds the minimum standards for environmental sustainability under the National Construction Code. 13.3 The proposal fails to take into account the recommendations of the Review of Innovative Models of Aged Care Research Paper, 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety in terms of its design and density. I implore you to give this objection due consideration.

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**Respondent No:** 117

**Responded At:** Jul 17, 2020 13:11:49 pm

**Last Seen:** Jul 17, 2020 05:08:15 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). I have the following concerns relating to the proposal: 1 The impact on amenity. 2 The increase in noise, traffic and odour. 3 The lack of on-site car parking. 4 The intensive height, bulk and scale as compared to the low density residential surround. 5 The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing developments and the proposed. 6 The lack of management plans or mitigation strategies. 7 The lack of proper community consultation.

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**Respondent No:** 118

**Responded At:** Jul 17, 2020 13:20:59 pm

**Last Seen:** Jul 17, 2020 05:10:28 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the this proposal The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 2 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 3 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. It also creates safety issues for vehicles and pedestrians given the different setbacks between the existing houses in the area and the proposal. 4 Car parking requirements and traffic impacts have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 119

**Responded At:** Jul 17, 2020 13:57:28 pm

**Last Seen:** Jul 17, 2020 05:38:32 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent, incompatible and out of character with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. 6 The quiet, residential nature of the immediate area will become completely undermined by this proposal. With insufficient parking included in the proposal visitors, deliveries and employees will be forced to park in surrounding streets, causing noise and congestion. I strongly urge you not to support this proposal.

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**Respondent No:** 120

**Responded At:** Jul 17, 2020 14:00:45 pm

**Last Seen:** Jul 17, 2020 05:36:46 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

From the outset, I would like to make a few points clear. I am supportive of Aged Care Facilities such as Melvista Lodge which sits within the amenity and style of a residential area. Furthermore, for absolute clarity, I as a resident of Doonan Road have never been contacted once from the developer or their myriad of consultants. Community Consultation, to the best of my knowledge (with some evidence) was a number of years ago for a two story development in partnership with Lisle Villages. Roll forward a number of years, and being a resident with only 1 house in between me and this monstrosity, with no contact, have had thrust upon us a 4/5 level, plus roof space development squeezed on a block with questionable zoning. My family is facing a destruction in value of our amenity in the vicinity of \$0.5m in valuation, and we saved and sacrificed plenty to buy in a residential street. From my perspective the plan for this building is ill-conceived, flies against best practice and will significantly impact the amenity of Betty, Doonan and surrounding streets. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. These a family friendly narrow residential streets, and significantly differs from the Regis site in Hollywood, where you are next to a hospital precinct and the development is zoned Commercial. To the extent the decision maker chooses to rely on significant and unadvertised provisions of the Policy, I further object as follows: 1 The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. I believe the Council may have underestimated the outrage at the loss of amenity from youthful to older residents who are now suffering significant emotional distress. 2 The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. I find the developers images completely misleading, with significant shaded out areas not depicting the true scale of this commercial enterprise to be slotted against families 3 The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 4 Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. I have had an aged care expert review the parking which is significantly undercooked. I estimate roughly 35 staff are required with nursing changeovers, plus visitors and maybe the odd resident who wants to keep a car. The parking proposed doesn't even go close and is amateur in design at best. Compare the parking provided at nearby aged care facilities in the City of Nedlands and Town of Claremont and you can see that parking is significantly underestimated. 5 The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and pedestrian safety. 6

Notwithstanding claims made by the developer, the community does not support this proposal and has not been properly consulted. I urge you not to support this proposal. I have some other more detailed points for you to consider:

**7 Policy objectives**

**7.1** One of the primary objectives of the Policy is – “to ensure the appearance and design of residential aged care facilities are of high quality and do not have an undue impact on the residential amenity by way of building bulk and scale, noise, traffic or parking”. The proposal fundamentally conflicts with this objective given the stark and jarring contrast between the surrounding R10 and R12.5 locality and the R80 development. The number of residents proposed to be accommodated will increase the residential capacity of the site by over 1000%. The consequential visual impacts, noise, traffic and parking that will flow from such an intensification will destroy the residential amenity of the locality.

**8 Compatibility with setting (bulk, scale and height)**

**8.1** The Site is surrounded by low density residential development. The land immediately to its east and west is R10 and the land to its north is R12.5. The contrast between the existing density and the proposed R80 coding will be sharp, and the proposed plot ratio is wholly incompatible with the broader setting.

**8.2** The bulk and scale of the proposal is imposing in its context. The proposal makes no attempt to mitigate the visual impact of its northern and southern walls, which are large and bland, on the adjacent neighbours and streetscape.

**8.3** The depicted bulk and scale of the Melvista Lodge land (immediately to the South of the Site) in the development application plans is misleading. There are no such plans proposed or prepared, and the proposal is inconsistent with its setting in that regard. Redevelopment of Melvista Lodge is not likely or imminent given the nature of the landholdings there.

**8.4** The proposed street frontage setbacks of 2.5 metres undermine line of sight in the context of the surrounding residential developments which have 9 metre setbacks. This has safety implications for drivers and pedestrians using Doonan Road and Betty Street. The design has complete disregard for its setting.

**9 Amenity**

**9.1** The proposal fails to take into account the existing and future character of the locality. The City has a new local planning scheme, and whilst higher density has been provided for elsewhere, this locality preserved its low density coding. There is a clear intention and understanding that the low density residential nature of the area will be maintained. A high rise intensive aged care development completely undermines that intention.

**9.2** The proposal will significantly diminish visual amenity of the area due to its size, scale and design. It is not in keeping with the character or streetscape in the locality.

**9.3** The proposal represents a significant intensification in how the site will look and operate. It increases the number of people living on the site by over 1000%. The level of staffing and services required to accommodate 90 high needs aged care residents must not be understated. The cumulative impact of 90 residents, combined with the servicing and operational requirements of the facility and movement of staff, visitors and deliveries, will result in a substantial increase in:

**9.3.1** noise from traffic movements, at all hours of the day, to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users;

**9.3.2** noise generated from the operations of the proposal, including air-conditioning, services, and an intensive increase of population and people movement;

**9.3.3** light spill from 24 hour a day operations; and

**9.3.4** odours generated from the operations of the proposal, including catering, laundry and servicing.

**9.4** No management plans have been provided to show how the detrimental amenity impacts which will arise from such an intensified use will be mitigated, particularly given its hours of operation. No development condition will be validly capable of managing those impacts.

**10 Traffic**

**10.1** The proposal will result in a significant increase in vehicle movements to and from the site, at all hours of the day.

**10.2** The Traffic Impact Statement made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment traffic movements.

**10.3** The Transport Impact Statement provides very little detail on the type of vehicle movements and the frequency and timings of those movements. This detail is essential to form a properly considered assessment of traffic movements and their impacts, and the document therefore cannot be relied upon.

**11 Car Parking**

**11.1** The amount of administrative, catering, cleaning, medical, allied health and maintenance staff required to support an intensive 90-bed high care facility will not be supported by 26 bays, particularly given no parking allowances have been made for deliveries, visitors of residents, or the Wellness Centre staff and visitors.

**11.2** The surrounding streets are not capable of supporting the street car parking which will necessarily arise due to the lack of sufficient on-site car parking.

**12 Community consultation**

**12.1** The developer relies on consultation it conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different from what is proposed. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed.

**12.2** Immediately affected residents have either never been contacted or have only recently been informed about the extent of the proposal.

**13 Other**

**13.1** Clause 4.6.2 of the Policy states – “a minimum of twenty-five per cent (25%) of the site area is to be landscaped”. The proposed development does not comply with this requirement of the

Policy. 13.2 The proposal will have a significant carbon footprint, and only just exceeds the minimum standards for environmental sustainability under the National Construction Code. 13.3 The proposal fails to take into account the recommendations of the Review of Innovative Models of Aged Care Research Paper, 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety in terms of its design and density.

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**Respondent No:** 121

**Responded At:** Jul 17, 2020 14:06:20 pm

**Last Seen:** Jul 10, 2020 03:11:24 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. My objection is made on the following grounds: 1 The proposal is inconsistent with the Residential Aged Care Facilities Local Planning Policy because of the undue impact it will have on the residential amenity of the area. 2 The height, bulk and scale of a four-storey development proposal is incompatible with the locality and surrounding developments. 3 The proposal will result in unacceptable increases in noise, traffic, odours, car parking congestion and light pollution. 4 The proposal fails to adequately manage or mitigate the impacts it will have on the existing and future residential amenity. 5 The design of the proposal is imposing and unsympathetic to the existing character of the area. Not only does that have aesthetic implications, the contrast in setbacks affects sight lines, and therefore vehicle and pedestrian safety. 6 The car parking and traffic assessments do not adequately take into account the realistic vehicle movements the proposal will generate.

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**Respondent No:** 122

**Responded At:** Jul 17, 2020 16:24:50 pm

**Last Seen:** Jul 17, 2020 08:16:44 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. My objection is made on the following grounds: 1 I consider the proposal to be inconsistent with the Residential Aged Care Facilities Local Planning Policy because of the undue impact it will have on the residents of the area. 2 The height, bulk and scale of a four-storey development proposal is incompatible with the locality and surrounding properties. 3 The proposal will result in unreasonable increases in noise, traffic, car parking congestion and light pollution. 4 I believe that the proposal fails to adequately manage or mitigate the impacts it will have on the existing and future residential amenity. 5 The design of the proposal is imposing and unsympathetic to the existing character of the area. Not only does that have aesthetic implications, the contrast in setbacks affects sight lines, and therefore vehicle and pedestrian safety. 6 The on-site car parking is inadequate and will therefore force an unreasonable extent of street parking. 7 The volume of associated traffic will be detrimental to the area and potentially unsafe in a residential location immediately adjacent to a park.

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**Respondent No:** 123

**Responded At:** Jul 17, 2020 16:40:30 pm

**Last Seen:** Jul 17, 2020 08:38:02 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Owner of a property

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. To the extent the decision maker chooses to rely on significant and unadvertised provisions of the Policy, I further object as follows: 1 The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. 2 The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. 3 The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 4 Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. 5 The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and pedestrian safety. 6 Notwithstanding claims made by the developer, the community does not support this proposal and has not been properly consulted. I urge you not to support this proposal. Proforma additional paragraphs, to be added as relevant to the objector if desired: 7 Policy objectives 7.1 One of the primary objectives of the Policy is – “to ensure the appearance and design of residential aged care facilities are of high quality and do not have an undue impact on the residential amenity by way of building bulk and scale, noise, traffic or parking”. The proposal fundamentally conflicts with this objective given the stark and jarring contrast between the surrounding R10 and R12.5 locality and the proposed four storey R80 development. The number of residents proposed to be accommodated will increase the residential capacity of the site by over 1000%. The consequential visual impacts, noise, traffic and parking that will flow from such an intensification will destroy the residential amenity of the locality. 8 Compatibility with setting (bulk, scale and height) 8.1 The Site is surrounded by low density residential development. The land immediately to its east and west is R10 and the land to its north is R12.5. The contrast between the existing density and the proposed R80 coding will be sharp, and the proposed plot ratio is wholly incompatible with the broader setting. 8.2 The bulk and scale of the proposal is imposing in its context. The proposal makes no attempt to mitigate the visual impact of its northern and southern walls, which are large and bland, on the adjacent neighbours and streetscape. 8.3 The depicted bulk and scale of the Melvista Lodge land (immediately to the South of the Site) in the development application



plans is misleading. There are no such plans proposed or prepared, and the proposal is inconsistent with its setting in that regard. Redevelopment of Melvista Lodge is not likely or imminent given the nature of the landholdings there. 8.4 The proposed street frontage setbacks of 2.5 metres undermine line of sight in the context of the surrounding residential developments which have 9 metre setbacks. This has safety implications for drivers and pedestrians using Doonan Road and Betty Street. The design has complete disregard for its setting. 9 Amenity 9.1 The proposal fails to take into account the existing and future character of the locality. The City has a new local planning scheme, and whilst higher density has been provided for elsewhere, this locality preserved its low density coding. There is a clear intention and understanding that the low density residential nature of the area will be maintained. A high rise intensive aged care development completely undermines that intention. 9.2 The proposal will significantly diminish visual amenity of the area due to its size, scale and design. It is not in keeping with the character or streetscape in the locality. 9.3 The proposal represents a significant intensification in how the site will look and operate. It increases the number of people living on the site by over 1000%. The level of staffing and services required to accommodate 90 high needs aged care residents must not be understated. The cumulative impact of 90 residents, combined with the servicing and operational requirements of the facility and movement of staff, visitors and deliveries, will result in a substantial increase in: 9.3.1 noise from traffic movements, at all hours of the day, to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users; 9.3.2 noise generated from the operations of the proposal, including air-conditioning, services, and an intensive increase of population and people movement; 9.3.3 light spill from 24 hour a day operations; and 9.3.4 odours generated from the operations of the proposal, including catering, laundry and servicing. 9.4 No management plans have been provided to show how the detrimental amenity impacts which will arise from such an intensified use will be mitigated, particularly given its hours of operation. No development condition will be validly capable of managing those impacts. 10 Traffic 10.1 The proposal will result in a significant increase in vehicle movements to and from the site, at all hours of the day. 10.2 The Traffic Impact Statement made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment traffic movements. 10.3 The Transport Impact Statement provides very little detail on the type of vehicle movements and the frequency and timings of those movements. This detail is essential to form a properly considered assessment of traffic movements and their impacts, and the document therefore cannot be relied upon. 11 Car Parking 11.1 The amount of administrative, catering, cleaning, medical, allied health and maintenance staff required to support an intensive 90-bed high care facility will not be supported by 26 bays, particularly given no parking allowances have been made for deliveries, visitors of residents, or the Wellness Centre staff and visitors. 11.2 The surrounding streets are not capable of supporting the street car parking which will necessarily arise due to the lack of sufficient on-site car parking. 12 Community consultation 12.1 The developer relies on consultation it conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different from what is proposed. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed. 12.2 Immediately affected residents have either never been contacted or have only recently been informed about the extent of the proposal. 13 Other 13.1 Clause 4.6.2 of the Policy states – “a minimum of twenty-five per cent (25%) of the site area is to be landscaped”. The proposed development does not comply with this requirement of the Policy. 13.2 The proposal will have a significant carbon footprint, and only just exceeds the minimum standards for environmental sustainability under the National Construction Code. 13.3 The proposal fails to take into account the recommendations of the Review of Innovative Models of Aged Care Research Paper, 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety in terms of its design and density.

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**Respondent No:** 124

**Responded At:** Jul 17, 2020 17:01:32 pm

**Last Seen:** Jul 26, 2020 22:51:52 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**      Suburb of Nedlands

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

STOP destroying our suburb

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**Respondent No:** 125

**Responded At:** Jul 17, 2020 17:58:36 pm

**Last Seen:** Jul 17, 2020 09:56:46 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the Nedlands locality. 3 Due to its size and intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light and traffic. 1 The proposal diminishes the visual amenity of the locality and has not at all been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 2 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated to run an establishment of this size, with a 24 hour staff requirement. The surrounding roads are not adequate to cope with the expected traffic and parking generated and required. I urge you not to support this proposal.

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**Respondent No:** 126

**Responded At:** Jul 17, 2020 18:39:02 pm

**Last Seen:** Jul 17, 2020 10:34:56 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

The proposed development is entirely out of keeping with the nature of the street and surrounding area. It will be a blight on the landscape and set a worrying precedent. We pay high prices to live in areas such as Nedlands for a reason - including not being neighbours of developments such as this.

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**Respondent No:** 127

**Responded At:** Jul 17, 2020 18:57:49 pm

**Last Seen:** Jul 17, 2020 10:55:01 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object.

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**Respondent No:** 128

**Responded At:** Jul 17, 2020 19:41:26 pm

**Last Seen:** Jul 17, 2020 11:10:20 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

We feel this mass development in this location will devalue the character streets and destroy the peaceful feel of the area with excess traffic & infrastructure. We have purchased here as it is a low density, and if this development proceeds it will set a precedent for more development. We appreciate that people would like to move to retirement homes in the area they already live but this is commercial enterprise at a scale too large for the proposed location.

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**Respondent No:** 129

**Responded At:** Jul 18, 2020 12:17:08 pm

**Last Seen:** Jul 18, 2020 04:11:54 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

This is a ridiculous idea. Within a community of houses you want to build something so big is totally inappropriate. This is not what the community wants and it's not ideal for those seeking aged care. This is a money making exercise that benefits only a small few and impacts many negatively. Please reconsider.

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**Respondent No:** 130

**Responded At:** Jul 18, 2020 12:38:41 pm

**Last Seen:** Jul 18, 2020 04:36:29 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property
Occupier of a property

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. To the extent the decision maker chooses to rely on significant and unadvertised provisions of the Policy, I further object as follows: 1 The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. 2 The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. 3 The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 4 Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. 5 The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and pedestrian safety. 6 Notwithstanding claims made by the developer, the community does not support this proposal and has not been properly consulted. I urge you not to support this proposal.

1 Policy objectives 1.1 One of the primary objectives of the Policy is – “to ensure the appearance and design of residential aged care facilities are of high quality and do not have an undue impact on the residential amenity by way of building bulk and scale, noise, traffic or parking”. The proposal fundamentally conflicts with this objective given the stark and jarring contrast between the surrounding R10 and R12.5 locality and the proposed four storey R80 development. The number of residents proposed to be accommodated will increase the residential capacity of the site by over 1000%. The consequential visual impacts, noise, traffic and parking that will flow from such an intensification will destroy the residential amenity of the locality.

2 Compatibility with setting (bulk, scale and height) 2.1 The Site is surrounded by low density residential development. The land immediately to its east and west is R10 and the land to its north is R12.5. The contrast between the existing density and the proposed R80 coding will be sharp, and the proposed plot ratio is wholly incompatible with the broader setting. 2.2 The bulk and scale of the proposal is imposing in its context. The proposal makes no attempt to mitigate the visual impact of its northern and southern walls, which are large and bland, on the adjacent neighbours and streetscape. 2.3 The depicted bulk and scale of the Melvista Lodge land (immediately to the South of the Site) in the



development application plans is misleading. There are no such plans proposed or prepared, and the proposal is inconsistent with its setting in that regard. Redevelopment of Melvista Lodge is not likely or imminent given the nature of the landholdings there.

2.4 The proposed street frontage setbacks of 2.5 metres undermine line of sight in the context of the surrounding residential developments which have 9 metre setbacks. This has safety implications for drivers and pedestrians using Doonan Road and Betty Street. The design has complete disregard for its setting.

3 Amenity

3.1 The proposal fails to take into account the existing and future character of the locality. The City has a new local planning scheme, and whilst higher density has been provided for elsewhere, this locality preserved its low density coding. There is a clear intention and understanding that the low density residential nature of the area will be maintained. A high rise intensive aged care development completely undermines that intention.

3.2 The proposal will significantly diminish visual amenity of the area due to its size, scale and design. It is not in keeping with the character or streetscape in the locality.

3.3 The proposal represents a significant intensification in how the site will look and operate. It increases the number of people living on the site by over 1000%. The level of staffing and services required to accommodate 90 high needs aged care residents must not be understated. The cumulative impact of 90 residents, combined with the servicing and operational requirements of the facility and movement of staff, visitors and deliveries, will result in a substantial increase in:

3.3.1 noise from traffic movements, at all hours of the day, to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users;

3.3.2 noise generated from the operations of the proposal, including air-conditioning, services, and an intensive increase of population and people movement;

3.3.3 light spill from 24 hour a day operations; and

3.3.4 odours generated from the operations of the proposal, including catering, laundry and servicing.

3.4 No management plans have been provided to show how the detrimental amenity impacts which will arise from such an intensified use will be mitigated, particularly given its hours of operation. No development condition will be validly capable of managing those impacts.

4 Traffic

4.1 The proposal will result in a significant increase in vehicle movements to and from the site, at all hours of the day.

4.2 The Traffic Impact Statement made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment traffic movements.

4.3 The Transport Impact Statement provides very little detail on the type of vehicle movements and the frequency and timings of those movements. This detail is essential to form a properly considered assessment of traffic movements and their impacts, and the document therefore cannot be relied upon.

5 Car Parking

5.1 The amount of administrative, catering, cleaning, medical, allied health and maintenance staff required to support an intensive 90-bed high care facility will not be supported by 26 bays, particularly given no parking allowances have been made for deliveries, visitors of residents, or the Wellness Centre staff and visitors.

5.2 The surrounding streets are not capable of supporting the street car parking which will necessarily arise due to the lack of sufficient on-site car parking.

6 Community consultation

6.1 The developer relies on consultation it conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different from what is proposed. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed.

6.2 Immediately affected residents have either never been contacted or have only recently been informed about the extent of the proposal.

7 Other

7.1 Clause 4.6.2 of the Policy states – “a minimum of twenty-five per cent (25%) of the site area is to be landscaped”. The proposed development does not comply with this requirement of the Policy.

7.2 The proposal will have a significant carbon footprint, and only just exceeds the minimum standards for environmental sustainability under the National Construction Code.

7.3 The proposal fails to take into account the recommendations of the Review of Innovative Models of Aged Care Research Paper, 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety in terms of its design and density.

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**Respondent No:** 131

**Responded At:** Jul 18, 2020 16:23:18 pm

**Last Seen:** Jul 18, 2020 08:08:15 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

In my opinion this location is not suitable for a development of this size which is adjacent to residential housing and would greatly overlook several surrounding properties. The available parking would be insufficient for the number of cars involved in a development of this nature and the local park (Masons Gardens) which is used by so many families would be greatly affected. Doonan Road, Betty Street and Melvista Avenue could not cope with the parking and probably severe traffic congestion would occur. Please have the empathy and sense to reconsider the location of this development.

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**Respondent No:** 132

**Responded At:** Jul 18, 2020 16:33:42 pm

**Last Seen:** Jul 18, 2020 08:31:49 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property
Occupier of a property

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Residential Aged Care Facility 16&17 Betty Street and 73&75 Doonan St. I strongly OBJECT to the Development Application proposed for the Residential Aged Care Facility 16&17 Betty Street and 73&75 Doonan St.on the following grounds • Gigantic 4 storey constructions like this in a low density residential areas are inappropriate and adversely impact the amenities of neighbouring properties • huge lack of transparency around change in Policy and borders corrupt - this was not advertised for public consultation before significant increases in development capability were put in policy. Sly and sneaky and not ok. • need to start again at policy level and get public agreement on this before proceeding • bulk and scale totally inconsistent with surroundings • destroys the peace and ambiance of the lovely Masons Garden which should be protected so the community in Nedlands can enjoy (same error with Rose Gardens) we are destroying the long term amenities and parks that have been so carefully preserved by previous generations. It is simply not nice to visit a park and look at that – visibly horrible • this is not built with a sympathetic view or any reasonable attempt to fit in with the surrounding character of houses and park • height is not fair to neighbours as it invades privacy, is a visual eyesore to look at • pollution in the form of noise, excessive lights for neighbours, smells from chemicals etc in an old persons home does not belong here • safety issues as again completely insufficient focus on the traffic implications, dangerous for our school kids and our older citizens on walking around • car parking is again completely inadequate for such a facility and the consequences of so many cars have not been thought out and considered in the planning It is time that we change the entire process. Start with true infrastructure planning and if this can be done adequately in advance it is possible to start 'sub' planning developments. The developments should only be looked at if they benefit the long term community without harming existing residents in an unreasonable way. Sink the railway line and plan proper infrastructure like the sophisticated European countries so we can be successful long term in delivering the needs of the community in the future without destroying the lovely ambiance that so many generations have worked hard to achieve. I strongly oppose yet another disgraceful Development Application.

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**Respondent No:** 133

**Responded At:** Jul 18, 2020 17:10:41 pm

**Last Seen:** Jul 18, 2020 09:09:16 am

**IP Address:**

Q1. **Your name:**

Q2. **Your address:**

Q3. **Your email address:**

Q4. **Your telephone number:** not answered

Q5. **State how your interests are affected (select all relevant boxes)** Owner of a property

Q6. **Address of the property affected (if applicable)**

Q7. **My response to the proposal:** I object to the proposal

Q8. **Submission : Please give your comments relating to this item in full below.**

18 July 2020 OBJECTION TO PROPOSED AGED CARE FACILITY IN DOONAN RD AND BETTY ST NEDLANDS I object to the aged care facility proposed for Betty Street and Doonan Road in Nedlands (Proposed Development) for the following reasons: 1. There has been no independent analysis provided by the City of Nedlands (City) or Oryx Communities (Developer) which demonstrates there is a demand for the proposed 90 high care residential beds in the proposed location in Nedlands. Indeed, there are a number of vacant aged care places currently available south of Stirling Highway in Claremont and elsewhere in the western suburbs. 2. To the extent there is demand for aged care places in Nedlands, the existing and immediately adjacent aged care facility at Melvista Lodge should be utilised before new aged care facilities are developed in a residential area. 3. Any new aged care facilities should be located in existing high-density zoned areas closer to Stirling Highway. 4. Approval of any new residential aged care facilities should wait until the release of the final report of the Royal Commission into Aged Care Quality and Safety. It will be negligent of the City to approve the Proposed Development before it can confirm that the Proposed Development is consistent with any recommendations from the Royal Commission, including the recommendations of the Review of Innovative Models of Aged Care Research Paper. 5. The process by which one of the lots to be used for the Proposed Development was improperly sold to the Developer by the City by way of private treaty, and which was then improperly rezoned for commercial use by the City, requires independent investigation. 6. The improper process by which the remaining lots were rezoned for commercial use without proper community consultation requires independent investigation. 7. The Proposed Development needs to be considered as part of a broader aged care strategy for the neighbourhood, including the future development of Melvista Lodge. 8. There has been inadequate community consultation about the Proposed Development. 9. The overwhelming majority of local rate-payers object to the Proposed Development. 10. No community consultation regarding the Proposed Development was undertaken with affected residents by the Developer. The only prior engagement by the Developer was for a fundamentally different (2-storey) development in 2016. The lack of subsequent engagement has resulted in the local community being misled into believing a development of a fundamentally smaller scale was proposed. 11. There has been no appropriate community consultation by the City at any stage during the 5-year gestation period of the Proposed Development. 12. The Proposed Development relies on the City's Residential Aged Care Facilities Local Planning Policy (Policy). The final form of this Policy, including substantial changes to height and plot ratio, was not advertised to the public. 13. The Proposed Development is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the suburban residential neighbourhood in which it is located. 14. The Proposed Development is fundamentally inconsistent with one of the key objectives of the Policy which is "to ensure the appearance and design of

residential aged care facilities are of high quality and do not have an undue impact on the residential amenity by way of building bulk and scale, noise, traffic or parking". For the reasons listed below, the Proposed Development has a severely adverse impact on residential amenity. 15. The proposal will significantly diminish visual amenity of the area due to its size, scale and design. It is not in keeping with the character or streetscape in the locality. 16. As a 24 hour, seven day a week operation the Proposed Development will result in a significant increase in noise (and a resultant reduction in local amenity) from traffic movements to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users. 17. As a 24 hour, seven day a week operation the Proposed Development will result in a significant increase in noise (and a resultant reduction in local amenity) resulting from the operations of air-conditioning and generators. 18. There will be unacceptable light spill from the 24 hour a day, seven day a week operations (and a resultant reduction in local amenity). 19. As a 24-hour, seven day a week operation the Proposed Development will result in a significant increase in odours (and a resultant reduction in local amenity) generated from the operation of the aged care facility, including catering, laundry and servicing. 20. No management plans have been provided with the Proposed Development which demonstrate how these detrimental impacts on local amenity will be mitigated to an acceptable level. It is submitted that these impacts cannot be adequately mitigated given the residential nature of the surrounding streets. No development condition(s) will be validly capable of managing those adverse impacts on amenity. 21. The proposal will result in a significant increase in vehicle movements to and from the site, at all hours of the day. 22. The Traffic Impact Statement prepared by the Developer is factually incorrect (for example it states that there is no bus route on Betty Street and Doonan Road which there is). 23. The Traffic Impact Statement made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment traffic movements. 24. The Transport Impact Statement provides very little detail on the type of vehicle movements and the frequency and timings of those movements. This detail is essential to form a properly considered assessment of traffic movements and their impacts, and the document therefore cannot be relied upon. 25. The Transport Impact Statement provides very little detail on the movement of commercial vehicles (delivery trucks, garbage trucks, couriers, ambulances etc) all of which will have a materially detrimental impact on the surrounding residential neighbourhood. 26. The Proposed Development does not comply with clause 4.6.2 of the Policy which requires "a minimum of twenty-five per cent (25%) of the site area is to be landscaped". 27. The Proposed Development is surrounded by low density residential accommodation. The land immediately to its east and west is R10 and the land to its north (including abutting neighbours) is R12.5. The contrast between the existing density and the proposed R80 coding is extreme and is wholly incompatible with the broader local community. 28. The bulk and scale of the proposal is imposing in its context. The proposal makes no attempt to mitigate the visual impact of its northern and southern walls, which are large and bland, on the adjacent neighbours and streetscape. 29. The depicted bulk and scale of the Melvista Lodge land (immediately to the South of the Site) in the development application plans is misleading. There are no such plans proposed or prepared, and the proposal is inconsistent with its setting in that regard. Redevelopment of Melvista Lodge is not likely or imminent given the nature of the landholdings there. 30. The proposed street frontage setbacks of 2.5 metres undermine line of sight in the context of the surrounding residential developments which have 9 metre setbacks. This has safety implications for drivers and pedestrians using Doonan Road and Betty Street. The design has complete disregard for its setting. 31. 26 car bays are grossly inadequate to service the 40-plus employees, catering staff, maintenance staff, deliveries and visitors of the Proposed Development. 32. This means that overflow parking will dominate the surrounding streets. Doonan Road and Betty Street already experience significant street parking from Lisle Village and have a bus service reducing parking to one side of each street. For these reasons it is submitted that: The City Administration must recommend against the Proposed Development in the Responsible Authority Report. The City Councillors must recommend against the Proposed Development. The City Councillors must revoke the City's Residential Aged Care Facilities Local Planning Policy and replace it with a more considered document following appropriate community consultation and the outcomes of the Royal Commission into Aged Care. The City's representatives on MINJDAP should vote against the Proposed Development. It is incumbent upon the elected representatives of the Nedlands ratepayers to act in accordance with the wishes of those ratepayers, not the commercial interests of developers. It is also incumbent upon the Councillors to direct the City's CEO to compel his staff to act in the best interests of those ratepayers and not developers seeking commercial gain.

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**Respondent No:** 134

**Responded At:** Jul 18, 2020 17:13:03 pm

**Last Seen:** Jul 18, 2020 09:11:22 am

**IP Address:**

Q1. **Your name:**

Q2. **Your address:**

Q3. **Your email address:**

Q4. **Your telephone number:** not answered

Q5. **State how your interests are affected (select all relevant boxes)** Owner of a property

Q6. **Address of the property affected (if applicable)**

Q7. **My response to the proposal:** I object to the proposal

Q8. **Submission : Please give your comments relating to this item in full below.**

OBJECTION TO PROPOSED AGED CARE FACILITY IN DOONAN RD AND BETTY ST NEDLANDS I OBJECT to the proposed aged care facility for a number of reasons which I have set out in this letter. My key objection is that the Aged Care Facility is completely inconsistent with one of the key objectives of the City of Nedlands' Local Planning Policy which is "to ensure the appearance and design of residential aged care facilities are of high quality and do not have an undue impact on the residential amenity by way of building bulk and scale, noise, traffic or parking". Accordingly, as a Nedlands ratepayer directly affected by the Aged Care Facility, I request that: The Responsible Authority Report prepared by the City of Nedlands recommends against the Aged Care Facility. The City of Nedlands' Councillors recommend against the Aged Care Facility. The City's representatives on MINJDAP should vote against the Aged Care Facility. The City Councillors should revoke the current Residential Aged Care Facilities Local Planning Policy and replace it with a more considered document following appropriate community consultation and the outcomes of the Royal Commission into Aged Care. Some of the reasons for my objection are set out below. There has been inadequate community consultation about the Aged Care Facility and the overwhelming majority of local rate-payers object to the Aged Care Facility. Oryx has not undertaken any community consultation about the current design of the Aged Care Facility with affected residents. The only prior engagement by the Developer was for a fundamentally different (2-storey) development in 2016. The lack of subsequent engagement has resulted in the local community being misled into believing a development of a fundamentally smaller scale was proposed. Additionally, there has been no appropriate community consultation by the Council about the Aged Care Facility, notwithstanding that the Council has known about, and facilitated, the development over the last 5 years. This included the Council adopting its current aged care Local Planning Policy without properly advertising the increased height and plot ratio changes made at the last minute. The Aged Care Facility is in excess of the advertised provisions of the Local Planning Policy in respect of height and plot ratio. The increase is excessive, unjustified and entirely inconsistent with the surrounding neighbourhood. The proposed 26 car bays are grossly inadequate to service the 40-plus employees, catering staff, maintenance staff, deliveries and visitors of the Proposed Facility. This means that overflow parking will dominate the surrounding streets. Doonan Road and Betty Street already experience significant street parking from Lisle Village and have a bus service reducing parking to one side of each street. The Traffic Impact Statement provides very little detail on the type of vehicle movements and the frequency and timings of those movements (eg delivery trucks, garbage trucks, couriers, ambulances etc) all of which will have a materially detrimental impact on the surrounding residential neighbourhood. This detail is essential to form a properly considered assessment of traffic movements and their impacts, and the document therefore cannot be relied upon. The Traffic Impact Statement is also factually incorrect (for

example it states that there is no bus route on Betty Street and Doonan Road which there is). It also makes incorrect assumptions as to the nature of the Aged Care Facility, the likely traffic patterns and the car parking associated with a facility of this type. It is therefore an inappropriate document upon which to base the assessment traffic movements. As a 24 hour, seven day a week operation the Aged Care Facility will result in a significant reduction in local amenity due to: (1) an increase in noise from traffic movements to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users; (2) a significant increase in noise from heavy equipment such as air-conditioning and generators; (3) unacceptable light spill from the 24 hour a day, seven day a week operations; and (4) a significant increase in odours generated from the operations of the Aged Care Facility including catering, laundry and servicing. The development application provides no information on how these impacts on amenity will be managed. I believe that they cannot be adequately managed on a development of the proposed size and the imposition of conditions will not help. The Aged Care Facility is surrounded by low density residential accommodation. The land immediately to its east and west is R10 and the land to its north (including abutting neighbours) is R12.5. The contrast between the existing density and the proposed R80 coding is extreme and is wholly incompatible with the broader local community. The bulk and scale of the proposal is therefore imposing in its context. The proposal makes no attempt to mitigate the visual impact of its northern and southern walls, which are large and bland, on the adjacent neighbours and streetscape. The design has complete disregard for its setting given the proposed street frontage setbacks of 2.5 metres. This is completely inconsistent with the surrounding residences which are required to have 9 metre setbacks. This has safety implications for drivers and pedestrians using Doonan Road and Betty Street. Additionally, the Aged Care Facility does not comply with clause 4.6.2 of the Policy which requires "a minimum of twenty-five per cent (25%) of the site area is to be landscaped". In addition to these objections to the size and scale of the Aged Care Facility, I also believe that there has been no independent analysis provided by the Council or Oryx Communities which demonstrates there is a demand for such a large number of additional aged care beds in Nedlands. Indeed, there are a number of vacant aged care places currently available south of Stirling Highway in Claremont and elsewhere in the western suburbs. To the extent there is demand for additional aged care places in Nedlands, surely the existing Melvista Lodge aged care facility, which is right next door, should be utilised before a new 5 storey aged care facilities is built in a residential area. It also seems negligent that the Council would approve such a significant Aged Care Facility which will be around for years to come without giving consideration to the findings of the Royal Commission into Aged Care Quality and Safety which are due at the end of this year. The ratepayers and Council do not want to be burdened with a white elephant facility of this scale should the Royal Commission recommend an entirely different approach to aged care – for example ageing in place rather than large institutional facilities.

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**Respondent No:** 135

**Responded At:** Jul 18, 2020 17:19:58 pm

**Last Seen:** Jul 18, 2020 09:18:27 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:** I object to the proposal

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**Q8. Submission : Please give your comments relating to this item in full below.**

OBJECTION NEW AGED CARE FACILITY DOONAN RD AND BETTY ST NEDLANDS 17 July 2020 I object to the proposed new aged care facility intended to be built at numbers 73 and 75 Doonan Road and numbers 16 and 18 Betty Street in Nedlands. I believe that it is improper for the City of Nedlands to use the current Local Planning Policy for aged care as the basis for assessing this application given that Policy was incorrectly approved due to the lack of public advertising and consultation on the final form of the policy. In particular, it is inappropriate that the changes in the Policy from the advertised three storey limit to the current four storey limit was not advertised or the subject of community consultation. This change is a material change in the design and intent of the Policy from that which was advertised, and which will have significant adverse implications for affected ratepayers. Additionally, other fatal flaws in the proposed application include: 1. A complete lack of community consultation on the current 4-5 storey application. The developers have misled the community by consulting on a 2-storey development in 2016 and not re-engaging with affected residents on the fundamentally different 4-5 storey development now proposed. 2. The City of Nedlands has failed to undertake any community consultation on the proposal prior to the development application being lodged, this is notwithstanding that the City approved the sale of land to the developers and approved the rezoning of the affected land and approved the Local Planning Policy for Aged Care which contemplated the proposed development. 3. The proposed development is fundamentally inconsistent with one of the key objectives of the Policy which is "to ensure the appearance and design of residential aged care facilities are of high quality and do not have an undue impact on the residential amenity by way of building bulk and scale, noise, traffic or parking". Key examples of reductions in residential amenity include: a significant increase in noise (and a resultant reduction in local amenity) from traffic movements 24/7 to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users. a significant increase in noise resulting from the operations of air-conditioning and generators. unacceptable light spill from the 24/7 operations. a significant increase in odours resulting from the 24/7 operation of catering, laundry and servicing. A significant increase street parking due to the inadequate number of car bays contained within the proposed development. 2.5m setbacks, which are in contrast to the 9m setbacks for the remainder of the surrounding houses on the affected streets. No management plans have been provided with the development application which demonstrate how these detrimental impacts on local amenity will be mitigated to an acceptable level. It is submitted that these impacts cannot be adequately mitigated given the residential nature of the surrounding streets. No development condition(s) will be validly capable of managing those adverse impacts on amenity. 4. The proposed development does not comply with clause 4.6.2 of the Policy which requires "a minimum of twenty-five per cent (25%) of the site area is to be landscaped". 5. The proposed development is surrounded by low density residential accommodation. The land immediately to its east and west is R10 and the land to its north (including abutting neighbours) is R12.5. The contrast between the existing density and the proposed R80 coding is extreme and is wholly incompatible with the broader local community. The proposal makes no attempt to mitigate the visual impact of its northern and southern walls, which are large and bland, on the adjacent neighbours and streetscape. 6. 26 car bays are grossly inadequate to service the 40-plus employees, catering staff, maintenance staff, deliveries and visitors of the proposed aged care facility. This means that overflow parking will dominate the surrounding streets. Doonan Road and Betty Street already experience significant street parking from Lisle Village and have a bus service reducing parking to one side of each street. The elected councillors have an obligation to act in accordance with the wishes of the Nedlands ratepayers, not the commercial interests of developers. For this reason, and the reasons described above, the development application should be rejected.

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**Respondent No:** 136

**Responded At:** Jul 18, 2020 17:21:51 pm

**Last Seen:** Jul 18, 2020 09:20:42 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Occupier of a property

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

To: The City of Nedlands Subject: OBJECTION to the Proposed Aged Care Facility in Doonan Road and Betty Street Date: 18 July 2020 I hereby object to the proposed Aged Care Facility to be built at 16 and 18 Betty Street and 73 and 75 Doonan Road, Nedlands. My objection is for the following reasons: o The proposal will have an undue impact on the residential amenity of the area surrounding the development, and accordingly it is inconsistent with the City of Nedlands' Residential Aged Care Facilities Local Planning Policy. o The height, bulk and scale of a four-five storey development proposal is incompatible with the locality and surrounding developments and totally unnecessary. o There has been a complete lack of community consultation by the City of Nedlands on this proposal, notwithstanding that it has been facilitating the proposal over the last five years by selling City of Nedlands land to the developers, rezoning that land to accommodate commercial aged care and approving height increases in the Local Planning Policy to 4 storeys without re-advertising. o The community has been misled by the developers over the size of the facility. The only community engagement undertaken by the developers was for a 2-storey development in 2016. No subsequent consultation has occurred to correct the perception that the development would remain a 2-storey development. o The proposal will result in unacceptable increases in noise, traffic, odours, car parking congestion and light pollution. The traffic management plans submitted with the development application are incorrect and grossly underestimate the adverse traffic and parking consequences for the surrounding streets. o The proposal fails to adequately manage or mitigate the impacts it will have on the existing and future residential amenity – there is no explanation of how matters such as noise, odours, light, traffic and parking will be appropriately managed. It is believed that these matters cannot be adequately managed for a development of this size in a residential neighbourhood. o The design of the proposal is imposing and unsympathetic to the existing character of the area. Not only does that have aesthetic implications, the contrast in setbacks affects sight lines, and therefore vehicle and pedestrian safety. o The car parking and traffic assessments do not adequately take into account the realistic vehicle movements the proposal will generate. The proposed 26 car bays are grossly inadequate for the numbers of staff, visitors, tradespeople and deliveries to and from a high care facility operating 24 hours a day, seven days a week. I am also concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy without re-advertising significantly increased the height and plot ratio and allowed for a significant intensification of what could be developed on the site. It is inappropriate that such material changes were made without re-advertising and community consultation, and the incorrectly revised policy should not be used as a basis for assessing the current proposal.

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**Respondent No:** 137

**Responded At:** Jul 18, 2020 20:39:17 pm

**Last Seen:** Jul 18, 2020 12:34:27 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public especially not even the residents. The City might think this is a minor amendment but to me this is major amendment and due process and best practice have not been followed. As it wasn't advertised I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 138

**Responded At:** Jul 18, 2020 20:42:24 pm

**Last Seen:** Jul 23, 2020 04:46:00 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. To the extent the decision maker chooses to rely on significant and unadvertised provisions of the Policy, I further object as follows: 1 The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. 2 The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. 3 The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 4 Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. 5 The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and pedestrian safety. 6 Notwithstanding claims made by the developer, the community does not support this proposal and has not been properly consulted. I urge you not to support this proposal. Proforma additional paragraphs, to be added as relevant to the objector if desired: 7 Policy objectives 7.1 One of the primary objectives of the Policy is – “to ensure the appearance and design of residential aged care facilities are of high quality and do not have an undue impact on the residential amenity by way of building bulk and scale, noise, traffic or parking”. The proposal fundamentally conflicts with this objective given the stark and jarring contrast between the surrounding R10 and R12.5 locality and the proposed four storey R80 development. The number of residents proposed to be accommodated will increase the residential capacity of the site by over 1000%. The consequential visual impacts, noise, traffic and parking that will flow from such an intensification will destroy the residential amenity of the locality. 8 Compatibility with setting (bulk, scale and height) 8.1 The Site is surrounded by low density residential development. The land immediately to its east and west is R10 and the land to its north is R12.5. The contrast between the existing density and the proposed R80 coding will be sharp, and the proposed plot ratio is wholly incompatible with the broader setting. 8.2 The bulk and scale of the proposal is imposing in its context. The proposal makes no attempt to mitigate the visual impact of its northern and southern walls, which are large and bland, on the adjacent neighbours and streetscape. 8.3 The depicted bulk and scale of the Melvista Lodge land (immediately to the South of the Site) in the development application

plans is misleading. There are no such plans proposed or prepared, and the proposal is inconsistent with its setting in that regard. Redevelopment of Melvista Lodge is not likely or imminent given the nature of the landholdings there. 8.4 The proposed street frontage setbacks of 2.5 metres undermine line of sight in the context of the surrounding residential developments which have 9 metre setbacks. This has safety implications for drivers and pedestrians using Doonan Road and Betty Street. The design has complete disregard for its setting. 9 Amenity 9.1 The proposal fails to take into account the existing and future character of the locality. The City has a new local planning scheme, and whilst higher density has been provided for elsewhere, this locality preserved its low density coding. There is a clear intention and understanding that the low density residential nature of the area will be maintained. A high rise intensive aged care development completely undermines that intention. 9.2 The proposal will significantly diminish visual amenity of the area due to its size, scale and design. It is not in keeping with the character or streetscape in the locality. 9.3 The proposal represents a significant intensification in how the site will look and operate. It increases the number of people living on the site by over 1000%. The level of staffing and services required to accommodate 90 high needs aged care residents must not be understated. The cumulative impact of 90 residents, combined with the servicing and operational requirements of the facility and movement of staff, visitors and deliveries, will result in a substantial increase in: 9.3.1 noise from traffic movements, at all hours of the day, to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users; 9.3.2 noise generated from the operations of the proposal, including air-conditioning, services, and an intensive increase of population and people movement; 9.3.3 light spill from 24 hour a day operations; and 9.3.4 odours generated from the operations of the proposal, including catering, laundry and servicing. 9.4 No management plans have been provided to show how the detrimental amenity impacts which will arise from such an intensified use will be mitigated, particularly given its hours of operation. No development condition will be validly capable of managing those impacts. 10 Traffic 10.1 The proposal will result in a significant increase in vehicle movements to and from the site, at all hours of the day. 10.2 The Traffic Impact Statement made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment traffic movements. 10.3 The Transport Impact Statement provides very little detail on the type of vehicle movements and the frequency and timings of those movements. This detail is essential to form a properly considered assessment of traffic movements and their impacts, and the document therefore cannot be relied upon. 11 Car Parking 11.1 The amount of administrative, catering, cleaning, medical, allied health and maintenance staff required to support an intensive 90-bed high care facility will not be supported by 26 bays, particularly given no parking allowances have been made for deliveries, visitors of residents, or the Wellness Centre staff and visitors. 11.2 The surrounding streets are not capable of supporting the street car parking which will necessarily arise due to the lack of sufficient on-site car parking. 12 Community consultation 12.1 The developer relies on consultation it conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different from what is proposed. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed. 12.2 Immediately affected residents have either never been contacted or have only recently been informed about the extent of the proposal. 13 Other 13.1 Clause 4.6.2 of the Policy states – “a minimum of twenty-five per cent (25%) of the site area is to be landscaped”. The proposed development does not comply with this requirement of the Policy. 13.2 The proposal will have a significant carbon footprint, and only just exceeds the minimum standards for environmental sustainability under the National Construction Code. 13.3 The proposal fails to take into account the recommendations of the Review of Innovative Models of Aged Care Research Paper, 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety in terms of its design and density.

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**Respondent No:** 139

**Responded At:** Jul 18, 2020 23:04:37 pm

**Last Seen:** Jul 18, 2020 13:55:57 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object the proposal for the development of 16 & 18 Betty Street and 73 & 75 Doonan Road, Nedlands based on the reasons below: \* The proposal would make Doonan Road a main route directly off Stirling Highway for the development/facility. This would result in increase of traffic on this narrow 2-lane road, increase noise levels throughout the night and day, and creating a higher risk environment for pedestrians and cyclists around this area. \* The proposal will have undue impact on the current amenities surrounding the development area. \* The proposal would increase noise and traffic around the Melvista area. \* The proposal would increase exposure of residential children who utilise Mason Gardens extensively to traffic/activities by contractors/service providers/employees/clients and their visitors. \* The proposal has extensive height and design that is inconsistent with the surrounding residential area. For the safety and the very reason to why we chose to live in the care of City of Nedlands, please do not support this development.

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**Respondent No:** 140

**Responded At:** Jul 19, 2020 11:13:10 am

**Last Seen:** Jul 19, 2020 03:15:11 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Other

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I neither support nor object, however any comments or concerns I have outlined below

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. My objection is made on the following grounds: 1 The proposal is inconsistent with the Residential Aged Care Facilities Local Planning Policy because of the undue impact it will have on the residential amenity of the area. 2 The height, bulk and scale of a four-storey development proposal is incompatible with the locality and surrounding developments. 3 The proposal will result in unacceptable increases in noise, traffic, odours, car parking congestion and light pollution. 4 The proposal fails to adequately manage or mitigate the impacts it will have on the existing and future residential amenity. 5 The design of the proposal is imposing and unsympathetic to the existing character of the area. Not only does that have aesthetic implications, the contrast in setbacks affects sight lines, and therefore vehicle and pedestrian safety. 6 The car parking and traffic assessments do not adequately take into account the realistic vehicle movements the proposal will generate.

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**Respondent No:** 141

**Responded At:** Jul 19, 2020 11:17:00 am

**Last Seen:** Jul 19, 2020 03:11:14 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**  Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I strongly object to the development application being considered for the Residential Aged Care building to be located at 73-75 Doonan Road and 16-18 Betty Street, Nedlands, for the following reasons: 1. It is completely out of character with the surrounding low density R10-R12.5 residential properties. (Appendix 1) a. According to the LPS3 the area stipulated in Appendix 1 marked in 'red' is A9 – one parcel of land, I am not sure how it has happened that a DA has been put forward on 30% of the total lot. b. Its height, scale and bulk are not sympathetic to the residential area. c. It will take up 90% of the usable land area for the building without regard for garden sitting areas. (require 25% for gardens). d. It will sit at an elevation that does not complement the surrounding area e. The bulk of the building will be visible as a 'scar' from the Melvista Avenue - Masons gardens presentation, in what is a 'leafy' suburb. Something that follows the contours of the land would have been more in keeping. f. The building setbacks will affect sight lines for pedestrian and vehicle safety. g. It will also block light to the south for two local residences, that will face a 17-metre wall that will run approximately 30+ metres east to west. h. Aesthetics – The building's facade looks like an institution with foreboding black metal bars and black trim. It does not look like a high-quality build as the marketing would suggest 5 Star. There are no stone trims or interesting architecture. It looks like another 'box'. 2. Technical building aspects to brief have been overlooked and do not break the stereotypes of healthcare design (see Appendix 2 for examples) a. It has no luxury aged care appeal, as it is so deemed needs to appear more 'resort' than hospital. b. It needs to take the 'clinical' feeling out of a hospital design – as the building presented looks like a conventional box with central access on each floor and small resident rooms running on exterior walls. c. There appears to be little use of passive energy noted. d. There are no light filled and nature-oriented spaces for healing, like small gardens and sitting areas, aside from an obligatory band of green on the building boundaries. e. Wellness and socialisation does not mean designating a 'Wellness Centre' which is little more than a room. f. Sensitive design in a low residential area could easily have been achieved through the building design following the natural contour of the land and parcelled with the Lisle Village as set out in LPS3 designated area 9, rather than 'shoe-horned' into four residential blocks. 3. Technical operational considerations are lacking. a. Fire evacuation and testing on site. (This needs to be referred to the DFES.) i. There is little access to roof plant room for fire brigade ii. Limited space to safely evacuate the building of a considerable number of non-ambulant aged care residents. iii. There does not appear to be wide(or multiple) stairways that can reach all levels and would be necessary for safe evacuation of non-ambulant residents. b. Infectious disease control, like Covid-19 and lock downs, will be difficult to manage. c. Elevator operations – There does not appear to be a dedicated lift for removal of the deceased, which would be a common occurrence in such a facility. d. Industrial Kitchen and Laundry in the car park basement. Insufficient consideration has been given to the management of exhausts and fumes, given there will be 480 meals and snacks prepared daily for residents. e. Waste management – I notice Alfred



Carsons (Aged Care, Bay Road, Claremont) has a separate facility across from its building which is accessed by a wide road. The proposed DA will have trucks running East to West through a narrow lane accessing the building through the underground car park, where waste will be held.

f. Noise and light issue in an operation that is 24/7 within a bulky 17m high building.

i. Air conditioning and exhaust systems will not fall below 45db?

ii. Lights will be on all the time around the perimeter, paths and car parks.

g. Staffing has been inadequately estimated.

i. Having recently surveyed Alfred Carsons, their staff numbers sit at 110 -120 for 90 beds. The Royal Commission estimates staffing to cover 3.5-4.2 hours per resident per day. The estimates suggested by Oryx are 15 people per shift, no allowance for Admin. Maintenance, Technical, Utility Services.

ii. There are no adequate staff areas where staff can leave belongings, take meals etc., for the number of staff required to operate this facility.

h. Parking is insufficient for a shift change of 30-40 staff during peak periods, the Wellness Centre and visitors. Alfred Carsons has 54 bays for staff and visitors.

i. Street parking is already provided on Doonan and Betty for the Lisle village due to the lack of parking existing for their 26 dwellings (12 bays available on site only).

ii. Masons gardens car park already shares its 13 bays with the peak drop off/collections for the Early Learning Centre adjacent.

iii. Parking will end up overflowing into streets like Granby, Leopold, Marita, Melvista and Princess as well as on local verges, and Masons Gardens on Kathryn Street.

i. Traffic congestion.

i. It will impede access by locals due to congestion.

ii. Betty Street and Doonan Road run 200m in length between Princess and Melvista.

iii. The TIS says the 6m roads (Betty and Doonan) can adequately handle high volume of cars each day – a Traffic Impact Assessment is required in the consideration of congestion, that has been overlooked.

iv. There is the issue of one side of the road consistently having parked cars on it.

v. Buses go both ways on a regular basis and are often seen waiting at the top or bottom of the streets waiting to access, while traffic is heading toward them.

vi. Local traffic already sits and queues because the road is effectively a one-way street during peak times.

vii. Both Streets have T junctions at Princess and Melvista, which in peak times will lead to the backing up of cars waiting to enter the intersections (approximately 200m of road). Peak queues will send traffic from Betty through Granby as a 'Rat Run'.

4. The Process of block sales, rezoning without due consultation.

a. It is a commercial for-profit enterprise (in the middle of suburbia) adjacent to a not for profit retirement and aged care village. It would be more in keeping in West Perth with The Richardson.

b. The sale of the four R10-R12.5 blocks were conducted without full disclosure to residents, given the intent of the Council to rezone them aged care.

c. The blocks should have been parcelled with Lisle village and any development considered wholistically with a strategic plan for aged care.

d. There should have been a consultation process with residents about this new proposed development.

i. It has no resemblance to what was agreed in principle with residents in mid-2016. This proposal has come as a 'fait accompli' because of the Council's complete lack of pro-activity around aged care in Nedlands.

ii. The LPP does not reflect the majority of aged care facilities in and around Perth metropolitan area (of the 20 I reviewed, 17 were between 1-2 levels) only the new Regis building that was opened on Monash Avenue, the proposed Queenslea (by Oryx) in Claremont, The Richardson (by Oryx) in West Perth are between 4 and 9 levels.

iii. The LPP fails to take into consideration the impact of the Royal Commission findings, available in January 2020 that discusses 'small scale domestic models of aged care'.

5. There are no buffer R zones between it and the residential properties as there are at other aged care facilities, where height is or will be an issue

a. Lisle Claremont (designated aged care) follows the contour of the land and sits between 1-2 levels currently with buffer R ratings R20-40 around it.

b. Regent Park, Mt Claremont Village (designated aged care) existing sits at 1-2 levels currently with buffer R ratings surrounding it.

c. Regis Weston aged care sits on a 17200sq.m site with 'aging in place' fronting Monash avenue, Nedlands a major hospital zone, sits with buffer R ratings surrounding it.

d. Aegis Montgomery House, Mt Claremont sits on a 16,700 sq.m lot buffered by land. It is 3-4 levels, a refurbished existing building. Its elevation does not impede local resident's access and views and complements the surrounding homes. (most of which R20).

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**Respondent No:** 142

**Responded At:** Jul 19, 2020 11:37:39 am

**Last Seen:** Jul 10, 2020 00:23:54 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Increase in noise and traffic - both are narrow streets Lack of sufficient onsite parking Bulk and size compared to surrounding property

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**Respondent No:** 143

**Responded At:** Jul 19, 2020 13:02:03 pm

**Last Seen:** Jul 19, 2020 04:50:51 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 144

**Responded At:** Jul 19, 2020 14:06:39 pm

**Last Seen:** Jul 19, 2020 05:59:42 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am disappointed to hear of the proposed development and the extent of this due to the nature of the narrow local streets, the height of the development and the negative impact this will have on the community. This is a very quiet residential area and the adverse impact this development would have including a dramatic increase in street traffic along with the emergency ambulance traffic that is associated with aged care. The visual impact would also be detrimental to the community along with the associated noise impacts. This appears to be a rushed proposal which does not adhere to current transparency of tender protocols.

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**Respondent No:** 145

**Responded At:** Jul 19, 2020 14:32:51 pm

**Last Seen:** Jul 19, 2020 04:43:37 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object for the following reasons. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. The setbacks are not consistent with those required by local residents. There is a lack of open space around the building, and little allowance for replacing established trees. This is a commercial building set in a residential area. The "artist's impression" that has appeared in local papers is deceptive as it shows only 3 levels, and the building lacks the homelike setting that would be enjoyed by elderly patients. Car parking and increased traffic have not been considered adequately and the proposal for only 26 bays on site is a gross under-estimate of the parking required. This would be enough only for the nursing staff required for a 90 bed hospital, taking into consideration the half-hour change-over at the end of each shift. More parking would be required for the administrative staff, physiotherapists, kitchen staff, cleaners, maintenance staff, cafeteria staff and the hairdresser. Dedicated parking would be required for visiting doctors, ambulances, a mortuary vehicle and a pharmacist. As the hospital is privately run, the Pharmaceutical Benefit Scheme would be used for the patients' medications which therefore requires the involvement of a pharmacist. These people, as well as visitors, will have no option but to park on surrounding streets. Public transport is poor so not an option. With parking along the narrow, local streets it will be difficult for delivery trucks to gain access to the hospital. The removal of waste will be difficult. In the case of an emergency, ie. fire, it will be almost impossible for fire units to have easy access to the building, and the lack of open space makes no allowance for the safe evacuation of a large number of patients, many of whom would be non-ambulant. Street parking and extra traffic movement will also make it difficult and dangerous for local residents backing out of their own driveways. A smaller 2-level facility, as proposed in 2016, would be more relevant, would fit in with the residential area, and would be embraced by the community. The City of Nedlands would then have an Aged Care Hospital to be proud of. The developers should redesign the building to reflect the recommendations of the Royal Commission, keeping in mind the effects of the Covid-19 pandemic on the elderly population, and give us a state-of-the-art facility.

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**Respondent No:** 146

**Responded At:** Jul 19, 2020 14:58:44 pm

**Last Seen:** Jul 25, 2020 02:26:56 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I was very disappointed to learn about this hospital building going up near Masons Gardens. I am not against aged care but unhappy that a building such as this is being proposed in the middle of a low residential area. I am therefore writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). These are the concerns that i have as they relate to the proposal: 1 The amenity of a normally quiet narrow street will be impacted. 2 I don't believe that the Developer has considered sufficiently the enormous increase in noise, traffic and odour that will result from a building of this size, that supports 90 aged care beds. 3 From what i can see there is not enough on-site car parking, and there will be a lot of staff needed for the different shifts as well as visitors. Other aged care places seem to have a lot more parking bays allocated. There is no space in the street or across at Masons Gardens to accommodate the overflow that will occur. 4 It is hard to believe that the Developer is suggesting such an intensive height for the building when all around buildings are 10metres, similarly the bulk and scale as compared to the low density residential is quite extraordinary. I think that the Developer has overreached on the plot ratio and that it seems to be more like double the recommended. 5 There will be a lot of congestion in the street which will mean a significant reduction in vehicle and pedestrian safety. This is further compounded by huge differences in setbacks between existing developments and the proposed. 6 In reading the proposal there seems to be little in the way of management plans or mitigation strategies. 7 From what i have seen there is very poor consultation on this and other projects. and whilst I understand the need for infill it does not seem right to have a 17metre plus building hard up against low residential buildings. 8. Where are the lawns and sitting areas for the old people?

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**Respondent No:** 147

**Responded At:** Jul 19, 2020 15:52:37 pm

**Last Seen:** Jul 19, 2020 06:38:32 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property

Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**

I object to the proposal

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**Q8. Submission : Please give your comments relating to this item in full below.**

\*Both Doonan rd and Betty st are two narrow roads in NEDLANDS with parking on one side only. \*They are both on the number 25 bus route \*There are ALWAYS cars parked in the street belonging to home owners, Melvista Lodge residents, visitors to both the above and including tradesmen, lawn mowing contractors and delivery vehicles eg: Coles online and Australia Post. \* both streets are used by attendees at "Concerts in the Park" \* Doonan Rd is frequently used as an access road for trucks at the numerous houses north of Princess Rd currently undergoing construction or renovation. IT CAN BE A VERY BUSY STREET particularly when bus meets truck meets parked car. \* The car park opposite the Early Learning Centre is used for Centre staff, dog walkers and those who wish to enjoy the quiet ambience of the bush land. I fail to understand how the streets of Doonan and Betty will cope when a development of the size that is proposed, has only 26 car bays with a staff of around 30, (doubled at "handover") clients accessing the the Wellness Centre and visitors to the patients. Clearly, this issue has NOT BEEN PROPERLY ADDRESSED. Recently, a Q&A brochure from the developers was delivered to our letter box. \* The brochure states that "approximately 25 staff would be onsite at one time with Wellness staff included." This does not equate with what is required to manage a facility of this size. (Nursing, Food Service, Facilities and Admin, Laundry, Cleaning and Cafe) Many of these staff will ultimately need MORE STREET PARKING. \* The brochure states that "staff don't always drive and take public transport." The bus service to the site is one per hour from 9.00am until 4.00pm. this is unlikely to coincide with start and finishing times so again MORE STREET PARKING" \* The brochure states that "additional traffic is estimated to be 175 whole trips per day" This is an excessive number for a narrow suburban street not designed for multiple car and delivery vehicles, again MORE STREET PARKING. \* The brochure states that "The 25 bus route services the existing homes at the site." This bus is rarely used by the existing elderly residents as they are able to take advantage of the Nedlands Home Support Service which doesn't involve a large transit bus and caters for individual needs. \* The brochure poses the question "Is the car parking sufficient for patient ratios, admin services and the homes staffing numbers?" The developers answer is just a "Yes" With 25 bays available and taking into account the facts just listed, the answer is clearly "NO". Consequently there will be MORE STREET PARKING. \* The brochure poses the question "Where will visitors park?" The developers answer is basement parking i.e. in the 26 bays that are allocated. These bays will already be filled by staff, so again MORE STREET PARKING. \* The brochure states that The Old Melvista Home "had 2 bays for a home of up to 30 residents". The current proposal includes a "substantially higher ratio of onsite car bays." Stating a higher ratio doesn't mean that the allowed spaces are adequate. It still means MORE STREET PARKING. \* The brochure states that "the proposed development will generate approximately 175 vehicular trips per day equating to less than 1per minute." If correct, and there may even be more, this is an unacceptable number in a narrow suburban street with many parked cars belonging to the street residents and their visitors, allied health professionals and visitors to the development. Again, the issue of inadequate parking bays for a development of this size has NOT BEEN ADDRESSED. I urge you not to support this proposal.

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**Respondent No:** 148

**Responded At:** Jul 19, 2020 16:16:48 pm

**Last Seen:** Jul 19, 2020 08:11:55 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I have the following concerns relating to the proposal: 1 The impact on amenity. 2 The increase in noise, traffic and odour. 3 The lack of on-site car parking. 4 The intensive height, bulk and scale as compared to the low density residential surround. 5 The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing developments and the proposed. 6 The lack of management plans or mitigation strategies. 7 The lack of proper community consultation.

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**Respondent No:** 149

**Responded At:** Jul 19, 2020 16:27:53 pm

**Last Seen:** Jul 19, 2020 08:22:57 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). I have the following concerns relating to the proposal: 1 The impact on amenity. It will be impossible for me to park or even walk my grandmother down to Mason Gardens 2 The increase in noise, traffic and odour. 3 The lack of on-site car parking. 4 The intensive height, bulk and scale as compared to the low density residential surround. 5 The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing developments and the proposed. How do I even reverse out of my driveway I will now have a total blind spot unable to see any traffic 6 The lack of management plans or mitigation strategies. 7 The lack of proper community consultation by either the developer and the City of Nedlands

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**Respondent No:** 150

**Responded At:** Jul 19, 2020 16:36:37 pm

**Last Seen:** Jul 19, 2020 08:33:02 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**  Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. I cannot imagine anyone thinking this design is appropriate! 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal it is inappropriate

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**Respondent No:** 151

**Responded At:** Jul 19, 2020 18:00:19 pm

**Last Seen:** Jul 19, 2020 09:53:03 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I think that the height of the proposed building should be reduced by one storey. As it is, there will be no privacy at all for those Melvista Village residents who have windows facing north.

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**Respondent No:** 152

**Responded At:** Jul 19, 2020 18:34:27 pm

**Last Seen:** Jul 25, 2020 02:41:59 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. I am very concerned that the proposed development is not of an appropriate scale to either protect or enhance the existing and future amenity and character of this lovely local, low density residential neighbourhood. I object because: 1. I believe that the LPP is not the right instrument to be used to assess this site and it concerns me that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. It seems that there have been changes made to the draft Policy to increase the height and plot ratio such that a commercial building is being proposed for development on the site. 2. It is my belief that the proposal is more than the advertised provisions of the Policy with respect to height and plot ratio. My first view of documents tells me that the development is worse than those prescribed. 3. When I look at the residential properties that sit directly next to and across from the proposed building, I find that the height, bulk, and scale of the proposal does not seem to be very compatible. Everything sits below 10metres and this building looks to be double the height. 4. Aged care is important, and this is a nice location, but the proposed building does not seem consistent with the character of the locality. I fear that it will have an unacceptable detrimental impact on amenity. 5. I am unsure how traffic will be managed when combined with car parking issues that both seem to be understated in the proposal. I think that traffic flow and noise associated with backing trucks and other vehicles will end up having an unacceptable impact on local amenity. 6. I think people and children using footpaths will be impeded and safety will become an issue because of the impact of sight lines due to smaller setbacks when compared with other residences. This is a safety risk. 7. I can't see anywhere for the aged to enjoy a small courtyard or garden. It seems like the building takes up the entire four blocks. I hope the big gum trees on Doonan will not be removed.

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**Respondent No:** 153

**Responded At:** Jul 19, 2020 20:14:35 pm

**Last Seen:** Jul 19, 2020 07:32:48 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**      the whole street

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. 1. Being in the 70+age group with a deep knowledge of nursing homes, due to family and friends residing in them. I was horrified to read of a project being passed through council prior to a report being tabled from The Aged Care Commission inquiry. This will surely show that what is being planned is inadequate for the welfare of the intended residents. 2. A quick overview shows the intended room size and lack of window size is inadequate for a healthy mental environment for a resident, the plot ratio is far too small for a harmonious development of this size. The big brick compound, with No outside gardens, No balconies to enjoy socialization. 3. I was also horrified to see that the use of the food lift was the only provision that has been made for deceased residents to leave. Let me assure you families will not agree to their loved one being bundled into a food service lift. I insisted my mother leave the same way she came in and that was by the front door with dignity in place for her and for all of us saying goodbye 4. I'm also amazed at the lack of carparking being provided, where are the many visiting relatives who may be aged and in need of safe access in and out of the facility to safely park. Plus the day and night Staff overlapping handover going to Park, Plus the extra services for physio, café, hairdresser daily parking. 5. I am a regular visitor to Doonan Rd, and find it one of the most hazardous streets, parked cars, and a bus route make it impossible to feel safe driving down that street and to find parking is almost impossible without a Nursing Home facility making the street worse than it already is. 6. If the facility was built in and around the Stirling highway it would make for a much easier access for the taxis service for residents & their appointments.

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**Respondent No:** 154

**Responded At:** Jul 19, 2020 21:31:30 pm

**Last Seen:** Jul 19, 2020 13:29:14 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. My objection is made on the following grounds: 1 The proposal is inconsistent with the Residential Aged Care Facilities Local Planning Policy because of the undue impact it will have on the residential amenity of the area. 2 The height, bulk and scale of a four-storey development proposal is incompatible with the locality and surrounding developments. 3 The proposal will result in unacceptable increases in noise, traffic, odours, car parking congestion and light pollution. 4 The proposal fails to adequately manage or mitigate the impacts it will have on the existing and future residential amenity. 5 The design of the proposal is imposing and unsympathetic to the existing character of the area. Not only does that have aesthetic implications, the contrast in setbacks affects sight lines, and therefore vehicle and pedestrian safety. 6 The car parking and traffic assessments do not adequately take into account the realistic vehicle movements the proposal will generate.

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**Respondent No:** 155

**Responded At:** Jul 20, 2020 07:24:32 am

**Last Seen:** Jul 19, 2020 23:20:46 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I neither support nor object, however any comments or concerns I have outlined below

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Q8. **Submission : Please give your comments relating to this item in full below.**

I'm a Nedlands resident. I'm concerned for the amenity of the street, this street already has a big, ugly, and poorly maintained aged care facility on it. Linen, food service and waste delivery and collection from the business operated here, 24/7 is likely to affect the residents of both streets. 26 parking bays for over 90 aged care units seems a low amount of parking and will result in street overflow. There are a number of young children resident on these streets whos safety may be compromised with big trucks moving in and out of the facility.

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**Respondent No:** 156

**Responded At:** Jul 20, 2020 08:17:19 am

**Last Seen:** Jul 20, 2020 00:09:43 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am so disappointed in the lack of consultation with the community about these proposed changes. At the very least, no changes should be accepted that have not gone through community consultation. As a Shenton Park resident, I have seen the attempted erosion of beautiful leafy suburbs. It is very unfair to residents who have paid significant money for houses that are now going to be significantly devalued. People buy in the area with the expectation that anything built on the street will be in harmony with the surroundings and this does not appear to be the case. I would be furious if similar were attempted on my street, putting my kids at risk in terms of traffic and spoiling the ambience of the whole street. Traffic and parking issues also don't seem to have been thought about and will no doubt contribute to a less placid way of life and safety issues with small children in the area who are used to roaming free. I believe significantly more community consultation needs to be undertaken prior to anything being signed off upon.

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**Respondent No:** 157

**Responded At:** Jul 20, 2020 08:33:00 am

**Last Seen:** Jul 20, 2020 00:26:29 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	On behalf of an organisation

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I support the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

We believe there is a need for a local aged care facility. We have seen the design plans including shadowing on our village and parking. We are aware of how Oryx will manage traffic.

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**Respondent No:** 158

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**Responded At:** Jul 20, 2020 09:19:48 am

**Last Seen:** Jul 20, 2020 01:16:10 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

With several of our neighbours expressing concern over the proposed development at Melvista Lodge in Nedlands, my wife and I thought it worthwhile attending the community meeting held at the local Bowls Club on July 6th so that we could learn more of what was obviously becoming a very contentious issue (one of several that is currently a cause of concern in our established neighbourhood – and I include Claremont and Dalkeith in that brief statement). In our ignorance we had assumed that the proposed development was just that ..... a development of the current Melvista Lodge that appears to be in desperate need of renovation and modernisation. We listened to a very informative presentation by Matt McNeilly (a concerned neighbour of the proposed development) who had taken some considerable time and effort in unravelling the process in which Oryx Communities, the developer, had acquired land and residential property through stealth. Whilst accepting that there is nothing unethical in this practice, the sizeable Aged Care Hospital facility that has subsequently been proposed for the combined sites that Oryx had acquired is totally out of proportion for the locale... and that the proposed Aged Care Hospital doesn't even include Melvista Lodge ! Matt's due diligence in unravelling what the proposed Aged Care Hospital would entail and how it would impact on the immediate neighbourhood was alarming. Aside from the sheer size of the imposing development, it is obvious that planning for this facility is flawed in many rudimentary aspects. Not least is the insufficient parking for staff, residents and visitors (totally inadequate), the imposing size of the proposed building that ignores council regulation policy on both setback and elevation, physically servicing a 90 bed facility on a 24:7 basis (and all the necessary functions that this would entail). Oryx's proposed Aged Care Hospital Facility is clearly not suitable for quiet residential streets as it appears to be on an industrial scale. It is clearly not a Retirement Village (something that would be welcomed and compatible with Melvista Lodge that is already in existence) but a Nursing Home that would be better located in the Hollywood Hospital precinct where appropriate and complimentary services are to be found. Should the proposed Aged Care Nursing Hospital/Home be allowed to proceed then by necessity Masons Gardens would inevitably be sacrificed for parking and it would surely devalue the neighbourhood as a whole. My wife and I have worked tirelessly to aspire and to be able to live in a neighbourhood that we can enjoy. I feel the only people that will benefit from such a proposed development would be the local Real Estate Agents as many will choose to leave the neighbourhood when traffic volume in narrow streets becomes unbearable

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**Respondent No:** 159

**Responded At:** Jul 20, 2020 09:22:36 am

**Last Seen:** Jul 20, 2020 01:06:59 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

My husband has submitted an objection on our joint objection.

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**Respondent No:** 160

**Responded At:** Jul 20, 2020 10:02:25 am

**Last Seen:** Jul 16, 2020 12:11:10 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am horrified that two suburban streets can be impacted by a commercial 5 storey building jammed on to a small area and next door to homes built by people who never expected commercial developments of this scale next door. Once this starts in a residential area there will be no stopping future developments of a commercial nature. There seems to be no thought in the planning of traffic eg. public visitation, commercial vehicles and staff. I would have no objection to Melvista Lodge being improved and also no objection to a two storey building with more parking facilities.

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**Respondent No:** 161

**Responded At:** Jul 20, 2020 10:24:36 am

**Last Seen:** Jul 20, 2020 02:13:51 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**  Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am extremely concerned at the lack of transparency by The Nedlands Council in the handling of this new development. Selling the land to developer Oryx off market is only part of the subterfuge and downright deceptive conduct. Rezoning and changing useage of a residential block is simply unacceptable. My wife and I as lifetime residents of Nedlands (current home 32 years) have NO appetite for all the associated logistics of this development.

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**Respondent No:** 162

**Responded At:** Jul 20, 2020 11:19:29 am

**Last Seen:** Jul 20, 2020 03:17:39 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). I have the following concerns relating to the proposal: 1 The impact on amenity. 2 The increase in noise, traffic and odour. 3 The lack of on-site car parking. 4 The intensive height, bulk and scale as compared to the low density residential surround. 5 The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing developments and the proposed. 6 The lack of management plans or mitigation strategies. 7 The lack of proper community consultation.

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**Respondent No:** 163

**Responded At:** Jul 20, 2020 11:24:56 am

**Last Seen:** Jul 20, 2020 03:04:40 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. I'm annoyed that the developer can seek approval for large four storey commercial development in a low density residential area without public advertising and notice. I also object for the following reasons: 1. The size of the proposed development is inconsistent and incompatible with the locality. It is inappropriate for a residential coding of R80 right adjacent to R10 and R12.5 zoned properties. 2. This is a commercial facility with 24/7 operation, which also allows for non-resident patients to be treated in such facility. This will bring excessive noise, light, congestive street parking and traffic to the neighbourhood. 3. The proposal diminishes the visual appeal of the locality and does not have a minimum of 25% of site area being landscaped as per LPP. 4. The land was also sold as R10/R12.5 to the developer by private treaty then suspiciously redesignated as 'special use'. This does not sound like ethical conduct. I do not support this proposal and urge you not to support it either.

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**Respondent No:** 164

**Responded At:** Jul 20, 2020 11:26:46 am

**Last Seen:** Jul 20, 2020 03:25:47 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. I'm annoyed that the developer can seek approval for large four storey commercial development in a low density residential area without public advertising and notice. I also object for the following reasons: 1. The size of the proposed development is inconsistent and incompatible with the locality. It is inappropriate for a residential coding of R80 right adjacent to R10 and R12.5 zoned properties. 2. This is a commercial facility with 24/7 operation, which also allows for non-resident patients to be treated in such facility. This will bring excessive noise, light, congestive street parking and traffic to the neighbourhood. 3. The proposal diminishes the visual appeal of the locality and does not have a minimum of 25% of site area being landscaped as per LPP. 4. The land was also sold as R10/R12.5 to the developer by private treaty then suspiciously redesignated as 'special use'. This does not sound like ethical conduct. I do not support this proposal and urge you not to support it either.

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**Respondent No:** 165

**Responded At:** Jul 20, 2020 12:04:14 pm

**Last Seen:** Jul 20, 2020 04:00:41 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. To the extent the decision maker chooses to rely on significant and unadvertised provisions of the Policy, I further object as follows: 1 The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. 2 The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. 3 The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 4 Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. 5 The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sight lines, and consequently threaten vehicle and pedestrian safety. 6 Notwithstanding claims made by the developer, the community does not support this proposal and has not been properly consulted. I urge you not to support this proposal.

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**Respondent No:** 166

**Responded At:** Jul 20, 2020 12:09:39 pm

**Last Seen:** Jul 27, 2020 03:00:32 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property
Occupier of a property

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

SUBMISSION TO CITY OF NEDLANDS COUNCIL OBJECTIONS TO PROPOSED DEVELOPMENT OF Four (4) storey development with basement car parking AT 16 & 18 Betty Street and 73 & 75 Doonan Road, Nedlands WA 6009- Residential Aged Care Facility 1. A development proposal of such an inappropriate scale and bulk (4 storeys high plus a basement carpark) in an otherwise single or two-storey built environment should not be permitted in this residential area of Nedlands. To push such a huge development into well established peaceful suburban streets would be preposterous, totally out of scale with existing dwellings and would impact hugely upon existing residents. 2. In conceiving such a development it would appear that very little consideration has been given to the impact on existing residents in the area. For example: • Loss of amenity (open visual space, peacefulness) • Noise from extra traffic from all of the nurses, physiotherapists, occupational therapist, doctors, aged care helpers bringing many more vehicles into the area. Also the service vehicles and waste management vehicles will increase ambient noise levels and ruin the peace and amenity for surrounding residents. • Overlooking of residents' properties will occur in Betty St, Doonan Rd and surrounding streets leading to loss of privacy. • Proposed 26 basement parking spots are insufficient and will lead to visitors parking in surrounding streets and at Masons Gardens. • A considerable increase in road traffic/noise particularly along streets leading from the Stirling Highway including Vincent Street and Louise Street. 3. Overshadowing of nearby properties, visual impact of such a large development will be seen from Masons Gardens and will be clearly visible from many properties in the vicinity replacing what was formerly a view of trees and skyline. 4. An increase in ambient noise due to air-conditioning units, car movements and general activity from occupants, health professionals and visitors. 5. Most drivers will use Dalkeith Road traffic lights to turn onto Stirling Highway. Dalkeith Road junction with Stirling Highway is already congested at peak times with a long queue of cars along Dalkeith Rd. 6. The proposed scale and bulk of the building is dramatically out of character with the surrounding streetscape and open space of Masons Gardens and would result in a permanent change to the existing residential character and amenity of the area.

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**Respondent No:** 167

**Responded At:** Jul 20, 2020 12:32:32 pm

**Last Seen:** Jul 20, 2020 03:42:01 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property
Occupier of a property

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

As a long time ratepayer, and having served [REDACTED], I have always supported "Ageing in Place" and looking after the welfare of our ageing population. I was very pleased with the initial proposal for a 2 storey development. However, I think the current proposal for a 4-5 storey development is wrong. My reasons are as follows: 1. The proposal is for "Residential Aged Care", NOT a "Hospice". Yet there has been set aside large areas for "dementia patients", who need a more specialised service. Doing away with these wards, space would be freed up for the 90 aged care beds, and the proposed height easily lowered to 3 storeys. 2. The proposal includes many in-house "services" eg hair salon, physio, cafe etc ... all of which can be found in the immediate vicinity, Trips to these services would encourage residents to walk, venture outdoors, meet more people, and keep in touch with the rest of the outside community. As a Councillor, I had many conversations with elderly residents which highlighted their loneliness and separation from people. The in-house services are a money generating exercise, glossed over by an excuse that they are being provided for the ease and convenience of residents. 3. I agree with points of concern by affected residents regarding increased traffic, insufficient parking, noise from service vehicles ... all of which have not been adequately considered. 4. This area has always been a beautiful and quiet residential part of Nedlands; and there is no conceivable reason why the R-Code in an R10-R12.5 precinct should have been changed. Why was this done? 5. Several low-profile regulatory changes made the 90-bed proposal a possibility. What does Council deem "low profile regulatory changes", and how does it justify the impact on residential amenity of the area? How can Council's view on this important matter differ so widely from that of the people it claims to understand, represent and protect? 6. The start to this fiasco happened when a block of land belonging to Council was sold quietly to parties whose intentions must have been understood by anyone with common sense. Why was the zoning for this particular block subsequently changed? 7. Why was Council NOT more pro-active in engaging with the Community during this initial process, and in all processes leading up to this present situation, when it was (and is) obviously a highly contentious issue. It would seem that Due Diligence and Duty of Care have not been carried out by Administrators and Elected Members of this City. 8. This City has failed its ratepayers very badly in its inability to retain control over residential density in Nedlands, and this proposal, and events leading up to it give more cause for deeper distrust and doubt. The viability of any commercial enterprise should never be of any concern to Council. Your Duty is to your ratepayers. You need to act accordingly.

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**Respondent No:** 168

**Responded At:** Jul 20, 2020 13:49:41 pm

**Last Seen:** Jul 20, 2020 05:42:47 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Occupier of a property

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. My objection is made on the following grounds: 1 The proposal is inconsistent with the Residential Aged Care Facilities Local Planning Policy because of the undue impact it will have on the residential amenity of the area. 2 The height, bulk and scale of a four-storey development proposal is incompatible with the locality and surrounding developments. 3 The proposal will result in unacceptable increases in noise, traffic, odours, car parking congestion and light pollution. 4 The proposal fails to adequately manage or mitigate the impacts it will have on the existing and future residential amenity. 5 The design of the proposal is imposing and unsympathetic to the existing character of the area. Not only does that have aesthetic implications, the contrast in setbacks affects sight lines, and therefore vehicle and pedestrian safety. 6 The car parking and traffic assessments do not adequately take into account the realistic vehicle movements the proposal will generate.

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**Respondent No:** 169

**Responded At:** Jul 20, 2020 14:07:32 pm

**Last Seen:** Jul 20, 2020 05:36:27 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)** Other

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Q6. **Address of the property affected (if applicable)** n/a

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

16 & 18 Betty Street and 73 & 75 Doonan Road - Submission Form Being aware and looking around at what options maybe available to us as options for our own aged care, we have become increasing alarmed at the lack of design considerations focusing on the well being of the resident. We have reviewed many options, and high rise is not one option that we would consider for our next home, remember this is to be our home, which we are buying into. There are many variables that do not seem to meet what will hopefully become into law, after the Royal Commission into Aged Care Act is formalised. So why would you consider passing what will surely be an incomplete inadequate aged care facility. There are huge vacancies in most Nursing homes at present, and one surely would be asking why is that. These homes are not fulfilling the requirements of residents and or their families. For this proposal in Nedlands I feel it is wrongly positioned in the area, one too small a block of land with inadequate parking for staff and visitors. Picking up points from flyers, I whole heartily agree with the following points. The proposal fails to take into account the recommendations of the Review of Innovative Models Of Aged Care Research Paper, 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety in terms of its design and density. The Traffic Impact Statement made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment traffic movements. 1 Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. 1.1 The amount of administrative, catering, cleaning, medical, allied health and maintenance staff required to support an intensive 90-bed high care facility will not be supported by 26 bays, particularly given no parking allowances have been made for deliveries, visitors of residents, or the Wellness Centre staff and visitors. 2 The car parking and traffic assessments do not adequately take into account the realistic vehicle movements the proposal will generate. Gardens and the ability to walk outside in fresh air areas, are so important for the mental well being of residents and family. Clause 4.6.2 of the Policy states – “a minimum of twenty-five per cent (25%) of the site area is to be landscaped”. The proposed development does not comply with this requirement of the Policy. 2.1 The proposal fails to take into account the recommendations of the Review of Innovative Models of Aged Care Research Paper, 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety in terms of its design and density. Please consider deeply the inside and outside of these premises, the incline of the street and the increase of traffic does not allow for aged persons to walk safely in or out of the facility. Please do not allow this facility until more design discussion has taken place and the Royal Commission Guidlines become public. We remain in your hands to support us, who have contributed to the society you now live in.

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**Respondent No:** 170

**Responded At:** Jul 20, 2020 14:08:43 pm

**Last Seen:** Jul 20, 2020 06:06:28 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sight lines due to vastly different setbacks between the existing area and the proposal. 5 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 171

**Responded At:** Jul 20, 2020 14:24:14 pm

**Last Seen:** Jul 20, 2020 06:21:17 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 172

**Responded At:** Jul 20, 2020 14:50:19 pm

**Last Seen:** Jul 20, 2020 06:43:23 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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**Q8. Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. 6 The proposal will result in a significant increase in vehicle movements to and from the site, at all hours of the day. 7 The Traffic Impact Statement made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment traffic movements. 8 The Transport Impact Statement provides very little detail on the type of vehicle movements and the frequency and timings of those movements. This detail is essential to form a properly considered assessment of traffic movements and their impacts, and the document therefore cannot be relied upon. 9 The amount of administrative, catering, cleaning, medical, allied health and maintenance staff required to support an intensive 90-bed high care facility will not be supported by 26 bays, particularly given no parking allowances have been made for deliveries, visitors of residents, or the Wellness Centre staff and visitors. 10 The surrounding streets are not capable of supporting the street car parking which will necessarily arise due to the lack of sufficient on-site car parking. 11 The developer relies on consultation it conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different from what is proposed. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed. 12 Immediately affected residents have either never been contacted or have only recently been informed about the extent of the proposal. 13 Clause 4.6.2 of the Policy states – "a minimum of twenty-five per cent (25%) of the site area is to be landscaped". The proposed development does not comply with this requirement of the Policy. 14 The proposal will have a significant carbon footprint, and only just exceeds the minimum standards for environmental sustainability under the National Construction Code. 15 The proposal fails to take into account the recommendations of the Review of Innovative Models of Aged Care Research Paper, 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety in terms of its design and density.

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**Respondent No:** 173

**Responded At:** Jul 20, 2020 15:57:06 pm

**Last Seen:** Jul 20, 2020 06:59:32 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property
Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development differs markedly from the one presented to residents in 2016 which was for a 2-storey development encompassing refurbishment of the existing Melvista Lodge nursing home. Despite statements to the contrary the developer has undertaken zero community consultation on the 4/5 storey development now proposed. The development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. With respect to the LPP I urge Council to rescind it or rescind its application with respect to Betty / Doonan Road. In my view the LPP is flawed in terms of seeking to impose R80 density adjacent to R10 and R12.5 residential lots. I have heard that the LPP is the only thing curtailing what can be done on the Betty-Doonan-Melvista site (A9 in the LPS 3). However, this is clearly due to an oversight in the drafting of the LPS 3, which urgently requires a scheme amendment to close this loophole. Looking at other special use zones which allow residential aged care facility for a comparison: 1. A3 (near Hollywood Hospital) has a specified limit of 6 storeys, and 3 storeys where development has a residential interface. Adjacent residential codes, all separated from this site by streets, are R-AC3, R60, R40 and R20. 2. A4 (Heritage Lane) is specifically zoned R50. It is adjacent to R50, R30 and R12.5 residential blocks. 3. A5 (Lemnos St) is not in a residential zone at all. 4. A7 (Lisle St) is zoned partly R25 and partly R40. It is adjacent to R20 residential blocks. 5. A8 (Mooro Dr) is zoned R30, with R12.5 across a street. By contrast, A9, the site in question, is not zoned and has no specific conditions in the LPS 3. However, the effect of the LPP is to effectively assign permission for R80 zoning. This is higher than any of the other zoned residential aged care facilities with specific zonings, and effectively gives the highest permission (4 storeys) of any aged care facility adjacent to residential land. This, despite the fact that it is immediately adjacent to R12.5 zoned blocks and across the street from R10 zoned blocks. The only conclusion I can come to is that this is a mistake. I am not seeking to apportion blame to Councillors for the situation we now find ourselves in as residents in this area. But I do want Councillors to fix this, as the Mayor has promised. The best way to do this is to revoke the LPP and amend the scheme to give some due protection to the A9 site. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. To the extent the decision maker chooses to rely on the flawed, inappropriate and significant unadvertised provisions of the Policy, I further object as follows: 1 The proposal entirely contradicts the objectives of the Policy relating to

the mitigation of impact on residential amenity. 2 The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. 3 The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 4 The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and pedestrian safety. 5 The depicted bulk and scale of the Melvista Lodge land (immediately to the South of the Site) in the development application plans is misleading. There are no such plans proposed or prepared, and the proposal is inconsistent with its setting in that regard. Redevelopment of Melvista Lodge is not likely or imminent given the nature of the landholdings there. 6 The proposal fails to take into account the existing and future character of the locality. The City has a new local planning scheme, and whilst higher density has been provided for elsewhere, this locality preserved its low density coding. There is a clear intention and understanding that the low density residential nature of the area will be maintained. A high rise intensive aged care development completely undermines that intention. 7 The proposal will significantly diminish visual amenity of the area due to its size, scale and design. It is not in keeping with the character or streetscape in the locality. 8 The proposal represents a significant intensification in how the site will look and operate. The level of staffing and services required to accommodate 90 high needs aged care residents must not be understated. The cumulative impact of 90 residents, combined with the servicing and operational requirements of the facility and movement of staff, visitors and deliveries, will result in a substantial increase in: 8.1 noise from traffic movements, at all hours of the day, to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users; 8.2 noise generated from the operations of the proposal, including air-conditioning, services, and an intensive increase of population and people movement; 8.3 light spill from 24 hour a day operations; and 8.4 odours generated from the operations of the proposal, including catering, laundry and servicing. 8.5 No management plans have been provided to show how the detrimental amenity impacts which will arise from such an intensified use will be mitigated, particularly given its hours of operation. No development condition will be validly capable of managing those impacts. 9 Traffic 9.1 The proposal will result in a significant increase in vehicle movements to and from the site, at all hours of the day. 9.2 The Traffic Impact Statement made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment traffic movements. 9.3 The Transport Impact Statement provides very little detail on the type of vehicle movements and the frequency and timings of those movements. This detail is essential to form a properly considered assessment of traffic movements and their impacts, and the document therefore cannot be relied upon. 10 Car Parking 10.1 The amount of administrative, catering, cleaning, medical, allied health and maintenance staff required to support an intensive 90-bed high care facility will not be supported by 26 bays, particularly given no parking allowances have been made for deliveries, visitors of residents, or the Wellness Centre staff and visitors. 10.2 The surrounding streets are not capable of supporting the street car parking which will necessarily arise due to the lack of sufficient on-site car parking. 11 Clause 4.6.2 of the Policy states – “a minimum of twenty-five per cent (25%) of the site area is to be landscaped”. The proposed development does not comply with this requirement of the Policy.

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**Respondent No:** 174

**Responded At:** Jul 20, 2020 19:10:04 pm

**Last Seen:** Jul 21, 2020 07:30:01 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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**Q8. Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. My objection is made on the following grounds:

1. The proposal is inconsistent with the Residential Aged Care Facilities Local Planning Policy because of the undue impact it will have on the residential amenity of the area:
  - I. The height, bulk and scale of a four-storey development proposal is incompatible with the locality and surrounding developments, which are all two storey residential with 9 metre setbacks.
  - II. The proposal fails to adequately manage or mitigate the impacts it will have on the existing and future residential amenity.
  - III. The car parking and traffic assessments do not adequately take into account the realistic vehicle movements the proposal will generate. The impact of staff shift changes on parking requirements have not been considered. The lack of parking for staff and visitors will result in dangerous traffic movement and parking in narrow residential streets such as Betty Street and Doonan Road.
  - IV. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour.
  - V. The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing developments and the proposed.
2. The lack of consultation with local residents:
  - I. Despite the claims made in the application, the only consultation with residents was in 2016 regarding the refurbishment of Melvista Lodge not for this development, which is on a different site and for a much higher building.
  - II. I feel that the developer has misled the community. Tacit support may have been given to a proposal in 2016, but that was for a vastly different proposal.
  - III. The developer claims that the community supports this proposal. I vehemently object to the developer's claim. I have never been contacted, informed or consulted in any way shape or form by the developer on this current proposal.
  - IV. The sale of the Council owned block without going to public tender.
  - V. The Council's failure to advise their intention to rezone the four residential blocks in question before their sale.
  - VI. The rezoning of residential blocks of land by the Council similarly appears to have been undertaken without reasonable notification to neighbouring residents, which I consider to be a breach of faith.
3. Safety:
  - I. The increased traffic that will be generated will make pedestrian movement to and from Mason's Gardens hazardous for the numerous young children and elderly who currently use this park and the adjacent Early Learning Centre.
  - II. The lack of parking spaces will lead to both staff and visitors trawling for parking spaces in the narrow streets of Doonan Road and Betty Street, which currently carry buses in both directions.
  - III. There will be an increase in heavy vehicle traffic in these narrow streets for delivery, maintenance and waste removal.
  - IV. Residents of the high care aged facility proposed would be placed at unreasonable levels of risk in an emergency given the difficulties associated with evacuation of non ambulatory residents in this high rise facility.
4. Other concerns are:
  - I. The placement of a high rise, commercial for profit business in the middle of two quiet residential streets.
  - II. The aesthetics of the building when viewed from Mason's Garden.
  - III. Given the Council's intention to amalgamate these four blocks with the Melvista Lodge and Lisle Villages site as one A9 parcel of land for aged care, why is consideration being given to this development, which utilises only approximately a third of the space and provides no buffer zone with the adjacent residential properties? I urge you to not support this proposal.

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**Respondent No:** 175

**Responded At:** Jul 20, 2020 19:46:30 pm

**Last Seen:** Jul 20, 2020 11:43:22 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

The developer relies on consultation it conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different from what is proposed. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed. Immediately affected residents have either never been contacted or have only recently been informed about the extent of the proposal.

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**Respondent No:** 176

**Responded At:** Jul 20, 2020 20:01:31 pm

**Last Seen:** Jul 20, 2020 11:59:31 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal. --

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**Respondent No:** 177

**Responded At:** Jul 20, 2020 20:10:20 pm

**Last Seen:** Jul 20, 2020 12:07:50 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). I have the following concerns relating to the proposal: 1 The impact on amenity. 2 The increase in noise, traffic and odour. 3 The lack of on-site car parking. 4 The intensive height, bulk and scale as compared to the low density residential surround. 5 The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing developments and the proposed. 6 The lack of management plans or mitigation strategies. 7 The lack of proper community consultation.

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**Respondent No:** 178

**Responded At:** Jul 20, 2020 20:51:13 pm

**Last Seen:** Jul 20, 2020 12:30:15 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Occupier of a property

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I object because the sense of family orientated community is being eroded with a multi-storey development totally out of line with its surroundings. The well-known characteristics of the City of Nedlands such as leafy, low density, family orientated, low level, open spaces between dwellings and large frontages are not being upheld by this development. This proposal is not in line with the rest of the city and should be rejected by council. I also object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. To the extent the decision maker chooses to rely on significant and unadvertised provisions of the Policy, I further object as follows: 1 Policy objectives 1.1 One of the primary objectives of the Policy is – “to ensure the appearance and design of residential aged care facilities are of high quality and do not have an undue impact on the residential amenity by way of building bulk and scale, noise, traffic or parking”. The proposal fundamentally conflicts with this objective given the stark and jarring contrast between the surrounding R10 and R12.5 locality and the proposed four storey R80 development. The number of residents proposed to be accommodated will increase the residential capacity of the site by over 1000%. The consequential visual impacts, noise, traffic and parking that will flow from such an intensification will destroy the residential amenity of the locality. 2 Compatibility with setting (bulk, scale and height) 2.1 The Site is surrounded by low density residential development. The land immediately to its east and west is R10 and the land to its north is R12.5. The contrast between the existing density and the proposed R80 coding will be sharp, and the proposed plot ratio is wholly incompatible with the broader setting. 2.2 The bulk and scale of the proposal is imposing in its context. The proposal makes no attempt to mitigate the visual impact of its northern and southern walls, which are large and bland, on the adjacent neighbours and streetscape. 2.3 The depicted bulk and scale of the Melvista Lodge land (immediately to the South of the Site) in the development application plans is misleading. There are no such plans proposed or prepared, and the proposal is inconsistent with its setting in that regard. Redevelopment of Melvista Lodge is not likely or imminent given the nature of the landholdings there. 2.4 The proposed street frontage setbacks of 2.5 metres undermine line of sight in the context of the surrounding residential developments which have 9 metre setbacks. This has safety implications for drivers and pedestrians using Doonan Road and Betty Street. The design has complete disregard for its setting. 3 Amenity 3.1 The proposal fails to take into account

the existing and future character of the locality. The City has a new local planning scheme, and whilst higher density has been provided for elsewhere, this locality preserved its low density coding. There is a clear intention and understanding that the low density residential nature of the area will be maintained. A high rise intensive aged care development completely undermines that intention. 3.2 The proposal will significantly diminish visual amenity of the area due to its size, scale and design. It is not in keeping with the character or streetscape in the locality. 3.3 The proposal represents a significant intensification in how the site will look and operate. It increases the number of people living on the site by over 1000%. The level of staffing and services required to accommodate 90 high needs aged care residents must not be understated. The cumulative impact of 90 residents, combined with the servicing and operational requirements of the facility and movement of staff, visitors and deliveries, will result in a substantial increase in: 3.3.1 noise from traffic movements, at all hours of the day, to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users; 3.3.2 noise generated from the operations of the proposal, including air-conditioning, services, and an intensive increase of population and people movement; 3.3.3 light spill from 24 hour a day operations; and 3.3.4 odours generated from the operations of the proposal, including catering, laundry and servicing. 3.4 No management plans have been provided to show how the detrimental amenity impacts which will arise from such an intensified use will be mitigated, particularly given its hours of operation. No development condition will be validly capable of managing those impacts. 4 Traffic 4.1 The proposal will result in a significant increase in vehicle movements to and from the site, at all hours of the day. 4.2 The Traffic Impact Statement made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment traffic movements. 4.3 The Transport Impact Statement provides very little detail on the type of vehicle movements and the frequency and timings of those movements. This detail is essential to form a properly considered assessment of traffic movements and their impacts, and the document therefore cannot be relied upon. 5 Car Parking 5.1 The amount of administrative, catering, cleaning, medical, allied health and maintenance staff required to support an intensive 90-bed high care facility will not be supported by 26 bays, particularly given no parking allowances have been made for deliveries, visitors of residents, or the Wellness Centre staff and visitors. 5.2 The surrounding streets are not capable of supporting the street car parking which will necessarily arise due to the lack of sufficient on-site car parking. 6 Community consultation 6.1 The developer relies on consultation it conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different from what is proposed. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed. 6.2 Immediately affected residents have either never been contacted or have only recently been informed about the extent of the proposal. 7 Other 7.1 Clause 4.6.2 of the Policy states – “a minimum of twenty-five per cent (25%) of the site area is to be landscaped”. The proposed development does not comply with this requirement of the Policy. 7.2 The proposal will have a significant carbon footprint, and only just exceeds the minimum standards for environmental sustainability under the National Construction Code. 7.3 The proposal fails to take into account the recommendations of the Review of Innovative Models of Aged Care Research Paper, 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety in terms of its design and density.

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**Respondent No:** 179

**Responded At:** Jul 20, 2020 21:27:46 pm

**Last Seen:** Jul 20, 2020 13:23:50 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property
Occupier of a property

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 180

**Responded At:** Jul 20, 2020 21:47:02 pm

**Last Seen:** Jul 20, 2020 13:43:46 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements (eg. lack of deep root planting). 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to overlooking, noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 181

**Responded At:** Jul 20, 2020 21:58:42 pm

**Last Seen:** Jul 20, 2020 13:53:49 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property
Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I strongly object to the development application for a Residential Aged Care Facility located at 73-75 Doonan Road and 16-18 Betty Street, Nedlands (Proposed AC Facility). The proposed multiple level for-profit development covering 4 residential lots is not an appropriate size, scale or height for its setting or for the current or future character of this local, low density residential area, which is characterised by 1 and 2 storey homes. I understand the current proposal fully complies with the PD11.20 Local Planning Scheme 3 – Local Planning Policy: Residential Aged Care Facilities (LPP) and car parking policy however submit that this appears to be manifestly inappropriate for the residential context of Doonan Road and Betty Street. In particular, I object to the Proposed AC Facility because: 1. Planning Process Objections a. Nedlands residents have a legitimate expectation that their rights will not be negatively impacted by the City of Nedlands (Nedlands City) without, at a minimum, the rules of procedural fairness being followed. b. The community consultation on the Proposed AC Facility from the developer and Nedlands City has been mostly non-existent. In April 2016, information was provided by the developer regarding a proposed refurbishment of Melvista Lodge and the development of a 2-storey aged care facility on adjacent lots at 73-75 Doonan Rd and 16-18 Betty St with residential 9m set-backs (Initial Proposal). The 5 level Proposed AC Facility fundamentally differs to the Initial Proposal as it is a 4-storey plus basement and roof (height approx. 17 metres), 90 bed high care, aged care facility with 2m set-backs at ground level and no longer includes the refurbishment of the Melvista Lodge. Clause 5.1 of the LPP states “Consultation with affected landowners will be undertaken in accordance with the City’s Local Planning Policy- Consultation of Planning Proposals”. c. There was no communication by either the developer or the Nedlands City with the local community in relation to the Proposed AC Facility until ‘briefing’ sessions after the Proposed AC Facility had been lodged (which is not consultation). d. This lack of proper consultation by the Developer and the Nedlands City therefore breaches the LPP – Consultation of Planning Proposals. e. The adoption of the PD11.20 Local Planning Scheme 3 – Local Planning Policy: Residential Aged Care Facilities (LPP) setting out the parameters for the development of residential aged care facilities had substantial implications for impacted residents which were not immediately apparent on its face to any in the community without a planning background, and yet no individual notification was received by any ratepayer in those affected areas and the proposal was minimally advertised and passed during the initial turmoil of the COVID 19 pandemic and then associated shutdowns. f. The fact that not one comment was received from the community or affected residents on the LPP, as noted in the minutes of the meeting of the Nedlands City’s Council (Council) of 26 April 2020, should clearly have highlighted to the Nedlands City that the community and affected residents had not been made sufficiently aware of the implications of the amendments. Residents had a right to be properly and completely informed of the proposal and to be given fair hearing on it. g. In addition, the final version of the LPP

adopted contained significant amendments to density, height and plot ratio which had not been advertised at all. Given the increased building height, scale and plot ratio associated with these modifications will facilitate increased bulk and scale for any development proposed, I am of the view the modifications to the draft LPP are not minor and are in fact, significant, particularly in relation to the locality of surrounding residential area. h. The Nedlands City and its Council have not followed the appropriate process in the adoption of LPP and have failed in their duty of care to local ratepayers in making them aware of such significant structural changes which will have a fundamental negative impact on the quiet enjoyment of their homes. i. The Proposed AC Facility fails to satisfy aims of the Nedlands City's Local Planning Scheme No. 3 (LPS 3) to protect and enhance local character and amenity, respect the vision for the development of local streets or achieve quality residential built form outcomes. j. The effect of the LPP is that it allows for a higher density coding without the initiation of a scheme amendment to LPS 3. The purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the Nedlands City. Instead it has included an R-coding as a mechanism to deal with scale, bulk and built form. This is not appropriate as the imposition of an R80 R-coding immediately adjacent to properties subject to an R12.5 density coding (and with R.10 density coding surrounding) will result in significant conflict with respect to scale, bulk and streetscape impacts. k. A residential density coding of R80 as suggested by the LPP is not acceptable or justified at the subject site. It is completely out of context with a transition from the neighbouring R12.5 and R10 zoned properties. l. It is not appropriate that the LPP imposes density. Density should be imposed via a scheme amendment to LPS3. m. The LPP also appears to have been developed without due consideration to the individual locational attributes of the various sites within the Nedlands City to which it will apply. These range from sites within the medical precinct without adjacent residential properties, and with reciprocal car-parking and easy access for emergency and service vehicles, through to sites such as 73-75 Doonan Rd and 16-18 Betty St, Nedlands which are surrounded by residential properties, on narrow streets with limited car-parking and limited access for emergency and service vehicles. n. The purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the Nedlands City. The LPP makes no delineation between differing models of care (e.g. independent living units, low care, high care). The planning guidelines set out in the LPP, as drafted, applies the same planning conditions irrespective of the model of care. Different models of care have differing levels of servicing. This has not been considered in the application of the LPP. This has resulted in a High Care facility with an inappropriate density being located in a precinct unsuited to the facility function. The LPP should be redrafted to reflect the specific function and nature of aged care models of care, with appropriate planning of such facilities contextually. o. On this basis I question the validity of the adopted LPP. Its approval should urgently be reversed and only be reconsidered by the Council once appropriate due process has been followed with the required levels of community consultation and responses taken account of. p. Under LPS 3, the zoning applied is residential with "A9" additional use with a "P" use for residential aged care (meaning that residential aged care is permitted if it complies with any relevant development standards and requirements of LPS 3) but does not impose additional standards. As a result the residential zoning applies to the site together with the manifestly inadequate car-parking requirements as outlined in LPS 3. A scheme amendment should be initiated to guide appropriate density and development standards and car-parking. The Nedlands City and its Council should, in assessing the Proposed AC Facility, have due regard to any such scheme amendment, together with an appropriate local planning policy which is to replace the LPP. q. The renders and plans being promoted by the Developer do not correctly illustrate the upper levels and roof form which will be highly visible. These images and plans are misleading. In addition, the elevations do not show the upper level in bold, again misleading. r. There was no development control plan applied to this land at the time of its rezoning. The rushed endorsement of an R80 equivalent zoning in the LPP without community consultation has denied the community the opportunity to comment on the appropriateness of this density in a residential zone.

2. Specific Planning Objections In considering the Proposed AC Facility, under LPS 3 the Nedlands City and Council must have due regard to: a. The compatibility of the Proposed AC Facility with its setting including the relationship of the development to development on adjoining land or on other land in the locality including the likely effect of the height, bulk, scale, orientation and appearance of the Proposed AC Facility (cl. 67(m) of Schedule 2 of the Planning and Development (Local Planning Schemes) Regulations 2015 (WA)). I do not believe the Proposed AC Facility is compatible with the surrounding residential neighbourhood zoned R10 and R12.5 because: i. The setback for the development has been greatly reduced to the other homeowners in the area. ii. The set back of the boundary on 71 Doonan Rd is non-compliant with the LPP Clause 4.5.2 which requires a 7.5m set back and permanent screening to 75% obscure. The proposed plan has a 6.4m setback and NO screening. iii. The bulk and scale of a 5 level building across 4 residential lots is completely incompatible with the surrounding residential homes, each within the boundaries of single residential constraints. iv. This building will dominate all

surrounding buildings and the park in Masons Gardens. v. Given the topography of the local area, this large building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens and from various vantages around the neighbourhood. The visual projection of the development will be overbearing and detrimental to the urban fabric of the Betty St/Doonan Rd hill-scape and Mason Gardens Precinct. b. The amenity of the locality, including the character of the locality and the social impacts of the development and potential loss of any community service or benefit resulting from the Proposed AC Facility, including on the community as a whole (cls. 67(n), (v) and (x)). I believe the Proposed AC Facility will have a negative impact on the amenity of the locality and will cause a loss of benefit to the community as a whole because: i. The Proposed AC Facility is not compatible with the existing amenity surrounding / abutting it due to the height, scale and bulk of the Proposed AC Facility. The Proposed AC Facility therefore does not comply with cl 3.1 of the LPP which states "...and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking". ii. The Proposed AC Facility will introduce 120 patients and employees at any one time not interacting with community in the normal context of a residential area. iii. The Proposed AC Facility is commercial in nature, operating 24/7 and is not suited to a residential area. The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. iv. All available car-parking in the surrounding areas will be consumed by the Proposed AC Facility, constraining access to and use of Masons Gardens and visitors to local residences. v. Each of Betty St, Doonan Rd and Granby Cres has a substantial number of houses without front fences, enabling neighbours to interact in the front of our homes. Introducing a large building, with lower set-backs and walled along each street-front, will fundamentally change the character of these streets, and we will lose those neighbourly interactions. c. Whether adequate provision has been made for the landscaping of the land to which the application relates and whether any trees or other vegetation on the land should be preserved (cl. 67(p)). I believe the Proposed AC Facility fails to make such adequate provision or to preserve trees or other vegetation because: i. The Proposed AC Facility has a building footprint over most of the site and involves the removal of all trees and vegetation other than the street trees on the verges. ii. In particular, several large and very old trees of local importance will be removed and lost forever as a result of the Proposed AC Facility. These trees provide nesting and resting sites for various different species of birds as their canopies are high and provide the birds with a safe vantage point. iii. Clause 4.6.2 of the LPP states "A minimum of twenty-five per cent (25%) of the site area is to be landscaped". The Proposed AC Facility does not comply with this requirement of the LPP. d. The suitability of the land for the development taking into account the possible risk to human health or safety (cl. 67(r)). I do not believe that the land chosen is a suitable site for the Proposed AC Facility on this scale as: i. The Developer has no stated approach to operation of the facility in the instance of a required lockdown during a pandemic nor a stated approach of how to protect vulnerable patients to cross infection from air borne viruses. This is an irresponsible approach to quality aged care services in a post COVID 19 pandemic environment where a duty of care exists to protect patients who are in a vulnerable position. The Proposed AC Facility presents an unacceptable risk and has not considered a COVID safe design. ii. Furthermore, the Review of Innovative Models of Aged Care, Research Paper 3 January 2020 by the Royal Commission into Aged Care Quality and Safety recommended respite is provided in settings aligned to a person's background and offering structured activities. The report further recommends small scale domestic models of aged care where there is an emphasis on providing person centred care models. The proposed developments design and density is not aligned to the objectives of the Royal Commission. iii. At 90 beds of non-ambulatory patients over 4 occupied levels, safe evacuation has been poorly considered. Safe evacuation should necessitate a sprinkler protected building with a zoned smoke management system and designated safe zones. Brigade turn out points for fire truck parking and access to brigade booster points have not been considered in the design. Evacuation of 90 non-ambulatory residents is a risk. iv. Emergency services access to non-sprinklered areas, such as the roof plantroom, with access only available along Betty St and Doonan Rd for aerial firefighting, has not been considered. v. Lifts in the building are to be used for vertical movement of food services, visitors, patients, maintenance personnel and removal of deceased patients. This is an unhygienic practice and demonstrates poor design practice in this facility. Good design practice would separate different traffic streams in a facility of this size and density, with the minimum provision of a dedicated goods lift. e. The adequacy of the proposed means of access to and egress from the site; arrangements for the loading, unloading, manoeuvring and parking of vehicles; and the amount of traffic likely to be generated by the development, particularly in relation to the capacity of the road system in the locality and the probable effect on traffic flow and safety (cls. 67(s) and (t)). I believe that the Proposed AC Facility is inadequate in these respects because: i. The



Transport Impact Statement (TIS) has not calculated the total number of staff or visitor numbers in its car parking assessment for a facility of this nature. The TIS has relied on an allowance of 1 car bay per 4 beds. A high dependency aged care facility will have a significant staffing requirement that will exceed this requirement. It will also have significant visitor numbers. The TIS has made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment of car-parking and traffic movements.

- ii. The 2 streets on which the development will sit are narrow and are not designed to accommodate the amount of traffic for a facility of this size, particularly given the reliance on street parking (as the suggested parking is completely inadequate for the commercial operation of the nature contemplated).
- iii. The car-parking provisions are significantly underestimated. This will result in substantial on street parking to Betty St, Doonan Rd, Melvista Ave, Granby Cres and surrounding roads. Staffing numbers for the Wellness Centre (3 treatment bays + hair salon – circa 4 staff), full commercial kitchen for up 540 food services per day (circa 4-5 staff), facilities manager (1 staff), full laundry (circa 2 staff), on site admin (circa 7 staff), on-site coffee shop (1 staff), cleaning staff (circa 3-4), orderlies and support staff (circa 2), plus nursing and staff for 90 patients (minimum 15 staff) significantly exceeds car-parking allowances. Shift changeover of nursing staff, visitors and maintenance staff further results in car-parking being significantly undersized and inadequate for a facility of this size and density.
- iv. The increased traffic on the streets, and crossing the footpaths down Doonan Rd and Betty St, will be a danger to the large number of pedestrians, including children, who use the footpath to walk to Mason Gardens and the local childcare centre located less than 100m from the development.
- v. Truck access will be required for servicing the grease trap for the kitchen. This does not appear to have been considered in the design.
- vi. Inadequate on-site parking can result in off-site parking for nurses for night shifts. This can result in unsafe practices and security concerns for nursing staff accessing the facility at night having to park in unsecured/unmonitored locations (and overwhelming the current car-parking at Masons Gardens).
- vii. Truck vehicular access for food delivery, waste removal, medical gas bottle replenishment, diesel fuel delivery, maintenance personnel for mechanical, electrical, fire and communications plant will result in significant increase to truck movements on Doonan Rd and Betty St.
- viii. Inadequate provision has been made for replacement of roof top air conditioning plant. Access for large plant can only be made via crane access from Betty St or Doonan Rd.
- ix. Developer's Traffic Report also provides very little detail on the type of vehicle movements and their frequency and times during the week. This detail is also needed to form proper considered assessment of traffic movements and noise levels, which detail is also wholly lacking in the Developer's Transport Impact Statement and Acoustic Report.

### 3. Specific Design Objections

- a. In addition to any local planning policy, LPS 3 requires the Nedlands City and Council to take into account State Planning Policy 7.0 (Design of the Built Environment) and its Design Principles (Schedule 1). I believe that the design of the Proposed AC Facility fails on various aspects in relation to each of those Design Principles, as set out below.
- b. Context and character – The design of the Proposed AC Facility does not respond to or enhance the distinctive characteristics of the local area, and does not contribute to a sense of place, because:
  - i. The distinctive characteristics of the local area, including the adjacent lots, the streetscape and surrounding neighbourhood, are a low-rise, leafy and quiet neighbourhood with large green 9m setbacks and a local green park.
  - ii. A development of the bulk, scale and size contemplated, on 2m set-backs, is not sympathetic to, and will in fact detract from, all of the distinctive characteristics of this local area.
  - iii. The built form is a highly inappropriate in terms of bulk, scale and size to adjoining properties with box scale of building of approx. 70m overall length x 32m overall width and overall height of approx. 17m. The surrounding local homes are constrained to single blocks, and range from single level original 1930's cottages to architecturally designed 2 storey residences, incorporating significant landscaping and retention of large trees.
  - iv. The Proposed AC Facility includes large, bland featureless walls measuring 35 metres in length (running east/west), a scale that would typically be found in a mixed use or town/activity centre environment rather than the local residential area where it is proposed.
  - v. The 4-storey (5 level) Proposed AC Facility with a proposed plot ratio of 1:0 would result in a scale of development which is not compatible with the amenity of the locality and which does not reinforce or respond sympathetically to the locally distinct low-rise, low-density residential neighbourhood.
  - vi. The density of R80 being considered is not appropriate to the existing densities which surround it (R10 and R12.5) and is not able to be sustained by the transport options provided by the narrow surrounding streets and limited access to public transport.
  - vii. Ramp/through access with a 4.5m high boundary wall on southern boundary will be highly visible from Doonan and Betty Streets and is aesthetically ugly along with inappropriately high unfriendly front boundary walls close to 2m near southern boundaries on Doonan and Betty Streets.
  - viii. Given the topography of the local area, this large building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens and from various vantages around the neighbourhood. The visual projection of the development will be

overbearing and detrimental to the urban fabric of the Betty St/Doonan Rd hill-scape and Mason Gardens Precinct. ix. The Proposed AC Facility is commercial in nature, operating 24/7 and is not suited to a residential area. The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. x. The Proposed AC Facility is not compatible with the existing amenity surrounding / abutting it due to the height, scale and bulk of the Proposed AC Facility. The Proposed AC Facility therefore does not comply with cl 3.1 of the LPP which states "...and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking". c. Landscape Quality - The design of the Proposed AC Facility fails to recognise that together landscape and buildings operate as an integrated and sustainable system, within a broader ecological context, because: i. The visual projection of the development will be overbearing and detrimental to the leafy landscape of the Betty St/Doonan Rd hill-scape and Mason Gardens Precinct. ii. The Proposed AC Facility does not protect existing environmental features and ecosystems as the design is for a building footprint over most of the site and identifies several large and very old trees of local importance which will be removed and lost forever as a result. These trees provide nesting and resting sites for various different species of birds as their canopies are high and provide the birds with a safe vantage point. iii. There is no provision in the Proposed AC Facility for storm-water and soil management, ground and site conditions, solar access, microclimate, tree canopy, urban heat island impacts, habitat creation and preservation of green infrastructure. iv. The Proposed AC Facility proposes a density of occupancy that maximises the built form on the available land area, leaving limited open space for residents/patients. v. There are very limited outdoor spaces proposed for the site, with a lack of green areas other than built-form landscaping. vi. The LPP (clause 4.6.2) requires 25% of the site area to be landscaped but this has not been provided. vii. The Proposed AC Facility does not encourage social inclusion for its residents with the public and neighbours, with street-side fences and walls proposed. This does not contribute to the local streetscape where most of the front gardens do not have walls or fences, allowing neighbours to interact on a daily basis. d. Built form and scale – The massing and height of the Proposed AC Facility is not appropriate to its setting and does not successfully negotiate between existing built form and the intended future character of the local area because: i. The building massing and scale is disproportionate to the surrounding urban vernacular. The mass and height are disrespectful to the scale and pitch lines from the adjoining properties with a consequential negative impact to the Betty St and Doonan Rd streetscapes. Its verticality will project as a dominant insertion on the residential neighbourhood. As a "for-profit" commercial operation it will damage the residential cohesion of the suburb of Nedlands. Clause 3.1 of the LPP states "design of residential aged care facilities are of a high quality and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking". The proposed development is therefore non-compliant with LPP cl. 3.1. ii. The built form is a highly inappropriate in terms of bulk, scale and size to adjoining properties with box scale of building of approx. 70m overall length x 32m overall width and overall height of approx. 17m. The surrounding local homes are constrained to single blocks, and range from single level original 1930's cottages to architecturally designed 2 storey residences, incorporating significant landscaping and retention of large trees. iii. The four-storey (5 level) Proposed AC Facility with a proposed plot ratio of 1:0 would result in a scale of development which is not compatible with the amenity of the residential locality and which does not reinforce or respond sympathetically to the locally distinct low-rise, low-density residential neighbourhood. iv. The scale, massing and height of new development does not respond positively to that of the adjoining buildings, the topography, the general pattern of heights, and the views, vistas and landmarks of the Doonan Rd/Betty St area, and detracts from a coherent local identity. The orientation, proportion, composition, and articulation of built form elements should deliver an outcome that is suited to the purpose, defines the public domain, contributes to the character of adjacent streetscapes and parks, and provides good amenity for people at ground level. This Proposed AC Facility fails to do so. e. Sustainability – The Proposed AC Facility does not optimise the sustainability of the built environment, delivering positive environmental, social and economic outcomes because: i. The proposed development is not setting a target for environmental sustainability. The development is taking a just above minimum approach, proposing to exceed Part J of the National Construction Code by a stated 10%. This is an inadequate attempt to demonstrate environmental sustainability credentials. As a minimum a Green Star 6-star standard should be set, and consideration should be given to a Passive House rating. This facility will have a significant carbon footprint that will represent a substantial increase over the carbon footprint of the existing three (3) residences. ii. The Sustainability Report does not consider any modelling of obnoxious discharges from kitchen, toilet and laundry exhausts and their impact on the surrounding properties. Dispersion modelling and CFD modelling should be undertaken to determine that there is no undue impact, as required by clause 3.1 of the LPP.

iii. The Sustainability Report has not considered any heat island impact on the surrounding properties as a result of rejecting circa 700 - 800 kW of heat from the facility to determine that there is no undue impact, as required by clause 3.1 of the LPP. iv. The Sustainability Report has not considered glare and reflectance to properties on the east in the morning and west in the evening to determine that there is no undue impact, as required by clause 3.1 of the LPP. f. Amenity – The Proposed AC Facility does not offer optimise internal and external amenity for occupants, visitors and neighbours, and does not provide an environment that is comfortable, productive and healthy because: i. The 24 hour a day noise from the large scale commercial air-conditioning plant and additional traffic and noise from staff during shift-changes, combined with the noise from the operation of the facility, including the commercial laundry and commercial kitchen will destroy the peaceful amenity of the residential locality. ii. The Proposed AC Facility would result in detrimental impacts to the amenity and character of the low-density residential neighbourhood. iii. The proposed development will significantly impact the visual amenity of all residential lots to the north on Doonan Rd and Betty St, up to Princess Rd, particularly when the development is viewed from private outdoor areas. iv. The Developer's proposal, with its nominated function, size and density, has not considered any technical issues and will have a material negative impact to the amenity of the locality. v. Light spill for night-time access to car-parking and pedestrian entrances will result in light pollution to adjoining neighbours. vi. No consideration appears to have been given for acoustic treatment for roof located air conditioning plant and roof discharges. Discharges from the facility will adversely impact neighbours and have not been considered appropriately. Discharge stacks will also extend beyond the roof line creating further visual impact. vii. The acoustics technical report has not calculated the cumulative noise impact of ventilation systems with the air-cooled condensers. Significant ventilation systems will be required for the kitchen exhaust, evaporative kitchen make up, toilet exhausts, laundry exhausts and flues. To determine the full impact of the facility on adjoining residences, all noise sources should be defined and calculated on a cumulative basis. viii. Due to the low-rise nature of the near-neighbours, the Proposed AC Facility will overlook the back and front yards of not just the immediately adjacent residences but also the residences across the road and up each of the surrounding streets. This includes my home at 76 Doonan Road, a 1 storey house which will be overlooked, together with our front and back yards, including from the common balcony on the upper floors. g. Safety – The Proposed AC Facility does not optimise safety and security, minimising the risk of personal harm and supporting safe behaviour and use, because: i. The Developer has no stated approach to operation of the facility in the instance of a required lockdown during a pandemic nor a stated approach of how to protect vulnerable patients to cross infection from air borne viruses. This is an irresponsible approach to quality aged care services in a post COVID 19 environment where a duty of care exists to protect patients who are in a vulnerable position. The Nedlands City would be in breach of its duty of care now with the foreknowledge that this facility presents an unacceptable risk and has not considered a COVID safe design. ii. Furthermore, the Review of Innovative Models of Aged Care, Research Paper 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety recommended respite is provided in settings aligned to a person's background and offering structured activities. The report further recommends small scale domestic models of aged care where there is an emphasis on providing person centred care models. The proposed developments design and density is not aligned to the objectives of the Royal Commission. iii. At 90 beds of non-ambulatory patients over four (4) occupied levels, safe evacuation has been poorly considered. Safe evacuation should necessitate a sprinkler protected building with a zoned smoke management system and designated safe zones. Brigade turn out points for fire truck parking and access to brigade booster points have not been considered in the design. Evacuation of 90 non-ambulatory residents is a risk. iv. Emergency services access to non-sprinklered areas, such as the roof plantroom, with access only available along Betty St and Doonan Rd for aerial firefighting, has not been considered. v. Lifts in the building are to be used for vertical movement of food services, visitors, patients, maintenance personnel and removal of deceased patients. This is an unhygienic practice and demonstrates poor design practice in this facility. Good design practice would separate different traffic streams in a facility of this size and density, with the minimum provision of a dedicated goods lift. vi. No design provision is shown for kitchen exhaust discharges, carpark ventilation discharges, generator exhaust discharge. Discharges from the facility will adversely impact neighbours and have not been considered appropriately. Discharge stacks will also extend beyond the roof line creating further visual impact. vii. The front boundary walls are impacted further by the proposed 2.5mt setbacks beyond the current street line sets backs of 9m making it impossible to see down the street. This will result in the streetscape significantly altered with the proposed development jutting out 6.5m beyond the existing street line. Residents reversing out of their driveway will have no line of sight, keeping in mind a pedestrian footpath runs down the east side of Doonan Rd and west side of Betty St making this impossible to ensure the safety of any family walking down the street to Masons Gardens, or car driving up the street. viii. Inadequate on-site parking can result in off-site parking for nurses for

night shifts. This can result in unsafe practices and security concerns for nursing staff accessing the facility at night having to park in unsecured/unmonitored locations (and overwhelming the current car-parking at Masons Gardens). h. Community – The Proposed AC Facility does not appropriately respond to local community needs as well as the wider social context accommodating change over time and responding to new social demands because: i. Given the current impacts of the COVID-19 pandemic on similar large scale, institutional aged care facilities, it does not seem appropriate to be encouraging the development of these facilities outside a hospital precinct. ii. The Interim Report of the Royal Commission into Aged Care Quality and Safety indicates that the final report will be exploring a shift in focus from institutional style aged care, such as the Proposed AC Facility, into lower scale ageing in place and home care which poses the question – will this Proposed AC Facility be out-dated before it is completed.

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**Respondent No:** 182

**Responded At:** Jul 20, 2020 22:01:46 pm

**Last Seen:** Jul 20, 2020 13:49:40 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property

Occupier of a property

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Q6. **Address of the property affected (if applicable)**

not answered

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Q7. **My response to the proposal:**

I object to the proposal

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**Q8. Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. To the extent the decision maker chooses to rely on significant and unadvertised provisions of the Policy, I further object as follows: 1 The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. 2 The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. The Site is surrounded by low density residential development. The land immediately to its east and west is R10 and the land to its north is R12.5. The contrast between the existing density and the proposed R80 coding will be sharp, and the proposed plot ratio is wholly incompatible with the broader setting. The proposal makes no attempt to mitigate the visual impact of its northern and southern walls, which are large and bland, on the adjacent neighbours and streetscape. The proposed street frontage setbacks of 2.5 metres undermine line of sight in the context of the surrounding residential developments which have 9 metre setbacks. 3 Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. The proposal will result in a significant increase in vehicle movements to and from the site, at all hours of the day. The surrounding streets are not capable of supporting the street car parking which will necessarily arise due to the lack of sufficient on-site car parking. The amount of administrative, catering, cleaning, medical, allied health and maintenance staff required to support an intensive 90-bed high care facility will not be supported by 26 bays, particularly given no parking allowances have been made for deliveries, visitors of residents, or the Wellness Centre staff and visitors. 4 The proposal will result in a substantial increase in noise from traffic movements, at all hours of the day, to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users; noise generated from the operations of the proposal, including air-conditioning, services, and an intensive increase of population and people movement; light spill from 24 hour a day operations; and odours generated from the operations of the proposal, including catering, laundry and servicing. 5 The new proposal has been made without consultation with neighbors and the community (ie ratepayers). The developer relies on consultation it conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different from what is proposed. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed. Immediately affected residents have either never been contacted or have only recently been informed about the extent of the proposal. 6 Notwithstanding claims made by the developer, the community does not support this proposal and has not been properly consulted. I urge you not to support this proposal.

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**Respondent No:** 183

**Responded At:** Jul 20, 2020 23:03:39 pm

**Last Seen:** Jul 20, 2020 15:01:44 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. This is a commercial 24 hour run facility that is structurally and functionally out of keeping with the quiet residential area that it is proposed for. With the current Royal Commission into Aged Care Quality and Safety, it would be prudent to wait and see what the recommendations are. Based on the current proposal, I object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facilities Local Planning Policy because of the undue impact it will have on the residential amenity of the area. 2 The height, bulk and scale of a four-storey development proposal is incompatible with the locality and surrounding developments. 3 The proposal will result in unacceptable increases in noise, traffic, odours, car parking congestion and light pollution. 4 The proposal fails to adequately manage or mitigate the impacts it will have on the existing and future residential amenity. 5 The design of the proposal is imposing and unsympathetic to the existing character of the area. Not only does that have aesthetic implications, the contrast in setbacks affects sight lines, and therefore vehicle and pedestrian safety. 6 The car parking and traffic assessments do not adequately take into account the realistic vehicle movements the proposal will generate. This includes staff, visitors and other contractors. This leads to serious questions in regards to traffic safety both during construction and after completion particularly with family and children and the nearby Mason Gardens and College Park. Thank you for taking the time to read this objection. I urge you not to support this proposal.

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**Respondent No:** 184

**Responded At:** Jul 20, 2020 23:10:25 pm

**Last Seen:** Jul 20, 2020 15:08:29 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. This is a commercial 24 hour run facility that is structurally and functionally out of keeping with the quiet residential area that it is proposed for. With the current Royal Commission into Aged Care Quality and Safety, it would be prudent to wait and see what the recommendations are. Based on the current proposal, I object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facilities Local Planning Policy because of the undue impact it will have on the residential amenity of the area. 2 The height, bulk and scale of a four-storey development proposal is incompatible with the locality and surrounding developments. 3 The proposal will result in unacceptable increases in noise, traffic, odours, car parking congestion and light pollution. 4 The proposal fails to adequately manage or mitigate the impacts it will have on the existing and future residential amenity. 5 The design of the proposal is imposing and unsympathetic to the existing character of the area. Not only does that have aesthetic implications, the contrast in setbacks affects sight lines, and therefore vehicle and pedestrian safety. 6 The car parking and traffic assessments do not adequately take into account the realistic vehicle movements the proposal will generate. This includes staff, visitors and other contractors. This leads to serious questions in regards to traffic safety both during construction and after completion particularly with family and children and the nearby Mason Gardens and College Park. Thank you for taking the time to read this objection. I urge you not to support this proposal.

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**Respondent No:** 185

**Responded At:** Jul 21, 2020 07:35:06 am

**Last Seen:** Jul 20, 2020 23:33:26 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property
Occupier of a property

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. To the extent the decision maker chooses to rely on significant and unadvertised provisions of the Policy, I further object as follows: 1 The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. 2 The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. 3 The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 4 Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. 5 The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and pedestrian safety. 6 Notwithstanding claims made by the developer, the community does not support this proposal and has not been properly consulted. I urge you not to support this proposal. Proforma additional paragraphs, to be added as relevant to the objector if desired: 7 Policy objectives 7.1 One of the primary objectives of the Policy is – “to ensure the appearance and design of residential aged care facilities are of high quality and do not have an undue impact on the residential amenity by way of building bulk and scale, noise, traffic or parking”. The proposal fundamentally conflicts with this objective given the stark and jarring contrast between the surrounding R10 and R12.5 locality and the proposed four storey R80 development. The number of residents proposed to be accommodated will increase the residential capacity of the site by over 1000%. The consequential visual impacts, noise, traffic and parking that will flow from such an intensification will destroy the residential amenity of the locality. 8 Compatibility with setting (bulk, scale and height) 8.1 The Site is surrounded by low density residential development. The land immediately to its east and west is R10 and the land to its north is R12.5. The contrast between the existing density and the proposed R80 coding will be sharp, and the proposed plot ratio is wholly incompatible with the broader setting. 8.2 The bulk and scale of the proposal is imposing in its context. The proposal makes no attempt to mitigate the visual impact of its northern and southern walls, which are large and bland, on the adjacent neighbours and streetscape. 8.3 The

depicted bulk and scale of the Melvista Lodge land (immediately to the South of the Site) in the development application plans is misleading. There are no such plans proposed or prepared, and the proposal is inconsistent with its setting in that regard. Redevelopment of Melvista Lodge is not likely or imminent given the nature of the landholdings there. 8.4 The proposed street frontage setbacks of 2.5 metres undermine line of sight in the context of the surrounding residential developments which have 9 metre setbacks. This has safety implications for drivers and pedestrians using Doonan Road and Betty Street. The design has complete disregard for its setting. 9 Amenity 9.1 The proposal fails to take into account the existing and future character of the locality. The City has a new local planning scheme, and whilst higher density has been provided for elsewhere, this locality preserved its low density coding. There is a clear intention and understanding that the low density residential nature of the area will be maintained. A high rise intensive aged care development completely undermines that intention. 9.2 The proposal will significantly diminish visual amenity of the area due to its size, scale and design. It is not in keeping with the character or streetscape in the locality. 9.3 The proposal represents a significant intensification in how the site will look and operate. It increases the number of people living on the site by over 1000%. The level of staffing and services required to accommodate 90 high needs aged care residents must not be understated. The cumulative impact of 90 residents, combined with the servicing and operational requirements of the facility and movement of staff, visitors and deliveries, will result in a substantial increase in: 9.3.1 noise from traffic movements, at all hours of the day, to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users; 9.3.2 noise generated from the operations of the proposal, including air-conditioning, services, and an intensive increase of population and people movement; 9.3.3 light spill from 24 hour a day operations; and 9.3.4 odours generated from the operations of the proposal, including catering, laundry and servicing. 9.4 No management plans have been provided to show how the detrimental amenity impacts which will arise from such an intensified use will be mitigated, particularly given its hours of operation. No development condition will be validly capable of managing those impacts. 10 Traffic 10.1 The proposal will result in a significant increase in vehicle movements to and from the site, at all hours of the day. 10.2 The Traffic Impact Statement made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment traffic movements. 10.3 The Transport Impact Statement provides very little detail on the type of vehicle movements and the frequency and timings of those movements. This detail is essential to form a properly considered assessment of traffic movements and their impacts, and the document therefore cannot be relied upon. 11 Car Parking 11.1 The amount of administrative, catering, cleaning, medical, allied health and maintenance staff required to support an intensive 90-bed high care facility will not be supported by 26 bays, particularly given no parking allowances have been made for deliveries, visitors of residents, or the Wellness Centre staff and visitors. 11.2 The surrounding streets are not capable of supporting the street car parking which will necessarily arise due to the lack of sufficient on-site car parking. 12 Community consultation 12.1 The developer relies on consultation it conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different from what is proposed. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed. 12.2 Immediately affected residents have either never been contacted or have only recently been informed about the extent of the proposal. 13 Other 13.1 Clause 4.6.2 of the Policy states – “a minimum of twenty-five per cent (25%) of the site area is to be landscaped”. The proposed development does not comply with this requirement of the Policy. 13.2 The proposal will have a significant carbon footprint, and only just exceeds the minimum standards for environmental sustainability under the National Construction Code. 13.3 The proposal fails to take into account the recommendations of the Review of Innovative Models of Aged Care Research Paper, 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety in terms of its design and density.

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**Respondent No:** 186

**Responded At:** Jul 21, 2020 08:49:09 am

**Last Seen:** Jul 26, 2020 01:53:32 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**       Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**       I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I have submitted my objection in full through to Council@Nedlands.wa.gov.au as i could not load it in here.

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**Respondent No:** 187

**Responded At:** Jul 21, 2020 09:59:01 am

**Last Seen:** Jul 21, 2020 01:52:58 am

**IP Address:**

Q1. **Your name:**

Q2. **Your address:**

Q3. **Your email address:**

Q4. **Your telephone number:** not answered

Q5. **State how your interests are affected (select all relevant boxes)** Other

Q6. **Address of the property affected (if applicable)** not answered

Q7. **My response to the proposal:** I object to the proposal

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.



**Respondent No:** 188

**Responded At:** Jul 21, 2020 10:07:29 am

**Last Seen:** Jul 21, 2020 02:05:28 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Other

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). I have the following concerns relating to the proposal: The impact on amenity. The increase in noise, traffic and odour. The lack of on-site car parking. The intensive height, bulk and scale as compared to the low density residential surround. The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing developments and the proposed. The lack of management plans or mitigation strategies. The lack of proper community consultation.

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**Respondent No:** 189

**Responded At:** Jul 21, 2020 10:12:21 am

**Last Seen:** Jul 25, 2020 02:31:05 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I spend time in and around Masons gardens with my dogs as my Aunty lives close by. I feel very surprised and disappointed that a commercial building of such a height could even be proposed let alone considered in such a small neighbourhood. The Lisle village was built by a well-known Architect in the 70's and it follows the land levels up Betty and Doonan streets and does not look out of place, if a little dated. The proposed building will sit like a 'monolith' on the face of the hill, changing the look and feel of this area for ever. It will be all I can see looking north from Masons Gardens. I am therefore writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). 1. I use Betty Street and know how quiet it is and that this proposal will negatively impact the amenity of a normally quiet narrow street and the surrounding neighbourhood. 2. The Developer has given little consideration to the enormous increase in noise, traffic and odour that will result from a building of this size, that supports 90 aged care beds. There will be a lot of noise from traffic movements, 24/7 for deliveries, supplies, medical support, waste collection, staffing shifts, visitors, and other users. 3. For a building of this size, servicing 90 aged folk, there will be a lot of staff needed for the different shifts as well as their visitors. There will definitely be an overflow which will impact Masons Gardens and surrounding streets. 4. I find it outrageous that the Developer is proposing such a height and bulk for the building which is almost double all surrounding buildings of 10metres. Ironically, the bulk and scale as compared to the low density residential it will back onto is absurd. The number of floors and rooms seems to far exceed the plot ratio 1:1. 5. There will be a lot of congestion in the street which will mean a significant reduction in vehicle and pedestrian safety. This is further compounded by huge differences in setbacks between existing developments and the proposed. 6. I haven't been able to find anything that talks to operational management plans or mitigation strategies. 7. In terms of emotional wellbeing and healthfulness for the aged, there are no courtyards or green sitting areas or large trees proposed. I thought that there had to be one large over 10m tall mature tree and 5 medium density trees of 8m for a site of this size. I can't see them shown anywhere. What I can see is that the beautiful old gum tree that stands 20m high with a fabulous canopy where the local birds gather, will be chopped down. This is not right. 8. Why hasn't the City of Nedlands sought engagement with local people to help determine the landscaping and planning for aged care at the Lisle Village and additional site recently rezoned aged care. It seems like something weird is going on. 9. I would not like my Council to approve something as large as this in such a low residential area.

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**Respondent No:** 190

**Login:**

**Email:**

**Responded At:** Jul 21, 2020 10:17:32 am

**Last Seen:** Jul 21, 2020 02:14:17 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 191

**Login:**

**Email:**

**Responded At:** Jul 21, 2020 10:19:11 am

**Last Seen:** Jul 21, 2020 02:13:29 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated.

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**Respondent No:** 192

**Login:**

**Email:**

**Responded At:** Jul 21, 2020 10:33:11 am

**Last Seen:** Jul 21, 2020 02:30:57 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal. -- Kind regards

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**Respondent No:** 193

**Login:**

**Email:**

**Responded At:** Jul 21, 2020 10:35:33 am

**Last Seen:** Jul 25, 2020 02:36:49 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I recently lost my Father, who was well looked after in a low-rise aged care group. When it comes time to move my Mother I will be looking for somewhere similar. Nedlands would be a great choice however I am disheartened that you are considering a multi-level aged care building on the site between Betty and Doonan. I am very supportive of aged care but something that provides for the wellness of my Mother this is not. It is very disappointing to propose a high rise hospital building for old people especially given all the aged care deaths associated with Covid-19. Building it near Masons Gardens and in the middle of a low residential area is ridiculous. I am therefore writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). I want you to understand that these are the concerns that I have, which are not dissimilar to those of anyone looking to place their parent, as they relate to the proposed development: I do not believe the surrounding streets are capable of supporting the car parking that will happen in the local streets nearby. This will be necessary because from what i can see there is not enough on-site car parking to support the number of staff needed and visitors to 90 old folk. I would not want to have all that congestion in my street, so why would I support this being built in my sister's street. It is the size of the building that I really object to and the fact that the height of it means it will tower above everything around it and will be seen from everywhere South. Not an attractive building nor sensitive to the surrounding homes. From what I can see, the building takes up almost the entire four blocks and provides nowhere for people like my Mother to sit out and enjoy the fresh air amidst leafy trees. The building looks like a block of flats with small balconies, the black bars make no sense other than to remind people that this is probably the last stop for them. I hope you take my concerns seriously as if approved this will be a gross miscarriage of justice where the local residents have to live.

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**Respondent No:** 194

**Login:**

**Email:**

**Responded At:** Jul 21, 2020 10:38:04 am

**Last Seen:** Jul 21, 2020 02:31:22 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I think that the size and bulk of the development is detrimental, to not only the adjacent streets, but our local amenity. Most alarmingly, is that due process does not appear to have been followed by council.

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**Respondent No:** 195

**Login:**

**Email:**

**Responded At:** Jul 21, 2020 10:47:46 am

**Last Seen:** Jul 21, 2020 02:35:36 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I object to this proposal based on the bulk and scale, particularly compared to the surrounding neighbourhood. The proposal does not take into account the areas amenity and its impact on the amenity. Given the consultation carried out in 2016 only demonstrated a 2 story development and now is 4 levels there exists adequate reasons for this not to recommended for approval and for the consultation process to be restarted such that the wider community can provide better and more informed input. The City of Nedlands needs to set a height limit based on a maximum 2-3 story development on this site. Clearly there is insufficient parking available and this meaning visitors, and the elderly do have visitors, will require street parking. This will impact on the number 25 bus service and its ability to navigate through the narrow streets.

---



**Respondent No:** 196

**Login:**

**Email:**

**Responded At:** Jul 21, 2020 10:49:31 am

**Last Seen:** Jul 21, 2020 02:44:33 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

---

Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). I have the following concerns relating to the proposal: 1 The impact on amenity. 1 The increase in noise, traffic and odour. 2 The lack of on-site car parking. 3 The intensive height, bulk and scale as compared to the low density residential surround. 4 The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing developments and the proposed. 5 The lack of management plans or mitigation strategies. 6 The lack of proper community consultation.

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**Respondent No:** 197

**Login:**

**Email:**

**Responded At:** Jul 21, 2020 11:30:00 am

**Last Seen:** Jul 21, 2020 03:17:45 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

16 & 18 Betty Street and 73 & 75 Doonan Road - Submission Form • These are not suites they are WARDS • No consideration has been given to the safe evacuation of patients who are non-ambulatory or cognitively impaired • No consideration has been given to the fire brigade on responding to an event • No consideration has been given to truck access for refuelling diesel tanks, medical gas supplies etc • Parking provisions are the bare minimum required under and are inadequate for the nursing and staffing levels required to care for in excess of 140 patients • The 'physio, rehab, podiatry, speech pathology, dietetics, occupational therapy and pain management is a MEDICAL Centre open to the public and is one of the additional avenues of 'profit' for the Oryx Communities. Consider this in the context that they are providing only 24 car parking bags (2 are across) in addition to the staffing, visitor, parking needs. • This facility will operate 24/7 - there will be shift changes late and early hours, entry and exits for pedestrians and cars and will be highly illuminated night to allow safe egress. Internal lighting all night for night start – in short the loudest and brightest building in Dalkeith / Nedlands / Claremont. • Due to the scale and size of the planned facility it will be visible both day and night for hundreds of meters from Watkins Road Dalkeith to Bay Road Claremont to Louise Street Nedlands to Colin Street Dalkeith.

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**Respondent No:** 198

**Login:**

**Email:**

**Responded At:** Jul 21, 2020 11:32:01 am

**Last Seen:** Jul 21, 2020 03:18:42 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

This commercial development appears to be utterly unsuited to the residential nature of the location at Betty St and Doonan Rd. It seems no thought whatsoever has been applied to the context of the neighborhood. It is far to large and imposing on the immediate dwellings. Apart from the structure, the size of the roads and potential traffic increase are in conflict. How this location could be deemed fit for this development is incredible. The councillors and their advisors can only be seen as suspect in collusion with developers or otherwise are bereft of all common sense and decency and in either case should be removed from office. How is it that other more established and accepted commercial precincts have not been considered for this development? What motivating factors have compelled the council to entertain the proposal? If this proceeds, then all confidence in maintaining an equitable balance of development and preservation of the unique character of Nedlands will be lost. Voters will revolt and the end result will justify the means.

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**Respondent No:** 199

**Login:**

**Email:**

**Responded At:** Jul 21, 2020 12:13:12 pm

**Last Seen:** Jul 21, 2020 04:11:39 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. My objection is made on the following grounds: 1 The proposal is inconsistent with the Residential Aged Care Facilities Local Planning Policy because of the undue impact it will have on the residential amenity of the area. 1 The height, bulk and scale of a four-storey development proposal is incompatible with the locality and surrounding developments. 2 The proposal will result in unacceptable increases in noise, traffic, odours, car parking congestion and light pollution. 3 The proposal fails to adequately manage or mitigate the impacts it will have on the existing and future residential amenity. 4 The design of the proposal is imposing and unsympathetic to the existing character of the area. Not only does that have aesthetic implications, the contrast in setbacks affects sight lines, and therefore vehicle and pedestrian safety. 5 The car parking and traffic assessments do not adequately take into account the realistic vehicle movements the proposal will generate.

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**Respondent No:** 200

**Login:**

**Email:**

**Responded At:** Jul 21, 2020 12:32:33 pm

**Last Seen:** Jul 21, 2020 04:28:42 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site) (proposal). I have the following concerns relating to the proposal: 1 The impact on amenity. 2 The increase in noise, traffic and odour. 3 The lack of on-site car parking. 4 The intensive height, bulk and scale as compared to the low density residential surround. 5 The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing developments and the proposed. 6 The lack of management plans or mitigation strategies. 7 The lack of proper community consultation.

---



**Respondent No:** 201

**Login:**

**Email:**

**Responded At:** Jul 21, 2020 12:35:11 pm

**Last Seen:** Jul 21, 2020 04:25:53 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

---

Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. Moreover, our family has been house hunting for a number of months and we have recently purchased and moved into our current property. Prior to that, we lived in Riley road very close to Masons Garden. During our intensive house searching, we looked at and were very interested in various properties close to the proposed site of the Aged Care Facility. I find it suspicious that at no time were we ever informed by the various estate agents and builders that we met with (some as recently as January this year) of the proposed building. In fact, a property on Melvista which we made an offer on is less than a block away. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

---



**Respondent No:** 202

**Login:**

**Email:**

**Responded At:** Jul 21, 2020 14:42:15 pm

**Last Seen:** Jul 21, 2020 06:40:02 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

This submission is to register my strong objection to the proposed Residential Aged Care Facility (RACF) at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. My objection is based on the following: • The proposed RACF fails utterly to respect the area's character as primarily a residential part of Nedlands. The imposition of a R80 development on residential R10 and R12.5, and the resulting 10 times increase in residential living density, is a wholly undesirable outcome and contradicts the City's new local planning scheme which aims to keep the area as low density residential. • The cumulative effect of 90 residents, combined with the servicing and operational requirements of the facility and movement of staff, visitors and deliveries, will result in unacceptable impacts which include; o noise from traffic movements, at all hours of the day, to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users; o noise generated from the operations of the proposal, including air-conditioning, services, and an intensive increase of population and people movement; o light spill from 24 hour a day operations; and o odours generated from the operations of the proposal, including catering, laundry and servicing. No management plans have been provided to show how these detrimental amenity impacts will be mitigated, particularly given it is a 24 hour operation. • Traffic management and car parking needs associated with the RACF have not been adequately addressed in the proposal. The actual likely traffic movements, noise and parking requirements will result in an unacceptable impact on the local area. • The RACF proposal cites consultation conducted over 3 years ago to assert that the community had been consulted and was in support of this proposal. That assertion is wrong and misleading. The previous building proposal was completely different and, with lower buildings and greater setbacks, was much more suited to the area. • The present proposal shows hints of a similar scale development occurring on the site of the Melvista Lodge land (immediately to the south of the present development site). To my knowledge, no such plans have been proposed or prepared, and in any regard the implied redevelopment would also be unacceptable for the same reasons set out in this submission. This begs the important question of why a more holistic proposal for both areas has not been done. Surely this would be the best approach given this is clearly being considered, albeit informally. If this is not the case then certainly the impact on the current occupants of Melvista Lodge would be completely overpowering and detrimental. • Finally, the proposal fails to take into account and seems quite out of step with the recommendations set out in the Review of Innovative Models of Aged Care Research Paper, 3 January 2020 by the Royal Commission into Aged Care Quality and Safety concerning the now recognised importance of small-scale, domestic models of residential aged care, an approach which would be completely acceptable. I urge you not to support this proposal.

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**Respondent No:** 203

**Login:**

**Email:**

**Responded At:** Jul 21, 2020 14:47:25 pm

**Last Seen:** Jul 25, 2020 00:25:06 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

---

Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

---



**Respondent No:** 204

**Login:**

**Email:**

**Responded At:** Jul 21, 2020 14:48:55 pm

**Last Seen:** Jul 21, 2020 06:56:54 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property  
Occupier of a property

---

Q6. **Address of the property affected (if applicable)** not answered

---

Q7. **My response to the proposal:** I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 205

**Login:**

**Email:**

**Responded At:** Jul 21, 2020 14:50:52 pm

**Last Seen:** Jul 25, 2020 00:26:28 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

---

Q6. **Address of the property affected (if applicable)**      not answered

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

---



**Respondent No:** 206

**Login:**

**Email:**

**Responded At:** Jul 21, 2020 14:52:08 pm

**Last Seen:** Jul 21, 2020 06:51:25 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

---



**Respondent No:** 207

**Login:**

**Email:**

**Responded At:** Jul 21, 2020 15:24:05 pm

**Last Seen:** Jul 21, 2020 07:19:29 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

Dear Council, As a local resident and health care provider I would like to formally object to the proposed development for the reasons stated below. As a health care provider I do believe that the proposed dementia care plan is appropriate in light of an ongoing aged care review. The inadequacies of this type of dementia aged care have been highlighted by the current Covid-19 pandemic. In addition with young children using the local facility of Mason's garden the increased traffic and parking would be dangerous and a risk. I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. To the extent the decision maker chooses to rely on significant and unadvertised provisions of the Policy, I further object as follows: 1 The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. 2 The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. 3 The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 4 Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. 5 The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and pedestrian safety. 6 Notwithstanding claims made by the developer, the community does not support this proposal and has not been properly consulted. I urge you not to support this proposal. Proforma additional paragraphs, to be added as relevant to the objector if desired: 7 Policy objectives 7.1 One of the primary objectives of the Policy is – “to ensure the appearance and design of residential aged care facilities are of high quality and do not have an undue impact on the residential amenity by way of building bulk and scale, noise, traffic or parking”. The proposal fundamentally conflicts with this objective given the stark and jarring contrast between the surrounding R10 and R12.5 locality and the proposed four storey R80 development. The number of residents proposed to be accommodated will increase the residential capacity of the site by over 1000%. The consequential visual impacts, noise, traffic and parking that will flow from such an intensification will destroy the residential amenity of the locality. 8 Compatibility with setting (bulk, scale and height) 8.1 The Site is surrounded by low density residential development. The land immediately to its east and west is R10 and the land to its north is R12.5. The contrast



between the existing density and the proposed R80 coding will be sharp, and the proposed plot ratio is wholly incompatible with the broader setting. 8.2 The bulk and scale of the proposal is imposing in its context. The proposal makes no attempt to mitigate the visual impact of its northern and southern walls, which are large and bland, on the adjacent neighbours and streetscape. 8.3 The depicted bulk and scale of the Melvista Lodge land (immediately to the South of the Site) in the development application plans is misleading. There are no such plans proposed or prepared, and the proposal is inconsistent with its setting in that regard. Redevelopment of Melvista Lodge is not likely or imminent given the nature of the landholdings there. 8.4 The proposed street frontage setbacks of 2.5 metres undermine line of sight in the context of the surrounding residential developments which have 9 metre setbacks. This has safety implications for drivers and pedestrians using Doonan Road and Betty Street. The design has complete disregard for its setting. 9 Amenity 9.1 The proposal fails to take into account the existing and future character of the locality. The City has a new local planning scheme, and whilst higher density has been provided for elsewhere, this locality preserved its low density coding. There is a clear intention and understanding that the low density residential nature of the area will be maintained. A high rise intensive aged care development completely undermines that intention. 9.2 The proposal will significantly diminish visual amenity of the area due to its size, scale and design. It is not in keeping with the character or streetscape in the locality. 9.3 The proposal represents a significant intensification in how the site will look and operate. It increases the number of people living on the site by over 1000%. The level of staffing and services required to accommodate 90 high needs aged care residents must not be understated. The cumulative impact of 90 residents, combined with the servicing and operational requirements of the facility and movement of staff, visitors and deliveries, will result in a substantial increase in:

9.3.1 Noise from traffic movements, at all hours of the day, to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users; 9.3.2 Noise generated from the operations of the proposal, including air-conditioning, services, and an intensive increase of population and people movement; 9.3.3 Light spill from 24 hour a day operations; and 9.3.4 Odours generated from the operations of the proposal, including catering, laundry and servicing. 9.4 No management plans have been provided to show how the detrimental amenity impacts which will arise from such an intensified use will be mitigated, particularly given its hours of operation. No development condition will be validly capable of managing those impacts. 10 Traffic 10.1 The proposal will result in a significant increase in vehicle movements to and from the site, at all hours of the day. 10.2 The Traffic Impact Statement made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment traffic movements. 10.3 The Transport Impact Statement provides very little detail on the type of vehicle movements and the frequency and timings of those movements. This detail is essential to form a properly considered assessment of traffic movements and their impacts, and the document therefore cannot be relied upon. 11 Car Parking 11.1 The amount of administrative, catering, cleaning, medical, allied health and maintenance staff required to support an intensive 90-bed high care facility will not be supported by 26 bays, particularly given no parking allowances have been made for deliveries, visitors of residents, or the Wellness Centre staff and visitors. 11.2 The surrounding streets are not capable of supporting the street car parking which will necessarily arise due to the lack of sufficient on-site car parking. 12 Community consultation 12.1 The developer relies on consultation it conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different from what is proposed. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed. 12.2 Immediately affected residents have either never been contacted or have only recently been informed about the extent of the proposal. 13 Other 13.1 Clause 4.6.2 of the Policy states – “a minimum of twenty-five per cent (25%) of the site area is to be landscaped”. The proposed development does not comply with this requirement of the Policy. 13.2 The proposal will have a significant carbon footprint, and only just exceeds the minimum standards for environmental sustainability under the National Construction Code. 13.3 The proposal fails to take into account the recommendations of the Review of Innovative Models of Aged Care Research Paper, 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety in terms of its design and density.

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**Respondent No:** 208

**Login:**

**Email:**

**Responded At:** Jul 21, 2020 15:38:26 pm

**Last Seen:** Jul 21, 2020 07:30:24 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 209

**Login:**

**Email:**

**Responded At:** Jul 21, 2020 15:44:12 pm

**Last Seen:** Jul 21, 2020 07:37:33 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

**Q8. Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. My objection is made on the following grounds:

1. The proposal is inconsistent with the Residential Aged Care Facilities Local Planning Policy because of the undue impact it will have on the residential amenity of the area:
  - I. The height, bulk and scale of a four-storey development proposal is incompatible with the locality and surrounding developments, which are all two storey residential with 9 metre setbacks.
  - II. The proposal fails to adequately manage or mitigate the impacts it will have on the existing and future residential amenity.
  - III. The car parking and traffic assessments do not adequately take into account the realistic vehicle movements the proposal will generate. The impact of staff shift changes on parking requirements have not been considered. The lack of parking for staff and visitors will result in dangerous traffic movement and parking in narrow residential streets such as Betty Street and Doonan Road.
  - IV. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour.
  - V. The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing developments and the proposed.
2. The lack of consultation with local residents:
  - I. Despite the claims made in the application, the only consultation with residents was in 2016 regarding the refurbishment of Melvista Lodge not for this development, which is on a different site and for a much higher building.
  - II. I feel that the developer has misled the community. Tacit support may have been given to a proposal in 2016, but that was for a vastly different proposal.
  - III. The developer claims that the community supports this proposal. I strongly object to the developer's claim. I have never been contacted, informed or consulted in any way shape or form by the developer on this current proposal.
  - IV. The sale of the Council owned block without going to public tender.
  - V. The Council's failure to advise their intention to rezone the four residential blocks in question before their sale.
  - VI. The rezoning of residential blocks of land by the Council similarly appears to have been undertaken without reasonable notification to neighbouring residents, which I consider to be a breach of faith.
3. Safety:
  - I. The increased traffic that will be generated will make pedestrian movement to and from Mason's Gardens hazardous for the numerous young children and elderly who currently use this park and the adjacent Early Learning Centre.
  - II. The lack of parking spaces will lead to both staff and visitors trawling for parking spaces in the narrow streets of Doonan Road and Betty Street, which currently carry buses in both directions.
  - III. There will be an increase in heavy vehicle traffic in these narrow streets for delivery, maintenance and waste removal.
  - IV. Residents of the high care aged facility proposed would be placed at unreasonable levels of risk in an emergency given the difficulties associated with evacuation of non ambulatory residents in this high rise facility.
4. Other concerns are:
  - I. The placement of a high rise, commercial for profit business in the middle of two quiet residential streets.
  - II. The aesthetics of the building when viewed from Mason's Garden.
  - III. Given the Council's intention to amalgamate these four blocks with the Melvista Lodge and Lisle Villages site as one A9 parcel of land for aged care, why is consideration being given to this development, which utilises only approximately a third of the space and provides no buffer zone with the adjacent residential properties? I would urge you NOT to support this proposal.

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**Respondent No:** 210

**Login:**

**Email:**

**Responded At:** Jul 21, 2020 16:49:42 pm

**Last Seen:** Jul 21, 2020 08:41:51 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**  Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. Surely if any aged care development is to go ahead it should be on the existing Melvista Homes site, and in keeping with this structure only one to two stories. I understand 16-18 Betty St has already been sold to the developer so if it must be further developed it should be in keeping with the current Melvista Homes structure and Melvista Homes could be renovated as part of this. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated.

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**Respondent No:** 211

**Login:**

**Email:**

**Responded At:** Jul 21, 2020 16:50:34 pm

**Last Seen:** Jul 21, 2020 08:01:25 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 212

**Login:**

**Email:**

**Responded At:** Jul 21, 2020 17:15:02 pm

**Last Seen:** Jul 21, 2020 05:20:53 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. I am at a loss as to why a drastic change has been applied to the R codes in these 2 quiet streets that accommodate single dwellings only. A 4-5 storey development of any type seems grossly unfair to all the immediate neighbours as well as the surrounding areas. To allow a 90 bed high care aged facility is incomprehensible and begs the following questions. How is this proposed facility even remotely sympathetic to the area? Melvista Lodge seems to be an ideal type of development that is sympathetic to the surrounding area. A 4-5 storey development looming above Melvista Lodge seems grotesque. How many of the 24 car bays (+ 2 disabled) will be permanently reserved for staff and the various health care professionals that will undoubtedly visit on a regular basis? Where will the visitors park that come to see aged relatives? Will they park in Betty St, Doonan St, Granby Close, Melvista Ave, Vincent St, Adelma St and so on or will Mason Gardens be re-developed as a parking lot? Has the increased noise level been investigated given that there will be service delivery vehicles operating at all times? Will there be Emergency vehicles entering at all hours of the night as I'm sure patient emergencies don't only happen between 0900 and 1700 ? Given that I can hear trains at night will the operation of air conditioners be a constant hum 24 hours a day? If this facility is not a hospital in disguise how does it promote serenity for those in their dotage. Does it have outdoor areas and green space or will the residents be confined to a small room until their end? In these days of COVID 19 and given that this is the third virus in just this short part of the century ( SARS, MERS) will the residents of this facility be more susceptible to infection? To what extent has the developer demonstrated a need for this facility as it certainly does nothing to enhance the character of this area? Alfred Carson Lodge seems far more appropriate than this monstrosity? The population of these 4 blocks will overnight increase by over 100 people if it has 90 residents and conceivably at least 20 staff. What effect will this have on the immediate neighbourhood? Having attended a community meeting on this proposal I wholeheartedly support all of the concerns expressed by those more knowledgeable than myself in the areas of planning and government policy

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**Respondent No:** 213

**Login:**

**Email:**

**Responded At:** Jul 21, 2020 17:33:48 pm

**Last Seen:** Jul 21, 2020 09:28:08 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

This will introduce a considerable amount of traffic and noise to a quiet neighbourhood. The building is significant in size and would not fit in with the residential environment.

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**Respondent No:** 214

**Login:**

**Email:**

**Responded At:** Jul 21, 2020 18:28:29 pm

**Last Seen:** Jul 10, 2020 06:56:04 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. To the extent the decision maker chooses to rely on significant and unadvertised provisions of the Policy, I further object as follows: 1 The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. 2 The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. 3 The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 4 Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. 5 The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and pedestrian safety. 6 Notwithstanding claims made by the developer, the community does not support this proposal and has not been properly consulted. 7 Policy objectives 7.1 One of the primary objectives of the Policy is – “to ensure the appearance and design of residential aged care facilities are of high quality and do not have an undue impact on the residential amenity by way of building bulk and scale, noise, traffic or parking”. The proposal fundamentally conflicts with this objective given the stark and jarring contrast between the surrounding R10 and R12.5 locality and the proposed four storey R80 development. The number of residents proposed to be accommodated will increase the residential capacity of the site by over 1000%. The consequential visual impacts, noise, traffic and parking that will flow from such an intensification will destroy the residential amenity of the locality. 8 Compatibility with setting (bulk, scale and height) 8.1 The Site is surrounded by low density residential development. The land immediately to its east and west is R10 and the land to its north is R12.5. The contrast between the existing density and the proposed R80 coding will be sharp, and the proposed plot ratio is wholly incompatible with the broader setting. 8.2 The bulk and scale of the proposal is imposing in its context. The proposal makes no attempt to mitigate the visual impact of its northern and southern walls, which are large and bland, on the adjacent neighbours and streetscape. 8.3 The depicted bulk and scale of the Melvista Lodge land (immediately to the South of the Site) in the development application plans is misleading. There are no such plans proposed or prepared, and the proposal is inconsistent with its setting in that

regard. Redevelopment of Melvista Lodge is not likely or imminent given the nature of the landholdings there. 8.4 The proposed street frontage setbacks of 2.5 metres undermine line of sight in the context of the surrounding residential developments which have 9 metre setbacks. This has safety implications for drivers and pedestrians using Doonan Road and Betty Street. The design has complete disregard for its setting. 9 Amenity 9.1 The proposal fails to take into account the existing and future character of the locality. The City has a new local planning scheme, and whilst higher density has been provided for elsewhere, this locality preserved its low density coding. There is a clear intention and understanding that the low density residential nature of the area will be maintained. A high rise intensive aged care development completely undermines that intention. 9.2 The proposal will significantly diminish visual amenity of the area due to its size, scale and design. It is not in keeping with the character or streetscape in the locality. 9.3 The proposal represents a significant intensification in how the site will look and operate. It increases the number of people living on the site by over 1000%. The level of staffing and services required to accommodate 90 high needs aged care residents must not be understated. The cumulative impact of 90 residents, combined with the servicing and operational requirements of the facility and movement of staff, visitors and deliveries, will result in a substantial increase in: 9.3.1 noise from traffic movements, at all hours of the day, to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users; 9.3.2 noise generated from the operations of the proposal, including air-conditioning, services, and an intensive increase of population and people movement; 9.3.3 light spill from 24 hour a day operations; and 9.3.4 odours generated from the operations of the proposal, including catering, laundry and servicing. 9.4 No management plans have been provided to show how the detrimental amenity impacts which will arise from such an intensified use will be mitigated, particularly given its hours of operation. No development condition will be validly capable of managing those impacts. 10 Traffic 10.1 The proposal will result in a significant increase in vehicle movements to and from the site, at all hours of the day. 10.2 The Traffic Impact Statement made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment traffic movements. 10.3 The Transport Impact Statement provides very little detail on the type of vehicle movements and the frequency and timings of those movements. This detail is essential to form a properly considered assessment of traffic movements and their impacts, and the document therefore cannot be relied upon. 11 Car Parking 11.1 The amount of administrative, catering, cleaning, medical, allied health and maintenance staff required to support an intensive 90-bed high care facility will not be supported by 26 bays, particularly given no parking allowances have been made for deliveries, visitors of residents, or the Wellness Centre staff and visitors. 11.2 The surrounding streets are not capable of supporting the street car parking which will necessarily arise due to the lack of sufficient on-site car parking. 12 Community consultation 12.1 The developer relies on consultation it conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different from what is proposed. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed. 12.2 Immediately affected residents have either never been contacted or have only recently been informed about the extent of the proposal. 13 Other 13.1 Clause 4.6.2 of the Policy states – “a minimum of twenty-five per cent (25%) of the site area is to be landscaped”. The proposed development does not comply with this requirement of the Policy. 13.2 The proposal will have a significant carbon footprint, and only just exceeds the minimum standards for environmental sustainability under the National Construction Code. 13.3 The proposal fails to take into account the recommendations of the Review of Innovative Models of Aged Care Research Paper, 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety in terms of its design and density.

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**Respondent No:** 215

**Login:**

**Email:**

**Responded At:** Jul 21, 2020 18:50:40 pm

**Last Seen:** Jul 25, 2020 02:45:39 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**  Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am quite disheartened to hear about this hospital building going up near Masons Gardens. It is extremely disappointing that a building such as this is being proposed in the middle of a low residential area. Aged Care development is important but has to be done properly, which is why I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands proposal. I believe that the plot ratio in the proposal is wrong and much higher than the stipulated 1:1 in respect to height and plot ratio set out in the advertised provisions of the Policy. This is a very quiet neighbourhood where children walk and play. the amenity will be completely changed by the size of the building that is proposed. It seems to be a big building that is trying to be squeezed into a small plot of ex residential land, without due respect to the height of houses around it. There doesn't seem to be anywhere for the oldies to sit in the garden with their visitors or to read a book. There will be a lot more traffic in the local streets as this building will no doubt have at least 40 staff on hand during the day, covering staffing, administration, laundry, kitchen, wellness centre etc I can't see that there are enough parking spaces for all the people, which means it is likely that people will be fighting for parking in the local streets and across at Masons Gardens. This does not even cover the visitors who will want to see their relatives/friends. Please do not support this proposal

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**Respondent No:** 216

**Login:**

**Email:**

**Responded At:** Jul 21, 2020 20:17:11 pm

**Last Seen:** Jul 21, 2020 12:15:46 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 217

**Login:**

**Email:**

**Responded At:** Jul 21, 2020 21:03:21 pm

**Last Seen:** Jul 21, 2020 13:01:23 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Mayor, Councillors, Neighbours, The purpose of this email is to register, as residents of the City of Nedlands, our objection to the development application for a residential facility covering lots 16 and 19 Betty Street, and lots 73 and 75 Doonan Street, Nedlands. An array of concerns exist about this development and the lack of due process that has been undertaken to this point. We believe the following: - there is a societal need to care for our elderly - local building development must be in accordance with the law and local guidelines - local building development must be responsible, sustainable, and follow a rigorous process of notification and refinement based on engagement with those impacted by the development - financial considerations are of secondary importance to good governance and the preservation of local interests Our concerns include: - This proposal has been poorly communicated, with late notification to local residents of plans for such a major development. Why the rush? Why the lack of due process? - The height and scale are incongruous with the local surroundings. This indicates poor planning and no attempt to integrate with the local neighbourhood. The corollary of this includes issues of safety, parking, traffic, noise and odours: none of these appear to have been satisfactorily accounted for. - Community engagement is central to 'getting things right' and is a fundamental responsibility of local government. There needs to be an open meeting held where local residents can learn more about the development, appraise the situation, and provide feedback to the City of Nedlands about the inevitable impact such a development will have on the local community. There have been over 100 days with no community spread of COVID-19. It would be disingenuous and cynical for the Council to pretend that COVID-19 is a credible reason to hold a closed session. Otherwise, the Council should defer the proposal until it is suitable to have a robust discussion on the proposal. As it stands, the perception is that this is a deliberate attempt to avoid critical appraisal from residents. - There is an urgent need to eliminate misinformation. An open forum is the perfect chance to address this. You will have identified from the prose to this point that we are not in favour of this development. However, if there is a case for an aged care facility in the locality, then this is a chance for the City of Nedlands to state the need for this and to understand from residents what can be integrated successfully into the area. Criticism after all tells you your flaws. A poorly-conceived and poorly-delivered development of this magnitude has the potential to do irreparable damage to the neighbourhood. Do you wish to preside over a debacle, as the signals suggest this will be, or would you prefer to make the right decision, at the right time, and for the right reasons?

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**Respondent No:** 218

**Login:**

**Email:**

**Responded At:** Jul 21, 2020 21:09:43 pm

**Last Seen:** Jul 21, 2020 13:08:34 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

Mayor, Councillors, Neighbours, The purpose of this email is to register, as residents of the City of Nedlands, our objection to the development application for a residential facility covering lots 16 and 19 Betty Street, and lots 73 and 75 Doonan Street, Nedlands. An array of concerns exist about this development and the lack of due process that has been undertaken to this point. We believe the following: - there is a societal need to care for our elderly - local building development must be in accordance with the law and local guidelines - local building development must be responsible, sustainable, and follow a rigorous process of notification and refinement based on engagement with those impacted by the development - financial considerations are of secondary importance to good governance and the preservation of local interests Our concerns include: - This proposal has been poorly communicated, with late notification to local residents of plans for such a major development. Why the rush? Why the lack of due process? - The height and scale are incongruous with the local surroundings. This indicates poor planning and no attempt to integrate with the local neighbourhood. The corollary of this includes issues of safety, parking, traffic, noise and odours: none of these appear to have been satisfactorily accounted for. - Community engagement is central to 'getting things right' and is a fundamental responsibility of local government. There needs to be an open meeting held where local residents can learn more about the development, appraise the situation, and provide feedback to the City of Nedlands about the inevitable impact such a development will have on the local community. There have been over 100 days with no community spread of COVID-19. It would be disingenuous and cynical for the Council to pretend that COVID-19 is a credible reason to hold a closed session. Otherwise, the Council should defer the proposal until it is suitable to have a robust discussion on the proposal. As it stands, the perception is that this is a deliberate attempt to avoid critical appraisal from residents. - There is an urgent need to eliminate misinformation. An open forum is the perfect chance to address this. You will have identified from the prose to this point that we are not in favour of this development. However, if there is a case for an aged care facility in the locality, then this is a chance for the City of Nedlands to state the need for this and to understand from residents what can be integrated successfully into the area. Criticism after all tells you your flaws. A poorly-conceived and poorly-delivered development of this magnitude has the potential to do irreparable damage to the neighbourhood. Do you wish to preside over a debacle, as the signals suggest this will be, or would you prefer to make the right decision, at the right time, and for the right reasons?

---



**Respondent No:** 219

**Login:**

**Email:**

**Responded At:** Jul 21, 2020 21:32:48 pm

**Last Seen:** Jul 21, 2020 13:29:41 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). I have the following concerns relating to the proposal: 1 The impact on amenity. 2 The increase in traffic and congestion. 3 The lack of on-site car parking. 4 The intensive height, bulk and scale as compared to the low density residential surround. 5 The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing developments and the proposed. 6 The lack of management plans or mitigation strategies. 7 The lack of proper community consultation. 8. I doubt the suitability of location for its purpose 9. inadequate community consultation 10. Unfair on neighbour who decided to stay in that street for many years of their lives.

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**Respondent No:** 220

**Login:**

**Email:**

**Responded At:** Jul 22, 2020 05:05:41 am

**Last Seen:** Jul 21, 2020 21:01:12 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Not appropriate to have a large aged care facility in amongst modest residential homes.

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**Respondent No:** 221

**Login:**

**Email:**

**Responded At:** Jul 22, 2020 05:40:04 am

**Last Seen:** Jul 21, 2020 21:34:30 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**       Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**       I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

The bulk and scale of the proposed development is not in keeping with the surrounding streets. Also it is not wise to be planning this kind of high-density aged-care home in the light of the recent Royal Commission. Thank you for your consideration.

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**Respondent No:** 222  
**Login:** kthrn.ngyn  
**Email:** kthrn.ngyn@gmail.com

**Responded At:** Jul 22, 2020 06:52:50 am  
**Last Seen:** Jul 21, 2020 22:49:46 pm  
**IP Address:** 121.200.19.77

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object to this proposal due to the size of the development. It will create traffic congestion and noise to a beautiful quiet green and leafy suburb.

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**Respondent No:** 223

**Login:**

**Email:**

**Responded At:** Jul 22, 2020 09:32:16 am

**Last Seen:** Jul 25, 2020 09:08:48 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). I have the following concerns relating to the proposal: 1. The impact on amenity. 2. The increase in noise, traffic and odour. The retirement village on Bay Road stinks of onion and cooking constantly - it lingers in the atmosphere for hours. 3. The lack of on-site car parking. 4. The intensive height, bulk and scale as compared to the low density residential surround. 5. The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing developments and the proposed. 6. The lack of management plans or mitigation strategies. 7. The lack of proper community consultation - this is the greatest issue of concern. The level of compliance in relation to "collaboration" that's required BY LAW in every corporate industry when making any decision is highly regulated .....and I am unsure why this high standard is considered inapplicable to the Nedlands Council?

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**Respondent No:** 224

**Login:**

**Email:**

**Responded At:** Jul 22, 2020 09:34:21 am

**Last Seen:** Jul 22, 2020 00:22:17 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

My concerns regard the nature and scale of the development, it's impact on adjacent family homes, and the severe impacts on traffic. This is a medical facility, and as such comes with all the trappings of a small hospital, including emergency vehicles. Large numbers of service vehicles will be required daily (and nightly) to support the functions of the facility (think food/laundry/medical waste/maintenance for the pumps/tanks/generators/emergency systems). The plans show storage for DOM (dissolved organic matter) water, and "tanks" whose purpose is not stated. Hospitals require various systems of gas supply (think oxygen, combustible), as well as provision of other medical support systems. None of this is clearly outlined in the plans, but quite clearly this facility is not a "normal" neighbour. It will also require 24 hour-a-day access, with attendant significant increases in traffic, 24 hours a day. This development is proposed in an odd location, in the very centre of a residential block, bordered by two narrow, quiet streets, with limited access. The scale of development is extremely large, at 5 storeys, and will tower over neighbouring properties. It is not in keeping with the current style or character of the area. Indeed, the neighbouring Melvista Lodge shows that aged care facilities do not have to be monstrous in nature, and can happily co-exist with the community if designed thoughtfully and with consideration to their neighbours. This proposed development will look over a number of other properties, cause overshadowing, diminish their amenity, and significantly diminish property values. Construction of deep underground excavations, in a sand substrate, on a sloping block, will also likely cause severe subsidence and damage to properties along the northern border. This happens frequently in Nedlands (several examples have been reported in the Post in recent years, and we experienced the same thing at our own property), and the Nedlands council seems powerless to do anything about it. Owners simply have to live with the damage, and then later try and take legal action for costs to mitigate the damage caused. It is simply not possible to excavate many metres down into a sand pile and not expect significant motions downhill. Pile-driving operations to mitigate land movement also have potential to cause significant damage to adjacent homes. This will further devalue neighbouring properties and cause additional troubles for these adjacent homeowners. The parking proposed for this facility is manifestly inadequate. Twenty-six bays, with two of these reserved for ACROD parking, is not remotely adequate to service the number of residents and guests, let alone the workforce. The 90 proposed suites will generate large multiples in traffic, and this does not begin to account for the staff (nurses, cooks, cleaners, medical practitioners, the café, the physio etc). There is simply nowhere for them to park. Staff alone will require more than the provided spaces. Users seeking parking will spill out all over the adjacent Nedlands streets to find any available street parking. The impacts on traffic here are severe, and will impact the entire community for a large radius. Pity the residents of Granby Crescent, who paid a premium to live on a lovely quiet street, and who will now find themselves living in a busy turning circle. Current residential parking on Doonan and Betty streets already causes a number of chicanes. If one side of the street is taken up

entirely with parking, the streets effectively become one-way for their entire length. There is nowhere to pull in and let traffic (the bus!) pass. This already happens close to the Sir Charles Gairdner hospital, where the Council response (when it was still part of Nedlands), was to impose time limits and parking restrictions, which would further impact a large number of local residents. The one-way system of entry and exit proposed is also problematic, and will likely require modifications to Betty and Doonan roads, potentially as one-way streets, further impacting adjacent homes. Given the likely parking nightmare, you can imagine visitors trying to exit on Betty St find themselves blocked in by oncoming two-way traffic on a street where parked cars reduce it to a single lane. I also can't imagine that it is ideal from the perspective of emergency vehicle access. A medical facility has far more combustible elements than a residential home. In the case of a fire, emergency vehicles having to negotiate a one-way system into the facility, and potentially on the surrounding roads, could have fatal repercussions. In the case of an emergency, all exiting vehicles will have to use a one-way system? Whilst I have sympathy with the need for the provision of aged care in this area, this location, and the scale of the development, are not suitable. Ironically, large blocks of suitable land elsewhere in Nedlands lie vacant – think the vacant block on the corner of Smyth and Karella streets. I am also concerned about comments reported in the Post regarding previous consultations on this development and height limits for medical facilities. The previously advertised version of this development was about half the size of the current proposal, and in no way compares to what is now proposed. Previous advertising regarding heights for medical facilities received no comments, simply as there were no “medical” facilities in this part of Nedlands (until the recent, unadvertised rezoning). Nedlands residents could be forgiven for assuming that the advertising referred to areas near Sir Charles Gairdner and Hollywood hospitals, which until recently were part of Nedlands. A severely scaled back version of the proposal (remove two storeys), with sufficient parking (so a very large fold increase in the number of provided bays), might be acceptable at this location. The parking alone will affect many more residents than just those immediately adjacent.

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**Respondent No:** 225

**Login:**

**Email:**

**Responded At:** Jul 22, 2020 09:43:02 am

**Last Seen:** Jul 22, 2020 01:40:22 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Not an appropriate location given the quiet residential streets that are surrounding it

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**Respondent No:** 226

**Login:**

**Email:**

**Responded At:** Jul 22, 2020 09:59:35 am

**Last Seen:** Jul 22, 2020 01:44:03 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I concur with many of the objections no doubt made by others. I think the proposed development is simply wrong for the site. There will be too much traffic for the narrow streets nearby. (I am skeptical of Oryx's traffic impact statement - I think there will be many more visits than they suggest.) Also the loud noise from certain vehicles (for e.g ambulance sirens when patients must be taken to SCGH at night and also the loud beeping of trucks reversing into the delivery bays during the day) will create continual disturbance for the neighbours. I would point out that the proposed development is right next to a retirement home. What about the rights of these seniors to enjoy a retirement they no doubt expected to be tranquil? There are certainly other better sites for a development such as this that enjoy better access to major roads, are closer to SCGH and would not disrupt the neighbourhood so extremely. Please tell Oryx to find another location.

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**Respondent No:** 227

**Login:**

**Email:**

**Responded At:** Jul 22, 2020 11:14:10 am

**Last Seen:** Jul 21, 2020 06:46:51 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). I have the following concerns relating to the proposal: 1 The impact on amenity. 2 The increase in noise, traffic and odour. 3 The lack of on-site car parking. 4 The intensive height, bulk and scale as compared to the low density residential surround. 5 The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing developments and the proposed. 6 The lack of management plans or mitigation strategies. 7 The lack of proper community consultation.

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**Respondent No:** 228

**Login:**

**Email:**

**Responded At:** Jul 22, 2020 11:17:14 am

**Last Seen:** Jul 22, 2020 03:14:08 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**

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Q8. **Submission : Please give your comments relating to this item in full below.**

As a resident who will be directly impacted by the proposed Aged Care development on Betty/Doonan streets, I am writing to object to this project. The first issue is that this development is inappropriately large for this particular site. The four-storey building proposed is not in keeping with the surrounding park-like residential area. It therefore does not comply with the Aged Care LPP clause 4.3. Although one could argue that it complies with the height regulations in the LPP, here lies the flaw in this particular LPP for Aged Care. It seems obvious that one cannot have blanket regulations like these that can then be applied to Aged Care development in any location, be it on a busy Monash Ave (hospital precinct area) or a tiny residential street in the middle of a quiet suburb. This is a serious oversight that needs to be fixed! Secondly, the associated parking and traffic issues have not been adequately addressed. The building plans show a basement parking level with only 26 bays! This will be a large residential home to 90 people. There will be administrative staff, nursing staff and carers, support staff like cleaners and kitchen workers, hairdressers, physios. There will be members of the public attending the Wellness centre and café. Not to mention visitors! With only 26 bays available, parking needs will subsequently spill over onto our small residential roads – Betty, Doonan and Granby and further afield. The increased traffic associated with deliveries, ambulances and other service vehicles will make our streets significantly noisier and busier. The developers, who will also be the managers of this “home”, clearly feel that the community must absorb the impact of this development while they absorb the profits! The traffic and parking congestion will make our previously quiet and leafy streets ugly, cluttered, difficult to manoeuvre in and frankly unsafe for our children. Thirdly, we as a community feel that community consultation has been inadequate and misleading. Four years ago, the developer held an Open Day in Masons Gardens. At this time, the few neighbours who actually attended were shown plans for a 2-storey development, a reasonable proposal that most neighbours would have been happy with, but less than half the size of the development now proposed. The developers, believing that they had filled an obligation to consult the public, then moved on to working with the planning department (without any further public consultation) and the result is this – a massively imposing 4- storey building. How did this happen? Where is the due process? Please refuse this proposal. It will destroy the amenity of this neighbourhood forever.

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**Respondent No:** 229

**Login:**

**Email:**

**Responded At:** Jul 22, 2020 11:33:38 am

**Last Seen:** Jul 22, 2020 03:18:46 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. To the extent the decision maker chooses to rely on significant and unadvertised provisions of the Policy, I further object as follows: 1 The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. 2 The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. 3 The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 4 Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. 5 The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and pedestrian safety. 6 Notwithstanding claims made by the developer, the community does not support this proposal and has not been properly consulted. I urge you not to support this proposal. Proforma additional paragraphs, to be added as relevant to the objector if desired: 7 Policy objectives 7.1 One of the primary objectives of the Policy is – “to ensure the appearance and design of residential aged care facilities are of high quality and do not have an undue impact on the residential amenity by way of building bulk and scale, noise, traffic or parking”. The proposal fundamentally conflicts with this objective given the stark and jarring contrast between the surrounding R10 and R12.5 locality and the proposed four storey R80 development. The number of residents proposed to be accommodated will increase the residential capacity of the site by over 1000%. The consequential visual impacts, noise, traffic and parking that will flow from such an intensification will destroy the residential amenity of the locality. 8 Compatibility with setting (bulk, scale and height) 8.1 The Site is surrounded by low density residential development. The land immediately to its east and west is R10 and the land to its north is R12.5. The contrast between the existing density and the proposed R80 coding will be sharp, and the proposed plot ratio is wholly incompatible with the broader setting. 8.2 The bulk and scale of the proposal is imposing in its context. The proposal makes no attempt to mitigate the visual impact of its northern and southern walls, which are large and bland, on the adjacent neighbours and streetscape. 8.3 The

depicted bulk and scale of the Melvista Lodge land (immediately to the South of the Site) in the development application plans is misleading. There are no such plans proposed or prepared, and the proposal is inconsistent with its setting in that regard. Redevelopment of Melvista Lodge is not likely or imminent given the nature of the landholdings there. 8.4 The proposed street frontage setbacks of 2.5 metres undermine line of sight in the context of the surrounding residential developments which have 9 metre setbacks. This has safety implications for drivers and pedestrians using Doonan Road and Betty Street. The design has complete disregard for its setting. 9 Amenity 9.1 The proposal fails to take into account the existing and future character of the locality. The City has a new local planning scheme, and whilst higher density has been provided for elsewhere, this locality preserved its low density coding. There is a clear intention and understanding that the low density residential nature of the area will be maintained. A high rise intensive aged care development completely undermines that intention. 9.2 The proposal will significantly diminish visual amenity of the area due to its size, scale and design. It is not in keeping with the character or streetscape in the locality. 9.3 The proposal represents a significant intensification in how the site will look and operate. It increases the number of people living on the site by over 1000%. The level of staffing and services required to accommodate 90 high needs aged care residents must not be understated. The cumulative impact of 90 residents, combined with the servicing and operational requirements of the facility and movement of staff, visitors and deliveries, will result in a substantial increase in: 9.3.1 noise from traffic movements, at all hours of the day, to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users; 9.3.2 noise generated from the operations of the proposal, including air-conditioning, services, and an intensive increase of population and people movement; 9.3.3 light spill from 24 hour a day operations; and 9.3.4 odours generated from the operations of the proposal, including catering, laundry and servicing. 9.4 No management plans have been provided to show how the detrimental amenity impacts which will arise from such an intensified use will be mitigated, particularly given its hours of operation. No development condition will be validly capable of managing those impacts. 10 Traffic 10.1 The proposal will result in a significant increase in vehicle movements to and from the site, at all hours of the day. 10.2 The Traffic Impact Statement made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment traffic movements. 10.3 The Transport Impact Statement provides very little detail on the type of vehicle movements and the frequency and timings of those movements. This detail is essential to form a properly considered assessment of traffic movements and their impacts, and the document therefore cannot be relied upon. 11 Car Parking 11.1 The amount of administrative, catering, cleaning, medical, allied health and maintenance staff required to support an intensive 90-bed high care facility will not be supported by 26 bays, particularly given no parking allowances have been made for deliveries, visitors of residents, or the Wellness Centre staff and visitors. 11.2 The surrounding streets are not capable of supporting the street car parking which will necessarily arise due to the lack of sufficient on-site car parking. 12 Community consultation 12.1 The developer relies on consultation it conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different from what is proposed. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed. 12.2 Immediately affected residents have either never been contacted or have only recently been informed about the extent of the proposal. 13 Other 13.1 Clause 4.6.2 of the Policy states – “a minimum of twenty-five per cent (25%) of the site area is to be landscaped”. The proposed development does not comply with this requirement of the Policy. 13.2 The proposal will have a significant carbon footprint, and only just exceeds the minimum standards for environmental sustainability under the National Construction Code. 13.3 The proposal fails to take into account the recommendations of the Review of Innovative Models of Aged Care Research Paper, 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety in terms of its design and density.

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**Respondent No:** 230

**Login:**

**Email:**

**Responded At:** Jul 22, 2020 11:35:12 am

**Last Seen:** Jul 22, 2020 02:34:23 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Melvista Ave and Princess Rd is already too busy with traffic from general householders and commuters to and from schools. The size and number of people occupying , working and visiting this proposed Aged Facility will increase the traffic , noise and congestion in this residential area. The main reason to purchase in this area of the City of Nedlands is the parks, trees and serenity of the river life. There is a need for Aged Care Facilities but this is the wrong spot. I strongly oppose this proposal.

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**Respondent No:** 231

**Login:**

**Email:**

**Responded At:** Jul 22, 2020 11:59:14 am

**Last Seen:** Jul 23, 2020 03:48:03 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I do not support this development. It location is inconsistent with the location in the suburb. The ratepayers are discussing this at every opportunity, and I am yet to hear a single person say they are happy with this.

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**Respondent No:** 232

**Login:**

**Email:**

**Responded At:** Jul 22, 2020 14:15:19 pm

**Last Seen:** Jul 22, 2020 06:11:28 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. To the extent the decision maker chooses to rely on significant and unadvertised provisions of the Policy, I further object as follows: 1 The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. 2 The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. 3 The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 4 Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. 5 The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and pedestrian safety. 6 Notwithstanding claims made by the developer, the community does not support this proposal and has not been properly consulted. I urge you not to support this proposal. In addition, I make the following additional objections: 1 Policy objectives 1.1 One of the primary objectives of the Policy is – “to ensure the appearance and design of residential aged care facilities are of high quality and do not have an undue impact on the residential amenity by way of building bulk and scale, noise, traffic or parking”. The proposal fundamentally conflicts with this objective given the stark and jarring contrast between the surrounding R10 and R12.5 locality and the proposed four storey R80 development. The number of residents proposed to be accommodated will increase the residential capacity of the site by over 1000%. The consequential visual impacts, noise, traffic and parking that will flow from such an intensification will destroy the residential amenity of the locality. 2 Compatibility with setting (bulk, scale and height) 2.1 The Site is surrounded by low density residential development. The land immediately to its east and west is R10 and the land to its north is R12.5. The contrast between the existing density and the proposed R80 coding will be sharp, and the proposed plot ratio is wholly incompatible with the broader setting. 2.2 The bulk and scale of the proposal is imposing in its context. The proposal makes no attempt to mitigate the visual impact of its northern and southern walls, which are large and bland, on the adjacent neighbours and streetscape. 2.3 The depicted bulk and scale of the Melvista

Lodge land (immediately to the South of the Site) in the development application plans is misleading. There are no such plans proposed or prepared, and the proposal is inconsistent with its setting in that regard. Redevelopment of Melvista Lodge is not likely or imminent given the nature of the landholdings there.

2.4 The proposed street frontage setbacks of 2.5 metres undermine line of sight in the context of the surrounding residential developments which have 9 metre setbacks. This has safety implications for drivers and pedestrians using Doonan Road and Betty Street. The design has complete disregard for its setting.

3 Amenity

3.1 The proposal fails to take into account the existing and future character of the locality. The City has a new local planning scheme, and whilst higher density has been provided for elsewhere, this locality preserved its low density coding. There is a clear intention and understanding that the low density residential nature of the area will be maintained. A high rise intensive aged care development completely undermines that intention.

3.2 The proposal will significantly diminish visual amenity of the area due to its size, scale and design. It is not in keeping with the character or streetscape in the locality.

3.3 The proposal represents a significant intensification in how the site will look and operate. It increases the number of people living on the site by over 1000%. The level of staffing and services required to accommodate 90 high needs aged care residents must not be understated. The cumulative impact of 90 residents, combined with the servicing and operational requirements of the facility and movement of staff, visitors and deliveries, will result in a substantial increase in:

3.3.1 noise from traffic movements, at all hours of the day, to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users;

3.3.2 noise generated from the operations of the proposal, including air-conditioning, services, and an intensive increase of population and people movement;

3.3.3 light spill from 24 hour a day operations; and

3.3.4 odours generated from the operations of the proposal, including catering, laundry and servicing.

3.4 No management plans have been provided to show how the detrimental amenity impacts which will arise from such an intensified use will be mitigated, particularly given its hours of operation. No development condition will be validly capable of managing those impacts.

4 Traffic

4.1 The proposal will result in a significant increase in vehicle movements to and from the site, at all hours of the day.

4.2 The Traffic Impact Statement made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment traffic movements.

4.3 The Transport Impact Statement provides very little detail on the type of vehicle movements and the frequency and timings of those movements. This detail is essential to form a properly considered assessment of traffic movements and their impacts, and the document therefore cannot be relied upon.

5 Car Parking

5.1 The amount of administrative, catering, cleaning, medical, allied health and maintenance staff required to support an intensive 90-bed high care facility will not be supported by 26 bays, particularly given no parking allowances have been made for deliveries, visitors of residents, or the Wellness Centre staff and visitors.

5.2 The surrounding streets are not capable of supporting the street car parking which will necessarily arise due to the lack of sufficient on-site car parking.

6 Community consultation

6.1 The developer relies on consultation it conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different from what is proposed. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed.

6.2 Immediately affected residents have either never been contacted or have only recently been informed about the extent of the proposal.

7 Other

7.1 Clause 4.6.2 of the Policy states – “a minimum of twenty-five per cent (25%) of the site area is to be landscaped”. The proposed development does not comply with this requirement of the Policy.

7.2 The proposal will have a significant carbon footprint, and only just exceeds the minimum standards for environmental sustainability under the National Construction Code.

7.3 The proposal fails to take into account the recommendations of the Review of Innovative Models of Aged Care Research Paper, 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety in terms of its design and density.

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**Respondent No:** 233

**Login:**

**Email:**

**Responded At:** Jul 22, 2020 14:19:11 pm

**Last Seen:** Jul 22, 2020 06:16:13 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. My objection is made on the following grounds: 6 The proposal is inconsistent with the Residential Aged Care Facilities Local Planning Policy because of the undue impact it will have on the residential amenity of the area. 7 The height, bulk and scale of a four-storey development proposal is incompatible with the locality and surrounding developments. 8 The proposal will result in unacceptable increases in noise, traffic, odours, car parking congestion and light pollution. 9 The proposal fails to adequately manage or mitigate the impacts it will have on the existing and future residential amenity. 10 The design of the proposal is imposing and unsympathetic to the existing character of the area. Not only does that have aesthetic implications, the contrast in setbacks affects sight lines, and therefore vehicle and pedestrian safety. 11 The car parking and traffic assessments do not adequately take into account the realistic vehicle movements the proposal will generate.

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**Respondent No:** 234

**Login:**

**Email:**

**Responded At:** Jul 22, 2020 14:22:44 pm

**Last Seen:** Jul 22, 2020 06:17:17 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 235

**Login:**

**Email:**

**Responded At:** Jul 22, 2020 14:30:42 pm

**Last Seen:** Jul 22, 2020 06:26:34 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Inappropriate location for a building of this type and size. Poor community engagement. Very distressing for residents.

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**Respondent No:** 236

**Login:**

**Email:**

**Responded At:** Jul 22, 2020 14:37:53 pm

**Last Seen:** Jul 22, 2020 06:35:12 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**

I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the above development proposed.

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**Respondent No:** 237

**Login:**

**Email:**

**Responded At:** Jul 22, 2020 15:01:22 pm

**Last Seen:** Jul 22, 2020 06:58:06 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). I have the following concerns relating to the proposal: 1 The impact on amenity. 7 The increase in noise, traffic and odour. 8 The lack of on-site car parking. 9 The intensive height, bulk and scale as compared to the low density residential surround. 10 The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing developments and the proposed. 11 The lack of management plans or mitigation strategies. 12 The lack of proper community consultation.

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**Respondent No:** 238

**Login:**

**Email:**

**Responded At:** Jul 22, 2020 15:19:52 pm

**Last Seen:** Jul 22, 2020 07:14:20 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. To the extent the decision maker chooses to rely on significant and unadvertised provisions of the Policy, I further object as follows: 1 The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. 2 The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. 3 The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 4 Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. 5 The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and pedestrian safety. 6 Notwithstanding claims made by the developer, the community does not support this proposal and has not been properly consulted. I urge you not to support this proposal.

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**Respondent No:** 239

**Login:**

**Email:**

**Responded At:** Jul 22, 2020 15:50:59 pm

**Last Seen:** Jul 22, 2020 07:37:09 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. 1. The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. 2. The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 3. Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. 4. My experience in a company allowed to build an aged care home in a residential street in Alfred Cove has been negative in the extreme due to amenity loss, noise, traffic and road safety problems which are still continuing after 2 years of the completion of the facility. I urge you not to support this proposal.

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**Respondent No:** 240

**Login:**

**Email:**

**Responded At:** Jul 22, 2020 15:55:05 pm

**Last Seen:** Jul 22, 2020 07:52:28 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Don't do it please

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**Respondent No:** 241

**Login:**

**Email:**

**Responded At:** Jul 22, 2020 15:56:22 pm

**Last Seen:** Jul 22, 2020 07:47:47 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property
Occupier of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I strongly object to the proposed Residential Aged Care Facility located at 73-75 Doonan Road and 16-18 Betty Street, Nedlands. I write as a resident for over 30 years of 67 Doonan Road, Nedlands. I am fully supportive of aged care in our street of the scale and type originally promoted by Oryx Communities in their one and only community engagement session in April 2016. This was a 2 level facility which included the refurbishment of the existing Melvista Lodge. However I was recently shocked to learn that Oryx has now proposed something completely different - not 2 level and not including refurbishment of the Melvista Lodge. The proposal is for a 4/5 level, high-rise for aged care, shoe-horned onto newly rezoned residential lots in between two narrow, quiet Nedlands streets. TOTAL LACK OF PROPER COMMUNITY CONSULTATION The development the community was consulted on in April 2016 is fundamentally different from what is now proposed. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed. Immediately affected residents have either never been contacted or have only recently been informed about the extent of the proposal. The community does not support this proposal and has not been properly consulted. As residents we are feeling like we are being ambushed by a Developer interested only in cramming as many units as possible onto the site to maximise their profit at the expense of the neighbourhood. FAILURE TO MEET POLICY OBJECTIVES The proposed development fundamentally contradicts one of the primary objectives of the Residential Aged Care Facilities Local Planning Policy (LPP) – “to ensure the appearance and design of residential aged care facilities are of high quality and do not have an undue impact on the residential amenity by way of building bulk and scale, noise, traffic or parking”. UNDUE IMPACT ON RESIDENTIAL AMENITY • The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of this local, low density residential area. It is wholly disproportionate and inconsistent with the character and streetscape of the area. • The 24/7 operation, scale and commercial nature of the proposed development is not suited to a residential area and will significantly impact nearby residents. The cumulative impact of 90 residents, combined with the servicing and operational requirements of the facility and movement of staff, visitors and deliveries, will result in a substantial increase in: • noise from traffic movements, at all hours of the day, to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users • noise generated from the operations of the proposal, including air-conditioning, services, and an intensive increase of population and people movement; • light spill from 24 hour a day operations; and • odours generated from the operations of the proposal, including catering, laundry and servicing. No management plans have been provided to show how the detrimental amenity impacts which will arise from such an intensified use will be mitigated, particularly given its hours of operation. No development condition will be validly capable of managing those impacts. There are many good examples of low-level



aged care facilities in Perth that are in keeping with their local residential areas, e.g.: Aegis Alfred Carson Claremont, Wearne Cottesloe, RiverSea Mosman Park, Aegis Shawford Innaloo, Hall & Prior Freshwater Bay, Aegis Amberley Spearwood, Aegis Shoreline North Coogee, Aegis Shorehaven Alkimos. In stark contrast to these, the proposed development is totally inappropriate for the setting and will significantly impact the surrounding residential neighbourhood due to its scale, bulk, streetscape impact and 24/7 operation. TRAFFIC & PARKING IMPACT Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. • The proposed development will employ around 40 staff and this significantly exceeds the onsite parking allowances. In addition, shift changeovers of nursing and maintenance staff as well as visitors further results in the onsite car parking being totally inadequate for a facility of this size and density. • Therefore, 24 hrs per day, staff and visitors will have no choice but to search for parking on streets all around the proposed facility including the parking bays provided at Masons Gardens for the Early Learning Centre and people just wanting to enjoy Masons Gardens. This will significantly impact not only local residents, but everyone using the Early Learning Centre and Masons Gardens, including during Concerts in the Park. • The inadequate on-site parking for people on night-shifts could result in unsafe practices and security concerns for staff accessing the facility at night having to park in unsecured and unmonitored locations. • The proposed facility will also require truck access for food delivery, waste removal, medical gas bottle replenishment, diesel fuel delivery, maintenance personnel for mechanical, electrical, fire and communications plant that will result in a significant increase to truck movements on Doonan Road and Betty Street. • Both Doonan Road and Betty Street are narrow streets with parking on one side only. There are already many cars parked in Doonan Road and Betty Street each day belonging to home owners and their visitors, Melvista Lodge workers and visitors, tradesmen and delivery vehicles. • The Developer's Transport Impact Statement (TIS) has made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment of car parking and traffic movements. • The TIS provides very little detail on the type of vehicle movements and their frequency and timings during the week. This detail is essential to form a properly considered assessment of traffic movements and their impacts, and the document therefore cannot be relied upon.

THE WRONG DEVELOPMENT FOR A POST COVID WORLD The proposed development was conceived and planned in a pre COVID environment, but we all now live in a very different world where a high-rise, high density aged care facility can present a very high risk to vulnerable patients. The Developer's proposal includes no stated approach to operation of the facility in the instance of a required lockdown nor a stated approach of how to protect vulnerable patients to cross infection from air borne viruses. The Developer's approach of cramming as many units as possible onto the site is a reckless and irresponsible approach to quality aged care services in a post COVID 19 environment where a duty of care exists to protect high-care patients who are in a very vulnerable position. The City of Nedlands would be in breach of its duty of care now with the foreknowledge that this facility presents an unacceptable risk and has not considered a COVID safe design. I want an aged care facility that is appropriate for this residential setting - not aged care that looks after the needs of the Developer at the expense of the neighbourhood and its residents. I therefore urge you not to support this proposal.

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**Respondent No:** 242

**Login:**

**Email:**

**Responded At:** Jul 22, 2020 16:18:53 pm

**Last Seen:** Jul 22, 2020 07:57:08 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). I have the following concerns relating to the proposal: The impact on amenity. The increase in noise, traffic and odour. The lack of on-site car parking which means staff, visitors will have no choice but to park on surrounding streets. There are already lots of cars parks next to Mason Garden so there is very little street parking space for a development of this scale. The intensive height, bulk and scale as compared to the low density residential surround. Developer just wanted to put as much sell-able space as they can while claiming some of their own facilities as community giveback. There is no genuine community benefit in this development. The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing developments and the proposed. The lack of management plans or mitigation strategies, which also shown developer had no due regard to the area and residents nearby at all. The lack of proper community consultation, actual it was a MISLEADING community consultation a few years back where the plan has changed significantly now. To the City and JDAP: It should NOT be a one size fits all planning assessment approach whilst no consideration is given to the local amenity for this development. This is not Stirling Hwy or Hampton Rd, this is much further down in a R10, 12.5 residential area next to a park.

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**Respondent No:** 243

**Login:**

**Email:**

**Responded At:** Jul 22, 2020 16:29:31 pm

**Last Seen:** Jul 22, 2020 08:14:38 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**  Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to strongly object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1) The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2) The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3) Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4) The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5) Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I therefore urge you not to support this proposal. Emily Meneghello

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**Respondent No:** 244

**Login:**

**Email:**

**Responded At:** Jul 22, 2020 17:24:13 pm

**Last Seen:** Jul 22, 2020 08:38:56 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

1. At 4 stories, the proposed building is inconsistent with the low density residential surroundings & will abut existing residences to the north: quite specifically the design conflicts with the claim that it will "achieve a sensitive integration with the surrounding low scale, residential area." 2. It will increase traffic congestion especially during shift handover (7 days per week), weekends & holiday times (e.g. mother's day) as vehicles enter & exit the institution posing a risk to other vehicular & pedestrian traffic e.g. children entering & exiting the park. 3. It is a rather ugly great big box that that will visually impinge upon the lines of sight on adjacent roads increasing hazards for drivers & pedestrians, especially children. 4. The movement of service & delivery trucks will add further congestion to the neighborhood streets as will the negotiation of vehicles into & out of the access points & underground parking. 5. There appear to be no garden / recreational areas for inmates who will need respite from their boxy little rooms. 6. The evacuation of 90 inmates, family members, institutional staff & service personnel down the very small stairwells in the event of a fire or other emergency will be a significant challenge. 7. The pokey living arrangements for the inmates would appear conducive to the spread of infectious diseases such as COVID-19. 8. The plans do not show any provision for the removal of cadavers except through the public areas or 2 x elevators.

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**Respondent No:** 245

**login:**

**Email:**

**Responded At:** Jul 22, 2020 18:24:33 pm

**Last Seen:** Jul 22, 2020 10:21:05 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**  Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

OBJECTION TO THE DEVELOPMENT APPLICATION FOR PROPOSED RESIDENTIAL AGED CARE FACILITY FOR 73-T5 DOONAN RD AND 16-18 BETTY ST NEDLANDS RESIDENT 39 DOONAN ROAD Key Objections: 1.0 The Scale, Which Includes Height and Overall Bulk, is Incompatible With The Area of the Blocks and the Immediate Residential Setting The overall complex is overly large and high (4 floors) and aesthetically not in keeping with the surrounding residential setting and infrastructure. The building totally dominates the setting with minimal setbacks and no planned garden surrounds - the lack of which impacts negatively on (i) the host suburban setting of two quiet, narrow streets, and as importantly on (ii) the facility's residents. The latter point is critical by virtue that the residents would be largely confined to the building, lacking opportunities to enjoy green surrounds for exercise and relaxation and to interact with local residents. While it's proposed that delivery trucks access via the underground parking, the building's entry/exits impose physical limitations on truck size. In reality, there would be no guarantee that delivery trucks would meet the minimum size, indicating that this could be a source for congestion 2.0 Infrastructure Limitations Betty Street, Doonan Rd and Melvista Ave are all narrow, quiet suburban streets. The former two are not through-going streets and lack the capacity to carry increased traffic flow and provide overflow parking to the facility. In the case of any significant emergency the tight infrastructure and multi-floor nature of the complex could pose significant elevated risks to the residents and neighbours. With the limited space outside of the multi-floored facility and its level of occupancy would present significant evacuation challenges 3.0 Noise, Emissions and Light Pollution Notwithstanding the threadbare technical reports, noise, emissions and light pollution could have a detrimental impact on the immediate neighbourhood.

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**Respondent No:** 246

**Login:**

**Email:**

**Responded At:** Jul 22, 2020 20:00:46 pm

**Last Seen:** Jul 22, 2020 11:52:28 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

This development is an unreasonable size and structure to be placed in a residential area and will effect the whole nature of the street and neighbourhood. The plans of the structure show that it is of a size that i wouldn't want to live across the road from. If the development was of a suitable size or in a location that made sense such as near Hollywood hospital, I'd accept that.

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**Respondent No:** 247

**Login:**

**Email:**

**Responded At:** Jul 22, 2020 20:36:59 pm

**Last Seen:** Jul 22, 2020 12:32:35 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I would not want to live next to such a big development...this is a residential area for families to live not for big companies to build.

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**Respondent No:** 248

**Login:**

**Email:**

**Responded At:** Jul 22, 2020 20:52:42 pm

**Last Seen:** Jul 22, 2020 12:49:14 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

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**Q8. Submission : Please give your comments relating to this item in full below.**

I object to the development proposal as a ratepayer, parent and grandparent of a young family living on Betty Street. The idea to insensitively sandwiched / cramped a 4/5 level hotel style aged care home between R12.5 residential homes and some 26 units of existing Melvista Lodge Retirement Village is preposterous. The proposed mass & scale does not complement the low density neighbourhood . There is insufficient ground level open space / compound planned to complement adjacent residents or for the enjoyment of the in-house aged care residents. There will be increased level of activities changing the character of the low density neighbourhood. In this neighbourhood there is no multi level building in close proximity. The lack of sufficient parking bays will cause many traffic bottleneck and safety issues for all parties such as aged care staff, suppliers, contractors, visitors and neighbouring residents. The surrounding narrow streets are not capable of supporting on-street car parking which will necessarily arise due to the lack of sufficient on-site car parking. Excess visitors or permanent staff cannot at all times be expected to park on the narrow Betty or Doonan streets or on verge, or on Mason Garden parking lots as it will impact on Childcare centre parking for parents pick up and drop off kids. Residential Aged Care is nursing home. The WA Health Department guideline for Nursing Homes states sufficient parking bays needs to be provided to satisfy applicable authority requirements and the needs of staff and visitors. Therefore for the needs of staff and visitors: \*Permanent number of employees working on any one day must be estimated to include staff car parking bays. \* Spaces dedicated for use by staff or visiting health care consultants must be distinctively indicated , \* A dedicated parking space for emergency, delivery, resident patient transport and service vehicles (oversized 7/8 seaters or heavy vehicles) must be set aside. The inadequacy can be demonstrated by simple maths: Assuming that there are 12 minimum staff working (reception, health care, cleaning, restaurant cafeteria, maintenance), on any day, so 12 parking bays must be dedicated for staff parking. Removing 12 dedicated staff car bays from the 23 bays as proposed in the development application, only a balance of 11 car bays would be left for visitors use. Using the developer's formula of 1 visitor car bay per 4 units , only (11x4) 44 units should be allowable instead of the proposed 90 units. Should the development persists with 90 units, assuming minimum staff level of 20 and 90 units at 1 car per 4 units will be 23 car bay for visitors. Staff and visitors car bay requirement should totalled 43, the developer is substantially understating car bay provisions. On busy days such as family get together days or on special occasion days, assuming 1 resident may get 2 visitors requiring 2 car spots per resident( could be more visitors per family) , it will require between 100 to 180 parking spots !!!!! Significantly impacting on street parking in the quiet neighbourhood at regular frequency. (Note: staff numbers must be included in the calculation for car bay provision and be in accordance with the minimum staff requirement for the welfare of Aged Care residents) Bus service is infrequent, so it is not expected that staff will take public transport to work nor have expectation that Transperth will increase frequencies at Transperth's expense. This development proposal is so lack of due considerations for the Aged Care residents, staff and insensitive to the low density character of the neighbourhood. When parking is not address it will be horrendous for the narrow single way roads of Betty and Doonan streets. It will have traffic and people safety implications especially for the local children going to Mason garden. Responsible planning should also include a car park safety study ensuring overall manoeuvrability within the basement parking for staff, visitors and service vehicles. It appears that there is no consideration for resident pick up or set off and emergencies. The increased in activities will increase in volume of traffic. Do not assume low visitor volumes as family visiting is important and encouraged for the well being of seniors in aged care environment especially during day time hours, not in the evenings when Aged Care residents retire for early bedtime. 90 suites / units definitely not allowable to be cramped within the low density zoning neighbourhood. (R10, R12.5 neighbourhood). In short, as a ratepayer I look forward to City of Nedlands undertakes responsible & accountable planning assessment in this application, not only for existing residents but for the future residents and visitors of the high care Aged Care/ Nursing Home Health facility , to evaluate traffic bottlenecks and people safety issues. Please do not support a multi level non complementary hotel building to be sandwiched / cramped between low density neighbourhood and the existing Melvista Lodge Retirement Village. The parking, traffic and transport impacts as submitted must be realistically reviewed. Commercial for profit organisation seek financial benefits for themselves supported by Government grants hence they proposed high number of units ignoring the detrimental effect on senior residents, their visitors and neighbours. They expect future problems of traffic congestion, parking issues to be solved by others like City of Nedlands.

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**Respondent No:** 249

**Login:**

**Email:**

**Responded At:** Jul 22, 2020 21:15:12 pm

**Last Seen:** Jul 22, 2020 09:08:10 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property

Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**

I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

[https://yourvoice.nedlands.wa.gov.au/da20-49308/survey\\_tools/submission-da20-49308](https://yourvoice.nedlands.wa.gov.au/da20-49308/survey_tools/submission-da20-49308) does not have the facility for me to upload my submission. I have tried pasting it to this submission box but it will only accept simplified text and it won't accept tables or graphics.

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**Respondent No:** 250

**Login:**

**Email:**

**Responded At:** Jul 22, 2020 22:41:46 pm

**Last Seen:** Jul 22, 2020 14:15:01 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

We are writing to express our deep concerns about and objections to the proposed residential aged care facility at 16 & 18 Betty Street and 73 & 75 Doonan Road, Nedlands. Our objections are summarized below under four broad headings: 1. The scale of the project 2. The nature of the project 3. The lack of meaningful consultation with neighbours and the local community 4. The nature of the approval process.

1. The Scale of the Project 1.1 Impact on Amenity of the Surrounding Area o The proposal places a four-storey plus basement plus roof plant building in an elevated position in a residential area, among dwellings which are limited to two storeys. The visual impact of the building from Melvista Avenue and Mason's Gardens, which it overlooks, will be the equivalent of a five-storey building. This constitutes a massive adverse impact on the amenity of adjoining properties and the streetscape, including road reserves and the public open space provided by Mason's Gardens.1 o Furthermore, is the purported basement a basement at all? An open roadway will run down the side of the building with access to the "basement" car park off it. Five stories will rise above this open roadway, which defines ground level for the greater site, with potential future extension south towards Mason's Gardens. The roof plant further compromises this building and the four storey claims for it. 1.2 Vulnerability to External Threats: COVID-19, Future Pandemics & Other Emergencies o In all the documents provided we have seen no consideration given to how the proposed development accounts for the new challenges and dangers posed by COVID-19 and likely future pandemics. The current pandemic brings into sharp focus the public health and safety concerns related to creating a facility to house a high number of aged people within the close confines and shared common areas of a multistorey facility with limited external access.2,3 Insights that have developed from this pandemic experience include: the vulnerability of large groups of people living at close quarters; the particular vulnerability of elderly people; and the threat that institutional breakouts of disease pose both to the occupants and to surrounding areas, with aged-care facilities at the very top of this list of institutional vulnerabilities. Apart from its isolation, a natural advantage Perth has enjoyed in combating the COVID-19 threat is the low density of its buildings and habitations. To be creating high-density aged-care facilities in the face of the COVID-19 experience and the related advantages conferred by our low-rise city defies good sense and poses future threats both to the residents of such facilities and the surrounding community. 1.3 Evacuation Plan o Another risk that worries us is the matter of access and evacuation in case of fire or other emergency. This is a particular concern where difficult-to-evacuate residents are involved, and the narrow access points provided by Doonan Rd and Betty St and the narrow one-way "basement"-level roadway give rise to unease in this regard. o What readily usable evacuation routes exist between the floors in case of fire or other emergency where lifts cannot be used? 1.4 Parking o The parking allowance on site for the proposed 90 bed facility is 26 bays. This appears manifestly inadequate and we are concerned adjoining streets will become parking lots for the excess vehicles. Alfred Carson Hospital, a close-by aged care facility that also has 90 beds,

has over 50 parking bays and is serviced by a major road. o The parking bays are inadequately designed: tightly packed and accessed with difficulty in the back of the basement (or, more accurately, the ground floor)

1.5 Traffic o Traffic flows are already heavy on the small streets on which we live and we are concerned about the additional traffic that this 24-hour-a-day 7-day-a-week 90-patient facility will generate on streets completely unfit for purpose. These streets are bus routes which will be reduced to one lane by parking creating crowding and danger for residents and other users.

1.6 Lighting o Lighting of the 24/7 nursing facility with its narrow street frontages and height will be a major intrusion into the amenity and sleep comfort of neighbours.

1.7 Air Conditioning/Ventilation o Has consideration been given to the implication of dispersal of air and aerosolized secretions (stable in the air for hours) from roof-based air conditioning and ventilation systems on the safety of surrounding residents in case of Covid-19 or similar disease outbreaks within an inherently vulnerable aged-care facility?

1.8 Sound o Has the noise of building plant and activities been considered, both in terms of daytime and night-time intrusiveness.

2. The Nature of the Project

2.1 Fitness for purpose o While aged-care facilities are a helpful component of a community, they must be sympathetic to the needs of the residents within them. Transposing people at the end of their lives from independent living in low density surroundings to a multistorey hospital in which they are virtually confined until death seems the antithesis of compassionate end-of-life care. A spacious low rise building with easy access to the exterior, allowing sun and light into the building, garden aspects viewable from within it and directly accessible from it, and a ready capacity to move beyond its confines are desirable assets which are apparent at the one-storey Alfred Carson facility, less than 1 Km from the proposed development. In contrast, the proposed high rise development is seriously limited in all these regards and these limitations are compounded by the steep inclines of Betty St and Doonan Rd outside the building, making walking and wheelchair use beyond the building difficult and potentially dangerous for the elderly. The Alfred Carson facility provides a local working example of a community-friendly low-rise development, which is an exemplar for those that follow. o Has the Royal Commission into Aged Care process been factored into decision making? It is likely that this process (see interim report <https://agedcare.royalcommission.gov.au/publications/interim-report>) will set new directions in accommodation requirements for aged care facilities, based on the limitations in current facilities. Given the final report is imminent (12 November 2020) it is imprudent to approve in the absence of this advice.

2.2 A commercial project in a residential area o This is not a low key not-for-profit development built with local residents in mind, but a unabashed commercial enterprise and the end point of a chain of facilities starting with low care on other sites and culminating in high care here.

3. Lack of Meaningful Consultation with Neighbours and the Local Community It has been stated that extensive community consultation has been undertaken.<sup>4</sup> We are situated across the street and two doors up from the proposed facility and until two weeks ago had no knowledge of this proposal. We were aware that there had been a proposal to redevelop the adjacent Melvista Nursing Home site with a similar low-rise development, empathetic to the surrounding housing, to take place of the defunct building. We had no notion of a variance of these plans until the revelations of recent weeks. We are extremely disappointed by this: advertising (in the Post newspaper or wherever) is no substitute for direct communication. While an appropriately scaled aged-care facility, as existed on the Melvista Nursing Home site, is an arguable proposition, this development goes immeasurably beyond that. We feel that the interests of those residents most physically affected by this development have been given little or no consideration by the Council and its planning department. How could the imposition of such a huge building within a residential area be allowed to happen without fair and frank communication with residents in the surrounding area? Why was approval given to the rezoning of residential land to create the opportunity for such a large development? How could councillors elected by resident/ratepayers to defend their interests have acceded to this?

4. The Nature of the Approval Process In relationship to this proposal, it was stated at the Nedlands Council meeting on the 23 June, the Council planning director that the developer, Oryx, "undertook more consultation than I have ever seen any developer do for a proposal". He went on to observe that there was little point in neighbours objecting to Oryx's plans because they were fully compliant with a planning policy adopted in April, meaning "there's nothing to object to. Its only being advertised because it's in the policy to do so".<sup>4</sup> Nothing to object to! Within the planning rules! Further exploration of the events that preceded this situation reveals that the planning rules with which the project is said to be compliant were contrived over a series of extraordinary steps. These included assigning of aged-care special use to the four residential lots that form the land on which the development is proposed, off-market sale of one of these lots to the developer by the Council, a three-storey limit for development on the lots which was subsequently increased to four stories and an opaque communication process with the community with no direct communication regarding any of these steps with nearby residents despite claims to the contrary, as we know from our own experience, given our proximity to the site. In none of this series of events were the interests of the local community properly

considered. "Only being advertised because it's in the policy to do so" captures the dismissive attitude to community consultation which appears to characterise the Council's approach to this matter. References 1. [https://www.dplh.wa.gov.au/getmedia/5dce3eb2-abe9-4fc3-bbab-92cc89f0b5cf/State\\_Planning\\_Policy\\_3-1-Residential\\_Design\\_Codes-for-mobile](https://www.dplh.wa.gov.au/getmedia/5dce3eb2-abe9-4fc3-bbab-92cc89f0b5cf/State_Planning_Policy_3-1-Residential_Design_Codes-for-mobile) 2. <https://www.architectureanddesign.com.au/features/comment/how-covid-19-is-reshaping-the-future-of-aged-care#> 3. <https://www.australianageingagenda.com.au/executive/architecture-design/covid-19-is-shaping-design-of-future-facilities/> 4. Claremont Nedlands Post Vol. 47, No. 27, July 4, 2020, P42.

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**Respondent No:** 251

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 11:07:44 am

**Last Seen:** Jul 23, 2020 03:54:41 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I wish to object to this proposed residential aged care facility at no 16 and 18 Betty St and 73 and 75 Doonan Rd Nedlands for the following reasons. 1 This is a large commercial 5 level high care nursing home and the scale, bulk and size of the proposal is totally out of place in a single residential area and is incompatible with the setting and the surrounding developments. 2 There is no provision for the required 25% of outdoor garden spaces which is essential for the well-being of patients 3 The 26 parking bays are totally inadequate to cater for staff, and visitors of over 90 patients as well as the visitors to the wellness centre. This will cause parking and traffic issues in the residential vicinity. 4 There will be an increase in noise, lighting and odour 5 There is a lack of management plans or mitigation strategies for fire and other emergencies. 6 Despite the developers claims, there has been no consultations with the immediate neighbours regarding this design prior to its submission to Council. The Developer is quoting feedback from a 2016 proposal which was very different in its design and scale. I urge you not to support this proposal

---



**Respondent No:** 252

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 11:13:28 am

**Last Seen:** Jul 23, 2020 02:49:57 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

This development is inappropriate for this quiet residential area. It should be sited in a commercial zone.

---



**Respondent No:** 253

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 11:35:43 am

**Last Seen:** Jul 23, 2020 03:33:20 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

---

Q5. **State how your interests are affected (select all relevant boxes)**  Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I wish to object to this proposed residential aged care facility at no 16 and 18 Betty St and 73 and 75 Doonan Rd Nedlands for the following reasons. 1 This is a large commercial 5 level high care nursing home and the scale, bulk and size of the proposal is totally out of place in a single residential area and is incompatible with the setting and the surrounding developments. 2 There is no provision for the required 25% of outdoor garden spaces which is essential for the well-being of patients 3 The 26 parking bays are totally inadequate to cater for staff, and visitors of over 90 patients as well as the visitors to the wellness centre. This will cause parking and traffic issues in the residential vicinity. 4 There will be an increase in noise, lighting and odour 5 There is a lack of management plans or mitigation strategies for fire and other emergencies. 6 Despite the developers claims, there has been no consultations with the immediate neighbours regarding this design prior to its submission to Council. The Developer is quoting feedback from a 2016 proposal which was very different in its design and scale. I urge you not to support this proposal

---





**Respondent No:** 254

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 11:49:57 am

**Last Seen:** Jul 23, 2020 03:28:34 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

---

Q3. **Your email address:**

---

Q4. **Your telephone number:**

---

Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at 73/75 Doonan Rd and 16/18 Betty St. I am concerned that the application relies on the City's Residential Aged Care Local Planning Policy, which was not fully advertised in its current form, with increase to 4 levels not advertised for approval. I believe the setbacks are inconsistent with the local area and surrounding residential zoning. These smaller setbacks with impede the line of sight for vehicles and pedestrians. I believe the current proposed building is bulky, overpowering and completely out of touch and sympathy with the surrounding neighbourhood, which is zoned R10 and R12.5 I believe the Traffic Impact Report underestimates the parking impact on the local area. The developers have not been transparent about the number of staff onsite and whether parking on site will accommodate staff, visitors, visiting staff and users of the Wellness Centre. On street parking will be lost on Betty St and Doonan Rd due to the basement entry and exit. I do not think there is enough on street parking to accommodate overflow, and the council bays on the corner of Melvista Ave and Hackett Rd will be occupied by visitors and staff, reducing its availability for existing public access. I believe the current LPP allows for overintensification of the site resulting in density that is too high for the area. Given the nature of facility and the vulnerable elderly who will be living there, it will rely on centralised airconditioning, which will created ideal environment for spread of airborne diseases. I am particularly concerned about this given the current COVID-19 pandemic, which has disproportionately affected elderly people in residential care, resulting in illness and death. I am worried about that having the potential to affect local residents.

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**Respondent No:** 255

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 11:53:29 am

**Last Seen:** Jul 23, 2020 03:50:53 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at 73/75 Doonan Rd and 16/18 Betty St. I am concerned that the application relies on the City's Residential Aged Care Local Planning Policy, which was not fully advertised in its current form, with increase to 4 levels not advertised for approval. I believe the setbacks are inconsistent with the local area and surrounding residential zoning. These smaller setbacks with impede the line of sight for vehicles and pedestrians. I believe the current proposed building is bulky, overpowering and completely out of touch and sympathy with the surrounding neighbourhood, which is zoned R10 and R12.5 I believe the Traffic Impact Report underestimates the parking impact on the local area. The developers have not been transparent about the number of staff onsite and whether parking on site will accommodate staff, visitors, visiting staff and users of the Wellness Centre. On street parking will be lost on Betty St and Doonan Rd due to the basement entry and exit. I do not think there is enough on street parking to accommodate overflow, and the council bays on the corner of Melvista Ave and Hackett Rd will be occupied by visitors and staff, reducing its availability for existing public access. I believe the current LPP allows for overintensification of the site resulting in density that is too high for the area. Given the nature of facility and the vulnerable elderly who will be living there, it will rely on centralised airconditioning, which will created ideal environment for spread of airborne diseases. I am particularly concerned about this given the current COVID-19 pandemic, which has disproportionately affected elderly people in residential care, resulting in illness and death. I am worried about that having the potential to affect local residents.

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**Respondent No:** 256

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 13:05:51 pm

**Last Seen:** Jul 23, 2020 05:04:19 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

he 4 storey proposed development covering 4 residential lots is not an appropriate size, scale or height appropriate for its setting or for the current or future character of the local area, which is predominantly residential and is characterised by 1 and 2 storey homes. A development of this scale is not sympathetic to, and will in fact detract from, all of the distinctive characteristics of this local area - a low-rise, leafy and quiet neighbourhood with large green setbacks Several large and very old trees of local importance will be removed and lost forever, further degrading the amenity. The setback for the development has been greatly reduced compared to all the other homeowners in the area. Given the topography of the local area, the building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible and dominate the enjoyment of Masons Gardens. The two streets on which the development will sit are narrow and are not designed to accommodate the amount of traffic for a facility of this size, particularly given the reliance on street parking (as the suggested parking is completely inadequate for the commercial operation of the nature contemplated). The increased traffic on the streets, and crossing the footpath down Doonan Road, will be a danger to the large number of pedestrians, including children, who use the footpath to walk to Mason Gardens and the local childcare centre located less than 100m from the development. The continual noise from the large scale commercial air-conditioning plant, commercial laundry and commercial kitchen and traffic will destroy the peaceful amenity of the residential locality. The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. This development will reduce the value and amenity of all the neighbouring and nearby homes that residents have worked all their lives to afford.

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**Respondent No:** 257

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 13:51:34 pm

**Last Seen:** Jul 23, 2020 09:03:50 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I write to register my objection to the proposed Residential Aged Care Facility on Lots 10 and 11 (No's 16 and 18) Betty Street and Lots 19 and 18 (No's 73 and 75) Doonan Road, Nedlands. As a nearby resident already impacted by the construction of a Nursing Home adjacent to my home I can see that there will be issues with this proposal. In brief I have the following concerns: (a) The impact of the facility upon the existing amenity of its existing surrounds . (b) The increase in traffic and also operational noise and smells (cooking, laundry). (c) The lack of sufficient on-site car parking bays. (d) The height, bulk and scale as compared to the low density residential surrounds. (e) The potential for reduced vehicle and pedestrian safety created by reduced set-back requirements. (f) The lack of a suitable impact mitigation management plan. (g) A clear lack of adequate community consultation regarding the proposal. As I have stated, I live next to a similar aged care facility. Given the magnitude of the potential impact of the proposed building and the operational concerns I have outlined, I seriously doubt that the Council can apply any developmental conditions which will suitably manage these. In consequence the proposal should be rejected.

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**Respondent No:** 258

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 14:44:41 pm

**Last Seen:** Jul 23, 2020 06:20:14 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

July 23, 2020 Director of Planning and Development Administration Office City of Nedlands 71 Stirling Highway NEDLANDS WA 6009 Re: PROPOSED AGED-CARE HOSPITAL 16 and 18 Betty Street / 73 and 75 Doonan Road, Nedlands Dear Sir, I write to register my objection to the Residential Aged Care Facility currently proposed for Lots 10 and 11 (No's 16 and 18) Betty Street and Lots 19 and 18 (No's 73 and 75) Doonan Road, Nedlands. Simply stated, the proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. In particular, I have the following concerns: (1) Impact Upon Surrounding Residential Amenity: The area surrounding the proposed development is comprised almost entirely of private residences. As such it exhibits a distinct and definable character. Having had the opportunity to review the design documentation for the proposed aged-care facility there is clearly nothing, either in scale or in its operation, that can be described as 'private residential'. The people who have chosen to live and make their lives within this area did so because of its quiet residential amenity, yet the proposed building is significantly 'public' in its operation. Every upper room in the proposed multi-story building will overlook (at and into) the surrounding residences. Moreover, each room will require constant staff/employee access and, by its very function, inevitably have a continual turnover of occupants; each bringing with them a new group of visiting relatives. By any understanding of the word, this constitutes a major public space. (2) Increased Traffic, Noise and Generation of Operational Odour: The operation of an aged-care facility of this size can in no way be equated with that of the residential properties surrounding it. The facility will require constant and daily interaction with external services, staff and visiting relatives. The movement of delivery vehicles, staff changes, medical support and visitors, potentially at all hours of the day, is in no way compatible with what currently exists. In addition to the inevitable night time light-spill, there will be a constant generation of noise from air-conditioning. Added to this ambient impact, laundry and cooking activities, which are by nature intensive, undeniably constitute an unacceptable detriment the amenity of the locality, particularly in relation to noise, incident light, traffic and generated smells. (3) Traffic and Insufficient On-Site Car Parking: The provided twenty-six bay basement car parking does not appear adequate to the proposal. I would submit that given the volume and number of administrative, medical, catering, cleaning, health and maintenance staff required for an intensive ninety-bed high care facility, the likely needs of the development have been understated and the number of bays provided arguably insufficient. In addition to this, further parking for staff, deliveries and daytime visitors to the proposed Wellness Center will be necessary. Also, apart from stopping points for passing public transport, the surrounding streets are demonstrably incapable of supporting the additional parking which will necessarily arise from the lack of sufficient on-site car parking. The actual parking requirement, therefore, as well as the likely movement of associated traffic will result in a further unacceptable impact upon amenity, traffic flow and noise. (4) Building Height, Bulk and Scale: The

subject site is surrounded by low density residential properties, from R10 to the immediate east and west, to R12.5 to its north. With the development's R80 coding, the density contrast between what now exists and what is proposed will not only be sharp, but wholly incompatible with the surrounds. Even a casual review of the building elevations that have been submitted clearly show that at an R80 zoning, the scale and bulk of the proposed building is imposing and will have a considerable impact upon adjacent neighbours and the streetscape in general. (5) Setback Differences and Reduced Vehicle and Pedestrian Safety: Again, a review of the proposed design suggests that there has been a complete disregard for the impact of the building's setting. The proposed street frontage setbacks of 2.5 metres stand in stark contrast with the setbacks of 9 metres required of those existing residences surrounding the facility. Arguably, in undermining the existing lines of sight within the area, there are safety implications for both drivers and pedestrians when using the driveways into the adjacent Doonan Road and Betty Street. This situation will be further exacerbated by a potential increase in vehicle movement over that existing of over 300%. (7) Lack of Adequate Community Consultation: As an intensive four-storey facility, the proponents are seeking approval to increase the development capability of the concerned sites in an otherwise low density residential area. In order to achieve this they have relied upon changes to the City's Residential Aged Care Local Planning Policy, and thereby, significantly, changes to the nature and residential ambiance of the precinct. With changes of this magnitude, every affected person should have been afforded meaningful input into the deliberations and actions taken by Council. To this end the proposal should have been adequately advertised for public consideration and comment. It is my understanding that this has not been the case. In conclusion, I respectfully submit that the proposed aged-care facility fails to take into account the existing and future character of its locality. Where, according to the City of Nedlands' new local planning scheme, higher density has been provided elsewhere, there was also the clear intention that the low density residential nature of the area in question would be maintained. The proposed major increase to the site's live-in population represents a significant intensification in its built appearance, its use and its function. The cumulative impact of ninety high-need aged-care residents; their requirements in terms of staffing; servicing and the operation of the facility; as well as the movement of staff, visitors and deliveries, cannot be understated. In size and in scale, the design of the proposed development as it now stands, cannot be considered in keeping with the character or the locality's streetscape. It will significantly diminish the visual amenity of the area and completely undermine the intention of the City of Nedlands' new scheme. In view of the above concerns it may also be argued that in terms of design and density, the development fails to accommodate the recommendations contained within the recent Review of Innovative Models of Aged Care Research Paper, undertaken by the Royal Commission in to Aged Care Quality and Safety. Finally, there appears to be no management plan or indication to Council from the project's proponents, as to how the detrimental impacts upon the surrounding amenity arising from this intensified use might be mitigated. Moreover, I would argue that there are simply no development conditions Council might apply, which are capable of managing such impact. Accordingly, I submit that the proposed development should be rejected.

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**Respondent No:** 259

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 14:52:53 pm

**Last Seen:** Jul 23, 2020 06:44:32 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to strongly object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. I object to this development proposal for the following reasons: 1 The development proposed is a large, 24 hour business and as such will produce noise, light, traffic and odour inconsistent with the low density, residential surrounds. 2 A proposal of this type within a residential setting will create safety issues for vehicles and, more concerningly, for pedestrians given the impact on sightlines due to setback differences, and the increase in heavy vehicles manoeuvring in and out of the access points. 3 The impact of this development on traffic in the area has been inadequately considered in the proposal. 4 Car parking that caters for both staff and visitors has been inadequately accommodated in the proposal, which will result in overflow parking to the small neighbouring streets. 5 The physical scale of the proposal is inconsistent and incompatible with the surrounding neighbourhood. 6 The proposal does not meet the objectives or landscaping requirements of the Residential Aged Care Facility Local Planning Policy. 7 There has been a lack of proper community consultation. I urge you not to support this proposal.

---



**Respondent No:** 260

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 15:17:23 pm

**Last Seen:** Jul 23, 2020 07:13:18 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

This commercial development is far too large for this quiet, residential area. It will spoil the appeal of the area.

---





**Respondent No:** 261

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 15:36:54 pm

**Last Seen:** Jul 23, 2020 07:31:20 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

a formal letter has been addressed to the nedlands council

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**Respondent No:** 262

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 15:43:25 pm

**Last Seen:** Jul 23, 2020 07:41:46 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I support the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I think this is an excellent proposal - we should be allowing residents to age in place and the design, aesthetics are of a high quality.

---



**Respondent No:** 263

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 16:16:01 pm

**Last Seen:** Jul 23, 2020 08:07:16 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**  Other

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to strongly object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. My objection is made on the following grounds: 1 The proposal is inconsistent with the Residential Aged Care Facilities Local Planning Policy because of the undue impact it will have on the residential amenity of the area. 2 The height, bulk and scale of a four-storey development proposal is incompatible with the locality and surrounding developments. 3 The proposal will result in unacceptable increases in noise, traffic, odours, car parking congestion and light pollution. 4 The proposal fails to adequately manage or mitigate the impacts it will have on the existing and future residential amenity. 5 The design of the proposal is imposing and unsympathetic to the existing character of the area. Not only does that have aesthetic implications, the contrast in setbacks affects sight lines, and therefore vehicle and pedestrian safety. 6 The car parking and traffic assessments do not adequately take into account the realistic vehicle movements the proposal will generate. I urge you not to support this proposal.

---



**Respondent No:** 264

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 16:17:03 pm

**Last Seen:** Jul 23, 2020 08:11:32 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. My objection is made on the following grounds: 1 The proposal is inconsistent with the Residential Aged Care Facilities Local Planning Policy because of the undue impact it will have on the residential amenity of the area. 2 The height, bulk and scale of a four-storey development proposal is incompatible with the locality and surrounding developments. 3 The proposal will result in unacceptable increases in noise, traffic, odours, car parking congestion and light pollution. 4 The proposal fails to adequately manage or mitigate the impacts it will have on the existing and future residential amenity. 5 The design of the proposal is imposing and unsympathetic to the existing character of the area. Not only does that have aesthetic implications, the contrast in setbacks affects sight lines, and therefore vehicle and pedestrian safety. 6 The car parking and traffic assessments do not adequately take into account the realistic vehicle movements the proposal will generate.

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**Respondent No:** 265

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 16:18:10 pm

**Last Seen:** Jul 23, 2020 08:12:44 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Other
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to OBJECT to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, especially with regard to provisions changed without public notice. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements (eg. lack of deep root planting; not enough garden space for aged care residents or staff). 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to OVERLOOKING on neighbouring Northern properties on Betty st and Doonan St, noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates SAFETY issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. \*\*My grandchildren use the footpaths to walk to the parks close by, and go to the daycare centre, their safety is at risk due the lack of setbacks to respect current residential setbacks. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you NOT to support this proposal.

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**Respondent No:** 266

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 16:29:40 pm

**Last Seen:** Jul 23, 2020 08:21:06 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

While I am usually supportive of investment, development and progress I wish to lodge my objection to the proposed aged care facility between Betty St and Doonan Rd near Melvista Avenue. The physical size and intensive resident capacity of this development is not compatible with the neighbourhood setting in terms of aesthetics, access and parking and does not appear to be part of any longer term strategy for the city in terms of areas for increased density and associated development of amenities. In the medium term construction of the facility will undoubtedly result in an extended period of significant obtrusion for local residents in a setting with limited ability to support such a substantial building effort. I am also concerned at what appear to be policy changes and land purchase between the council and developers to facilitate this development prior to any notification of the proposal and the lack of any prior consultation process. The development of aged care is important for the area and the council should be working more systematically with the developers and ratepayers to ensure the appropriate locations and scale of developments.

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**Respondent No:** 267

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 16:40:29 pm

**Last Seen:** Jul 23, 2020 08:36:55 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the present plans for the Residential Aged Care Facility at Lots 10 and 11 (No.16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. I'm an aging resident in the area - and for reasons of being a widower with some health issues - might in the future be a candidate for needing a care facility, so very much not against having an aged care facility in the area but would like it to be better planned than this one. I wouldn't want to live in the present design. Although there are many objections to the present proposal, one that is clear to many of us now is "infection control". We all know of COVID difficulties in care homes in NSW and Victoria, with relatives unable to visit, etc. When an aged care home is locked down family visits to outside a resident's room, with communication through a closed window, seems a reasonable thing to design (to supplement phone calls and video conferencing). Noting on the pdf of "Development Plans (Rev 1)" that the upper levels have verandahs to the "Terrace Rooms"/"Terrace Suites" but not to "Signature Rooms". Should a bit more privacy/security be needed it would be possible to have gates between bits of verandah associated with each "Terrace Suite". In any event it should be possible to design to make possible visits where communication through windows is all that is allowed. The "Signature Room" areas may be appropriate in dementia wing, but probably not for clients without dementia from Dalkeith/Nedlands. I realise that balconies should not overlook the ordinary residential areas, but designs where the units overlook an atrium could allow balcony access to other rooms. (Something like movable partitioning - clear blinds - between a corridor half of such internal balcony and the access route for visiting relatives not allowed contact with patients would be needed. There are details an architect could solve.) Viruses are spread when aged care workers attend several facilities or are also involved in home care. The main part of the aged care workforce at a facility should be full time and should live in flats in the aged care facility and required not to work elsewhere. A couple of flats for nurses could be a method to attract a good stable workforce. The remainder of this post is by way of suggestion, not really "objection". I suggest a smaller, more up-market, aged care facility would be more appropriate to the area. I think the present design should be withdrawn and the Dalkeith/Nedlands community invited to participate financially in a revised proposal, with Oryx as a service provider, including home care to the Dalkeith/Nedlands area.

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**Respondent No:** 268

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 17:03:13 pm

**Last Seen:** Jul 23, 2020 08:57:36 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

---





**Respondent No:** 269

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 17:18:53 pm

**Last Seen:** Jul 23, 2020 09:17:40 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to raise my objection to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the existing and future amenity and character of this lovely local, low density residential neighbourhood. I object because: 1. I believe that the LPP is not the right instrument to be used to assess this site and it concerns me that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. It seems that there have been changes made to the draft Policy to increase the height and plot ratio such that a commercial building is being proposed for development on the site. 2. It is my belief that the proposal is more than the advertised provisions of the Policy with respect to height and plot ratio. My review of documents leave me with many doubts about its compliance with the Policy. 3. When I look at the residential properties that sit directly next to and across from the proposed building, I find that the height, bulk, and scale of the proposal is far from compatible. The other buildings sit below 10metres and this building is far higher than that. 4. Aged care is important; that I acknowledge but this location is inconsistent with the character of the locality, and will have an adverse detrimental impact on the amenity of the area. 5. I think that resultant traffic flow and noise associated with backing trucks and other vehicles will end up having an unacceptable impact on local amenity. 6. People and children using footpaths including those on their way to and from schools will be impeded and safety will become an issue because of the impact of sight lines due to smaller setbacks when compared with other residences. This is a major safety risk. 7. There appear to be no small courtyards or gardens. Obviously the lovely big gum on the vacant block will be chopped down – we can ill afford to let this happen. In summary there are many reasons why this planned 'hospital' or 'hospice' is unacceptable and the Council needs to reject it.

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**Respondent No:** 270

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 17:40:51 pm

**Last Seen:** Jul 23, 2020 09:20:06 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Occupier of a property
<input type="checkbox"/>	Other

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to OBJECT to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do NOT believe the Policy should be taken into consideration, especially with regard to provisions changed without public notice. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements (eg. lack of deep root planting; not enough garden space for aged care residents or staff which could be addressed by pushing the proposed street setback back). 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. The proposed setback does not respect current street property setbacks. The number and large size of windows on the northern aspect do not protect neighbours from overlooking and has undue impact. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to OVERLOOKING on neighbouring Northern properties on Betty st and Doonan St, NOISE, light, traffic on narrow residential streets, parking and odour. Traffic reports do not consider the impact of other developments that are in the works in neighbouring areas in Nedlands or the future redevelopment of the melvista nursing home. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates SAFETY issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. \*\*My grandchildren use the footpaths to walk to the parks close by, and go to the daycare centre, their safety is at risk due the lack of setbacks to respect current residential setbacks. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. 6 . High density developments for high level aged care residents in Covid/post covid times is unacceptable. There are no provisions in place to reduce transmission of infection and allow safe physical distancing. Fire risk is another issue with high density living with high level aged care residents who may require a lot more assistance to evacuate. The safety of residents (elderly, young families) in neighbouring properties are put at risk. 7 . The 24/7 nature of the building and the proposal for deliveries etc. to occur even on weekends has undue impact on amenity I urge you to OBJECT this proposal.

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**Respondent No:** 271

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 18:28:30 pm

**Last Seen:** Jul 23, 2020 10:25:08 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property

Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**

I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

The setback for the development has been greatly reduced compared to all the other homeowners in the area.

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**Respondent No:** 272

**Login:** **Email:**

**Responded At:** Jul 23, 2020 18:33:06 pm

**Last Seen:** Jul 23, 2020 10:31:42 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

The 4 storey proposed development covering 4 residential lots is not an appropriate size, scale or height appropriate for its setting or for the current or future character of the local area, which is predominantly residential and is characterised by 1 and 2 storey homes.

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**Respondent No:** 273

**Login:** Indiana Leaversuch **Email:**

i

**Responded At:** Jul 23, 2020 18:39:16 pm

**Last Seen:** Jul 23, 2020 10:37:17 am

**IP Address:** 58.175.76.114

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

A development of this scale is not sympathetic to, and will in fact detract from, all of the distinctive characteristics of this local area - a low-rise, leafy and quiet neighbourhood with large green setbacks Several large and very old trees of local importance will be removed and lost forever, further degrading the amenity.

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**Respondent No:** 274

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 18:45:05 pm

**Last Seen:** Jul 23, 2020 10:42:14 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

The continual noise from the large scale commercial air-conditioning plant, commercial laundry and commercial kitchen and traffic will destroy the peaceful amenity of the residential locality. The 4 storey proposed development covering 4 residential lots is not an appropriate size, scale or height appropriate for its setting or for the current or future character of the local area, which is predominantly residential and is characterised by 1 and 2 storey homes.

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**Respondent No:** 275

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 18:49:09 pm

**Last Seen:** Jul 23, 2020 10:46:57 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

A development of this scale is not sympathetic to, and will in fact detract from, all of the distinctive characteristics of this local area - a low-rise, leafy and quiet neighbourhood with large green setbacks Several large and very old trees of local importance will be removed and lost forever, further degrading the amenity. The setback for the development has been greatly reduced compared to all the other homeowners in the area.

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**Respondent No:** 276

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 19:41:46 pm

**Last Seen:** Jul 23, 2020 11:37:06 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

---

Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

This is an inappropriate location for a large commercial building of this size. It will tower above the neighbouring houses and cause traffic and parking problems in the surrounding streets. The building is too big.

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**Respondent No:** 277

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 19:46:42 pm

**Last Seen:** Jul 23, 2020 11:41:06 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

---

Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

4 Hotchin Street Dalkeith WA 6009 23rd July, 2020 I, Stephen John Hewitt, co-owner of 4 Hotchin Street, Dalkeith, strongly object to the development application for a Residential Aged Care Facility located at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. This proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of this local, low density residential area. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been massively understated. I strongly urge you not to support this proposal.

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**Respondent No:** 278

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 20:02:53 pm

**Last Seen:** Jul 23, 2020 11:58:33 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). I have the following concerns relating to the proposal: 1 The impact on amenity. 2 The increase in noise, traffic and odour. 3 The lack of on-site car parking. 4 The intensive height, bulk and scale as compared to the low density residential surround. 5 The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing developments and the proposed. 6 The lack of management plans or mitigation strategies. 7 The lack of proper community consultation. 8

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**Respondent No:** 279

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 20:12:44 pm

**Last Seen:** Jul 23, 2020 12:10:28 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated.

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**Respondent No:** 280

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 20:45:46 pm

**Last Seen:** Jul 23, 2020 12:43:39 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). I have the following concerns relating to the proposal: - The impact on amenity/ - The increase in noise, traffic and odour. There will be significant overlooking onto private property of northern neighbours. - The lack of on-site car parking. - The intensive height, bulk and scale as compared to the low density residential surround. - The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing resident setback and that of the proposed development. - The lack of management plans or mitigation strategies. - The lack of proper community consultation. - lack of landscaping with deep root planted trees and garden space

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**Respondent No:** 281

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 21:03:11 pm

**Last Seen:** Jul 23, 2020 12:57:37 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). I have the following concerns relating to the proposal: - The increase in noise and traffic. The impact on increased traffic congestion and danger to children with regards to road safety. - lack of privacy with a 4 storey building overlooking onto private property of northern neighbours. - The lack of on-site car parking. - The intensive height, bulk and scale as compared to the low density residential surround. - The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing resident setback and that of the proposed development. - The lack of management plans or mitigation strategies. - The lack of proper community consultation. - lack of landscaping with deep root planted trees and garden space

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**Respondent No:** 282

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 21:10:02 pm

**Last Seen:** Jul 23, 2020 13:05:10 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**      not answered

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

An aged care facility in this location seems to be high rise not in keeping with the landscape of this area & create unnecessary traffic congestion.

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**Respondent No:** 283

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 21:18:48 pm

**Last Seen:** Jul 23, 2020 13:16:55 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). I have the following concerns relating to the proposal: - The impact on amenity/ - The increase in noise, traffic and odour. There will be significant overlooking onto private property of northern neighbours. - The lack of on-site car parking. - The intensive height, bulk and scale as compared to the low density residential surround. - The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing resident setback and that of the proposed development. - The lack of management plans or mitigation strategies. - The lack of proper community consultation. - lack of landscaping with deep root planted trees and garden space - lack of access to public spaces including child and road safety,

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**Respondent No:** 284

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 21:21:10 pm

**Last Seen:** Jul 23, 2020 13:18:20 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. No further developments in the area should be approved until a CIUMULATIVE TRAFFIC IMPACT STUDY has been undertaken of the Nedlands area south of Stirling Highway. I urge you not to support this proposal.

---





**Respondent No:** 285

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 21:59:30 pm

**Last Seen:** Jul 24, 2020 07:08:00 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property
Occupier of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I strongly object to the development application for a large scale Residential Aged Care Facility located at 73-75 Doonan Road and 16-18 Betty Street, Nedlands (Proposed Development). Whilst I appreciate the need for aged care facilities in our suburb, the proposed 5 level commercial development covering 4 residential lots is not an appropriate height, scale or size for its setting or for the current or future character of this local, low density residential area, which is characterised by 1 and 2 storey single residential homes. In particular, I object because: 1. Planning Process Objections (a) Nedlands residents have a legitimate expectation that their rights will not be negatively impacted by the City of Nedlands (City) without, at a minimum, the rules of procedural fairness being followed. (b) Whilst I appreciate and support the need for residential aged care facilities in the City to service a proportion of our aging population, where such facilities will sit in a residential area, they must be designed to complement that residential area. A good example is the Aegis Alfred Carson facility in the Town of Claremont. The size, bulk and scale of the 4-storey plus basement and roof (height approx. 17 metres), 90 bed high care, a residential aged care facility on 73-75 Doonan Rd and 16-18 Betty St, Nedlands is manifestly out of sync with the residential locality for which it is proposed. (c) I believe the City and its Council have not followed the appropriate process in the adoption of PD11.20 Local Planning Scheme 3 – Local Planning Policy: Residential Aged Care Facilities (LPP) and have failed in their duty of care to local ratepayers in making them aware of such significant structural changes which will have a fundamental negative impact on the quiet enjoyment of their homes. In particular: (I) The adoption of the LPP setting out the parameters for the development of residential aged care facilities had substantial implications for impacted residents which were not immediately apparent on its face to any in the community without a planning background, and yet no individual notification was received by any ratepayer in those affected areas and the proposal was minimally advertised and passed during the initial turmoil of the COVID 19 pandemic and then associated shutdowns. (II) The fact that not one comment was received from the community or affected residents on the LPP, as noted in the minutes of the meeting of the City's Council of 26 April 2020, should clearly have highlighted to the City that the community and affected residents had not been made sufficiently aware of the implications of the amendments. Residents had a right to be properly and completely informed of the proposal and to be given fair hearing on it. (III) In addition, the final version of the LPP adopted contained significant amendments to density, height and plot ratio which had not been advertised at all. Given the increased building height, scale and plot ratio associated with these modifications will facilitate increased bulk and scale for any development proposed, I am of the view the modifications to the draft LPP are not minor and are in fact, significant, particularly in relation to the locality of surrounding residential area. The Mayor has indicated that these changes were rushed through so that the Regis facility on Monash Avenue would not be a non-

conforming use, although the rationale for this requiring an urgent amendment to the LPP (without advertising) when it had already been constructed is not apparent. (IV) The Proposed Development fails to satisfy aims of the City's Local Planning Scheme No. 3 (LPS 3) to protect and enhance local character and amenity, respect the vision for the development of local streets or achieve quality residential built form outcomes. (V) The LPP allows for a higher density coding without the initiation of a scheme amendment to LPS 3. The stated purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City. Instead it has imposed an R-coding as a mechanism to deal with scale, bulk and built form. This is not appropriate as an R80 R-coding immediately adjacent to properties subject to an R12.5 density coding (and with R.10 density coding surrounding) will result in significant conflict with respect to scale, bulk and streetscape impacts and will have undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic and parking (LPP cl. 3.1). (VI) A residential density coding of R80 as suggested by the LPP is not acceptable or justified at the subject site. It is completely out of context with a transition from the neighbouring R12.5 and R10 zoned properties. (VII) Density should be imposed via a scheme amendment to LPS3, not through the LPP. LPS 3 states that one of its purposes is to "zone land within the Scheme area for the purposes defined in this Scheme" (LPS 3 cl. 8(c)) but then fails to do so in respect to the subject site. This must be amended in an appropriate manner. (VIII) The LPP also appears to have been developed without due consideration to the individual locational attributes of the various sites within the City to which it will apply. The application of the same density, height and plot ratios that apply to the Regis facility on Monash Avenue without adjacent residential properties and with reciprocal car-parking and easy access for emergency and service vehicles in a medical precinct to a development on 4 lots on Doonan Rd/Betty St surrounded by residential properties, on narrow streets with limited car-parking and limited access for emergency and service vehicles underlines the fact that imposing a broad LPP across various blocks without individual consideration of the areas affected is the wrong approach to a planning policy. Each of these blocks deserves a separate local development policy to address the specific needs of the relevant locale. (IX) The stated purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City. The LPP makes no delineation between differing models of care (e.g. independent living units, low care, high care). The planning guidelines set out in the LPP, as drafted, applies the same planning conditions irrespective of the model of care. Different models of care have differing levels of servicing. This has not been considered if the LPP is applied without the City undertaking further consideration of the relevant sites in question. This has resulted in a High Care facility with an inappropriate density being proposed in a precinct unsuited to the facility function. The LPP should be redrafted to reflect the specific function and nature of aged care models of care, with appropriate planning of such facilities contextually. (X) The rushed endorsement of an R80 equivalent zoning in the LPP without community consultation has denied the community the opportunity to comment on the appropriateness of this density in a residential zone or whether a local planning policy is the appropriate vehicle for this site. (XI) On this basis I question the validity of the adopted LPP. Its approval should urgently be reversed and only be reconsidered by the Council once appropriate due process has been followed with the required levels of community consultation and responses taken account of and due consideration of its appropriateness as a vehicle. (d) However, if the LPP is retained, rather than considering a higher density code under LPP cl. 4.2.4 in respect to the subject site, the City should exercise its discretion under that clause to not accept a higher density code, but rather should take all of the factors relating to impact on the residential amenity of the area by way of building bulk and scale, noise, traffic and parking into account (LPP 3.1) and instead impose an appropriate lower density, lower building height in both metres and storeys, with appropriate set-backs and plot ratio, more in keeping with a transition from the neighbouring R12.5 and R10 zoned residential homes. (e) In any event, the Proposed Development is arguably not permitted under LPS 3: (I) This site is zoned residential with an "A9" additional use, being "Residential Aged Care Facility" as a permitted use under LPS 3, but without applying additional development standards. The definition of "Residential Aged Care Facility" in LPS 3 does not refer to a facility being run for profit on a commercial basis and the site is has no other commercial zoning (such as the "Mixed Use" zoning underlying additional uses "A1" and "A2"). When placed in the residential zoning context, this means that a for-profit, commercial residential aged care facility arguably does not fall within the permitted use under LPS 3 for this site. (II) Furthermore, a "Medical Centre" as defined under LPS 3 is not listed as an additional use permitted on the site (either as a "P" permitted use or an "I" incidental use). This is unlike other sites under LPS 3 which have additional uses permitted. For example, the land zoned for additional uses "A3" or "A4", expressly include a "Medical Centre" as an additional use for those sites together with "Residential Aged Care" (so that use is clearly not included in the definition of "Residential Aged Care Facility", as is suggested in the "Incidental Use" heading on page 21 of the Development Application Report), with "Residential Aged Care Facility" specified as a "P" use and "Medical Centre" specified as an "I" use (i.e. permitted if it is

consequent on, or naturally attaching, appertaining or relating to the predominant use of the land). As a result, the medical centre described as the 'wellbeing centre' in the Proposed Development and which is serving not only residents of the facility but also non-residents on a 30% 'anticipated' (but uncapped) rate, is not a permitted use for the site under LPS 3. (f) A scheme amendment should be initiated to LPS 3 to deal with the inadequacies and lack of clarity in LPS 3 regarding this site, including introduction of appropriate development standards (including regarding size and scale and car-parking) and to guide appropriate density for any "Residential Aged Care Facility" which falls within the permitted use for this site.

2. Lack of Consultation on the Proposed Development (a) In addition to the failures surrounding the advertising of the LPP, and contrary to statements in the Development Application and by the City's administration, the community consultation on the development of a Proposed Development from the developer and City has been extremely limited. In April 2016, the developer held information sessions on the proposed refurbishment of Melvista Lodge and the development of a 2-storey aged care facility on adjacent lots at 73-75 Doonan Rd and 16-18 Betty St with residential 9m set-backs (Initial Proposal). This limited interaction on the different Initial Proposal is what is described as 'community consultation' in paragraph 1.3.2 of the development application. (b) The 5 level Proposed Development fundamentally differs to the Initial Proposal as it is a 4-storey plus basement and roof (height approx. 17 metres), 90 bed high care, aged care facility with 2m set-backs at ground level and no longer includes the refurbishment of the Melvista Lodge. Clause 5.1 of the LPP states "Consultation with affected landowners will be undertaken in accordance with the City's Local Planning Policy- Consultation of Planning Proposals". (c) Neither the developer nor the City communicated with the local community regarding the new and different Proposed Development until after the Proposed Development had been lodged. Communication from the developer was limited to provision of information rather than true consultation. (d) The statements from the City's administration and the developer and its representatives, Creating Communities, that this Proposed Development fully complies with applicable planning requirements and that as a result there is no basis for the community to object to the Proposed Development, contributes to the perception that the City is not interested in its residents' opinions or providing them with due process or consultation and that the lack of proper consultation by the Developer and the City on this Proposed Development breaches the City's own local planning policy on Consultation of Planning Proposals and LPP cl. 5.0. (e) Various images and plans included in the development application for the Proposed Development either avoid angles from which the upper levels and roof form which will be highly visible (for example, in the renders presented in the Architectural Drawings and the Development Application Report there is no render looking south-west from Doonan Rd, or directly east from Betty St) or shadow those upper levels and roof in a manner which I do not believe adequately represent what will be visible to local residents, particularly on sloping streets such as Betty St and Doonan Rd (and as is shown in just one diagram, on page 26 of the Architectural Design Statement). Other images do not appropriately represent the homes surrounding the site. For example, Photo 11 (on page 9 of the Development Application Report) is a photo of the 2 storey homes at 68 and 70 Doonan Rd (approximately 95m North-west of the subject site) but is entitled "View of residential dwellings on Doonan Road facing west towards subject site", whereas the 1 storey homes at 76 and 78 Doonan Rd, and the 2 storey home at 80 Doonan Rd would be the houses that 'face west towards the subject site' (and facing west from the houses pictured will be a view of 2 residential properties).

3. Specific Planning Objections The deemed provisions set out in Schedule 2 of the Planning and Development (Local Planning Schemes) Regulations 2015 are imported into LPS3 (whether or not the LPP is retained or revoked) (LPS3 cl 7(1)(a), 2, 10 and note 2 of cl 18(a)). These require the City and Council to have due regard to: (a) The compatibility of the Proposed Development with its setting including the relationship of the Proposed Development to development on adjoining land or on other land in the locality including the likely effect of the height, bulk, scale, orientation and appearance of the Proposed Development (cl. 67(m)). I do not believe the Proposed Development is compatible with the surrounding residential neighbourhood zoned R10 and R12.5 because: (I) The set-back for the development has been greatly reduced to the other homeowners in the area and does not comply with LPP cl. 4.2.1 which requires compliance with LPS 3 cl. 26(1) (a 9m set-back). (II) The bulk and scale of a 5 level building across 4 residential lots is completely incompatible with the surrounding residential homes, each within the boundaries of single residential constraints. (III) This building will dominate all surrounding buildings and the park in Masons Gardens. (IV) Given the topography of the local area, this large building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens and from various vantages around the neighbourhood. The visual projection of the development will be overbearing and detrimental to the urban fabric of the Betty St/Doonan Rd hill-scape and Mason Gardens Precinct. (V) It is not clear how the Proposed Development achieves the required ratio under the LPP in any event, or how this building achieves a 1:1 plot ratio as on its face the building footprint covers almost the entirety of

the block and has 5 levels. Even excluding common areas such as hallways and communal areas does not appear to achieve the required ratio. In addition, it appears from the "DA –Plot Ratio" drawing in the Architectural Drawings Development Plans for the Proposed Development that all private staff areas (such as offices, the administration area and staff rooms), common areas (including private break-out rooms) and the entire commercial medical 'wellness' centre have been excluded from the developer's plot ratio calculation which is not appropriate. (b) The amenity of the locality, including the character of the locality and the social impacts of the development and potential loss of any community service or benefit resulting from the Proposed Development, including on the community as a whole (cls. 67(n), (v) and (x)). I believe the Proposed Development will have a negative impact on the amenity of the locality and will cause a loss of benefit to the community as a whole because: (I) The Proposed Development is not compatible with the existing amenity surrounding / abutting it due to the height, scale and bulk of the Proposed Development. The Proposed Development therefore does not comply with cl 3.1 of the LPP which states "...and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking". (II) The Proposed Development will introduce 120 patients and employees at any one time not interacting with community in the normal context of a residential area. (III) The Proposed Development is commercial in nature, operating 24/7 and is not suited to a residential area. The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. (IV) All available car-parking in the surrounding areas will be consumed by the Proposed Development, constraining access to and use of Masons Gardens and visitors to local residences. (V) Each of Betty St, Doonan Rd and Granby Cres has a substantial number of houses without front fences, enabling neighbours to interact in the front of our homes. Introducing a large building, with lower set-backs and walled along each street-front, will fundamentally change the character of these streets, and we will lose those neighbourly interactions. (VI) There does not appear to be any independent evidence (other than the questionnaire responses acquired by the developer from 79 respondents to its questionnaire in 2016) of the urgent need for our community for building aged care on this scale south of the highway in Nedlands given the recent opening in the near vicinity of the Regis Nedlands in the Hollywood hospital precinct (141 aged care beds) and the future expansion of those facilities into the Regis Weston; the existing Aegis facilities at Alfred Carson (south of Stirling Hwy, 220 Aged Care beds); together with the developers own The Richardson in West Perth (92 suites) and soon to be completed Queenslea in Claremont (120 Residential Aged Care Suites). (c) Whether adequate provision has been made for the landscaping of the land to which the application relates and whether any trees or other vegetation on the land should be preserved (cl. 67(p)). I believe the Proposed Development fails to make such adequate provision or to preserve trees or other vegetation because: (I) The Proposed Development has a building footprint over most of the site and involves the removal of all trees and vegetation other than the street trees on the verges. (II) In particular, several large and very old trees of local importance will be removed and lost forever as a result of the Proposed Development. These trees provide nesting and resting sites for various different species of birds as their canopies are high and provide the birds with a safe vantage point. (III) Clause 4.6.2 of the LPP states "A minimum of twenty-five per cent (25%) of the site area is to be landscaped". The Proposed Development does not comply with this requirement of the LPP. (d) The suitability of the land for the development taking into account the possible risk to human health or safety (cl. 67(r)). I do not believe that the land chosen is a suitable site for the Proposed Development on this scale as: (I) The Developer has neither stated approach to operation of the facility in the instance of a required lockdown during a pandemic nor a stated approach of how to protect vulnerable patients to cross infection from air borne viruses. This is an irresponsible approach to quality aged care services in a post COVID 19 pandemic environment where a duty of care exists to protect patients who are in a vulnerable position. The Proposed Development presents an unacceptable risk and has not considered a COVID safe design. (II) Furthermore, the Review of Innovative Models of Aged Care, Research Paper 3 January 2020 by the Royal Commission into Aged Care Quality and Safety recommended respite is provided in settings aligned to a person's background and offering structured activities. The report further recommends small scale domestic models of aged care where there is an emphasis on providing person centred care models. The proposed developments design and density is not aligned to the objectives of the Royal Commission. (III) At 90 beds of non-ambulatory patients over 4 occupied levels, safe evacuation has been poorly considered. Safe evacuation should necessitate a sprinkler protected building with a zoned smoke management system and designated safe zones. Brigade turn out points for fire truck parking and access to brigade booster points have not been considered in the design. Evacuation of 90 non-ambulatory residents is a risk. (IV) Emergency services access to non-sprinklered areas, such as the roof plantroom, with access only available along Betty St and Doonan Rd for aerial firefighting, has not been considered. (V) Lifts in the building are to be used for vertical movement of food services, visitors,

patients, maintenance personnel and removal of deceased patients. This is an unhygienic practice and demonstrates poor design practice in this facility. Good design practice would separate different traffic streams in a facility of this size and density, with the minimum provision of a dedicated goods lift. (e) The adequacy of the proposed means of access to and egress from the site; arrangements for the loading, unloading, manoeuvring and parking of vehicles; and the amount of traffic likely to be generated by the development, particularly in relation to the capacity of the road system in the locality and the probable effect on traffic flow and safety (cls. 67(s) and (t)). I believe that the Proposed Development is inadequate in these respects because: (I) The Transport Impact Statement (TIS) has not calculated the total number of staff or visitor numbers in its car parking assessment for a facility of this nature. The TIS has relied on an allowance of 1 car bay per 4 beds. A high dependency aged care facility will have a significant staffing requirement that will exceed this requirement. It will also have significant visitor numbers. The TIS has made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment of car-parking and traffic movements. (II) The 2 streets on which the development will sit are narrow and are not designed to accommodate the amount of traffic for a facility of this size, particularly given the reliance on street parking (as the suggested parking is completely inadequate for the commercial operation of the nature contemplated). (III) The car-parking provisions are significantly underestimated, given the 23 car bays plus 3 Acrod bays for the 'well-being' medical centre (which will serve not only facility residents but also non-residents on a 30% 'anticipated' rate, but uncapped) plus a 90 bed facility with at least 40 employees/contractors plus Allied Services personnel and staff (particularly where there will need to be handover between staff shifts doubling up). This will result in substantial on street parking to Betty St, Doonan Rd, Melvista Ave, Granby Cres and surrounding roads. Staffing numbers for the Wellness Centre (3 treatment bays + hair salon – circa 4 staff), full commercial kitchen for up 540 food services per day (circa 4-5 staff), facilities manager (1 staff), full laundry (circa 2 staff), on site admin (circa 7 staff), on-site coffee shop (1 staff), cleaning staff (circa 3-4), orderlies and support staff (circa 2), plus nursing and staff for 90 patients (minimum 15 staff) significantly exceeds car-parking allowances. Shift changeover of nursing staff, visitors and maintenance staff further results in car-parking being significantly undersized and inadequate for a facility of this size and density. (IV) The increased traffic on the streets, and crossing the footpaths down Doonan Rd and Betty St, will be a danger to the large number of pedestrians, including children, who use the footpath to walk to Mason Gardens and the local childcare centre located less than 100m from the development. (V) Truck access will be required for servicing the grease trap for the kitchen. This does not appear to have been considered in the design. (VI) Inadequate on-site parking can result in off-site parking for nurses for night shifts. This can result in unsafe practices and security concerns for nursing staff accessing the facility at night having to park in unsecured/unmonitored locations (and overwhelming the current car-parking at Masons Gardens). (VII) Truck vehicular access for food delivery, waste removal, medical gas bottle replenishment, diesel fuel delivery, maintenance personnel for mechanical, electrical, fire and communications plant will result in significant increase to truck movements on Doonan Rd and Betty St. (VIII) Inadequate provision has been made for replacement of roof top air conditioning plant. Access for large plant can only be made via crane access from Betty St or Doonan Rd. (IX) Developer's Traffic Report also provides very little detail on the type of vehicle movements and their frequency and times during the week. This detail is also needed to form proper considered assessment of traffic movements and noise levels, which detail is also wholly lacking in the Developer's Transport Impact Statement and Acoustic Report.

#### 4. Objections to the Design

The deemed provisions outlined above and imposed by LPS 3 also require the City and Council to take into account State Planning Policy 7.0 (Design of the Built Environment) and its Design Principles (Sch 1). I believe that the design of the Proposed Development fails on various aspects in relation to each of those Design Principles, as set out below. (a) Context and character – The design of the Proposed Development does not respond to or enhance the distinctive characteristics of the local area, and does not contribute to a sense of place, because: (I) The distinctive characteristics of the local area, including the adjacent lots, the streetscape and surrounding neighbourhood, are a low-rise, leafy and quiet neighbourhood with large green 9m setbacks and a local green park. (II) A development of the bulk, scale and size contemplated, on 2m set-backs, is not sympathetic to, and will in fact detract from, all of the distinctive characteristics of this local area. (III) The built form is a highly inappropriate in terms of bulk, scale and size to adjoining properties with box scale of building of approx. 70m overall length x 32m overall width and overall height of approximately 17m. The surrounding local homes are constrained to single blocks, and range from single level original 1930's cottages to architecturally designed 2 storey residences, incorporating significant landscaping and retention of large trees. (IV) The Proposed Development includes large, bland featureless walls measuring 35 metres in length (running east/west), a scale that would typically be found in a

mixed use or town/activity centre environment rather than the local residential area where it is proposed. (V) The 4-storey (5 level) Proposed Development with a proposed plot ratio of 1:0 would result in a scale of development which is not compatible with the amenity of the locality and which does not reinforce or respond sympathetically to the locally distinct low-rise, low-density residential neighbourhood. (VI) The density of R80 being considered is not appropriate to the existing densities which surround it (R10 and R12.5) and is not able to be sustained by the transport options provided by the narrow surrounding streets and limited access to public transport. (VII) Ramp/through access with a 4.5m high boundary wall on southern boundary will be highly visible from Doonan and Betty Streets and is aesthetically ugly along with inappropriately high unfriendly front boundary walls close to 2m near southern boundaries on Doonan Rd and Betty St. (VIII) Given the topography of the local area, this large building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens and from various vantages around the neighbourhood. The visual projection of the development will be overbearing and detrimental to the urban fabric of the Betty St/Doonan Rd hill-scape and Mason Gardens Precinct. (IX) The Proposed Development is commercial in nature, operating 24/7 and is not suited to a residential area. The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. (X) The Proposed Development is not compatible with the existing amenity surrounding / abutting it due to the height, scale and bulk of the Proposed Development. The Proposed Development therefore does not comply with cl 3.1 of the LPP which states "...and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking".

(b) Landscape Quality - The design of the Proposed Development fails to recognise that together landscape and buildings operate as an integrated and sustainable system, within a broader ecological context, because: (I) The visual projection of the development will be overbearing and detrimental to the leafy landscape of the Betty St/Doonan Rd hill-scape and Mason Gardens Precinct. (II) The Proposed Development does not protect existing environmental features and ecosystems as the design is for a building footprint over most of the site and identifies several large and very old trees of local importance which will be removed and lost forever as a result (breaching LPP cl. 4.6.3). These trees provide nesting and resting sites for various different species of birds as their canopies are high and provide the birds with a safe vantage point. (III) There is no provision in the Proposed Development for storm-water and soil management, ground and site conditions, solar access, microclimate, tree canopy, urban heat island impacts, habitat creation and preservation of green infrastructure. (IV) The Proposed Development proposes a density of occupancy that maximises the built form on the available land area, leaving limited open space for residents/patients. (V) There are very limited outdoor spaces proposed for the site, with a lack of green areas other than built-form landscaping. (VI) The LPP (clause 4.6.2) requires 25% of the site area to be landscaped but this has not been provided. (VII) The Proposed Development does not encourage social inclusion for its residents with the public and neighbours, with street-side fences and walls proposed. This does not contribute to the local streetscape where most of the front gardens do not have walls or fences, allowing neighbours to interact on a daily basis. (c) Built form and scale – The massing and height of the Proposed Development is not appropriate to its setting and does not successfully negotiate between existing built form and the intended future character of the local area because: (I) The building massing and scale is disproportionate to the surrounding urban vernacular. The mass and height are disrespectful to the scale and pitch lines from the adjoining properties with a consequential negative impact to the Betty St and Doonan Rd streetscapes (in breach of LPP 4.3). Its verticality will project as a dominant insertion on the residential neighbourhood. As a "for-profit" commercial operation it will damage the residential cohesion of the suburb of Nedlands. Clause 3.1 of the LPP states "design of residential aged care facilities are of a high quality and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking". The proposed development is therefore non-compliant with LPP cl. 3.1. (II) The built form is a highly inappropriate in terms of bulk, scale and size to adjoining properties with box scale of building of approx. 70m overall length x 32m overall width and overall height of approximately 17m. The surrounding local homes are constrained to single blocks, and range from single level original 1930's cottages to architecturally designed 2 storey residences, incorporating significant landscaping and retention of large trees. (III) The four-storey (5 level) Proposed Development with a proposed plot ratio of 1:0 would result in a scale of development which is not compatible with the amenity of the residential locality and which does not reinforce or respond sympathetically to the locally distinct low-rise, low-density residential neighbourhood. (IV) The scale, massing and height of new development does not respond positively to that of the adjoining buildings, the topography, the general pattern of heights, and the views, vistas and landmarks of the Doonan Rd/Betty St area, and detracts from a coherent local identity. The orientation, proportion, composition, and articulation of built form elements should deliver an outcome that is suited to the purpose, defines the public domain,

contributes to the character of adjacent streetscapes and parks, and provides good amenity for people at ground level. This Proposed Development fails to do so.

(d) Sustainability – The Proposed Development does not optimise the sustainability of the built environment, delivering positive environmental, social and economic outcomes because:

- (I) The proposed development is not setting a target for environmental sustainability. The development is taking a just above minimum approach, proposing to exceed Part J of the National Construction Code by a stated 10%. This is an inadequate attempt to demonstrate environmental sustainability credentials. As a minimum a Green Star 6-star standard should be set, and consideration should be given to a Passive House rating. This facility will have a significant carbon footprint that will represent a substantial increase over the carbon footprint of the existing three (3) residences.
- (II) The Sustainability Report does not consider any modelling of obnoxious discharges from kitchen, toilet and laundry exhausts and their impact on the surrounding properties. Dispersion modelling and CFD modelling should be undertaken to determine that there is no undue impact, as required by LPP cl. 3.1.
- (III) The Sustainability Report has not considered any heat island impact on the surrounding properties as a result of rejecting circa 700 - 800 kW of heat from the facility to determine that there is no undue impact, as required by clause 3.1 of the LPP.
- (IV) The Sustainability Report has not considered glare and reflectance to properties on the east in the morning and west in the evening to determine that there is no undue impact, as required by clause 3.1 of the LPP.

(e) Amenity – The Proposed Development does not offer optimise internal and external amenity for occupants, visitors and neighbours, and does not provide an environment that is comfortable, productive and healthy because:

- (I) The 24 hour a day noise from the large scale commercial air-conditioning plant and additional traffic and noise from staff during shift-changes, combined with the noise from the operation of the facility, including the commercial laundry and commercial kitchen will destroy the peaceful amenity of the residential locality.
- (II) The Proposed Development would result in detrimental impacts to the amenity and character of the low-density residential neighbourhood.
- (III) The proposed development will significantly impact the visual amenity of all residential lots to the east on Doonan Rd and west on Betty St and to the north on both Doonan Rd and Betty St, up to Princess Rd, particularly when the development is viewed from private outdoor areas.
- (IV) The Developer's proposal, with its nominated function, size and density, has not considered any technical issues and will have a material negative impact to the amenity of the locality.
- (V) Light spill for night-time access to car-parking and pedestrian entrances will result in light pollution to adjoining neighbours.
- (VI) No consideration appears to have been given for acoustic treatment for roof located air conditioning plant and roof discharges. Discharges from the facility will adversely impact neighbours and have not been considered appropriately. Discharge stacks will also extend beyond the roof line creating further visual impact. Any consideration of each should take into account the topography of the area (a depression centred around Masons Gardens, creating a 'bowl' of the surrounding streets).
- (VII) The acoustics technical report has not calculated the cumulative noise impact of ventilation systems with the air-cooled condensers. Significant ventilation systems will be required for the kitchen exhaust, evaporative kitchen make up, toilet exhausts, laundry exhausts and flues. To determine the full impact of the facility on adjoining residences, all noise sources should be defined and calculated on a cumulative basis.
- (VIII) It is not clear how the development application satisfies noise pollution restrictions when it expressly does not address the issues of the noise from the emergency generator, fire pump and commercial dryers (paras 3.4, 3.7 and 3.8 of Acoustic Report), even where they are identified to be "problematic". These are in addition to the air-conditioning for the 90 bedrooms plus common areas, the commercial kitchen and commercial laundry plus increased traffic and pedestrian noise, all of which are dealt with on a very general basis.
- (IX) Due to the low-rise nature of the near-neighbours, the Proposed Development will overlook the back and front yards of not just the immediately adjacent residences but also the residences across the road and up each of the surrounding streets. Given my home (at 76 Doonan Rd) is single storey home, and we are immediately to the north-east of the site, the Proposed Development will overlook both our front and back yards (including our pool area) from the windows and balconies (including common areas) on the upper floors.

(f) Safety – The Proposed Development does not optimise safety and security, minimising the risk of personal harm and supporting safe behaviour and use, because:

- (I) The Developer has neither stated approach to operation of the facility in the instance of a required lockdown during a pandemic nor a stated approach of how to protect vulnerable patients to cross infection from air borne viruses. This is an irresponsible approach to quality aged care services in a post COVID 19 environment where a duty of care exists to protect patients who are in a vulnerable position. The City would be in breach of its duty of care now with the foreknowledge that this facility presents an unacceptable risk and has not considered a COVID safe design.
- (II) Furthermore, the Review of Innovative Models of Aged Care, Research Paper 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety recommended respite is provided in settings aligned to a person's background and

offering structured activities. The report further recommends small scale domestic models of aged care where there is an emphasis on providing person centred care models. The proposed developments design and density is not aligned to the objectives of the Royal Commission. (III) At 90 beds of non-ambulatory patients over four (4) occupied levels, safe evacuation has been poorly considered. Safe evacuation should necessitate a sprinkler protected building with a zoned smoke management system and designated safe zones. Brigade turn out points for fire truck parking and access to brigade booster points have not been considered in the design. Evacuation of 90 non-ambulatory residents is a risk. (IV) Emergency services access to non-sprinklered areas, such as the roof plantroom, with access only available along Betty St and Doonan Rd for aerial firefighting, has not been considered. (V) Lifts in the building are to be used for vertical movement of food services, visitors, patients, maintenance personnel and removal of deceased patients. This is an unhygienic practice and demonstrates poor design practice in this facility. Good design practice would separate different traffic streams in a facility of this size and density, with the minimum provision of a dedicated goods lift. (VI) No design provision is shown for kitchen exhaust discharges, carpark ventilation discharges, generator exhaust discharge. Discharges from the facility will adversely impact neighbours and have not been considered appropriately. Discharge stacks will also extend beyond the roof line creating further visual impact. (VII) The front boundary walls are impacted further by the proposed 2.5m setbacks beyond the current street line sets backs of 9m making it impossible to see down the street. This will result in the streetscape significantly altered with the proposed development jutting out 6.5m beyond the existing street line. Residents reversing out of their driveway will have no line of sight, keeping in mind a pedestrian footpath runs down the east side of Doonan Rd and west side of Betty St making this impossible to ensure the safety of any family walking down the street to Masons Gardens, or car driving up the street. (VIII) Inadequate on-site parking can result in off-site parking for nurses for night shifts. This can result in unsafe practices and security concerns for nursing staff accessing the facility at night having to park in unsecured/unmonitored locations (and overwhelming the current car-parking at Masons Gardens). (g) Community – The Proposed Development does not appropriately respond to local community needs as well as the wider social context accommodating change over time and responding to new social demands because: (I) Given the current impacts of the COVID-19 pandemic on similar large scale, institutional aged care facilities, it does not seem appropriate to be encouraging the development of these facilities outside a hospital precinct. (II) The Interim Report of the Royal Commission into Aged Care Quality and Safety indicates that the final report will be exploring a shift in focus from institutional style aged care, such as the Proposed Development, into lower scale ageing in place and home care which poses the question – will this Proposed Development be out-dated before it is completed. (III) The best practice recommendations of the Interim Report from the Royal Commission into Aged Care and the final report, once released in December 2020 (and ultimate legislative changes resulting from it) and the lessons learned in the context of the COVID-19 pandemic, should be taken into account in the design and approval of any new aged care facilities in the City, and indeed across the State.

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**Respondent No:** 286

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 22:02:44 pm

**Last Seen:** Jul 23, 2020 14:01:12 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**  Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to OBJECT to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). I have the following concerns relating to the proposal: - The impact on amenity. - The increase in noise, traffic and odour. There will be significant overlooking onto private property of northern neighbours. - The lack of on-site car parking. - The intensive height, bulk and scale as compared to the low density residential surround. - The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing resident setback and that of the proposed development. - The lack of management plans or mitigation strategies. - The lack of proper community consultation. - lack of landscaping with deep root planted trees and garden space - object to high density developments for high level aged care residents in Covid/post covid times is unacceptable. There are no provisions in place to reduce transmission of infection and allow safe physical distancing. Fire risk is another issue with high density living with high level aged care residents who may require a lot more assistance to evacuate. The safety of residents (elderly, young families) in neighbouring properties are put at risk. - the 24/7 nature of the building use and the proposal for deliveries etc. to occur even on weekends has undue impact on amenity

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**Respondent No:** 287

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 22:06:36 pm

**Last Seen:** Jul 23, 2020 14:04:23 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I strongly object to the development application for a large scale Residential Aged Care Facility located at 73-75 Doonan Road and 16-18 Betty Street, Nedlands (Proposed Development). Whilst I appreciate the need for aged care facilities in our suburb, the proposed 5 level commercial development covering 4 residential lots is not an appropriate height, scale or size for its setting or for the current or future character of this local, low density residential area, which is characterised by 1 and 2 storey single residential homes. In particular, I object because: 1. Planning Process Objections (a) Nedlands residents have a legitimate expectation that their rights will not be negatively impacted by the City of Nedlands (City) without, at a minimum, the rules of procedural fairness being followed. (b) Whilst I appreciate and support the need for residential aged care facilities in the City to service a proportion of our aging population, where such facilities will sit in a residential area, they must be designed to complement that residential area. A good example is the Aegis Alfred Carson facility in the Town of Claremont. The size, bulk and scale of the 4-storey plus basement and roof (height approx. 17 metres), 90 bed high care, a residential aged care facility on 73-75 Doonan Rd and 16-18 Betty St, Nedlands is manifestly out of sync with the residential locality for which it is proposed. (c) I believe the City and its Council have not followed the appropriate process in the adoption of PD11.20 Local Planning Scheme 3 – Local Planning Policy: Residential Aged Care Facilities (LPP) and have failed in their duty of care to local ratepayers in making them aware of such significant structural changes which will have a fundamental negative impact on the quiet enjoyment of their homes. In particular: (I) The adoption of the LPP setting out the parameters for the development of residential aged care facilities had substantial implications for impacted residents which were not immediately apparent on its face to any in the community without a planning background, and yet no individual notification was received by any ratepayer in those affected areas and the proposal was minimally advertised and passed during the initial turmoil of the COVID 19 pandemic and then associated shutdowns. (II) The fact that not one comment was received from the community or affected residents on the LPP, as noted in the minutes of the meeting of the City's Council of 26 April 2020, should clearly have highlighted to the City that the community and affected residents had not been made sufficiently aware of the implications of the amendments. Residents had a right to be properly and completely informed of the proposal and to be given fair hearing on it. (III) In addition, the final version of the LPP adopted contained significant amendments to density, height and plot ratio which had not been advertised at all. Given the increased building height, scale and plot ratio associated with these modifications will facilitate increased bulk and scale for any development proposed, I am of the view the modifications to the draft LPP are not minor and are in fact, significant, particularly in relation to the locality of surrounding residential area. The Mayor has indicated that these changes were rushed through so that the Regis facility on Monash Avenue would not be a non-conforming use, although the rationale for this requiring an urgent amendment to the LPP (without advertising) when it had

already been constructed is not apparent. (IV) The Proposed Development fails to satisfy aims of the City's Local Planning Scheme No. 3 (LPS 3) to protect and enhance local character and amenity, respect the vision for the development of local streets or achieve quality residential built form outcomes. (V) The LPP allows for a higher density coding without the initiation of a scheme amendment to LPS 3. The stated purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City. Instead it has imposed an R-coding as a mechanism to deal with scale, bulk and built form. This is not appropriate as an R80 R-coding immediately adjacent to properties subject to an R12.5 density coding (and with R.10 density coding surrounding) will result in significant conflict with respect to scale, bulk and streetscape impacts and will have undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic and parking (LPP cl. 3.1). (VI) A residential density coding of R80 as suggested by the LPP is not acceptable or justified at the subject site. It is completely out of context with a transition from the neighbouring R12.5 and R10 zoned properties. (VII) Density should be imposed via a scheme amendment to LPS3, not through the LPP. LPS 3 states that one of its purposes is to "zone land within the Scheme area for the purposes defined in this Scheme" (LPS 3 cl. 8(c)) but then fails to do so in respect to the subject site. This must be amended in an appropriate manner. (VIII) The LPP also appears to have been developed without due consideration to the individual locational attributes of the various sites within the City to which it will apply. The application of the same density, height and plot ratios that apply to the Regis facility on Monash Avenue without adjacent residential properties and with reciprocal car-parking and easy access for emergency and service vehicles in a medical precinct to a development on 4 lots on Doonan Rd/Betty St surrounded by residential properties, on narrow streets with limited car-parking and limited access for emergency and service vehicles underlines the fact that imposing a broad LPP across various blocks without individual consideration of the areas affected is the wrong approach to a planning policy. Each of these blocks deserves a separate local development policy to address the specific needs of the relevant locale. (IX) The stated purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City. The LPP makes no delineation between differing models of care (e.g. independent living units, low care, high care). The planning guidelines set out in the LPP, as drafted, applies the same planning conditions irrespective of the model of care. Different models of care have differing levels of servicing. This has not been considered if the LPP is applied without the City undertaking further consideration of the relevant sites in question. This has resulted in a High Care facility with an inappropriate density being proposed in a precinct unsuited to the facility function. The LPP should be redrafted to reflect the specific function and nature of aged care models of care, with appropriate planning of such facilities contextually. (X) The rushed endorsement of an R80 equivalent zoning in the LPP without community consultation has denied the community the opportunity to comment on the appropriateness of this density in a residential zone or whether a local planning policy is the appropriate vehicle for this site. (XI) On this basis I question the validity of the adopted LPP. Its approval should urgently be reversed and only be reconsidered by the Council once appropriate due process has been followed with the required levels of community consultation and responses taken account of and due consideration of its appropriateness as a vehicle. (d) However, if the LPP is retained, rather than considering a higher density code under LPP cl. 4.2.4 in respect to the subject site, the City should exercise its discretion under that clause to not accept a higher density code, but rather should take all of the factors relating to impact on the residential amenity of the area by way of building bulk and scale, noise, traffic and parking into account (LPP 3.1) and instead impose an appropriate lower density, lower building height in both metres and storeys, with appropriate set-backs and plot ratio, more in keeping with a transition from the neighbouring R12.5 and R10 zoned residential homes. (e) In any event, the Proposed Development is arguably not permitted under LPS 3: (I) This site is zoned residential with an "A9" additional use, being "Residential Aged Care Facility" as a permitted use under LPS 3, but without applying additional development standards. The definition of "Residential Aged Care Facility" in LPS 3 does not refer to a facility being run for profit on a commercial basis and the site is has no other commercial zoning (such as the "Mixed Use" zoning underlying additional uses "A1" and "A2"). When placed in the residential zoning context, this means that a for-profit, commercial residential aged care facility arguably does not fall within the permitted use under LPS 3 for this site. (II) Furthermore, a "Medical Centre" as defined under LPS 3 is not listed as an additional use permitted on the site (either as a "P" permitted use or an "I" incidental use). This is unlike other sites under LPS 3 which have additional uses permitted. For example, the land zoned for additional uses "A3" or "A4", expressly include a "Medical Centre" as an additional use for those sites together with "Residential Aged Care" (so that use is clearly not included in the definition of "Residential Aged Care Facility", as is suggested in the "Incidental Use" heading on page 21 of the Development Application Report), with "Residential Aged Care Facility" specified as a "P" use and "Medical Centre" specified as an "I" use (i.e. permitted if it is

consequent on, or naturally attaching, appertaining or relating to the predominant use of the land). As a result, the medical centre described as the 'wellbeing centre' in the Proposed Development and which is serving not only residents of the facility but also non-residents on a 30% 'anticipated' (but uncapped) rate, is not a permitted use for the site under LPS 3. (f) A scheme amendment should be initiated to LPS 3 to deal with the inadequacies and lack of clarity in LPS 3 regarding this site, including introduction of appropriate development standards (including regarding size and scale and car-parking) and to guide appropriate density for any "Residential Aged Care Facility" which falls within the permitted use for this site.

2. Lack of Consultation on the Proposed Development (a) In addition to the failures surrounding the advertising of the LPP, and contrary to statements in the Development Application and by the City's administration, the community consultation on the development of a Proposed Development from the developer and City has been extremely limited. In April 2016, the developer held information sessions on the proposed refurbishment of Melvista Lodge and the development of a 2-storey aged care facility on adjacent lots at 73-75 Doonan Rd and 16-18 Betty St with residential 9m set-backs (Initial Proposal). This limited interaction on the different Initial Proposal is what is described as 'community consultation' in paragraph 1.3.2 of the development application. (b) The 5 level Proposed Development fundamentally differs to the Initial Proposal as it is a 4-storey plus basement and roof (height approx. 17 metres), 90 bed high care, aged care facility with 2m set-backs at ground level and no longer includes the refurbishment of the Melvista Lodge. Clause 5.1 of the LPP states "Consultation with affected landowners will be undertaken in accordance with the City's Local Planning Policy- Consultation of Planning Proposals". (c) Neither the developer nor the City communicated with the local community regarding the new and different Proposed Development until after the Proposed Development had been lodged. Communication from the developer was limited to provision of information rather than true consultation. (d) The statements from the City's administration and the developer and its representatives, Creating Communities, that this Proposed Development fully complies with applicable planning requirements and that as a result there is no basis for the community to object to the Proposed Development, contributes to the perception that the City is not interested in its residents' opinions or providing them with due process or consultation and that the lack of proper consultation by the Developer and the City on this Proposed Development breaches the City's own local planning policy on Consultation of Planning Proposals and LPP cl. 5.0. (e) Various images and plans included in the development application for the Proposed Development either avoid angles from which the upper levels and roof form which will be highly visible (for example, in the renders presented in the Architectural Drawings and the Development Application Report there is no render looking south-west from Doonan Rd, or directly east from Betty St) or shadow those upper levels and roof in a manner which I do not believe adequately represent what will be visible to local residents, particularly on sloping streets such as Betty St and Doonan Rd (and as is shown in just one diagram, on page 26 of the Architectural Design Statement). Other images do not appropriately represent the homes surrounding the site. For example, Photo 11 (on page 9 of the Development Application Report) is a photo of the 2 storey homes at 68 and 70 Doonan Rd (approximately 95m North-west of the subject site) but is entitled "View of residential dwellings on Doonan Road facing west towards subject site", whereas the 1 storey homes at 76 and 78 Doonan Rd, and the 2 storey home at 80 Doonan Rd would be the houses that 'face west towards the subject site' (and facing west from the houses pictured will be a view of 2 residential properties).

3. Specific Planning Objections The deemed provisions set out in Schedule 2 of the Planning and Development (Local Planning Schemes) Regulations 2015 are imported into LPS3 (whether or not the LPP is retained or revoked) (LPS3 cl 7(1)(a), 2, 10 and note 2 of cl 18(a)). These require the City and Council to have due regard to: (a) The compatibility of the Proposed Development with its setting including the relationship of the Proposed Development to development on adjoining land or on other land in the locality including the likely effect of the height, bulk, scale, orientation and appearance of the Proposed Development (cl. 67(m)). I do not believe the Proposed Development is compatible with the surrounding residential neighbourhood zoned R10 and R12.5 because: (I) The set-back for the development has been greatly reduced to the other homeowners in the area and does not comply with LPP cl. 4.2.1 which requires compliance with LPS 3 cl. 26(1) (a 9m set-back). (II) The bulk and scale of a 5 level building across 4 residential lots is completely incompatible with the surrounding residential homes, each within the boundaries of single residential constraints. (III) This building will dominate all surrounding buildings and the park in Masons Gardens. (IV) Given the topography of the local area, this large building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens and from various vantages around the neighbourhood. The visual projection of the development will be overbearing and detrimental to the urban fabric of the Betty St/Doonan Rd hill-scape and Mason Gardens Precinct. (V) It is not clear how the Proposed Development achieves the required ratio under the LPP in any event, or how this building achieves a 1:1 plot ratio as on its face the building footprint covers almost the entirety of the block and has 5 levels. Even excluding common areas such as hallways and communal areas does not appear to

achieve the required ratio. In addition, it appears from the “DA –Plot Ratio” drawing in the Architectural Drawings Development Plans for the Proposed Development that all private staff areas (such as offices, the administration area and staff rooms), common areas (including private break-out rooms) and the entire commercial medical ‘wellness’ centre have been excluded from the developer’s plot ratio calculation which is not appropriate. (b) The amenity of the locality, including the character of the locality and the social impacts of the development and potential loss of any community service or benefit resulting from the Proposed Development, including on the community as a whole (cls. 67(n), (v) and (x)). I believe the Proposed Development will have a negative impact on the amenity of the locality and will cause a loss of benefit to the community as a whole because: (I) The Proposed Development is not compatible with the existing amenity surrounding / abutting it due to the height, scale and bulk of the Proposed Development. The Proposed Development therefore does not comply with cl 3.1 of the LPP which states “...and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking”. (II) The Proposed Development will introduce 120 patients and employees at any one time not interacting with community in the normal context of a residential area. (III) The Proposed Development is commercial in nature, operating 24/7 and is not suited to a residential area. The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. (IV) All available car-parking in the surrounding areas will be consumed by the Proposed Development, constraining access to and use of Masons Gardens and visitors to local residences. (V) Each of Betty St, Doonan Rd and Granby Cres has a substantial number of houses without front fences, enabling neighbours to interact in the front of our homes. Introducing a large building, with lower set-backs and walled along each street-front, will fundamentally change the character of these streets, and we will lose those neighbourly interactions. (VI) There does not appear to be any independent evidence (other than the questionnaire responses acquired by the developer from 79 respondents to its questionnaire in 2016) of the urgent need for our community for building aged care on this scale south of the highway in Nedlands given the recent opening in the near vicinity of the Regis Nedlands in the Hollywood hospital precinct (141 aged care beds) and the future expansion of those facilities into the Regis Weston; the existing Aegis facilities at Alfred Carson (south of Stirling Hwy, 220 Aged Care beds); together with the developers own The Richardson in West Perth (92 suites) and soon to be completed Queenslea in Claremont (120 Residential Aged Care Suites). (c) Whether adequate provision has been made for the landscaping of the land to which the application relates and whether any trees or other vegetation on the land should be preserved (cl. 67(p)). I believe the Proposed Development fails to make such adequate provision or to preserve trees or other vegetation because: (I) The Proposed Development has a building footprint over most of the site and involves the removal of all trees and vegetation other than the street trees on the verges. (II) In particular, several large and very old trees of local importance will be removed and lost forever as a result of the Proposed Development. These trees provide nesting and resting sites for various different species of birds as their canopies are high and provide the birds with a safe vantage point. (III) Clause 4.6.2 of the LPP states “A minimum of twenty-five per cent (25%) of the site area is to be landscaped”. The Proposed Development does not comply with this requirement of the LPP. (d) The suitability of the land for the development taking into account the possible risk to human health or safety (cl. 67(r)). I do not believe that the land chosen is a suitable site for the Proposed Development on this scale as: (I) The Developer has neither stated approach to operation of the facility in the instance of a required lockdown during a pandemic nor a stated approach of how to protect vulnerable patients to cross infection from air borne viruses. This is an irresponsible approach to quality aged care services in a post COVID 19 pandemic environment where a duty of care exists to protect patients who are in a vulnerable position. The Proposed Development presents an unacceptable risk and has not considered a COVID safe design. (II) Furthermore, the Review of Innovative Models of Aged Care, Research Paper 3 January 2020 by the Royal Commission into Aged Care Quality and Safety recommended respite is provided in settings aligned to a person’s background and offering structured activities. The report further recommends small scale domestic models of aged care where there is an emphasis on providing person centred care models. The proposed developments design and density is not aligned to the objectives of the Royal Commission. (III) At 90 beds of non-ambulatory patients over 4 occupied levels, safe evacuation has been poorly considered. Safe evacuation should necessitate a sprinkler protected building with a zoned smoke management system and designated safe zones. Brigade turn out points for fire truck parking and access to brigade booster points have not been considered in the design. Evacuation of 90 non-ambulatory residents is a risk. (IV) Emergency services access to non-sprinklered areas, such as the roof plantroom, with access only available along Betty St and Doonan Rd for aerial firefighting, has not been considered. (V) Lifts in the building are to be used for vertical movement of food services, visitors,

patients, maintenance personnel and removal of deceased patients. This is an unhygienic practice and demonstrates poor design practice in this facility. Good design practice would separate different traffic streams in a facility of this size and density, with the minimum provision of a dedicated goods lift. (e) The adequacy of the proposed means of access to and egress from the site; arrangements for the loading, unloading, manoeuvring and parking of vehicles; and the amount of traffic likely to be generated by the development, particularly in relation to the capacity of the road system in the locality and the probable effect on traffic flow and safety (cls. 67(s) and (t)). I believe that the Proposed Development is inadequate in these respects because: (I) The Transport Impact Statement (TIS) has not calculated the total number of staff or visitor numbers in its car parking assessment for a facility of this nature. The TIS has relied on an allowance of 1 car bay per 4 beds. A high dependency aged care facility will have a significant staffing requirement that will exceed this requirement. It will also have significant visitor numbers. The TIS has made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment of car-parking and traffic movements. (II) The 2 streets on which the development will sit are narrow and are not designed to accommodate the amount of traffic for a facility of this size, particularly given the reliance on street parking (as the suggested parking is completely inadequate for the commercial operation of the nature contemplated). (III) The car-parking provisions are significantly underestimated, given the 23 car bays plus 3 Acrod bays for the 'well-being' medical centre (which will serve not only facility residents but also non-residents on a 30% 'anticipated' rate, but uncapped) plus a 90 bed facility with at least 40 employees/contractors plus Allied Services personnel and staff (particularly where there will need to be handover between staff shifts doubling up). This will result in substantial on street parking to Betty St, Doonan Rd, Melvista Ave, Granby Cres and surrounding roads. Staffing numbers for the Wellness Centre (3 treatment bays + hair salon – circa 4 staff), full commercial kitchen for up 540 food services per day (circa 4-5 staff), facilities manager (1 staff), full laundry (circa 2 staff), on site admin (circa 7 staff), on-site coffee shop (1 staff), cleaning staff (circa 3-4), orderlies and support staff (circa 2), plus nursing and staff for 90 patients (minimum 15 staff) significantly exceeds car-parking allowances. Shift changeover of nursing staff, visitors and maintenance staff further results in car-parking being significantly undersized and inadequate for a facility of this size and density. (IV) The increased traffic on the streets, and crossing the footpaths down Doonan Rd and Betty St, will be a danger to the large number of pedestrians, including children, who use the footpath to walk to Mason Gardens and the local childcare centre located less than 100m from the development. (V) Truck access will be required for servicing the grease trap for the kitchen. This does not appear to have been considered in the design. (VI) Inadequate on-site parking can result in off-site parking for nurses for night shifts. This can result in unsafe practices and security concerns for nursing staff accessing the facility at night having to park in unsecured/unmonitored locations (and overwhelming the current car-parking at Masons Gardens). (VII) Truck vehicular access for food delivery, waste removal, medical gas bottle replenishment, diesel fuel delivery, maintenance personnel for mechanical, electrical, fire and communications plant will result in significant increase to truck movements on Doonan Rd and Betty St. (VIII) Inadequate provision has been made for replacement of roof top air conditioning plant. Access for large plant can only be made via crane access from Betty St or Doonan Rd. (IX) Developer's Traffic Report also provides very little detail on the type of vehicle movements and their frequency and times during the week. This detail is also needed to form proper considered assessment of traffic movements and noise levels, which detail is also wholly lacking in the Developer's Transport Impact Statement and Acoustic Report.

#### 4. Objections to the Design

The deemed provisions outlined above and imposed by LPS 3 also require the City and Council to take into account State Planning Policy 7.0 (Design of the Built Environment) and its Design Principles (Sch 1). I believe that the design of the Proposed Development fails on various aspects in relation to each of those Design Principles, as set out below.

(a) Context and character – The design of the Proposed Development does not respond to or enhance the distinctive characteristics of the local area, and does not contribute to a sense of place, because: (I) The distinctive characteristics of the local area, including the adjacent lots, the streetscape and surrounding neighbourhood, are a low-rise, leafy and quiet neighbourhood with large green 9m setbacks and a local green park. (II) A development of the bulk, scale and size contemplated, on 2m set-backs, is not sympathetic to, and will in fact detract from, all of the distinctive characteristics of this local area. (III) The built form is a highly inappropriate in terms of bulk, scale and size to adjoining properties with box scale of building of approx. 70m overall length x 32m overall width and overall height of approximately 17m. The surrounding local homes are constrained to single blocks, and range from single level original 1930's cottages to architecturally designed 2 storey residences, incorporating significant landscaping and retention of large trees. (IV) The Proposed Development includes large, bland featureless walls measuring 35 metres in length (running east/west), a scale that would typically be found in a mixed use or town/activity centre environment rather than the local residential area where it is proposed. (V) The 4-storey

(5 level) Proposed Development with a proposed plot ratio of 1:0 would result in a scale of development which is not compatible with the amenity of the locality and which does not reinforce or respond sympathetically to the locally distinct low-rise, low-density residential neighbourhood. (VI) The density of R80 being considered is not appropriate to the existing densities which surround it (R10 and R12.5) and is not able to be sustained by the transport options provided by the narrow surrounding streets and limited access to public transport. (VII) Ramp/through access with a 4.5m high boundary wall on southern boundary will be highly visible from Doonan and Betty Streets and is aesthetically ugly along with inappropriately high unfriendly front boundary walls close to 2m near southern boundaries on Doonan Rd and Betty St. (VIII) Given the topography of the local area, this large building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens and from various vantages around the neighbourhood. The visual projection of the development will be overbearing and detrimental to the urban fabric of the Betty St/Doonan Rd hill-scape and Mason Gardens Precinct. (IX) The Proposed Development is commercial in nature, operating 24/7 and is not suited to a residential area. The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. (X) The Proposed Development is not compatible with the existing amenity surrounding / abutting it due to the height, scale and bulk of the Proposed Development. The Proposed Development therefore does not comply with cl 3.1 of the LPP which states "...and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking".

(b) Landscape Quality - The design of the Proposed Development fails to recognise that together landscape and buildings operate as an integrated and sustainable system, within a broader ecological context, because: (I) The visual projection of the development will be overbearing and detrimental to the leafy landscape of the Betty St/Doonan Rd hill-scape and Mason Gardens Precinct. (II) The Proposed Development does not protect existing environmental features and ecosystems as the design is for a building footprint over most of the site and identifies several large and very old trees of local importance which will be removed and lost forever as a result (breaching LPP cl. 4.6.3). These trees provide nesting and resting sites for various different species of birds as their canopies are high and provide the birds with a safe vantage point. (III) There is no provision in the Proposed Development for storm-water and soil management, ground and site conditions, solar access, microclimate, tree canopy, urban heat island impacts, habitat creation and preservation of green infrastructure. (IV) The Proposed Development proposes a density of occupancy that maximises the built form on the available land area, leaving limited open space for residents/patients. (V) There are very limited outdoor spaces proposed for the site, with a lack of green areas other than built-form landscaping. (VI) The LPP (clause 4.6.2) requires 25% of the site area to be landscaped but this has not been provided. (VII) The Proposed Development does not encourage social inclusion for its residents with the public and neighbours, with street-side fences and walls proposed. This does not contribute to the local streetscape where most of the front gardens do not have walls or fences, allowing neighbours to interact on a daily basis. (c) Built form and scale – The massing and height of the Proposed Development is not appropriate to its setting and does not successfully negotiate between existing built form and the intended future character of the local area because: (I) The building massing and scale is disproportionate to the surrounding urban vernacular. The mass and height are disrespectful to the scale and pitch lines from the adjoining properties with a consequential negative impact to the Betty St and Doonan Rd streetscapes (in breach fo LPP 4.3). Its verticality will project as a dominant insertion on the residential neighbourhood. As a "for-profit" commercial operation it will damage the residential cohesion of the suburb of Nedlands. Clause 3.1 of the LPP states "design of residential aged care facilities are of a high quality and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking". The proposed development is therefore non-compliant with LPP cl. 3.1. (II) The built form is a highly inappropriate in terms of bulk, scale and size to adjoining properties with box scale of building of approx. 70m overall length x 32m overall width and overall height of approximately 17m. The surrounding local homes are constrained to single blocks, and range from single level original 1930's cottages to architecturally designed 2 storey residences, incorporating significant landscaping and retention of large trees. (III) The four-storey (5 level) Proposed Development with a proposed plot ratio of 1:0 would result in a scale of development which is not compatible with the amenity of the residential locality and which does not reinforce or respond sympathetically to the locally distinct low-rise, low-density residential neighbourhood. (IV) The scale, massing and height of new development does not respond positively to that of the adjoining buildings, the topography, the general pattern of heights, and the views, vistas and landmarks of the Doonan Rd/Betty St area, and detracts from a coherent local identity. The orientation, proportion, composition, and articulation of built form elements should deliver an outcome that is suited to the purpose, defines the public domain,

contributes to the character of adjacent streetscapes and parks, and provides good amenity for people at ground level. This Proposed Development fails to do so.

(d) Sustainability – The Proposed Development does not optimise the sustainability of the built environment, delivering positive environmental, social and economic outcomes because:

(I) The proposed development is not setting a target for environmental sustainability. The development is taking a just above minimum approach, proposing to exceed Part J of the National Construction Code by a stated 10%. This is an inadequate attempt to demonstrate environmental sustainability credentials. As a minimum a Green Star 6-star standard should be set, and consideration should be given to a Passive House rating. This facility will have a significant carbon footprint that will represent a substantial increase over the carbon footprint of the existing three (3) residences.

(II) The Sustainability Report does not consider any modelling of obnoxious discharges from kitchen, toilet and laundry exhausts and their impact on the surrounding properties. Dispersion modelling and CFD modelling should be undertaken to determine that there is no undue impact, as required by LPP cl. 3.1.

(III) The Sustainability Report has not considered any heat island impact on the surrounding properties as a result of rejecting circa 700 - 800 kW of heat from the facility to determine that there is no undue impact, as required by clause 3.1 of the LPP.

(IV) The Sustainability Report has not considered glare and reflectance to properties on the east in the morning and west in the evening to determine that there is no undue impact, as required by clause 3.1 of the LPP.

(e) Amenity – The Proposed Development does not offer optimise internal and external amenity for occupants, visitors and neighbours, and does not provide an environment that is comfortable, productive and healthy because:

(I) The 24 hour a day noise from the large scale commercial air-conditioning plant and additional traffic and noise from staff during shift-changes, combined with the noise from the operation of the facility, including the commercial laundry and commercial kitchen will destroy the peaceful amenity of the residential locality.

(II) The Proposed Development would result in detrimental impacts to the amenity and character of the low-density residential neighbourhood.

(III) The proposed development will significantly impact the visual amenity of all residential lots to the east on Doonan Rd and west on Betty St and to the north on both Doonan Rd and Betty St, up to Princess Rd, particularly when the development is viewed from private outdoor areas.

(IV) The Developer's proposal, with its nominated function, size and density, has not considered any technical issues and will have a material negative impact to the amenity of the locality.

(V) Light spill for night-time access to car-parking and pedestrian entrances will result in light pollution to adjoining neighbours.

(VI) No consideration appears to have been given for acoustic treatment for roof located air conditioning plant and roof discharges. Discharges from the facility will adversely impact neighbours and have not been considered appropriately. Discharge stacks will also extend beyond the roof line creating further visual impact. Any consideration of each should take into account the topography of the area (a depression centred around Masons Gardens, creating a 'bowl' of the surrounding streets).

(VII) The acoustics technical report has not calculated the cumulative noise impact of ventilation systems with the air-cooled condensers. Significant ventilation systems will be required for the kitchen exhaust, evaporative kitchen make up, toilet exhausts, laundry exhausts and flues. To determine the full impact of the facility on adjoining residences, all noise sources should be defined and calculated on a cumulative basis.

(VIII) It is not clear how the development application satisfies noise pollution restrictions when it expressly does not address the issues of the noise from the emergency generator, fire pump and commercial dryers (paras 3.4, 3.7 and 3.8 of Acoustic Report), even where they are identified to be "problematic". These are in addition to the air-conditioning for the 90 bedrooms plus common areas, the commercial kitchen and commercial laundry plus increased traffic and pedestrian noise, all of which are dealt with on a very general basis.

(IX) Due to the low-rise nature of the near-neighbours, the Proposed Development will overlook the back and front yards of not just the immediately adjacent residences but also the residences across the road and up each of the surrounding streets. Given my home (at 76 Doonan Rd) is single storey home, and we are immediately to the north-east of the site, the Proposed Development will overlook both our front and back yards (including our pool area) from the windows and balconies (including common areas) on the upper floors.

(f) Safety – The Proposed Development does not optimise safety and security, minimising the risk of personal harm and supporting safe behaviour and use, because:

(I) The Developer has neither stated approach to operation of the facility in the instance of a required lockdown during a pandemic nor a stated approach of how to protect vulnerable patients to cross infection from air borne viruses. This is an irresponsible approach to quality aged care services in a post COVID 19 environment where a duty of care exists to protect patients who are in a vulnerable position. The City would be in breach of its duty of care now with the foreknowledge that this facility presents an unacceptable risk and has not considered a COVID safe design.

(II) Furthermore, the Review of Innovative Models of Aged Care, Research Paper 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety recommended respite is provided in settings aligned to a person's background and offering structured activities. The report further recommends small scale domestic models of aged care where there is an



emphasis on providing person centred care models. The proposed developments design and density is not aligned to the objectives of the Royal Commission. (III) At 90 beds of non-ambulatory patients over four (4) occupied levels, safe evacuation has been poorly considered. Safe evacuation should necessitate a sprinkler protected building with a zoned smoke management system and designated safe zones. Brigade turn out points for fire truck parking and access to brigade booster points have not been considered in the design. Evacuation of 90 non-ambulatory residents is a risk. (IV) Emergency services access to non-sprinklered areas, such as the roof plantroom, with access only available along Betty St and Doonan Rd for aerial firefighting, has not been considered. (V) Lifts in the building are to be used for vertical movement of food services, visitors, patients, maintenance personnel and removal of deceased patients. This is an unhygienic practice and demonstrates poor design practice in this facility. Good design practice would separate different traffic streams in a facility of this size and density, with the minimum provision of a dedicated goods lift. (VI) No design provision is shown for kitchen exhaust discharges, carpark ventilation discharges, generator exhaust discharge. Discharges from the facility will adversely impact neighbours and have not been considered appropriately. Discharge stacks will also extend beyond the roof line creating further visual impact. (VII) The front boundary walls are impacted further by the proposed 2.5m setbacks beyond the current street line sets backs of 9m making it impossible to see down the street. This will result in the streetscape significantly altered with the proposed development jutting out 6.5m beyond the existing street line. Residents reversing out of their driveway will have no line of sight, keeping in mind a pedestrian footpath runs down the east side of Doonan Rd and west side of Betty St making this impossible to ensure the safety of any family walking down the street to Masons Gardens, or car driving up the street. (VIII) Inadequate on-site parking can result in off-site parking for nurses for night shifts. This can result in unsafe practices and security concerns for nursing staff accessing the facility at night having to park in unsecured/unmonitored locations (and overwhelming the current car-parking at Masons Gardens). (g) Community – The Proposed Development does not appropriately respond to local community needs as well as the wider social context accommodating change over time and responding to new social demands because: (I) Given the current impacts of the COVID-19 pandemic on similar large scale, institutional aged care facilities, it does not seem appropriate to be encouraging the development of these facilities outside a hospital precinct. (II) The Interim Report of the Royal Commission into Aged Care Quality and Safety indicates that the final report will be exploring a shift in focus from institutional style aged care, such as the Proposed Development, into lower scale ageing in place and home care which poses the question – will this Proposed Development be out-dated before it is completed. (III) The best practice recommendations of the Interim Report from the Royal Commission into Aged Care and the final report, once released in December 2020 (and ultimate legislative changes resulting from it) and the lessons learned in the context of the COVID-19 pandemic, should be taken into account in the design and approval of any new aged care facilities in the City, and indeed across the State.

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**Respondent No:** 288

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 22:23:29 pm

**Last Seen:** Jul 23, 2020 12:12:36 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Dear Mayor and Councillors PROPOSED AGED CARE FACILITY 73-75 DOONAN RD AND 16--18 BETTY ST I have been an owner and resident at 65 Doonan Rd since 1965. In those fifty five years we, my wife and I , alongside many neighbours, raised families in safe surroundings free of traffic concerns. The neighbourhood has many attractive features and this has strongly influenced our decision to continue our lives here. In the early years the development of Lisle Village and the adjacent Melvista Nursing Home ' at the bottom of the street' was a welcome enhancement of the neighbourhood. When it was first suggested that a redevelopment of this area was required, the community was supportive of the objective of creating an enhanced aged care facility housed in modest 2 story buildings. Oryx Communities have released information in the last few weeks of plans they have placed before Nedlands City Council for a redevelopment in Doonan Rd/Betty Street. THESE PLANS ARE AN OURRIGHT HIGHJACKING AND MISUSE OF THIS NEIGHBOURHOOD GOODWILL FOR BRINGING AN AGED CARE FACILITY TO THIS AREA Firstly, the proposed development would not sit easily in this site, being far too large and commercial in nature and would generate very substantial traffic issues, all counter to the long-held community expectations. Secondly, astonishingly, the planned development site is not even that occupied by the original aged care facility ie. the Lisle Village and Melvista Nursing Home. The proposed `development area is a different aggregation of blocks which have benefited from a reclassification in Council. No doubt supporting arguments for the reclassification would have misused the neighbourhood support through highjacking to their own (different) circumstances. I am strongly opposed to the development proposed by Oryx Communities. The traffic and parking problems seem undeniable. I have read the pamphlet from Oryx sent to us through the mail last week but am not swayed by their arguments in these regards. The building is too large for the site and the problems flow from there. Give us back our original concept please. John Knox

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**Respondent No:** 289

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 22:24:43 pm

**Last Seen:** Jul 24, 2020 00:38:52 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I strongly object to the development application for a large scale Residential Aged Care Facility located at 73-75 Doonan Road and 16-18 Betty Street, Nedlands (Proposed Development). Whilst I appreciate the need for aged care facilities in our suburb, the proposed 5 level commercial development covering 4 residential lots is not an appropriate height, scale or size for its setting or for the current or future character of this local, low density residential area, which is characterised by 1 and 2 storey single residential homes. In particular, I object because: 1 . Planning Process Objections (a) Nedlands residents have a legitimate expectation that their rights will not be negatively impacted by the City of Nedlands (City) without, at a minimum, the rules of procedural fairness being followed. (b) Whilst I appreciate and support the need for residential aged care facilities in the City to service a proportion of our ageing population, where such facilities will sit in a residential area, they must be designed to complement that residential area. A good example is the Aegis Alfred Carson facility in the Town of Claremont. The size, bulk and scale of the 4-storey plus basement and roof (height approx. 17 metres), 90 bed high care, a residential aged care facility on 73-75 Doonan Rd and 16-18 Betty St, Nedlands is manifestly out of sync with the residential locality for which it is proposed. (c) I believe the City and its Council have not followed the appropriate process in the adoption of PD11.20 Local Planning Scheme 3 – Local Planning Policy: Residential Aged Care Facilities (LPP) and have failed in their duty of care to local ratepayers in making them aware of such significant structural changes which will have a fundamental negative impact on the quiet enjoyment of their homes. In particular: (I) The adoption of the LPP setting out the parameters for the development of residential aged care facilities had substantial implications for impacted residents which were not immediately apparent on its face to any in the community without a planning background, and yet no individual notification was received by any ratepayer in those affected areas and the proposal was minimally advertised and passed during the initial turmoil of the COVID 19 pandemic and then associated shutdowns. (II) The fact that not one comment was received from the community or affected residents on the LPP, as noted in the minutes of the meeting of the City's Council of 26 April 2020, should clearly have highlighted to the City that the community and affected residents had not been made sufficiently aware of the implications of the amendments. Residents had a right to be properly and completely informed of the proposal and to be given fair hearing on it. (III) In addition, the final version of the LPP adopted contained significant amendments to density, height and plot ratio which had not been advertised at all. Given the increased building height, scale and plot ratio associated with these modifications will facilitate increased bulk and scale for any development proposed, I am of the view the modifications to the draft LPP are not minor and are in fact, significant, particularly in relation to the locality of surrounding residential area. The Mayor has indicated that these changes were rushed through so that the Regis facility on Monash Avenue would not be a non-

conforming use, although the rationale for this requiring an urgent amendment to the LPP (without advertising) when it had already been constructed is not apparent. (IV) The Proposed Development fails to satisfy aims of the City's Local Planning Scheme No. 3 (LPS 3) to protect and enhance local character and amenity, respect the vision for the development of local streets or achieve quality residential built form outcomes. (V) The LPP allows for a higher density coding without the initiation of a scheme amendment to LPS 3. The stated purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City. Instead it has imposed an R-coding as a mechanism to deal with scale, bulk and built form. This is not appropriate as an R80 R-coding immediately adjacent to properties subject to an R12.5 density coding (and with R.10 density coding surrounding) will result in significant conflict with respect to scale, bulk and streetscape impacts and will have undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic and parking (LPP cl. 3.1). (VI) A residential density coding of R80 as suggested by the LPP is not acceptable or justified at the subject site. It is completely out of context with a transition from the neighbouring R12.5 and R10 zoned properties. (VII) Density should be imposed via a scheme amendment to LPS3, not through the LPP. LPS 3 states that one of its purposes is to "zone land within the Scheme area for the purposes defined in this Scheme" (LPS 3 cl. 8(c)) but then fails to do so in respect to the subject site. This must be amended in an appropriate manner. (VIII) The LPP also appears to have been developed without due consideration to the individual locational attributes of the various sites within the City to which it will apply. The application of the same density, height and plot ratios that apply to the Regis facility on Monash Avenue without adjacent residential properties and with reciprocal car-parking and easy access for emergency and service vehicles in a medical precinct to a development on 4 lots on Doonan Rd/Betty St surrounded by residential properties, on narrow streets with limited car-parking and limited access for emergency and service vehicles underlines the fact that imposing a broad LPP across various blocks without individual consideration of the areas affected is the wrong approach to a planning policy. Each of these blocks deserves a separate local development policy to address the specific needs of the relevant locale. (IX) The stated purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City. The LPP makes no delineation between differing models of care (e.g. independent living units, low care, high care). The planning guidelines set out in the LPP, as drafted, applies the same planning conditions irrespective of the model of care. Different models of care have differing levels of servicing. This has not been considered if the LPP is applied without the City undertaking further consideration of the relevant sites in question. This has resulted in a High Care facility with an inappropriate density being proposed in a precinct unsuited to the facility function. The LPP should be redrafted to reflect the specific function and nature of aged care models of care, with appropriate planning of such facilities contextually. (X) The rushed endorsement of an R80 equivalent zoning in the LPP without community consultation has denied the community the opportunity to comment on the appropriateness of this density in a residential zone or whether a local planning policy is the appropriate vehicle for this site. (XI) On this basis I question the validity of the adopted LPP. Its approval should urgently be reversed and only be reconsidered by the Council once appropriate due process has been followed with the required levels of community consultation and responses taken account of and due consideration of its appropriateness as a vehicle. (d) However, if the LPP is retained, rather than considering a higher density code under LPP cl. 4.2.4 in respect to the subject site, the City should exercise its discretion under that clause to not accept a higher density code, but rather should take all of the factors relating to impact on the residential amenity of the area by way of building bulk and scale, noise, traffic and parking into account (LPP 3.1) and instead impose an appropriate lower density, lower building height in both metres and storeys, with appropriate set-backs and plot ratio, more in keeping with a transition from the neighbouring R12.5 and R10 zoned residential homes. (e) In any event, the Proposed Development is arguably not permitted under LPS 3: (I) This site is zoned residential with an "A9" additional use, being "Residential Aged Care Facility" as a permitted use under LPS 3, but without applying additional development standards. The definition of "Residential Aged Care Facility" in LPS 3 does not refer to a facility being run for profit on a commercial basis and the site is has no other commercial zoning (such as the "Mixed Use" zoning underlying additional uses "A1" and "A2"). When placed in the residential zoning context, this means that a for-profit, commercial residential aged care facility arguably does not fall within the permitted use under LPS 3 for this site. (II) Furthermore, a "Medical Centre" as defined under LPS 3 is not listed as an additional use permitted on the site (either as a "P" permitted use or an "I" incidental use). This is unlike other sites under LPS 3 which have additional uses permitted. For example, the land zoned for additional uses "A3" or "A4", expressly include a "Medical Centre" as an additional use for those sites together with "Residential Aged Care" (so that use is clearly not included in the definition of "Residential Aged Care Facility", as is suggested in the "Incidental Use" heading on page 21 of the Development Application Report), with

“Residential Aged Care Facility” specified as a “P” use and “Medical Centre” specified as an “I” use (i.e. permitted if it is consequent on, or naturally attaching, appertaining or relating to the predominant use of the land). As a result, the medical centre described as the ‘wellbeing centre’ in the Proposed Development and which is serving not only residents of the facility but also non-residents on a 30% ‘anticipated’ (but uncapped) rate, is not a permitted use for the site under LPS 3. (f) A scheme amendment should be initiated to LPS 3 to deal with the inadequacies and lack of clarity in LPS 3 regarding this site, including introduction of appropriate development standards (including regarding size and scale and car-parking) and to guide appropriate density for any “Residential Aged Care Facility” which falls within the permitted use for this site.

2. Lack of Consultation on the Proposed Development (a) In addition to the failures surrounding the advertising of the LPP, and contrary to statements in the Development Application and by the City’s administration, the community consultation on the development of a Proposed Development from the developer and City has been extremely limited. In April 2016, the developer held information sessions on the proposed refurbishment of Melvista Lodge and the development of a 2-storey aged care facility on adjacent lots at 73-75 Doonan Rd and 16-18 Betty St with residential 9m set-backs (Initial Proposal). This limited interaction on the different Initial Proposal is what is described as ‘community consultation’ in paragraph 1.3.2 of the development application. (b) The 5 level Proposed Development fundamentally differs to the Initial Proposal as it is a 4-storey plus basement and roof (height approx. 17 metres), 90 bed high care, aged care facility with 2m set-backs at ground level and no longer includes the refurbishment of the Melvista Lodge. Clause 5.1 of the LPP states “Consultation with affected landowners will be undertaken in accordance with the City’s Local Planning Policy- Consultation of Planning Proposals”. (c) Neither the developer nor the City communicated with the local community regarding the new and different Proposed Development until after the Proposed Development had been lodged. Communication from the developer was limited to provision of information rather than true consultation. (d) The statements from the City’s administration and the developer and its representatives, Creating Communities, that this Proposed Development fully complies with applicable planning requirements and that as a result there is no basis for the community to object to the Proposed Development, contributes to the perception that the City is not interested in its residents’ opinions or providing them with due process or consultation and that the lack of proper consultation by the Developer and the City on this Proposed Development breaches the City’s own local planning policy on Consultation of Planning Proposals and LPP cl. 5.0. (e) Various images and plans included in the development application for the Proposed Development either avoid angles from which the upper levels and roof form which will be highly visible (for example, in the renders presented in the Architectural Drawings and the Development Application Report there is no render looking south-west from Doonan Rd, or directly east from Betty St) or shadow those upper levels and roof in a manner which I do not believe adequately represent what will be visible to local residents, particularly on sloping streets such as Betty St and Doonan Rd (and as is shown in just one diagram, on page 26 of the Architectural Design Statement). Other images do not appropriately represent the homes surrounding the site. For example, Photo 11 (on page 9 of the Development Application Report) is a photo of the 2 storey homes at 68 and 70 Doonan Rd (approximately 95m North-west of the subject site) but is entitled “View of residential dwellings on Doonan Road facing west towards subject site”, whereas the 1 storey homes at 76 and 78 Doonan Rd, and the 2 storey home at 80 Doonan Rd would be the houses that ‘face west towards the subject site’ (and facing west from the houses pictured will be a view of 2 residential properties).

3. Specific Planning Objections The deemed provisions set out in Schedule 2 of the Planning and Development (Local Planning Schemes) Regulations 2015 are imported into LPS3 (whether or not the LPP is retained or revoked) (LPS3 cl 7(1)(a), 2, 10 and note 2 of cl 18(a)). These require the City and Council to have due regard to: (a) The compatibility of the Proposed Development with its setting including the relationship of the Proposed Development to development on adjoining land or on other land in the locality including the likely effect of the height, bulk, scale, orientation and appearance of the Proposed Development (cl. 67(m)). I do not believe the Proposed Development is compatible with the surrounding residential neighbourhood zoned R10 and R12.5 because: (I) The set-back for the development has been greatly reduced to the other homeowners in the area and does not comply with LPP cl. 4.2.1 which requires compliance with LPS 3 cl. 26(1) (a 9m set-back). (II) The bulk and scale of a 5 level building across 4 residential lots is completely incompatible with the surrounding residential homes, each within the boundaries of single residential constraints. (III) This building will dominate all surrounding buildings and the park in Masons Gardens. (IV) Given the topography of the local area, this large building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens and from various vantage points around the neighbourhood. The visual projection of the development will be overbearing and detrimental to the urban fabric of the Betty St/Doonan Rd hill-scape and Mason Gardens Precinct. (V) It is not clear how the Proposed Development achieves the required ratio under the LPP in any event, or how this building achieves a 1:1 plot ratio as on its face the building footprint covers almost the entirety of

the block and has 5 levels. Even excluding common areas such as hallways and communal areas does not appear to achieve the required ratio. In addition, it appears from the "DA –Plot Ratio" drawing in the Architectural Drawings Development Plans for the Proposed Development that all private staff areas (such as offices, the administration area and staff rooms), common areas (including private break-out rooms) and the entire commercial medical 'wellness' centre have been excluded from the developer's plot ratio calculation which is not appropriate. (b) The amenity of the locality, including the character of the locality and the social impacts of the development and potential loss of any community service or benefit resulting from the Proposed Development, including on the community as a whole (cls. 67(n), (v) and (x)). I believe the Proposed Development will have a negative impact on the amenity of the locality and will cause a loss of benefit to the community as a whole because: (I) The Proposed Development is not compatible with the existing amenity surrounding / abutting it due to the height, scale and bulk of the Proposed Development. The Proposed Development therefore does not comply with cl 3.1 of the LPP which states "...and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking". (II) The Proposed Development will introduce 120 patients and employees at any one time not interacting with community in the normal context of a residential area. (III) The Proposed Development is commercial in nature, operating 24/7 and is not suited to a residential area. The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. (IV) All available car-parking in the surrounding areas will be consumed by the Proposed Development, constraining access to and use of Masons Gardens and visitors to local residences. (V) Each of Betty St, Doonan Rd and Granby Cres has a substantial number of houses without front fences, enabling neighbours to interact in the front of our homes. Introducing a large building, with lower set-backs and walled along each street-front, will fundamentally change the character of these streets, and we will lose those neighbourly interactions. (VI) There does not appear to be any independent evidence (other than the questionnaire responses acquired by the developer from 79 respondents to its questionnaire in 2016) of the urgent need for our community for building aged care on this scale south of the highway in Nedlands given the recent opening in the near vicinity of the Regis Nedlands in the Hollywood hospital precinct (141 aged care beds) and the future expansion of those facilities into the Regis Weston; the existing Aegis facilities at Alfred Carson (south of Stirling Hwy, 220 Aged Care beds); together with the developers own The Richardson in West Perth (92 suites) and soon to be completed Queenslea in Claremont (120 Residential Aged Care Suites). (c) Whether adequate provision has been made for the landscaping of the land to which the application relates and whether any trees or other vegetation on the land should be preserved (cl. 67(p)). I believe the Proposed Development fails to make such adequate provision or to preserve trees or other vegetation because: (I) The Proposed Development has a building footprint over most of the site and involves the removal of all trees and vegetation other than the street trees on the verges. (II) In particular, several large and very old trees of local importance will be removed and lost forever as a result of the Proposed Development. These trees provide nesting and resting sites for various different species of birds as their canopies are high and provide the birds with a safe vantage point. (III) Clause 4.6.2 of the LPP states "A minimum of twenty-five per cent (25%) of the site area is to be landscaped". The Proposed Development does not comply with this requirement of the LPP. (d) The suitability of the land for the development taking into account the possible risk to human health or safety (cl. 67(r)). I do not believe that the land chosen is a suitable site for the Proposed Development on this scale as: (I) The Developer has neither stated approach to operation of the facility in the instance of a required lockdown during a pandemic nor a stated approach of how to protect vulnerable patients to cross infection from air borne viruses. This is an irresponsible approach to quality aged care services in a post COVID 19 pandemic environment where a duty of care exists to protect patients who are in a vulnerable position. The Proposed Development presents an unacceptable risk and has not considered a COVID safe design. (II) Furthermore, the Review of Innovative Models of Aged Care, Research Paper 3 January 2020 by the Royal Commission into Aged Care Quality and Safety recommended respite is provided in settings aligned to a person's background and offering structured activities. The report further recommends small scale domestic models of aged care where there is an emphasis on providing person centred care models. The proposed developments design and density is not aligned to the objectives of the Royal Commission. (III) At 90 beds of non-ambulatory patients over 4 occupied levels, safe evacuation has been poorly considered. Safe evacuation should necessitate a sprinkler protected building with a zoned smoke management system and designated safe zones. Brigade turn out points for fire truck parking and access to brigade booster points have not been considered in the design. Evacuation of 90 non-ambulatory residents is a risk. (IV) Emergency services access to non-sprinklered areas, such as the roof plantroom, with access only available along Betty St and Doonan Rd for aerial

firefighting, has not been considered. (V) Lifts in the building are to be used for vertical movement of food services, visitors, patients, maintenance personnel and removal of deceased patients. This is an unhygienic practice and demonstrates poor design practice in this facility. Good design practice would separate different traffic streams in a facility of this size and density, with the minimum provision of a dedicated goods lift. (e) The adequacy of the proposed means of access to and egress from the site; arrangements for the loading, unloading, manoeuvring and parking of vehicles; and the amount of traffic likely to be generated by the development, particularly in relation to the capacity of the road system in the locality and the probable effect on traffic flow and safety (cls. 67(s) and (t)). I believe that the Proposed Development is inadequate in these respects because: (I) The Transport Impact Statement (TIS) has not calculated the total number of staff or visitor numbers in its car parking assessment for a facility of this nature. The TIS has relied on an allowance of 1 car bay per 4 beds. A high dependency aged care facility will have a significant staffing requirement that will exceed this requirement. It will also have significant visitor numbers. The TIS has made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment of car-parking and traffic movements. (II) The 2 streets on which the development will sit are narrow and are not designed to accommodate the amount of traffic for a facility of this size, particularly given the reliance on street parking (as the suggested parking is completely inadequate for the commercial operation of the nature contemplated). (III) The car-parking provisions are significantly underestimated, given the 23 car bays plus 3 Acrod bays for the 'well-being' medical centre (which will serve not only facility residents but also non-residents on a 30% 'anticipated' rate, but uncapped) plus a 90 bed facility with at least 40 employees/contractors plus Allied Services personnel and staff (particularly where there will need to be handover between staff shifts doubling up). This will result in substantial on street parking to Betty St, Doonan Rd, Melvista Ave, Granby Cres and surrounding roads. Staffing numbers for the Wellness Centre (3 treatment bays + hair salon – circa 4 staff), full commercial kitchen for up 540 food services per day (circa 4-5 staff), facilities manager (1 staff), full laundry (circa 2 staff), on site admin (circa 7 staff), on-site coffee shop (1 staff), cleaning staff (circa 3-4), orderlies and support staff (circa 2), plus nursing and staff for 90 patients (minimum 15 staff) significantly exceeds car-parking allowances. Shift changeover of nursing staff, visitors and maintenance staff further results in car-parking being significantly undersized and inadequate for a facility of this size and density. (IV) The increased traffic on the streets, and crossing the footpaths down Doonan Rd and Betty St, will be a danger to the large number of pedestrians, including children, who use the footpath to walk to Mason Gardens and the local childcare centre located less than 100m from the development. (V) Truck access will be required for servicing the grease trap for the kitchen. This does not appear to have been considered in the design. (VI) Inadequate on-site parking can result in off-site parking for nurses for night shifts. This can result in unsafe practices and security concerns for nursing staff accessing the facility at night having to park in unsecured/unmonitored locations (and overwhelming the current car-parking at Masons Gardens). (VII) Truck vehicular access for food delivery, waste removal, medical gas bottle replenishment, diesel fuel delivery, maintenance personnel for mechanical, electrical, fire and communications plant will result in significant increase to truck movements on Doonan Rd and Betty St. (VIII) Inadequate provision has been made for replacement of roof top air conditioning plant. Access for large plant can only be made via crane access from Betty St or Doonan Rd. (IX) Developer's Traffic Report also provides very little detail on the type of vehicle movements and their frequency and times during the week. This detail is also needed to form proper considered assessment of traffic movements and noise levels, which detail is also wholly lacking in the Developer's Transport Impact Statement and Acoustic Report.

#### 4. Objections to the Design

The deemed provisions outlined above and imposed by LPS 3 also require the City and Council to take into account State Planning Policy 7.0 (Design of the Built Environment) and its Design Principles (Sch 1). I believe that the design of the Proposed Development fails on various aspects in relation to each of those Design Principles, as set out below. (a) Context and character – The design of the Proposed Development does not respond to or enhance the distinctive characteristics of the local area, and does not contribute to a sense of place, because: (I) The distinctive characteristics of the local area, including the adjacent lots, the streetscape and surrounding neighbourhood, are a low-rise, leafy and quiet neighbourhood with large green 9m setbacks and a local green park. (II) A development of the bulk, scale and size contemplated, on 2m set-backs, is not sympathetic to, and will in fact detract from, all of the distinctive characteristics of this local area. (III) The built form is a highly inappropriate in terms of bulk, scale and size to adjoining properties with box scale of building of approx. 70m overall length x 32m overall width and overall height of approximately 17m. The surrounding local homes are constrained to single blocks, and range from single level original 1930's cottages to architecturally designed 2 storey residences, incorporating significant landscaping and retention of large trees. (IV) The Proposed Development includes large, bland featureless walls measuring 35 metres in length (running east/west), a scale that would typically be found in a

mixed use or town/activity centre environment rather than the local residential area where it is proposed. (V) The 4-storey (5 level) Proposed Development with a proposed plot ratio of 1:0 would result in a scale of development which is not compatible with the amenity of the locality and which does not reinforce or respond sympathetically to the locally distinct low-rise, low-density residential neighbourhood. (VI) The density of R80 being considered is not appropriate to the existing densities which surround it (R10 and R12.5) and is not able to be sustained by the transport options provided by the narrow surrounding streets and limited access to public transport. (VII) Ramp/through access with a 4.5m high boundary wall on southern boundary will be highly visible from Doonan and Betty Streets and is aesthetically ugly along with inappropriately high unfriendly front boundary walls close to 2m near southern boundaries on Doonan Rd and Betty St. (VIII) Given the topography of the local area, this large building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens and from various vantages around the neighbourhood. The visual projection of the development will be overbearing and detrimental to the urban fabric of the Betty St/Doonan Rd hill-scape and Mason Gardens Precinct. (IX) The Proposed Development is commercial in nature, operating 24/7 and is not suited to a residential area. The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. (X) The Proposed Development is not compatible with the existing amenity surrounding / abutting it due to the height, scale and bulk of the Proposed Development. The Proposed Development therefore does not comply with cl 3.1 of the LPP which states "...and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking".

(b) Landscape Quality - The design of the Proposed Development fails to recognise that together landscape and buildings operate as an integrated and sustainable system, within a broader ecological context, because:

(I) The visual projection of the development will be overbearing and detrimental to the leafy landscape of the Betty St/Doonan Rd hill-scape and Mason Gardens Precinct. (II) The Proposed Development does not protect existing environmental features and ecosystems as the design is for a building footprint over most of the site and identifies several large and very old trees of local importance which will be removed and lost forever as a result (breaching LPP cl. 4.6.3). These trees provide nesting and resting sites for various different species of birds as their canopies are high and provide the birds with a safe vantage point. (III) There is no provision in the Proposed Development for storm-water and soil management, ground and site conditions, solar access, microclimate, tree canopy, urban heat island impacts, habitat creation and preservation of green infrastructure. (IV) The Proposed Development proposes a density of occupancy that maximises the built form on the available land area, leaving limited open space for residents/patients. (V) There are very limited outdoor spaces proposed for the site, with a lack of green areas other than built-form landscaping. (VI) The LPP (clause 4.6.2) requires 25% of the site area to be landscaped but this has not been provided. (VII) The Proposed Development does not encourage social inclusion for its residents with the public and neighbours, with street-side fences and walls proposed. This does not contribute to the local streetscape where most of the front gardens do not have walls or fences, allowing neighbours to interact on a daily basis.

(c) Built form and scale – The massing and height of the Proposed Development is not appropriate to its setting and does not successfully negotiate between existing built form and the intended future character of the local area because:

(I) The building massing and scale is disproportionate to the surrounding urban vernacular. The mass and height are disrespectful to the scale and pitch lines from the adjoining properties with a consequential negative impact to the Betty St and Doonan Rd streetscapes (in breach of LPP 4.3). Its verticality will project as a dominant insertion on the residential neighbourhood. As a "for-profit" commercial operation it will damage the residential cohesion of the suburb of Nedlands. Clause 3.1 of the LPP states "design of residential aged care facilities are of a high quality and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking". The proposed development is therefore non-compliant with LPP cl. 3.1. (II) The built form is a highly inappropriate in terms of bulk, scale and size to adjoining properties with box scale of building of approx. 70m overall length x 32m overall width and overall height of approximately 17m. The surrounding local homes are constrained to single blocks, and range from single level original 1930's cottages to architecturally designed 2 storey residences, incorporating significant landscaping and retention of large trees. (III) The four-storey (5 level) Proposed Development with a proposed plot ratio of 1:0 would result in a scale of development which is not compatible with the amenity of the residential locality and which does not reinforce or respond sympathetically to the locally distinct low-rise, low-density residential neighbourhood. (IV) The scale, massing and height of new development does not respond positively to that of the adjoining buildings, the topography, the general pattern of heights, and the views, vistas and landmarks of the Doonan Rd/Betty St area, and detracts from a coherent local identity. The orientation, proportion, composition, and



articulation of built form elements should deliver an outcome that is suited to the purpose, defines the public domain, contributes to the character of adjacent streetscapes and parks, and provides good amenity for people at ground level. This Proposed Development fails to do so. (d) Sustainability – The Proposed Development does not optimise the sustainability of the built environment, delivering positive environmental, social and economic outcomes because: (I) The proposed development is not setting a target for environmental sustainability. The development is taking a just above minimum approach, proposing to exceed Part J of the National Construction Code by a stated 10%. This is an inadequate attempt to demonstrate environmental sustainability credentials. As a minimum a Green Star 6-star standard should be set, and consideration should be given to a Passive House rating. This facility will have a significant carbon footprint that will represent a substantial increase over the carbon footprint of the existing three (3) residences. (II) The Sustainability Report does not consider any modelling of obnoxious discharges from kitchen, toilet and laundry exhausts and their impact on the surrounding properties. Dispersion modelling and CFD modelling should be undertaken to determine that there is no undue impact, as required by LPP cl. 3.1. (III) The Sustainability Report has not considered any heat island impact on the surrounding properties as a result of rejecting circa 700 - 800 kW of heat from the facility to determine that there is no undue impact, as required by clause 3.1 of the LPP. (IV) The Sustainability Report has not considered glare and reflectance to properties on the east in the morning and west in the evening to determine that there is no undue impact, as required by clause 3.1 of the LPP. (e) Amenity – The Proposed Development does not offer optimise internal and external amenity for occupants, visitors and neighbours, and does not provide an environment that is comfortable, productive and healthy because: (I) The 24 hour a day noise from the large scale commercial air-conditioning plant and additional traffic and noise from staff during shift-changes, combined with the noise from the operation of the facility, including the commercial laundry and commercial kitchen will destroy the peaceful amenity of the residential locality. (II) The Proposed Development would result in detrimental impacts to the amenity and character of the low-density residential neighbourhood. (III) The proposed development will significantly impact the visual amenity of all residential lots to the east on Doonan Rd and west on Betty St and to the north on both Doonan Rd and Betty St, up to Princess Rd, particularly when the development is viewed from private outdoor areas. (IV) The Developer's proposal, with its nominated function, size and density, has not considered any technical issues and will have a material negative impact to the amenity of the locality. (V) Light spill for night-time access to car-parking and pedestrian entrances will result in light pollution to adjoining neighbours. (VI) No consideration appears to have been given for acoustic treatment for roof located air conditioning plant and roof discharges. Discharges from the facility will adversely impact neighbours and have not been considered appropriately. Discharge stacks will also extend beyond the roof line creating further visual impact. Any consideration of each should take into account the topography of the area (a depression centred around Masons Gardens, creating a 'bowl' of the surrounding streets). (VII) The acoustics technical report has not calculated the cumulative noise impact of ventilation systems with the air-cooled condensers. Significant ventilation systems will be required for the kitchen exhaust, evaporative kitchen make up, toilet exhausts, laundry exhausts and flues. To determine the full impact of the facility on adjoining residences, all noise sources should be defined and calculated on a cumulative basis. (VIII) It is not clear how the development application satisfies noise pollution restrictions when it expressly does not address the issues of the noise from the emergency generator, fire pump and commercial dryers (paras 3.4, 3.7 and 3.8 of Acoustic Report), even where they are identified to be "problematic". These are in addition to the air-conditioning for the 90 bedrooms plus common areas, the commercial kitchen and commercial laundry plus increased traffic and pedestrian noise, all of which are dealt with on a very general basis. (IX) Due to the low-rise nature of the near-neighbours, the Proposed Development will overlook the back and front yards of not just the immediately adjacent residences but also the residences across the road and up each of the surrounding streets. Given my home (at 78 Doonan Rd) is single storey home, and we are immediately to the north-east of the site, the Proposed Development will overlook both our front and back yards (including our pool area) from the windows and balconies (including common areas) on the upper floors. (f) Safety – The Proposed Development does not optimise safety and security, minimising the risk of personal harm and supporting safe behaviour and use, because: (I) The Developer has neither stated approach to operation of the facility in the instance of a required lockdown during a pandemic nor a stated approach of how to protect vulnerable patients to cross infection from air borne viruses. This is an irresponsible approach to quality aged care services in a post COVID 19 environment where a duty of care exists to protect patients who are in a vulnerable position. The City would be in breach of its duty of care now with the foreknowledge that this facility presents an unacceptable risk and has not considered a COVID safe design. (II) Furthermore, the Review of Innovative Models of Aged Care, Research Paper 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety recommended respite is provided in settings aligned to a person's background and

offering structured activities. The report further recommends small scale domestic models of aged care where there is an emphasis on providing person centred care models. The proposed developments design and density is not aligned to the objectives of the Royal Commission. (III) At 90 beds of non-ambulatory patients over four (4) occupied levels, safe evacuation has been poorly considered. Safe evacuation should necessitate a sprinkler protected building with a zoned smoke management system and designated safe zones. Brigade turn out points for fire truck parking and access to brigade booster points have not been considered in the design. Evacuation of 90 non-ambulatory residents is a risk. (IV) Emergency services access to non-sprinklered areas, such as the roof plantroom, with access only available along Betty St and Doonan Rd for aerial firefighting, has not been considered. (V) Lifts in the building are to be used for vertical movement of food services, visitors, patients, maintenance personnel and removal of deceased patients. This is an unhygienic practice and demonstrates poor design practice in this facility. Good design practice would separate different traffic streams in a facility of this size and density, with the minimum provision of a dedicated goods lift. (VI) No design provision is shown for kitchen exhaust discharges, carpark ventilation discharges, generator exhaust discharge. Discharges from the facility will adversely impact neighbours and have not been considered appropriately. Discharge stacks will also extend beyond the roof line creating further visual impact. (VII) The front boundary walls are impacted further by the proposed 2.5m setbacks beyond the current street line sets backs of 9m making it impossible to see down the street. This will result in the streetscape significantly altered with the proposed development jutting out 6.5m beyond the existing street line. Residents reversing out of their driveway will have no line of sight, keeping in mind a pedestrian footpath runs down the east side of Doonan Rd and west side of Betty St making this impossible to ensure the safety of any family walking down the street to Masons Gardens, or car driving up the street. (VIII) Inadequate on-site parking can result in off-site parking for nurses for night shifts. This can result in unsafe practices and security concerns for nursing staff accessing the facility at night having to park in unsecured/unmonitored locations (and overwhelming the current car-parking at Masons Gardens). (g) Community – The Proposed Development does not appropriately respond to local community needs as well as the wider social context accommodating change over time and responding to new social demands because: (I) Given the current impacts of the COVID-19 pandemic on similar large scale, institutional aged care facilities, it does not seem appropriate to be encouraging the development of these facilities outside a hospital precinct. (II) The Interim Report of the Royal Commission into Aged Care Quality and Safety indicates that the final report will be exploring a shift in focus from institutional style aged care, such as the Proposed Development, into lower scale ageing in place and home care which poses the question – will this Proposed Development be out-dated before it is completed. (III) The best practice recommendations of the Interim Report from the Royal Commission into Aged Care and the final report, once released in December 2020 (and ultimate legislative changes resulting from it) and the lessons learned in the context of the COVID-19 pandemic, should be taken into account in the design and approval of any new aged care facilities in the City, and indeed across the State.

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**Respondent No:** 290

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 22:27:03 pm

**Last Seen:** Jul 24, 2020 00:37:23 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I strongly object to the development application for a large scale Residential Aged Care Facility located at 73-75 Doonan Road and 16-18 Betty Street, Nedlands (Proposed Development). Whilst I appreciate the need for aged care facilities in our suburb, the proposed 5 level commercial development covering 4 residential lots is not an appropriate height, scale or size for its setting or for the current or future character of this local, low density residential area, which is characterised by 1 and 2 storey single residential homes. In particular, I object because: 1 . Planning Process Objections (a) Nedlands residents have a legitimate expectation that their rights will not be negatively impacted by the City of Nedlands (City) without, at a minimum, the rules of procedural fairness being followed. (b) Whilst I appreciate and support the need for residential aged care facilities in the City to service a proportion of our ageing population, where such facilities will sit in a residential area, they must be designed to complement that residential area. A good example is the Aegis Alfred Carson facility in the Town of Claremont. The size, bulk and scale of the 4-storey plus basement and roof (height approx. 17 metres), 90 bed high care, a residential aged care facility on 73-75 Doonan Rd and 16-18 Betty St, Nedlands is manifestly out of sync with the residential locality for which it is proposed. (c) I believe the City and its Council have not followed the appropriate process in the adoption of PD11.20 Local Planning Scheme 3 – Local Planning Policy: Residential Aged Care Facilities (LPP) and have failed in their duty of care to local ratepayers in making them aware of such significant structural changes which will have a fundamental negative impact on the quiet enjoyment of their homes. In particular: (I) The adoption of the LPP setting out the parameters for the development of residential aged care facilities had substantial implications for impacted residents which were not immediately apparent on its face to any in the community without a planning background, and yet no individual notification was received by any ratepayer in those affected areas and the proposal was minimally advertised and passed during the initial turmoil of the COVID 19 pandemic and then associated shutdowns. (II) The fact that not one comment was received from the community or affected residents on the LPP, as noted in the minutes of the meeting of the City's Council of 26 April 2020, should clearly have highlighted to the City that the community and affected residents had not been made sufficiently aware of the implications of the amendments. Residents had a right to be properly and completely informed of the proposal and to be given fair hearing on it. (III) In addition, the final version of the LPP adopted contained significant amendments to density, height and plot ratio which had not been advertised at all. Given the increased building height, scale and plot ratio associated with these modifications will facilitate increased bulk and scale for any development proposed, I am of the view the modifications to the draft LPP are not minor and are in fact, significant, particularly in relation to the locality of surrounding residential area. The Mayor has indicated that these changes were rushed through so that the Regis facility on Monash Avenue would not be a non-

conforming use, although the rationale for this requiring an urgent amendment to the LPP (without advertising) when it had already been constructed is not apparent. (IV) The Proposed Development fails to satisfy aims of the City's Local Planning Scheme No. 3 (LPS 3) to protect and enhance local character and amenity, respect the vision for the development of local streets or achieve quality residential built form outcomes. (V) The LPP allows for a higher density coding without the initiation of a scheme amendment to LPS 3. The stated purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City. Instead it has imposed an R-coding as a mechanism to deal with scale, bulk and built form. This is not appropriate as an R80 R-coding immediately adjacent to properties subject to an R12.5 density coding (and with R.10 density coding surrounding) will result in significant conflict with respect to scale, bulk and streetscape impacts and will have undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic and parking (LPP cl. 3.1). (VI) A residential density coding of R80 as suggested by the LPP is not acceptable or justified at the subject site. It is completely out of context with a transition from the neighbouring R12.5 and R10 zoned properties. (VII) Density should be imposed via a scheme amendment to LPS3, not through the LPP. LPS 3 states that one of its purposes is to "zone land within the Scheme area for the purposes defined in this Scheme" (LPS 3 cl. 8(c)) but then fails to do so in respect to the subject site. This must be amended in an appropriate manner. (VIII) The LPP also appears to have been developed without due consideration to the individual locational attributes of the various sites within the City to which it will apply. The application of the same density, height and plot ratios that apply to the Regis facility on Monash Avenue without adjacent residential properties and with reciprocal car-parking and easy access for emergency and service vehicles in a medical precinct to a development on 4 lots on Doonan Rd/Betty St surrounded by residential properties, on narrow streets with limited car-parking and limited access for emergency and service vehicles underlines the fact that imposing a broad LPP across various blocks without individual consideration of the areas affected is the wrong approach to a planning policy. Each of these blocks deserves a separate local development policy to address the specific needs of the relevant locale. (IX) The stated purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City. The LPP makes no delineation between differing models of care (e.g. independent living units, low care, high care). The planning guidelines set out in the LPP, as drafted, applies the same planning conditions irrespective of the model of care. Different models of care have differing levels of servicing. This has not been considered if the LPP is applied without the City undertaking further consideration of the relevant sites in question. This has resulted in a High Care facility with an inappropriate density being proposed in a precinct unsuited to the facility function. The LPP should be redrafted to reflect the specific function and nature of aged care models of care, with appropriate planning of such facilities contextually. (X) The rushed endorsement of an R80 equivalent zoning in the LPP without community consultation has denied the community the opportunity to comment on the appropriateness of this density in a residential zone or whether a local planning policy is the appropriate vehicle for this site. (XI) On this basis I question the validity of the adopted LPP. Its approval should urgently be reversed and only be reconsidered by the Council once appropriate due process has been followed with the required levels of community consultation and responses taken account of and due consideration of its appropriateness as a vehicle. (d) However, if the LPP is retained, rather than considering a higher density code under LPP cl. 4.2.4 in respect to the subject site, the City should exercise its discretion under that clause to not accept a higher density code, but rather should take all of the factors relating to impact on the residential amenity of the area by way of building bulk and scale, noise, traffic and parking into account (LPP 3.1) and instead impose an appropriate lower density, lower building height in both metres and storeys, with appropriate set-backs and plot ratio, more in keeping with a transition from the neighbouring R12.5 and R10 zoned residential homes. (e) In any event, the Proposed Development is arguably not permitted under LPS 3: (I) This site is zoned residential with an "A9" additional use, being "Residential Aged Care Facility" as a permitted use under LPS 3, but without applying additional development standards. The definition of "Residential Aged Care Facility" in LPS 3 does not refer to a facility being run for profit on a commercial basis and the site is has no other commercial zoning (such as the "Mixed Use" zoning underlying additional uses "A1" and "A2"). When placed in the residential zoning context, this means that a for-profit, commercial residential aged care facility arguably does not fall within the permitted use under LPS 3 for this site. (II) Furthermore, a "Medical Centre" as defined under LPS 3 is not listed as an additional use permitted on the site (either as a "P" permitted use or an "I" incidental use). This is unlike other sites under LPS 3 which have additional uses permitted. For example, the land zoned for additional uses "A3" or "A4", expressly include a "Medical Centre" as an additional use for those sites together with "Residential Aged Care" (so that use is clearly not included in the definition of "Residential Aged Care Facility", as is suggested in the "Incidental Use" heading on page 21 of the Development Application Report), with

“Residential Aged Care Facility” specified as a “P” use and “Medical Centre” specified as an “I” use (i.e. permitted if it is consequent on, or naturally attaching, appertaining or relating to the predominant use of the land). As a result, the medical centre described as the ‘wellbeing centre’ in the Proposed Development and which is serving not only residents of the facility but also non-residents on a 30% ‘anticipated’ (but uncapped) rate, is not a permitted use for the site under LPS 3. (f) A scheme amendment should be initiated to LPS 3 to deal with the inadequacies and lack of clarity in LPS 3 regarding this site, including introduction of appropriate development standards (including regarding size and scale and car-parking) and to guide appropriate density for any “Residential Aged Care Facility” which falls within the permitted use for this site.

2. Lack of Consultation on the Proposed Development (a) In addition to the failures surrounding the advertising of the LPP, and contrary to statements in the Development Application and by the City’s administration, the community consultation on the development of a Proposed Development from the developer and City has been extremely limited. In April 2016, the developer held information sessions on the proposed refurbishment of Melvista Lodge and the development of a 2-storey aged care facility on adjacent lots at 73-75 Doonan Rd and 16-18 Betty St with residential 9m set-backs (Initial Proposal). This limited interaction on the different Initial Proposal is what is described as ‘community consultation’ in paragraph 1.3.2 of the development application. (b) The 5 level Proposed Development fundamentally differs to the Initial Proposal as it is a 4-storey plus basement and roof (height approx. 17 metres), 90 bed high care, aged care facility with 2m set-backs at ground level and no longer includes the refurbishment of the Melvista Lodge. Clause 5.1 of the LPP states “Consultation with affected landowners will be undertaken in accordance with the City’s Local Planning Policy- Consultation of Planning Proposals”. (c) Neither the developer nor the City communicated with the local community regarding the new and different Proposed Development until after the Proposed Development had been lodged. Communication from the developer was limited to provision of information rather than true consultation. (d) The statements from the City’s administration and the developer and its representatives, Creating Communities, that this Proposed Development fully complies with applicable planning requirements and that as a result there is no basis for the community to object to the Proposed Development, contributes to the perception that the City is not interested in its residents’ opinions or providing them with due process or consultation and that the lack of proper consultation by the Developer and the City on this Proposed Development breaches the City’s own local planning policy on Consultation of Planning Proposals and LPP cl. 5.0. (e) Various images and plans included in the development application for the Proposed Development either avoid angles from which the upper levels and roof form which will be highly visible (for example, in the renders presented in the Architectural Drawings and the Development Application Report there is no render looking south-west from Doonan Rd, or directly east from Betty St) or shadow those upper levels and roof in a manner which I do not believe adequately represent what will be visible to local residents, particularly on sloping streets such as Betty St and Doonan Rd (and as is shown in just one diagram, on page 26 of the Architectural Design Statement). Other images do not appropriately represent the homes surrounding the site. For example, Photo 11 (on page 9 of the Development Application Report) is a photo of the 2 storey homes at 68 and 70 Doonan Rd (approximately 95m North-west of the subject site) but is entitled “View of residential dwellings on Doonan Road facing west towards subject site”, whereas the 1 storey homes at 76 and 78 Doonan Rd, and the 2 storey home at 80 Doonan Rd would be the houses that ‘face west towards the subject site’ (and facing west from the houses pictured will be a view of 2 residential properties).

3. Specific Planning Objections The deemed provisions set out in Schedule 2 of the Planning and Development (Local Planning Schemes) Regulations 2015 are imported into LPS3 (whether or not the LPP is retained or revoked) (LPS3 cl 7(1)(a), 2, 10 and note 2 of cl 18(a)). These require the City and Council to have due regard to: (a) The compatibility of the Proposed Development with its setting including the relationship of the Proposed Development to development on adjoining land or on other land in the locality including the likely effect of the height, bulk, scale, orientation and appearance of the Proposed Development (cl. 67(m)). I do not believe the Proposed Development is compatible with the surrounding residential neighbourhood zoned R10 and R12.5 because: (I) The set-back for the development has been greatly reduced to the other homeowners in the area and does not comply with LPP cl. 4.2.1 which requires compliance with LPS 3 cl. 26(1) (a 9m set-back). (II) The bulk and scale of a 5 level building across 4 residential lots is completely incompatible with the surrounding residential homes, each within the boundaries of single residential constraints. (III) This building will dominate all surrounding buildings and the park in Masons Gardens. (IV) Given the topography of the local area, this large building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens and from various vantage points around the neighbourhood. The visual projection of the development will be overbearing and detrimental to the urban fabric of the Betty St/Doonan Rd hill-scape and Mason Gardens Precinct. (V) It is not clear how the Proposed Development achieves the required ratio under the LPP in any event, or how this building achieves a 1:1 plot ratio as on its face the building footprint covers almost the entirety of

the block and has 5 levels. Even excluding common areas such as hallways and communal areas does not appear to achieve the required ratio. In addition, it appears from the "DA –Plot Ratio" drawing in the Architectural Drawings Development Plans for the Proposed Development that all private staff areas (such as offices, the administration area and staff rooms), common areas (including private break-out rooms) and the entire commercial medical 'wellness' centre have been excluded from the developer's plot ratio calculation which is not appropriate. (b) The amenity of the locality, including the character of the locality and the social impacts of the development and potential loss of any community service or benefit resulting from the Proposed Development, including on the community as a whole (cls. 67(n), (v) and (x)). I believe the Proposed Development will have a negative impact on the amenity of the locality and will cause a loss of benefit to the community as a whole because: (I) The Proposed Development is not compatible with the existing amenity surrounding / abutting it due to the height, scale and bulk of the Proposed Development. The Proposed Development therefore does not comply with cl 3.1 of the LPP which states "...and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking". (II) The Proposed Development will introduce 120 patients and employees at any one time not interacting with community in the normal context of a residential area. (III) The Proposed Development is commercial in nature, operating 24/7 and is not suited to a residential area. The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. (IV) All available car-parking in the surrounding areas will be consumed by the Proposed Development, constraining access to and use of Masons Gardens and visitors to local residences. (V) Each of Betty St, Doonan Rd and Granby Cres has a substantial number of houses without front fences, enabling neighbours to interact in the front of our homes. Introducing a large building, with lower set-backs and walled along each street-front, will fundamentally change the character of these streets, and we will lose those neighbourly interactions. (VI) There does not appear to be any independent evidence (other than the questionnaire responses acquired by the developer from 79 respondents to its questionnaire in 2016) of the urgent need for our community for building aged care on this scale south of the highway in Nedlands given the recent opening in the near vicinity of the Regis Nedlands in the Hollywood hospital precinct (141 aged care beds) and the future expansion of those facilities into the Regis Weston; the existing Aegis facilities at Alfred Carson (south of Stirling Hwy, 220 Aged Care beds); together with the developers own The Richardson in West Perth (92 suites) and soon to be completed Queenslea in Claremont (120 Residential Aged Care Suites). (c) Whether adequate provision has been made for the landscaping of the land to which the application relates and whether any trees or other vegetation on the land should be preserved (cl. 67(p)). I believe the Proposed Development fails to make such adequate provision or to preserve trees or other vegetation because: (I) The Proposed Development has a building footprint over most of the site and involves the removal of all trees and vegetation other than the street trees on the verges. (II) In particular, several large and very old trees of local importance will be removed and lost forever as a result of the Proposed Development. These trees provide nesting and resting sites for various different species of birds as their canopies are high and provide the birds with a safe vantage point. (III) Clause 4.6.2 of the LPP states "A minimum of twenty-five per cent (25%) of the site area is to be landscaped". The Proposed Development does not comply with this requirement of the LPP. (d) The suitability of the land for the development taking into account the possible risk to human health or safety (cl. 67(r)). I do not believe that the land chosen is a suitable site for the Proposed Development on this scale as: (I) The Developer has neither stated approach to operation of the facility in the instance of a required lockdown during a pandemic nor a stated approach of how to protect vulnerable patients to cross infection from air borne viruses. This is an irresponsible approach to quality aged care services in a post COVID 19 pandemic environment where a duty of care exists to protect patients who are in a vulnerable position. The Proposed Development presents an unacceptable risk and has not considered a COVID safe design. (II) Furthermore, the Review of Innovative Models of Aged Care, Research Paper 3 January 2020 by the Royal Commission into Aged Care Quality and Safety recommended respite is provided in settings aligned to a person's background and offering structured activities. The report further recommends small scale domestic models of aged care where there is an emphasis on providing person centred care models. The proposed developments design and density is not aligned to the objectives of the Royal Commission. (III) At 90 beds of non-ambulatory patients over 4 occupied levels, safe evacuation has been poorly considered. Safe evacuation should necessitate a sprinkler protected building with a zoned smoke management system and designated safe zones. Brigade turn out points for fire truck parking and access to brigade booster points have not been considered in the design. Evacuation of 90 non-ambulatory residents is a risk. (IV) Emergency services access to non-sprinklered areas, such as the roof plantroom, with access only available along Betty St and Doonan Rd for aerial

firefighting, has not been considered. (V) Lifts in the building are to be used for vertical movement of food services, visitors, patients, maintenance personnel and removal of deceased patients. This is an unhygienic practice and demonstrates poor design practice in this facility. Good design practice would separate different traffic streams in a facility of this size and density, with the minimum provision of a dedicated goods lift. (e) The adequacy of the proposed means of access to and egress from the site; arrangements for the loading, unloading, manoeuvring and parking of vehicles; and the amount of traffic likely to be generated by the development, particularly in relation to the capacity of the road system in the locality and the probable effect on traffic flow and safety (cls. 67(s) and (t)). I believe that the Proposed Development is inadequate in these respects because: (I) The Transport Impact Statement (TIS) has not calculated the total number of staff or visitor numbers in its car parking assessment for a facility of this nature. The TIS has relied on an allowance of 1 car bay per 4 beds. A high dependency aged care facility will have a significant staffing requirement that will exceed this requirement. It will also have significant visitor numbers. The TIS has made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment of car-parking and traffic movements. (II) The 2 streets on which the development will sit are narrow and are not designed to accommodate the amount of traffic for a facility of this size, particularly given the reliance on street parking (as the suggested parking is completely inadequate for the commercial operation of the nature contemplated). (III) The car-parking provisions are significantly underestimated, given the 23 car bays plus 3 Acrod bays for the 'well-being' medical centre (which will serve not only facility residents but also non-residents on a 30% 'anticipated' rate, but uncapped) plus a 90 bed facility with at least 40 employees/contractors plus Allied Services personnel and staff (particularly where there will need to be handover between staff shifts doubling up). This will result in substantial on street parking to Betty St, Doonan Rd, Melvista Ave, Granby Cres and surrounding roads. Staffing numbers for the Wellness Centre (3 treatment bays + hair salon – circa 4 staff), full commercial kitchen for up 540 food services per day (circa 4-5 staff), facilities manager (1 staff), full laundry (circa 2 staff), on site admin (circa 7 staff), on-site coffee shop (1 staff), cleaning staff (circa 3-4), orderlies and support staff (circa 2), plus nursing and staff for 90 patients (minimum 15 staff) significantly exceeds car-parking allowances. Shift changeover of nursing staff, visitors and maintenance staff further results in car-parking being significantly undersized and inadequate for a facility of this size and density. (IV) The increased traffic on the streets, and crossing the footpaths down Doonan Rd and Betty St, will be a danger to the large number of pedestrians, including children, who use the footpath to walk to Mason Gardens and the local childcare centre located less than 100m from the development. (V) Truck access will be required for servicing the grease trap for the kitchen. This does not appear to have been considered in the design. (VI) Inadequate on-site parking can result in off-site parking for nurses for night shifts. This can result in unsafe practices and security concerns for nursing staff accessing the facility at night having to park in unsecured/unmonitored locations (and overwhelming the current car-parking at Masons Gardens). (VII) Truck vehicular access for food delivery, waste removal, medical gas bottle replenishment, diesel fuel delivery, maintenance personnel for mechanical, electrical, fire and communications plant will result in significant increase to truck movements on Doonan Rd and Betty St. (VIII) Inadequate provision has been made for replacement of roof top air conditioning plant. Access for large plant can only be made via crane access from Betty St or Doonan Rd. (IX) Developer's Traffic Report also provides very little detail on the type of vehicle movements and their frequency and times during the week. This detail is also needed to form proper considered assessment of traffic movements and noise levels, which detail is also wholly lacking in the Developer's Transport Impact Statement and Acoustic Report.

#### 4. Objections to the Design

The deemed provisions outlined above and imposed by LPS 3 also require the City and Council to take into account State Planning Policy 7.0 (Design of the Built Environment) and its Design Principles (Sch 1). I believe that the design of the Proposed Development fails on various aspects in relation to each of those Design Principles, as set out below. (a) Context and character – The design of the Proposed Development does not respond to or enhance the distinctive characteristics of the local area, and does not contribute to a sense of place, because: (I) The distinctive characteristics of the local area, including the adjacent lots, the streetscape and surrounding neighbourhood, are a low-rise, leafy and quiet neighbourhood with large green 9m setbacks and a local green park. (II) A development of the bulk, scale and size contemplated, on 2m set-backs, is not sympathetic to, and will in fact detract from, all of the distinctive characteristics of this local area. (III) The built form is a highly inappropriate in terms of bulk, scale and size to adjoining properties with box scale of building of approx. 70m overall length x 32m overall width and overall height of approximately 17m. The surrounding local homes are constrained to single blocks, and range from single level original 1930's cottages to architecturally designed 2 storey residences, incorporating significant landscaping and retention of large trees. (IV) The Proposed Development includes large, bland featureless walls measuring 35 metres in length (running east/west), a scale that would typically be found in a

mixed use or town/activity centre environment rather than the local residential area where it is proposed. (V) The 4-storey (5 level) Proposed Development with a proposed plot ratio of 1:0 would result in a scale of development which is not compatible with the amenity of the locality and which does not reinforce or respond sympathetically to the locally distinct low-rise, low-density residential neighbourhood. (VI) The density of R80 being considered is not appropriate to the existing densities which surround it (R10 and R12.5) and is not able to be sustained by the transport options provided by the narrow surrounding streets and limited access to public transport. (VII) Ramp/through access with a 4.5m high boundary wall on southern boundary will be highly visible from Doonan and Betty Streets and is aesthetically ugly along with inappropriately high unfriendly front boundary walls close to 2m near southern boundaries on Doonan Rd and Betty St. (VIII) Given the topography of the local area, this large building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens and from various vantages around the neighbourhood. The visual projection of the development will be overbearing and detrimental to the urban fabric of the Betty St/Doonan Rd hill-scape and Mason Gardens Precinct. (IX) The Proposed Development is commercial in nature, operating 24/7 and is not suited to a residential area. The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. (X) The Proposed Development is not compatible with the existing amenity surrounding / abutting it due to the height, scale and bulk of the Proposed Development. The Proposed Development therefore does not comply with cl 3.1 of the LPP which states "...and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking".

(b) Landscape Quality - The design of the Proposed Development fails to recognise that together landscape and buildings operate as an integrated and sustainable system, within a broader ecological context, because:

(I) The visual projection of the development will be overbearing and detrimental to the leafy landscape of the Betty St/Doonan Rd hill-scape and Mason Gardens Precinct. (II) The Proposed Development does not protect existing environmental features and ecosystems as the design is for a building footprint over most of the site and identifies several large and very old trees of local importance which will be removed and lost forever as a result (breaching LPP cl. 4.6.3). These trees provide nesting and resting sites for various different species of birds as their canopies are high and provide the birds with a safe vantage point. (III) There is no provision in the Proposed Development for storm-water and soil management, ground and site conditions, solar access, microclimate, tree canopy, urban heat island impacts, habitat creation and preservation of green infrastructure. (IV) The Proposed Development proposes a density of occupancy that maximises the built form on the available land area, leaving limited open space for residents/patients. (V) There are very limited outdoor spaces proposed for the site, with a lack of green areas other than built-form landscaping. (VI) The LPP (clause 4.6.2) requires 25% of the site area to be landscaped but this has not been provided. (VII) The Proposed Development does not encourage social inclusion for its residents with the public and neighbours, with street-side fences and walls proposed. This does not contribute to the local streetscape where most of the front gardens do not have walls or fences, allowing neighbours to interact on a daily basis. (c) Built form and scale – The massing and height of the Proposed Development is not appropriate to its setting and does not successfully negotiate between existing built form and the intended future character of the local area because:

(I) The building massing and scale is disproportionate to the surrounding urban vernacular. The mass and height are disrespectful to the scale and pitch lines from the adjoining properties with a consequential negative impact to the Betty St and Doonan Rd streetscapes (in breach of LPP 4.3). Its verticality will project as a dominant insertion on the residential neighbourhood. As a "for-profit" commercial operation it will damage the residential cohesion of the suburb of Nedlands. Clause 3.1 of the LPP states "design of residential aged care facilities are of a high quality and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking". The proposed development is therefore non-compliant with LPP cl. 3.1. (II) The built form is a highly inappropriate in terms of bulk, scale and size to adjoining properties with box scale of building of approx. 70m overall length x 32m overall width and overall height of approximately 17m. The surrounding local homes are constrained to single blocks, and range from single level original 1930's cottages to architecturally designed 2 storey residences, incorporating significant landscaping and retention of large trees. (III) The four-storey (5 level) Proposed Development with a proposed plot ratio of 1:0 would result in a scale of development which is not compatible with the amenity of the residential locality and which does not reinforce or respond sympathetically to the locally distinct low-rise, low-density residential neighbourhood. (IV) The scale, massing and height of new development does not respond positively to that of the adjoining buildings, the topography, the general pattern of heights, and the views, vistas and landmarks of the Doonan Rd/Betty St area, and detracts from a coherent local identity. The orientation, proportion, composition, and



articulation of built form elements should deliver an outcome that is suited to the purpose, defines the public domain, contributes to the character of adjacent streetscapes and parks, and provides good amenity for people at ground level. This Proposed Development fails to do so. (d) Sustainability – The Proposed Development does not optimise the sustainability of the built environment, delivering positive environmental, social and economic outcomes because: (I) The proposed development is not setting a target for environmental sustainability. The development is taking a just above minimum approach, proposing to exceed Part J of the National Construction Code by a stated 10%. This is an inadequate attempt to demonstrate environmental sustainability credentials. As a minimum a Green Star 6-star standard should be set, and consideration should be given to a Passive House rating. This facility will have a significant carbon footprint that will represent a substantial increase over the carbon footprint of the existing three (3) residences. (II) The Sustainability Report does not consider any modelling of obnoxious discharges from kitchen, toilet and laundry exhausts and their impact on the surrounding properties. Dispersion modelling and CFD modelling should be undertaken to determine that there is no undue impact, as required by LPP cl. 3.1. (III) The Sustainability Report has not considered any heat island impact on the surrounding properties as a result of rejecting circa 700 - 800 kW of heat from the facility to determine that there is no undue impact, as required by clause 3.1 of the LPP. (IV) The Sustainability Report has not considered glare and reflectance to properties on the east in the morning and west in the evening to determine that there is no undue impact, as required by clause 3.1 of the LPP. (e) Amenity – The Proposed Development does not offer optimise internal and external amenity for occupants, visitors and neighbours, and does not provide an environment that is comfortable, productive and healthy because: (I) The 24 hour a day noise from the large scale commercial air-conditioning plant and additional traffic and noise from staff during shift-changes, combined with the noise from the operation of the facility, including the commercial laundry and commercial kitchen will destroy the peaceful amenity of the residential locality. (II) The Proposed Development would result in detrimental impacts to the amenity and character of the low-density residential neighbourhood. (III) The proposed development will significantly impact the visual amenity of all residential lots to the east on Doonan Rd and west on Betty St and to the north on both Doonan Rd and Betty St, up to Princess Rd, particularly when the development is viewed from private outdoor areas. (IV) The Developer's proposal, with its nominated function, size and density, has not considered any technical issues and will have a material negative impact to the amenity of the locality. (V) Light spill for night-time access to car-parking and pedestrian entrances will result in light pollution to adjoining neighbours. (VI) No consideration appears to have been given for acoustic treatment for roof located air conditioning plant and roof discharges. Discharges from the facility will adversely impact neighbours and have not been considered appropriately. Discharge stacks will also extend beyond the roof line creating further visual impact. Any consideration of each should take into account the topography of the area (a depression centred around Masons Gardens, creating a 'bowl' of the surrounding streets). (VII) The acoustics technical report has not calculated the cumulative noise impact of ventilation systems with the air-cooled condensers. Significant ventilation systems will be required for the kitchen exhaust, evaporative kitchen make up, toilet exhausts, laundry exhausts and flues. To determine the full impact of the facility on adjoining residences, all noise sources should be defined and calculated on a cumulative basis. (VIII) It is not clear how the development application satisfies noise pollution restrictions when it expressly does not address the issues of the noise from the emergency generator, fire pump and commercial dryers (paras 3.4, 3.7 and 3.8 of Acoustic Report), even where they are identified to be "problematic". These are in addition to the air-conditioning for the 90 bedrooms plus common areas, the commercial kitchen and commercial laundry plus increased traffic and pedestrian noise, all of which are dealt with on a very general basis. (IX) Due to the low-rise nature of the near-neighbours, the Proposed Development will overlook the back and front yards of not just the immediately adjacent residences but also the residences across the road and up each of the surrounding streets. Given my home (at 78 Doonan Rd) is single storey home, and we are immediately to the north-east of the site, the Proposed Development will overlook both our front and back yards (including our pool area) from the windows and balconies (including common areas) on the upper floors. (f) Safety – The Proposed Development does not optimise safety and security, minimising the risk of personal harm and supporting safe behaviour and use, because: (I) The Developer has neither stated approach to operation of the facility in the instance of a required lockdown during a pandemic nor a stated approach of how to protect vulnerable patients to cross infection from air borne viruses. This is an irresponsible approach to quality aged care services in a post COVID 19 environment where a duty of care exists to protect patients who are in a vulnerable position. The City would be in breach of its duty of care now with the foreknowledge that this facility presents an unacceptable risk and has not considered a COVID safe design. (II) Furthermore, the Review of Innovative Models of Aged Care, Research Paper 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety recommended respite is provided in settings aligned to a person's background and

offering structured activities. The report further recommends small scale domestic models of aged care where there is an emphasis on providing person centred care models. The proposed developments design and density is not aligned to the objectives of the Royal Commission. (III) At 90 beds of non-ambulatory patients over four (4) occupied levels, safe evacuation has been poorly considered. Safe evacuation should necessitate a sprinkler protected building with a zoned smoke management system and designated safe zones. Brigade turn out points for fire truck parking and access to brigade booster points have not been considered in the design. Evacuation of 90 non-ambulatory residents is a risk. (IV) Emergency services access to non-sprinklered areas, such as the roof plantroom, with access only available along Betty St and Doonan Rd for aerial firefighting, has not been considered. (V) Lifts in the building are to be used for vertical movement of food services, visitors, patients, maintenance personnel and removal of deceased patients. This is an unhygienic practice and demonstrates poor design practice in this facility. Good design practice would separate different traffic streams in a facility of this size and density, with the minimum provision of a dedicated goods lift. (VI) No design provision is shown for kitchen exhaust discharges, carpark ventilation discharges, generator exhaust discharge. Discharges from the facility will adversely impact neighbours and have not been considered appropriately. Discharge stacks will also extend beyond the roof line creating further visual impact. (VII) The front boundary walls are impacted further by the proposed 2.5m setbacks beyond the current street line sets backs of 9m making it impossible to see down the street. This will result in the streetscape significantly altered with the proposed development jutting out 6.5m beyond the existing street line. Residents reversing out of their driveway will have no line of sight, keeping in mind a pedestrian footpath runs down the east side of Doonan Rd and west side of Betty St making this impossible to ensure the safety of any family walking down the street to Masons Gardens, or car driving up the street. (VIII) Inadequate on-site parking can result in off-site parking for nurses for night shifts. This can result in unsafe practices and security concerns for nursing staff accessing the facility at night having to park in unsecured/unmonitored locations (and overwhelming the current car-parking at Masons Gardens). (g) Community – The Proposed Development does not appropriately respond to local community needs as well as the wider social context accommodating change over time and responding to new social demands because: (I) Given the current impacts of the COVID-19 pandemic on similar large scale, institutional aged care facilities, it does not seem appropriate to be encouraging the development of these facilities outside a hospital precinct. (II) The Interim Report of the Royal Commission into Aged Care Quality and Safety indicates that the final report will be exploring a shift in focus from institutional style aged care, such as the Proposed Development, into lower scale ageing in place and home care which poses the question – will this Proposed Development be out-dated before it is completed. (III) The best practice recommendations of the Interim Report from the Royal Commission into Aged Care and the final report, once released in December 2020 (and ultimate legislative changes resulting from it) and the lessons learned in the context of the COVID-19 pandemic, should be taken into account in the design and approval of any new aged care facilities in the City, and indeed across the State.

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**Respondent No:** 291

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 22:48:57 pm

**Last Seen:** Jul 23, 2020 14:27:42 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I strongly object to the development application for a large scale Residential Aged Care Facility located at 73-75 Doonan Road and 16-18 Betty Street, Nedlands (Proposed Development). Whilst I appreciate the need for aged care facilities in our suburb, the proposed 5 level commercial development covering 4 residential lots is not an appropriate height, scale or size for its setting or for the current or future character of this local, low density residential area, which is characterised by 1 and 2 storey single residential homes. In particular, I object because: 1. Planning Process Objections (a) Nedlands residents have a legitimate expectation that their rights will not be negatively impacted by the City of Nedlands (City) without, at a minimum, the rules of procedural fairness being followed. (b) Whilst I appreciate and support the need for residential aged care facilities in the City to service a proportion of our ageing population, where such facilities will sit in a residential area, they must be designed to complement that residential area. A good example is the Aegis Alfred Carson facility in the Town of Claremont. The size, bulk and scale of the 4-storey plus basement and roof (height approx. 17 metres), 90 bed high care, a residential aged care facility on 73-75 Doonan Rd and 16-18 Betty St, Nedlands is manifestly out of sync with the residential locality for which it is proposed. (c) I believe the City and its Council have not followed the appropriate process in the adoption of PD11.20 Local Planning Scheme 3 – Local Planning Policy: Residential Aged Care Facilities (LPP) and have failed in their duty of care to local ratepayers in making them aware of such significant structural changes which will have a fundamental negative impact on the quiet enjoyment of their homes. In particular: (I) The adoption of the LPP setting out the parameters for the development of residential aged care facilities had substantial implications for impacted residents which were not immediately apparent on its face to any in the community without a planning background, and yet no individual notification was received by any ratepayer in those affected areas and the proposal was minimally advertised and passed during the initial turmoil of the COVID 19 pandemic and then associated shutdowns. (II) The fact that not one comment was received from the community or affected residents on the LPP, as noted in the minutes of the meeting of the City's Council of 26 April 2020, should clearly have highlighted to the City that the community and affected residents had not been made sufficiently aware of the implications of the amendments. Residents had a right to be properly and completely informed of the proposal and to be given fair hearing on it. (III) In addition, the final version of the LPP adopted contained significant amendments to density, height and plot ratio which had not been advertised at all. Given the increased building height, scale and plot ratio associated with these modifications will facilitate increased bulk and scale for any development proposed, I am of the view the modifications to the draft LPP are not minor and are in fact, significant, particularly in relation to the locality of surrounding residential area. The Mayor has indicated that these changes were rushed through so that the Regis facility on Monash Avenue would not be a non-

conforming use, although the rationale for this requiring an urgent amendment to the LPP (without advertising) when it had already been constructed is not apparent. (IV) The Proposed Development fails to satisfy aims of the City's Local Planning Scheme No. 3 (LPS 3) to protect and enhance local character and amenity, respect the vision for the development of local streets or achieve quality residential built form outcomes. (V) The LPP allows for a higher density coding without the initiation of a scheme amendment to LPS 3. The stated purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City. Instead it has imposed an R-coding as a mechanism to deal with scale, bulk and built form. This is not appropriate as an R80 R-coding immediately adjacent to properties subject to an R12.5 density coding (and with R.10 density coding surrounding) will result in significant conflict with respect to scale, bulk and streetscape impacts and will have undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic and parking (LPP cl. 3.1). (VI) A residential density coding of R80 as suggested by the LPP is not acceptable or justified at the subject site. It is completely out of context with a transition from the neighbouring R12.5 and R10 zoned properties. (VII) Density should be imposed via a scheme amendment to LPS3, not through the LPP. LPS 3 states that one of its purposes is to "zone land within the Scheme area for the purposes defined in this Scheme" (LPS 3 cl. 8(c)) but then fails to do so in respect to the subject site. This must be amended in an appropriate manner. (VIII) The LPP also appears to have been developed without due consideration to the individual locational attributes of the various sites within the City to which it will apply. The application of the same density, height and plot ratios that apply to the Regis facility on Monash Avenue without adjacent residential properties and with reciprocal car-parking and easy access for emergency and service vehicles in a medical precinct to a development on 4 lots on Doonan Rd/Betty St surrounded by residential properties, on narrow streets with limited car-parking and limited access for emergency and service vehicles underlines the fact that imposing a broad LPP across various blocks without individual consideration of the areas affected is the wrong approach to a planning policy. Each of these blocks deserves a separate local development policy to address the specific needs of the relevant locale. (IX) The stated purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City. The LPP makes no delineation between differing models of care (e.g. independent living units, low care, high care). The planning guidelines set out in the LPP, as drafted, applies the same planning conditions irrespective of the model of care. Different models of care have differing levels of servicing. This has not been considered if the LPP is applied without the City undertaking further consideration of the relevant sites in question. This has resulted in a High Care facility with an inappropriate density being proposed in a precinct unsuited to the facility function. The LPP should be redrafted to reflect the specific function and nature of aged care models of care, with appropriate planning of such facilities contextually. (X) The rushed endorsement of an R80 equivalent zoning in the LPP without community consultation has denied the community the opportunity to comment on the appropriateness of this density in a residential zone or whether a local planning policy is the appropriate vehicle for this site. (XI) On this basis I question the validity of the adopted LPP. Its approval should urgently be reversed and only be reconsidered by the Council once appropriate due process has been followed with the required levels of community consultation and responses taken account of and due consideration of its appropriateness as a vehicle. (d) However, if the LPP is retained, rather than considering a higher density code under LPP cl. 4.2.4 in respect to the subject site, the City should exercise its discretion under that clause to not accept a higher density code, but rather should take all of the factors relating to impact on the residential amenity of the area by way of building bulk and scale, noise, traffic and parking into account (LPP 3.1) and instead impose an appropriate lower density, lower building height in both metres and storeys, with appropriate set-backs and plot ratio, more in keeping with a transition from the neighbouring R12.5 and R10 zoned residential homes. (e) In any event, the Proposed Development is arguably not permitted under LPS 3: (I) This site is zoned residential with an "A9" additional use, being "Residential Aged Care Facility" as a permitted use under LPS 3, but without applying additional development standards. The definition of "Residential Aged Care Facility" in LPS 3 does not refer to a facility being run for profit on a commercial basis and the site is has no other commercial zoning (such as the "Mixed Use" zoning underlying additional uses "A1" and "A2"). When placed in the residential zoning context, this means that a for-profit, commercial residential aged care facility arguably does not fall within the permitted use under LPS 3 for this site. (II) Furthermore, a "Medical Centre" as defined under LPS 3 is not listed as an additional use permitted on the site (either as a "P" permitted use or an "I" incidental use). This is unlike other sites under LPS 3 which have additional uses permitted. For example, the land zoned for additional uses "A3" or "A4", expressly include a "Medical Centre" as an additional use for those sites together with "Residential Aged Care" (so that use is clearly not included in the definition of "Residential Aged Care Facility", as is suggested in the "Incidental Use" heading on page 21 of the Development Application Report), with

“Residential Aged Care Facility” specified as a “P” use and “Medical Centre” specified as an “I” use (i.e. permitted if it is consequent on, or naturally attaching, appertaining or relating to the predominant use of the land). As a result, the medical centre described as the ‘wellbeing centre’ in the Proposed Development and which is serving not only residents of the facility but also non-residents on a 30% ‘anticipated’ (but uncapped) rate, is not a permitted use for the site under LPS 3. (f) A scheme amendment should be initiated to LPS 3 to deal with the inadequacies and lack of clarity in LPS 3 regarding this site, including introduction of appropriate development standards (including regarding size and scale and car-parking) and to guide appropriate density for any “Residential Aged Care Facility” which falls within the permitted use for this site.

2. Lack of Consultation on the Proposed Development (a) In addition to the failures surrounding the advertising of the LPP, and contrary to statements in the Development Application and by the City’s administration, the community consultation on the development of a Proposed Development from the developer and City has been extremely limited. In April 2016, the developer held information sessions on the proposed refurbishment of Melvista Lodge and the development of a 2-storey aged care facility on adjacent lots at 73-75 Doonan Rd and 16-18 Betty St with residential 9m set-backs (Initial Proposal). This limited interaction on the different Initial Proposal is what is described as ‘community consultation’ in paragraph 1.3.2 of the development application. (b) The 5 level Proposed Development fundamentally differs to the Initial Proposal as it is a 4-storey plus basement and roof (height approx. 17 metres), 90 bed high care, aged care facility with 2m set-backs at ground level and no longer includes the refurbishment of the Melvista Lodge. Clause 5.1 of the LPP states “Consultation with affected landowners will be undertaken in accordance with the City’s Local Planning Policy- Consultation of Planning Proposals”. (c) Neither the developer nor the City communicated with the local community regarding the new and different Proposed Development until after the Proposed Development had been lodged. Communication from the developer was limited to provision of information rather than true consultation. (d) The statements from the City’s administration and the developer and its representatives, Creating Communities, that this Proposed Development fully complies with applicable planning requirements and that as a result there is no basis for the community to object to the Proposed Development, contributes to the perception that the City is not interested in its residents’ opinions or providing them with due process or consultation and that the lack of proper consultation by the Developer and the City on this Proposed Development breaches the City’s own local planning policy on Consultation of Planning Proposals and LPP cl. 5.0. (e) Various images and plans included in the development application for the Proposed Development either avoid angles from which the upper levels and roof form which will be highly visible (for example, in the renders presented in the Architectural Drawings and the Development Application Report there is no render looking south-west from Doonan Rd, or directly east from Betty St) or shadow those upper levels and roof in a manner which I do not believe adequately represent what will be visible to local residents, particularly on sloping streets such as Betty St and Doonan Rd (and as is shown in just one diagram, on page 26 of the Architectural Design Statement). Other images do not appropriately represent the homes surrounding the site. For example, Photo 11 (on page 9 of the Development Application Report) is a photo of the 2 storey homes at 68 and 70 Doonan Rd (approximately 95m North-west of the subject site) but is entitled “View of residential dwellings on Doonan Road facing west towards subject site”, whereas the 1 storey homes at 76 and 78 Doonan Rd, and the 2 storey home at 80 Doonan Rd would be the houses that ‘face west towards the subject site’ (and facing west from the houses pictured will be a view of 2 residential properties).

3. Specific Planning Objections The deemed provisions set out in Schedule 2 of the Planning and Development (Local Planning Schemes) Regulations 2015 are imported into LPS3 (whether or not the LPP is retained or revoked) (LPS3 cl 7(1)(a), 2, 10 and note 2 of cl 18(a)). These require the City and Council to have due regard to: (a) The compatibility of the Proposed Development with its setting including the relationship of the Proposed Development to development on adjoining land or on other land in the locality including the likely effect of the height, bulk, scale, orientation and appearance of the Proposed Development (cl. 67(m)). I do not believe the Proposed Development is compatible with the surrounding residential neighbourhood zoned R10 and R12.5 because: (I) The set-back for the development has been greatly reduced to the other homeowners in the area and does not comply with LPP cl. 4.2.1 which requires compliance with LPS 3 cl. 26(1) (a 9m set-back). (II) The bulk and scale of a 5 level building across 4 residential lots is completely incompatible with the surrounding residential homes, each within the boundaries of single residential constraints. (III) This building will dominate all surrounding buildings and the park in Masons Gardens. (IV) Given the topography of the local area, this large building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens and from various vantage points around the neighbourhood. The visual projection of the development will be overbearing and detrimental to the urban fabric of the Betty St/Doonan Rd hill-scape and Mason Gardens Precinct. (V) It is not clear how the Proposed Development achieves the required ratio under the LPP in any event, or how this building achieves a 1:1 plot ratio as on its face the building footprint covers almost the entirety of

the block and has 5 levels. Even excluding common areas such as hallways and communal areas does not appear to achieve the required ratio. In addition, it appears from the "DA –Plot Ratio" drawing in the Architectural Drawings Development Plans for the Proposed Development that all private staff areas (such as offices, the administration area and staff rooms), common areas (including private break-out rooms) and the entire commercial medical 'wellness' centre have been excluded from the developer's plot ratio calculation which is not appropriate. (b) The amenity of the locality, including the character of the locality and the social impacts of the development and potential loss of any community service or benefit resulting from the Proposed Development, including on the community as a whole (cls. 67(n), (v) and (x)). I believe the Proposed Development will have a negative impact on the amenity of the locality and will cause a loss of benefit to the community as a whole because: (I) The Proposed Development is not compatible with the existing amenity surrounding / abutting it due to the height, scale and bulk of the Proposed Development. The Proposed Development therefore does not comply with cl 3.1 of the LPP which states "...and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking". (II) The Proposed Development will introduce 120 patients and employees at any one time not interacting with community in the normal context of a residential area. (III) The Proposed Development is commercial in nature, operating 24/7 and is not suited to a residential area. The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. (IV) All available car-parking in the surrounding areas will be consumed by the Proposed Development, constraining access to and use of Masons Gardens and visitors to local residences. (V) Each of Betty St, Doonan Rd and Granby Cres has a substantial number of houses without front fences, enabling neighbours to interact in the front of our homes. Introducing a large building, with lower set-backs and walled along each street-front, will fundamentally change the character of these streets, and we will lose those neighbourly interactions. (VI) There does not appear to be any independent evidence (other than the questionnaire responses acquired by the developer from 79 respondents to its questionnaire in 2016) of the urgent need for our community for building aged care on this scale south of the highway in Nedlands given the recent opening in the near vicinity of the Regis Nedlands in the Hollywood hospital precinct (141 aged care beds) and the future expansion of those facilities into the Regis Weston; the existing Aegis facilities at Alfred Carson (south of Stirling Hwy, 220 Aged Care beds); together with the developers own The Richardson in West Perth (92 suites) and soon to be completed Queenslea in Claremont (120 Residential Aged Care Suites). (c) Whether adequate provision has been made for the landscaping of the land to which the application relates and whether any trees or other vegetation on the land should be preserved (cl. 67(p)). I believe the Proposed Development fails to make such adequate provision or to preserve trees or other vegetation because: (I) The Proposed Development has a building footprint over most of the site and involves the removal of all trees and vegetation other than the street trees on the verges. (II) In particular, several large and very old trees of local importance will be removed and lost forever as a result of the Proposed Development. These trees provide nesting and resting sites for various different species of birds as their canopies are high and provide the birds with a safe vantage point. (III) Clause 4.6.2 of the LPP states "A minimum of twenty-five per cent (25%) of the site area is to be landscaped". The Proposed Development does not comply with this requirement of the LPP. (d) The suitability of the land for the development taking into account the possible risk to human health or safety (cl. 67(r)). I do not believe that the land chosen is a suitable site for the Proposed Development on this scale as: (I) The Developer has neither stated approach to operation of the facility in the instance of a required lockdown during a pandemic nor a stated approach of how to protect vulnerable patients to cross infection from air borne viruses. This is an irresponsible approach to quality aged care services in a post COVID 19 pandemic environment where a duty of care exists to protect patients who are in a vulnerable position. The Proposed Development presents an unacceptable risk and has not considered a COVID safe design. (II) Furthermore, the Review of Innovative Models of Aged Care, Research Paper 3 January 2020 by the Royal Commission into Aged Care Quality and Safety recommended respite is provided in settings aligned to a person's background and offering structured activities. The report further recommends small scale domestic models of aged care where there is an emphasis on providing person centred care models. The proposed developments design and density is not aligned to the objectives of the Royal Commission. (III) At 90 beds of non-ambulatory patients over 4 occupied levels, safe evacuation has been poorly considered. Safe evacuation should necessitate a sprinkler protected building with a zoned smoke management system and designated safe zones. Brigade turn out points for fire truck parking and access to brigade booster points have not been considered in the design. Evacuation of 90 non-ambulatory residents is a risk. (IV) Emergency services access to non-sprinklered areas, such as the roof plantroom, with access only available along Betty St and Doonan Rd for aerial

firefighting, has not been considered. (V) Lifts in the building are to be used for vertical movement of food services, visitors, patients, maintenance personnel and removal of deceased patients. This is an unhygienic practice and demonstrates poor design practice in this facility. Good design practice would separate different traffic streams in a facility of this size and density, with the minimum provision of a dedicated goods lift. (e) The adequacy of the proposed means of access to and egress from the site; arrangements for the loading, unloading, manoeuvring and parking of vehicles; and the amount of traffic likely to be generated by the development, particularly in relation to the capacity of the road system in the locality and the probable effect on traffic flow and safety (cls. 67(s) and (t)). I believe that the Proposed Development is inadequate in these respects because: (I) The Transport Impact Statement (TIS) has not calculated the total number of staff or visitor numbers in its car parking assessment for a facility of this nature. The TIS has relied on an allowance of 1 car bay per 4 beds. A high dependency aged care facility will have a significant staffing requirement that will exceed this requirement. It will also have significant visitor numbers. The TIS has made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment of car-parking and traffic movements. (II) The 2 streets on which the development will sit are narrow and are not designed to accommodate the amount of traffic for a facility of this size, particularly given the reliance on street parking (as the suggested parking is completely inadequate for the commercial operation of the nature contemplated). (III) The car-parking provisions are significantly underestimated, given the 23 car bays plus 3 Acrod bays for the 'well-being' medical centre (which will serve not only facility residents but also non-residents on a 30% 'anticipated' rate, but uncapped) plus a 90 bed facility with at least 40 employees/contractors plus Allied Services personnel and staff (particularly where there will need to be handover between staff shifts doubling up). This will result in substantial on street parking to Betty St, Doonan Rd, Melvista Ave, Granby Cres and surrounding roads. Staffing numbers for the Wellness Centre (3 treatment bays + hair salon – circa 4 staff), full commercial kitchen for up 540 food services per day (circa 4-5 staff), facilities manager (1 staff), full laundry (circa 2 staff), on site admin (circa 7 staff), on-site coffee shop (1 staff), cleaning staff (circa 3-4), orderlies and support staff (circa 2), plus nursing and staff for 90 patients (minimum 15 staff) significantly exceeds car-parking allowances. Shift changeover of nursing staff, visitors and maintenance staff further results in car-parking being significantly undersized and inadequate for a facility of this size and density. (IV) The increased traffic on the streets, and crossing the footpaths down Doonan Rd and Betty St, will be a danger to the large number of pedestrians, including children, who use the footpath to walk to Mason Gardens and the local childcare centre located less than 100m from the development. (V) Truck access will be required for servicing the grease trap for the kitchen. This does not appear to have been considered in the design. (VI) Inadequate on-site parking can result in off-site parking for nurses for night shifts. This can result in unsafe practices and security concerns for nursing staff accessing the facility at night having to park in unsecured/unmonitored locations (and overwhelming the current car-parking at Masons Gardens). (VII) Truck vehicular access for food delivery, waste removal, medical gas bottle replenishment, diesel fuel delivery, maintenance personnel for mechanical, electrical, fire and communications plant will result in significant increase to truck movements on Doonan Rd and Betty St. (VIII) Inadequate provision has been made for replacement of roof top air conditioning plant. Access for large plant can only be made via crane access from Betty St or Doonan Rd. (IX) Developer's Traffic Report also provides very little detail on the type of vehicle movements and their frequency and times during the week. This detail is also needed to form proper considered assessment of traffic movements and noise levels, which detail is also wholly lacking in the Developer's Transport Impact Statement and Acoustic Report.

#### 4. Objections to the Design

The deemed provisions outlined above and imposed by LPS 3 also require the City and Council to take into account State Planning Policy 7.0 (Design of the Built Environment) and its Design Principles (Sch 1). I believe that the design of the Proposed Development fails on various aspects in relation to each of those Design Principles, as set out below. (a) Context and character – The design of the Proposed Development does not respond to or enhance the distinctive characteristics of the local area, and does not contribute to a sense of place, because: (I) The distinctive characteristics of the local area, including the adjacent lots, the streetscape and surrounding neighbourhood, are a low-rise, leafy and quiet neighbourhood with large green 9m setbacks and a local green park. (II) A development of the bulk, scale and size contemplated, on 2m set-backs, is not sympathetic to, and will in fact detract from, all of the distinctive characteristics of this local area. (III) The built form is a highly inappropriate in terms of bulk, scale and size to adjoining properties with box scale of building of approx. 70m overall length x 32m overall width and overall height of approximately 17m. The surrounding local homes are constrained to single blocks, and range from single level original 1930's cottages to architecturally designed 2 storey residences, incorporating significant landscaping and retention of large trees. (IV) The Proposed Development includes large, bland featureless walls measuring 35 metres in length (running east/west), a scale that would typically be found in a

mixed use or town/activity centre environment rather than the local residential area where it is proposed. (V) The 4-storey (5 level) Proposed Development with a proposed plot ratio of 1:0 would result in a scale of development which is not compatible with the amenity of the locality and which does not reinforce or respond sympathetically to the locally distinct low-rise, low-density residential neighbourhood. (VI) The density of R80 being considered is not appropriate to the existing densities which surround it (R10 and R12.5) and is not able to be sustained by the transport options provided by the narrow surrounding streets and limited access to public transport. (VII) Ramp/through access with a 4.5m high boundary wall on southern boundary will be highly visible from Doonan and Betty Streets and is aesthetically ugly along with inappropriately high unfriendly front boundary walls close to 2m near southern boundaries on Doonan Rd and Betty St. (VIII) Given the topography of the local area, this large building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens and from various vantages around the neighbourhood. The visual projection of the development will be overbearing and detrimental to the urban fabric of the Betty St/Doonan Rd hill-scape and Mason Gardens Precinct. (IX) The Proposed Development is commercial in nature, operating 24/7 and is not suited to a residential area. The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. (X) The Proposed Development is not compatible with the existing amenity surrounding / abutting it due to the height, scale and bulk of the Proposed Development. The Proposed Development therefore does not comply with cl 3.1 of the LPP which states "...and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking".

(b) Landscape Quality - The design of the Proposed Development fails to recognise that together landscape and buildings operate as an integrated and sustainable system, within a broader ecological context, because:

(I) The visual projection of the development will be overbearing and detrimental to the leafy landscape of the Betty St/Doonan Rd hill-scape and Mason Gardens Precinct. (II) The Proposed Development does not protect existing environmental features and ecosystems as the design is for a building footprint over most of the site and identifies several large and very old trees of local importance which will be removed and lost forever as a result (breaching LPP cl. 4.6.3). These trees provide nesting and resting sites for various different species of birds as their canopies are high and provide the birds with a safe vantage point. (III) There is no provision in the Proposed Development for storm-water and soil management, ground and site conditions, solar access, microclimate, tree canopy, urban heat island impacts, habitat creation and preservation of green infrastructure. (IV) The Proposed Development proposes a density of occupancy that maximises the built form on the available land area, leaving limited open space for residents/patients. (V) There are very limited outdoor spaces proposed for the site, with a lack of green areas other than built-form landscaping. (VI) The LPP (clause 4.6.2) requires 25% of the site area to be landscaped but this has not been provided. (VII) The Proposed Development does not encourage social inclusion for its residents with the public and neighbours, with street-side fences and walls proposed. This does not contribute to the local streetscape where most of the front gardens do not have walls or fences, allowing neighbours to interact on a daily basis. (c) Built form and scale – The massing and height of the Proposed Development is not appropriate to its setting and does not successfully negotiate between existing built form and the intended future character of the local area because:

(I) The building massing and scale is disproportionate to the surrounding urban vernacular. The mass and height are disrespectful to the scale and pitch lines from the adjoining properties with a consequential negative impact to the Betty St and Doonan Rd streetscapes (in breach of LPP 4.3). Its verticality will project as a dominant insertion on the residential neighbourhood. As a "for-profit" commercial operation it will damage the residential cohesion of the suburb of Nedlands. Clause 3.1 of the LPP states "design of residential aged care facilities are of a high quality and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking". The proposed development is therefore non-compliant with LPP cl. 3.1. (II) The built form is a highly inappropriate in terms of bulk, scale and size to adjoining properties with box scale of building of approx. 70m overall length x 32m overall width and overall height of approximately 17m. The surrounding local homes are constrained to single blocks, and range from single level original 1930's cottages to architecturally designed 2 storey residences, incorporating significant landscaping and retention of large trees. (III) The four-storey (5 level) Proposed Development with a proposed plot ratio of 1:0 would result in a scale of development which is not compatible with the amenity of the residential locality and which does not reinforce or respond sympathetically to the locally distinct low-rise, low-density residential neighbourhood. (IV) The scale, massing and height of new development does not respond positively to that of the adjoining buildings, the topography, the general pattern of heights, and the views, vistas and landmarks of the Doonan Rd/Betty St area, and detracts from a coherent local identity. The orientation, proportion, composition, and



articulation of built form elements should deliver an outcome that is suited to the purpose, defines the public domain, contributes to the character of adjacent streetscapes and parks, and provides good amenity for people at ground level. This Proposed Development fails to do so. (d) Sustainability – The Proposed Development does not optimise the sustainability of the built environment, delivering positive environmental, social and economic outcomes because: (I) The proposed development is not setting a target for environmental sustainability. The development is taking a just above minimum approach, proposing to exceed Part J of the National Construction Code by a stated 10%. This is an inadequate attempt to demonstrate environmental sustainability credentials. As a minimum a Green Star 6-star standard should be set, and consideration should be given to a Passive House rating. This facility will have a significant carbon footprint that will represent a substantial increase over the carbon footprint of the existing three (3) residences. (II) The Sustainability Report does not consider any modelling of obnoxious discharges from kitchen, toilet and laundry exhausts and their impact on the surrounding properties. Dispersion modelling and CFD modelling should be undertaken to determine that there is no undue impact, as required by LPP cl. 3.1. (III) The Sustainability Report has not considered any heat island impact on the surrounding properties as a result of rejecting circa 700 - 800 kW of heat from the facility to determine that there is no undue impact, as required by clause 3.1 of the LPP. (IV) The Sustainability Report has not considered glare and reflectance to properties on the east in the morning and west in the evening to determine that there is no undue impact, as required by clause 3.1 of the LPP. (e) Amenity – The Proposed Development does not offer optimise internal and external amenity for occupants, visitors and neighbours, and does not provide an environment that is comfortable, productive and healthy because: (I) The 24 hour a day noise from the large scale commercial air-conditioning plant and additional traffic and noise from staff during shift-changes, combined with the noise from the operation of the facility, including the commercial laundry and commercial kitchen will destroy the peaceful amenity of the residential locality. (II) The Proposed Development would result in detrimental impacts to the amenity and character of the low-density residential neighbourhood. (III) The proposed development will significantly impact the visual amenity of all residential lots to the east on Doonan Rd and west on Betty St and to the north on both Doonan Rd and Betty St, up to Princess Rd, particularly when the development is viewed from private outdoor areas. (IV) The Developer's proposal, with its nominated function, size and density, has not considered any technical issues and will have a material negative impact to the amenity of the locality. (V) Light spill for night-time access to car-parking and pedestrian entrances will result in light pollution to adjoining neighbours. (VI) No consideration appears to have been given for acoustic treatment for roof located air conditioning plant and roof discharges. Discharges from the facility will adversely impact neighbours and have not been considered appropriately. Discharge stacks will also extend beyond the roof line creating further visual impact. Any consideration of each should take into account the topography of the area (a depression centred around Masons Gardens, creating a 'bowl' of the surrounding streets). (VII) The acoustics technical report has not calculated the cumulative noise impact of ventilation systems with the air-cooled condensers. Significant ventilation systems will be required for the kitchen exhaust, evaporative kitchen make up, toilet exhausts, laundry exhausts and flues. To determine the full impact of the facility on adjoining residences, all noise sources should be defined and calculated on a cumulative basis. (VIII) It is not clear how the development application satisfies noise pollution restrictions when it expressly does not address the issues of the noise from the emergency generator, fire pump and commercial dryers (paras 3.4, 3.7 and 3.8 of Acoustic Report), even where they are identified to be "problematic". These are in addition to the air-conditioning for the 90 bedrooms plus common areas, the commercial kitchen and commercial laundry plus increased traffic and pedestrian noise, all of which are dealt with on a very general basis. (IX) Due to the low-rise nature of the near-neighbours, the Proposed Development will overlook the back and front yards of not just the immediately adjacent residences but also the residences across the road and up each of the surrounding streets. Given my home (at 78 Doonan Rd) is single storey home, and we are immediately to the east of the site, the Proposed Development will overlook both our front and back yards from the windows and balconies (including common areas) on the upper floors. (f) Safety – The Proposed Development does not optimise safety and security, minimising the risk of personal harm and supporting safe behaviour and use, because: (I) The Developer has neither stated approach to operation of the facility in the instance of a required lockdown during a pandemic nor a stated approach of how to protect vulnerable patients to cross infection from air borne viruses. This is an irresponsible approach to quality aged care services in a post COVID 19 environment where a duty of care exists to protect patients who are in a vulnerable position. The City would be in breach of its duty of care now with the foreknowledge that this facility presents an unacceptable risk and has not considered a COVID safe design. (II) Furthermore, the Review of Innovative Models of Aged Care, Research Paper 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety recommended respite is provided in settings aligned to a person's background and offering structured activities. The report further recommends

small scale domestic models of aged care where there is an emphasis on providing person centred care models. The proposed developments design and density is not aligned to the objectives of the Royal Commission. (III) At 90 beds of non-ambulatory patients over four (4) occupied levels, safe evacuation has been poorly considered. Safe evacuation should necessitate a sprinkler protected building with a zoned smoke management system and designated safe zones. Brigade turn out points for fire truck parking and access to brigade booster points have not been considered in the design. Evacuation of 90 non-ambulatory residents is a risk. (IV) Emergency services access to non-sprinklered areas, such as the roof plantroom, with access only available along Betty St and Doonan Rd for aerial firefighting, has not been considered. (V) Lifts in the building are to be used for vertical movement of food services, visitors, patients, maintenance personnel and removal of deceased patients. This is an unhygienic practice and demonstrates poor design practice in this facility. Good design practice would separate different traffic streams in a facility of this size and density, with the minimum provision of a dedicated goods lift. (VI) No design provision is shown for kitchen exhaust discharges, carpark ventilation discharges, generator exhaust discharge. Discharges from the facility will adversely impact neighbours and have not been considered appropriately. Discharge stacks will also extend beyond the roof line creating further visual impact. (VII) The front boundary walls are impacted further by the proposed 2.5m setbacks beyond the current street line sets backs of 9m making it impossible to see down the street. This will result in the streetscape significantly altered with the proposed development jutting out 6.5m beyond the existing street line. Residents reversing out of their driveway will have no line of sight, keeping in mind a pedestrian footpath runs down the east side of Doonan Rd and west side of Betty St making this impossible to ensure the safety of any family walking down the street to Masons Gardens, or car driving up the street. (VIII) Inadequate on-site parking can result in off-site parking for nurses for night shifts. This can result in unsafe practices and security concerns for nursing staff accessing the facility at night having to park in unsecured/unmonitored locations (and overwhelming the current car-parking at Masons Gardens). (g) Community – The Proposed Development does not appropriately respond to local community needs as well as the wider social context accommodating change over time and responding to new social demands because: (I) Given the current impacts of the COVID-19 pandemic on similar large scale, institutional aged care facilities, it does not seem appropriate to be encouraging the development of these facilities outside a hospital precinct. (II) The Interim Report of the Royal Commission into Aged Care Quality and Safety indicates that the final report will be exploring a shift in focus from institutional style aged care, such as the Proposed Development, into lower scale ageing in place and home care which poses the question – will this Proposed Development be out-dated before it is completed. (III) The best practice recommendations of the Interim Report from the Royal Commission into Aged Care and the final report, once released in December 2020 (and ultimate legislative changes resulting from it) and the lessons learned in the context of the COVID-19 pandemic, should be taken into account in the design and approval of any new aged care facilities in the City, and indeed across the State.

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**Respondent No:** 292

**Login:**

**Email:**

**Responded At:** Jul 23, 2020 23:34:56 pm

**Last Seen:** Jul 23, 2020 15:31:44 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. Reasons: a. The amount of administrative, catering, cleaning, medical, allied health and maintenance staff required to support an intensive 90-bed high care facility will not be supported by 26 bays, particularly given no parking allowances have been made for deliveries, visitors of residents, or the Wellness Centre staff and visitors. b. The Transport Impact Statement provides very little detail on the type of vehicle movements and the frequency and timings of those movements. c. The Site is surrounded by low density residential development. The land immediately to its east and west is R10 and the land to its north is R12.5. The contrast between the existing density and the proposed R80 coding will be sharp, and the proposed plot ratio is wholly incompatible with the broader setting. d. The developer relies on consultation it conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different from what is proposed. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed. e. Immediately affected residents have either never been contacted or have only recently been informed about the extent of the proposal. The land was sold as a Residential R10/R12.5 lot when the City knew its intent was always to redesignate the land. Why would the City sell land to a developer, prior to its redesignation. Why did they not designate it for aged care use first and by inference, sell the land at a much higher price? How have the City's ratepayers benefited from this sale? We note the developer paid \$2.6 million for the last residential piece of land required for this proposed development leaving the sale of the land by The City in question. f. The proposal fails to take into account the recommendations of the Review of Innovative Models of Aged Care Research Paper, 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety in terms of its design and density.

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**Respondent No:** 293

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 00:13:20 am

**Last Seen:** Jul 25, 2020 01:49:43 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property
Occupier of a property

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Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:** I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. I further object as follows: 1 The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. 1.1 One of the primary objectives of the Policy is – “to ensure the appearance and design of residential aged care facilities are of high quality and do not have an undue impact on the residential amenity by way of building bulk and scale, noise, traffic or parking”. The proposal fundamentally conflicts with this objective given the stark and jarring contrast between the surrounding R10 and R12.5 locality and the proposed four storey (with additional underground basement level and additional roof height level for airconditioning units) R80 development. The number of residents proposed to be accommodated will increase the residential capacity of the site by over 1000%. The consequential visual impacts, OVERLOOKING, noise, traffic and parking that will flow from such an intensification will destroy the residential amenity of the locality. 1.2 The airconditioning level needs to be counted as a level due to the size/height of it. This will cause significant noise concern and will look unsightly from the private outdoor areas of Northern neighbouring properties. It will cause undue impact. 1.3 There is a daycare centre close by. There is very limited parking already. Children and their parents cross the road to pick up and drop off children there. Issues of parking, pedestrian safety esp. young children. 1.4 24/7 use of the site will affect the residential amenity. This will result in noise at all hours and car movement at all hours due to staff changeover for the three shifts proposed. 1.5 Proposed delivery times to include Monday to SATURDAYS will affect the residential amenity. 1.6 The design of the Northern aspect of the building (what the Northern neighbouring properties will look at from private backyards) is an unsightly, block design with huge windows that are NOT in keeping with the requirements for OVERLOOKING in the LPP. 1.7 [https://yourvoice.nedlands.wa.gov.au/58740/widgets/299273/documents/172532 Development Plans \(Rev 1\).pdf](https://yourvoice.nedlands.wa.gov.au/58740/widgets/299273/documents/172532%20Development%20Plans%20(Rev%201).pdf) page 17 and 24 demonstrates the numerous LARGE windows and balconies that will look into the frontyards, sides and backyards of northern neighbouring properties. These windows and balconies will also allow overlooking into windows of living areas and bedrooms of northern neighbouring properties. The privacy of residents, and possibly their childrens' safety are at risk

due to the inability to control who is overlooking into private residences. There is no way to control who visits aged care residents, as visitors are not required to have criminal record screening or working with children checks. The privacy of the aged-care residents will also be at risk as their private bedrooms will be viewed by Northern neighbours from within their homes and from their front/side/backyards.

2 The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments.

2.1 The Site is surrounded by low density residential development. The land immediately to its east and west is R10 and the land to its north is R12.5. The contrast between the existing density and the proposed R80 coding will be sharp, and the proposed plot ratio is wholly incompatible with the broader setting.

2.2 The bulk and scale of the proposal is imposing in its context. The proposal makes no attempt to mitigate the visual impact of its northern and southern walls, which are large and bland, on the adjacent neighbours and streetscape. See page 24 of Development Plans (Rev 1).pdf <https://yourvoice.nedlands.wa.gov.au/58740/widgets/299273/documents/172532>

2.2.1 The proposed development will significantly impact the visual amenity of all residential lots to the north on Doonan Road and Betty Street, up to Princess Road, particularly when the development is viewed from private outdoor areas. Children's play areas, private laundry drying areas, swimming pools will be visible from aged-care residents bedroom windows (see page 17 of Development Plans (Rev 1).pdf).

2.2.2 We are concerned that the height of this proposal will allow for the adjacent site (Melvista nursing home and lodge) to then be redeveloped to the same height which will result in very large aged care site that imposes on surrounding properties.

2.3 The proposed street frontage setbacks of 2.5 metres undermine line of sight in the context of the surrounding residential developments which have 9 metre setbacks. This has SAFETY implications for drivers and pedestrians using Doonan Road and Betty Street. The design has complete disregard for its setting.

2.3.3 Lack of setback also result in minimal outdoor space for aged-care residents; results in undue impact on existing neighbouring properties – completely obstructing valley views from front yards of ALL northern neighbours – we will be looking into a very high and wide bland brown brick wall/ block.

3 The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity.

3.1 The proposal fails to take into account the existing and future character of the locality. The City has a new local planning scheme, and whilst higher density has been provided for elsewhere, this locality preserved its low density coding. There is a clear intention and understanding that the low density residential nature of the area will be maintained. A high rise intensive aged care development completely undermines that intention.

3.2 The proposal will significantly diminish visual amenity of the area due to its size, scale and design. It is not in keeping with the character or streetscape in the locality. The height and 2.5m frontage setback cause undue impact to the streetscape.

3.3 The proposal represents a significant intensification in how the site will look and operate. It increases the number of people living on the site by over 1000%. The level of staffing and services required to accommodate 90 high needs aged care residents must not be understated. The cumulative impact of 90 residents, combined with the servicing and operational requirements of the facility and movement of staff, visitors and deliveries, will result in a substantial increase in:

3.3.4 noise from traffic movements, at all hours of the day (including weekends), to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users;

3.3.5 noise generated from the operations of the proposal, including air-conditioning, services, and an intensive increase of population and people movement;

3.3.6 light spill from 24 hour a day operations; and

3.3.7 odours generated from the operations of the proposal, including catering, laundry and servicing.

3.4 No management plans have been provided to show how the detrimental amenity impacts which will arise from such an intensified use will be mitigated, particularly given its hours of operation. No development condition will be validly capable of managing those impacts.

4 Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise.

4.1 The proposal will result in a significant increase in vehicle movements to and from the site, at all hours of the day.

4.2 The Traffic Impact Statement made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment traffic movements.

4.3 The Transport Impact Statement provides very little detail on the type of vehicle movements and the frequency and timings of those movements. This detail is essential to form a properly considered assessment of traffic movements and their impacts, and the document therefore cannot be relied upon.

4.4 Number of staff increases significantly at shift changeovers which will result in street parking. Visitor numbers will increase dramatically when an aged care resident faces end-of-life issues or in times of ill health when family members and friends will visit more often. Higher visitor numbers are likely e.g. on weekends or prior to Holiday periods e.g. Christmas etc.

4.5 The assumption of use of public transport has not taken into account lack of use in times of e.g. COVID, when healthcare staff have been/were advised AGAINST use of public transport for the safety of those they care for (there have been reports of transmission of COVID during use of public transport) ; evening/ night staff unlikely to use public transport due to safety

concerns which will result in street parking; the inconvenience due to duration of bus trip and infrequent times. 4.6 Traffic report needs to consider the future increase in traffic from surrounding streets that will undergo large builds in the coming years e.g. Louise st, Waratah, Alexander, Philip Rd, Webster, Broadway etc. Traffic and parking requirement will increase when the Melvista nursing home and lodge gets redeveloped in the future. 4.7 Parking provisions for the Wellness Centre is underestimated, as current estimations are not financially viable in a for-profit organization. Even if the developers claim the centre will be used minimally, this does not guarantee that future use of the centre would not be increased to make it more financially viable e.g use by public as an outpatient centre, which would result in more parking and traffic issues. 4.8 Oryx's proposed development allows a total of 24 car bays plus 2 ACROD bays. Bays 1 and 23 will be problematic for parking when a vehicle is parked next to them (in bays 2 and 23)—egress will be difficult without reversing the full distance to the exit and foreseeably these two bays will end up as additional storage areas. 4.9 There are not enough onsite parking bays for staff, contractors, maintenance and support workers, visitors, etc. 5 The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and PEDESTRIAN SAFETY. 5.1 This is a residential area with pedestrians including children walking to access the close by parks (Masons, Granby, College park...), daycare centre near Masons gardens etc. 6 Notwithstanding claims made by the developer, the community does NOT support this proposal and has not been properly consulted. 6.1 The developer relies on consultation it conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different from what is proposed. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed. 6.2 Immediately affected residents have either never been contacted or have only recently been informed about the extent of the proposal. 6.3 The first communication I have had with Oryx was a letter in my letterbox on 22.6.2020. I have had no prior consultation. 6.4 Subsequent to 22.6.20 Oryx has made available the document titled "Proposed Improvements and Restoration at Melvista" (see reference link below). This document contains false information. Pages 10 and 11 heading "Proposed Improvements" demonstrate what was apparently advertised to the community. This "indicative layout" of the "proposed new residential care facility on private land" demonstrated a two storey build that follows the current residential height and setbacks. See diagrams on pages 10, 11. The diagram also claimed the build would respect the "Standard Building Height as per City of Nedlands Policy" and showed large deep rooted planted trees along the streetscape. Again NOT in keeping with what is proposed now. <https://oryxcommunities.com/wp-content/uploads/2020/07/Oryx-Melvista-Nedlands-Indicative-Proposal-2016-Info-Booklet-2.pdf> Further misinformation in the Oryx document includes: page 18 "Q How many storeys will the proposed new residential care facility have? A As the local area is for residential purposes, the building is to be appropriate in its height and setback. It is proposed that the facility will comprise two floors of accommodation over a basement parking level excavated into the hill. Some gardens, accommodation and plant may be included on the roof or in the attic space." The proposal is now a 4-5 storey build with basement parking level, which does NOT comply with residential height of setback. This demonstrates false and misleading once-off "consultation" from so many years ago. Further misinformation includes: Page 18 "Q Will the proposed new residential care facility have any impacts on my privacy? ...The design and planning process will endeavour to minimise any overlooking of other properties" As mentioned previously in the "Development Plans (Revv1).pdf" page 17 shows numerous Large windows on the Northern aspect that does NOT minimise overlooking. 7 Other 7.1 Clause 4.6.2 of the Policy states – "a minimum of twenty-five per cent (25%) of the site area is to be landscaped". The proposed development does not comply with this requirement of the Policy. 7.1.8 Lack of deep root planting to allow for large trees that is in keeping with the Nedlands landscape and to counter the height, bulk, size of the build. (a) Lack of LARGE trees (b) Proposed landscaping plan involves a lot of vertical planting of scrubs or small plants which will not be an adequate replacement of large deep root planted trees for shade/wildlife/environmental benefit. Some of the proposed trees to be planted in landscaping plan are also in pots – which will prevent them growing to full size. (c) Existing large trees will be removed with the planned build which will cause undue impact on amenity. 7.1.9 Lack street setback and garden space where a normal backyard would be, results in lack of open outdoor spaces for aged care residents, staff and visitors (a) Outdoor spaces important to allow for physical distancing and wellbeing of aged care residents, staff and visitors (as a result the wider community). 7.1.10 Lack of garden space where a normal backyard would be on these residential blocks of lands results in lack of airflow/breeze for backyards of northern properties and significant overlooking onto existing properties' backyards and swimming pools from windows. Recreating a central garden space in the proposed build would break up the bulk and block design. 7.2 The proposal will have a significant carbon footprint, and only just exceeds the minimum standards for environmental sustainability under the

National Construction Code. 7.3 The proposal fails to take into account the recommendations of the Review of Innovative Models of Aged Care Research Paper, 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety in terms of its design and density. 7.4 The facility provides a poor work environment for nursing staff. No nursing stations or staff lounges/breakout spaces are provided for staff. There will be SMOKERS lining the Doonan and Betty St at all hours as these sites will not allow smoking on premise. Resulting problems will include air pollution, littering, loitering, ill affects on the health of surrounding neighbours. 7.5 FIRE RISK of a building of this size, density and aged care residents who are not as mobile as low care residents and may be in cognitive decline or have dementia. Fire risk to neighbouring properties 7.6 NOISE issue regarding build of this size and density 7.7 NOISE issue regarding the hospital like nature of a dementia unit has not been considered. "Disruptive vocalization constitutes a serious problem in geriatric nursing home" (see reference link below). Disruptive vocalization "can take various forms such as ...screaming, yelling, swearing, growling..." The impact of this on nearby and adjacent residential properties has not been considered. <https://journals.sagepub.com/doi/pdf/10.1177/153331750301800307> 7.8 ACOUSTIC report does not consider the "link between dementia and distress caused by noise" See literature on subject, e.g. <https://www.scie.org.uk/dementia/supporting-people-with-dementia/dementia-friendly-environments/noise.asp> 7.9 The proposal should be objected based on the alarming issue of high density aged care in current COVID times and for post-COVID times. This proposed build does NOT satisfy government COVID recommendations (see reference link below) to "reduce the risk of transmission to residents, residential aged care facilities" e.g. allow for enough space to allow visitors to "visit the resident in their room, outdoor, or a specified area in the facility," "not have visits in communal areas with other residents." The high density nature of the facility does NOT allow for appropriate safe physical distancing. An outbreak of respiratory/ droplet/airborne illness in the development would also put the health of staff, surrounding residential neighbours and wider community at risk. <https://www.health.gov.au/news/health-alerts/novel-coronavirus-2019-ncov-health-alert/advice-for-people-at-risk-of-coronavirus-covid-19/coronavirus-covid-19-advice-for-people-in-aged-care-facilities#:~:text=To%20reduce%20the%20risk%20of,communal%20areas%20with%20other%20residents> I OBJECT this proposal. I urge the council to REJECT this proposal. Please consider the undue impact this proposal will have on the people living in neighbouring properties and surrounding streets, as well as the streetscape and amenity. I urge you to consider the safety and quality of life of aged care residents in a COVID/post COVID world – the answer is not a high density multi-level building (with limited outdoor gardens) where residents will be held in their small rooms to prevent spread of infection.

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**Respondent No:** 294

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 04:55:18 am

**Last Seen:** Jul 23, 2020 20:51:48 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 295

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 07:51:05 am

**Last Seen:** Jul 23, 2020 23:47:25 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

No communicated to community in advanced Council had even sold council owned land to the developer off market !!!

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**Respondent No:** 296

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 08:21:41 am

**Last Seen:** Jul 24, 2020 00:09:06 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. To the extent the decision maker chooses to rely on significant and unadvertised provisions of the Policy, I further object as follows: 1 The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. 2 The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. 3 The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 4 Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. 5 The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and pedestrian safety. 6 Notwithstanding claims made by the developer, the community does not support this proposal and has not been properly consulted. 7 Fundamentally, as a Registered Physiotherapist and very familiar with Aged care facilities, I consider a multi storey high care aged facility is not a solution to caring for the elderly in our community. There are no rules around layout and size of rooms, opening windows are not required, air conditioners can be over beds, access to gardens and the size of doors are an active deterrent to elderly leaving their rooms. In this post-COVID world this is not a viable option for the care and safety of our elderly. I urge you not to support this proposal.

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**Respondent No:** 297

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 09:08:06 am

**Last Seen:** Jul 24, 2020 01:05:25 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated.

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**Respondent No:** 298

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 09:14:28 am

**Last Seen:** Jul 24, 2020 01:06:51 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property

Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**

I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

The development is far too big and intrusive for the area. Loss of privacy and amenities for the neighbours. Traffic congestion and parking problems. The beauty of Nedlands will be lost forever.

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**Respondent No:** 299

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 09:19:50 am

**Last Seen:** Jul 24, 2020 01:07:31 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. My objection is made on the following grounds: The proposal is inconsistent with the Residential Aged Care Facilities Local Planning Policy because of the undue impact it will have on the residential amenity of the area. 1 The height, bulk and scale of a four-storey development proposal is incompatible with the locality and surrounding developments. 2 The proposal will result in unacceptable increases in noise, traffic, car parking congestion and light pollution. 3 The proposal fails to adequately manage or mitigate the impacts it will have on the existing and future residential amenity. 4 The design of the proposal is imposing and unsympathetic to the existing character of the area. Not only does that have aesthetic implications, the contrast in setbacks affects sight lines, and therefore vehicle and pedestrian safety.

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**Respondent No:** 300

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 09:22:07 am

**Last Seen:** Jul 24, 2020 01:20:07 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated.

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**Respondent No:** 301

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 09:24:37 am

**Last Seen:** Jul 24, 2020 01:21:46 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**  Occupier of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated.

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**Respondent No:** 302

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 09:27:47 am

**Last Seen:** Jul 22, 2020 01:36:29 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent, incompatible and out of character with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. 6 The quiet, residential nature of the immediate area will become completely undermined by this proposal. With insufficient parking included in the proposal visitors, deliveries and employees will be forced to park in surrounding streets, causing noise and congestion. 7 The proposal for a high care facility, which will be staffed 24 hours around the clock, with shift changes, will change the quiet residential area. Doctors, staff, deliveries and visitors will be visiting the facility and adversely affecting the quiet residential nature of the area that we presently enjoy. I urge you not to support this proposal.

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**Respondent No:** 303

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 09:37:40 am

**Last Seen:** Jul 24, 2020 01:18:49 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I endorse the comments made by People for Responsible Development on this issue . The developers have only one aim and that is to make themselves wealthy at any cost. Unfortunately the Minister for Planning's (Saffioti) arrogant attitude supports many of these unsuitable developments with no regard to detrimental consequences for local people.She will be the cause of State labor losing the next election .In the meantime we are left with these abominations and the developers are laughing at how easy a target WA is knowing any objections to their proposals by community and councils will be overruled in their favour. The bleating by her and the developers about the jobs these projects are providing only provides a short term employment fix but longterm negative impacts on the people who live in these areas.

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**Respondent No:** 304

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 09:53:30 am

**Last Seen:** Jul 24, 2020 01:52:51 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated.

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**Respondent No:** 305

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 09:57:39 am

**Last Seen:** Jul 24, 2020 01:53:45 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. My objection is made on the following grounds: 1 The proposal is inconsistent with the Residential Aged Care Facilities Local Planning Policy because of the undue impact it will have on the residential amenity of the area. 2 The height, bulk and scale of a four-storey development proposal is incompatible with the locality and surrounding developments. 3 The proposal will result in unacceptable increases in noise, traffic, odours, car parking congestion and light pollution. 4 The proposal fails to adequately manage or mitigate the impacts it will have on the existing and future residential amenity. 5 The design of the proposal is imposing and unsympathetic to the existing character of the area. Not only does that have aesthetic implications, the contrast in setbacks affects sight lines, and therefore vehicle and pedestrian safety. 6 The car parking and traffic assessments do not adequately take into account the realistic vehicle movements the proposal will generate.

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**Respondent No:** 306

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 10:01:46 am

**Last Seen:** Jul 24, 2020 01:53:14 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am worried about extra traffic in Betty St where my young grandchildren live and play

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**Respondent No:** 307

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 10:12:09 am

**Last Seen:** Jul 24, 2020 02:02:20 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. To the extent the decision maker chooses to rely on significant and unadvertised provisions of the Policy, I further object as follows: 1 The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. 2 The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. 3 The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 4 Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. 5 The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and pedestrian safety. 6 Notwithstanding claims made by the developer, the community does not support this proposal and has not been properly consulted. I urge you not to support this proposal.

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**Respondent No:** 308

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 10:26:28 am

**Last Seen:** Jul 24, 2020 02:19:01 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

The nursing home encroaches on the living enjoyment of the surrounding surrounding houses in terms of height and volume of traffic. It is land that could be developed for people wanting to downsize into single story dwellings on small blocks. Nursing homes are needed in the area. Monash Ave Nedlands would be suitable. Residents of nursing homes enjoy space and gardens.

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**Respondent No:** 309

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 10:39:08 am

**Last Seen:** Jul 24, 2020 02:37:55 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated.

---



**Respondent No:** 310

**Login:**

**Email:** j

**Responded At:** Jul 24, 2020 10:45:02 am

**Last Seen:** Jul 24, 2020 02:41:58 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

This proposal would increase traffic on Vincent st, which is already busy and dangerous for children. I object to commercial developments and buildings over 3 storeys high in Nedlands. Nedlands is a valuable area because it has lots of established trees, green spaces and heritage buildings.

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**Respondent No:** 311

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 11:12:15 am

**Last Seen:** Jul 24, 2020 03:10:47 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated.

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**Respondent No:** 312

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 11:46:17 am

**Last Seen:** Jul 24, 2020 03:43:13 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated.

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**Respondent No:** 313

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 11:54:37 am

**Last Seen:** Jul 24, 2020 03:52:16 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I would like to place my extreme objection to the development application Residential Aged Care Facility located at 73-75 Doonan Road and 16-18 Betty Street, Nedlands. While I have many concerns the key concern is around the sheer size of the project deep within a low density residential narrow street. It does not fit within the streetscape and in imposes on all those residences around it. Design Issues: 1. The proposed development will significantly impact the visual amenity of all residential lots to the north on Doonan Road and Betty Street, up to Princess Road, particularly when the development is viewed from private outdoor areas. 2. The plot ratio of 1.0 severely overwhelms the streetscape and is totally out of step with all other properties in the street and the immediate vicinity. No other small street in the council area has this level of plot ratio. 3. The impact of commercial level services has not been considered to any extent from the perspective of the current residents – noise from industrial machinery, reversing motor vehicle noise at all hours, large scale commercial vehicles constantly using small narrow streets. 4. The design is not taking into consideration the disastrous Covid issues we have so recently seen in the Eastern States. We should be awaiting the government's report before making rash decisions that will affect our most vulnerable. 5. The mass and scale of the development in now way fit into a small narrow suburban Nedlands street. The sheer height and scale will negatively impact the sense of community in this quite residential area. There are many other areas of Nedlands that this size of building would look within character – not in a totally residential street. 6. 2.5m setbacks compared to the rest of the street having 9m is abhorrent. Every other property in the surrounding area must be within the 9m set back rules to maintain the sense of community, light, allow for trees and open spaces. Why is this not good planning for this property also? 7. LPP clause 4.6.2 requires 25% of the site to be landscaped. This has in no way been followed. 8. There are no specific design features to allow for an emergency situation such as fire or mass evacuation. This development is in a small narrow residential street; this is a recipe for disaster. 9. Car parking is absolutely underplanned. The car park currently as Masons Gardens is filled to 80% most days all day. Where are staff, visitors, consultants, tradespeople supposed to park? The development is not on a high-level transport window, thinking staff will be able to travel via public transport is incredible to say the least let alone staffing on rosters 24/7. 10. No thought or process has gone into consideration of noise from air conditioning or ventilation. Planning Objections 1. The process of the Council adopting the Residential Aged Care Facilities Local Planning Policy ('LPP') on 26 April 2020 is highly inappropriate, without publicly advertising significant amendments made to the density, height and plot ratio. 2. A residential density coding of R80 as imposed by the LPP is not acceptable or justified at the subject site. It is entirely out of context with a transition from the neighbouring R12.5 and R10 zoned properties. 3. The development is a 24/7 large scale commercial business. It is in no way suited to be dumped in a small suburban street just because a developer thinks it is a good idea. 4. Council has not followed the due process for the adoption of the LPP. I challenge the

validity of the adopted LPP when it has not taken into consideration the major changes to scale and size of facility. 5. Pursuant to Schedule 2, Part 9, Clause 67(m) of the Regulations, the proposed development is not compatible with the surrounding residential neighbourhood and particularly the adjoining land zoned R12.5. 6. The community consultation has been an absolute joke. We did not visit April 2016 consultation at Mason's Gardens and were in no way involved in any effective communication from the developer then or at any time since. I have lost substantial trust in the Council's staff over this. Why have they spent numerous years in close communication with the developer and arranging sweetheart deals yet have not provided ANY timely, reasonable consultation with residents? 7. I called the Council at the time of the major Nedlands rezoning to check on whether there were to be any changes along Princess Rd, in particular a property on the corner of Princess & Betty. I was told absolute no change – only Stirling Hwy/Broadway/Waratah absolutely nothing near you. I do not know how such a mammoth change in my street could happen without ANY communication. Why? What are the Council trying to hide? Who is getting paid off? 8. The development is a vast 24/7 development using the absolute full length and breadth of the property. It does not fit in with the residential area. We are absolutely for ageing in place but in a place that feels like my community, not some high rise box to be shoved in and left to die. This is not the style of property that will be desirable for local residents to use. 9. The purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City, however, instead it has imposed an R-coding as a mechanism to deal with scale, bulk and built form. This is not appropriate as the imposition of an R80 R-coding immediately adjacent to properties subject to an R12.5 density coding will result in significant conflict concerning scale, bulk and streetscape impacts. Sale of Land in secret I absolutely object to the secret sale of land in the Nedlands area directly to a developer without consultation and without using the public marketplace. Please provide further explanation on how this is possible. It is absolutely clear that the Council has sold this land well under market value when compared to the sale of properties in Betty St. Why has the Council made special arrangements in secret with private developers at the expense of council accounts and residents ongoing concerns? Technical Reports The technical reports lack reasonable detail to provide a realistic measurement of cumulative noises and effluents. There will be a substantial number of commercial facilities that will provide noise on top of noise not simply one machine turned on at a time. The reality needs to be measured and considered. The transport impact statement has in no way effectively considered the number of staff, visiting consultants and visitors in detailing car parking needs and traffic issues. The assumptions made in this document do not reflect the true nature of the facility and reasonable expectations that will be inflicted on local residents. In closing I have been shocked to learn of the incredible amount of assistance, liaison and communication that the Council has felt fit to devote to a Developer at the expense of ratepayers. Why have we not been part of this journey? Why have we not been asked to provide insight into what will fit and suit for aged care in our community? What is the purpose of ageing in place if that place is so out of character? High density aged care is not best practice why are we rushing this through? Recent changes have been made to enhance the level of density in our community. I cannot understand how a small package of land in a clearly residential small street has been somehow included in these plans that are otherwise absolutely limited to major traffic thoroughfares that are more in keeping with a large development and have the amenities for a large development (parking, public transport etc).

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**Respondent No:** 314

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 11:55:16 am

**Last Seen:** Jul 23, 2020 02:16:11 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated.

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**Respondent No:** 315

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 12:04:43 pm

**Last Seen:** Jul 24, 2020 04:02:18 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:** I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 316

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 12:07:48 pm

**Last Seen:** Jul 24, 2020 04:07:11 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated.

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**Respondent No:** 317

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 12:10:06 pm

**Last Seen:** Jul 24, 2020 03:10:53 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property
Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Dear Nedlands Council I write to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Proposal). As a threshold matter, I am concerned there are fundamental flaws in the process by which the Proposal has been allowed to come about. The Proposal has been submitted on the basis of the City of Nedlands Residential Aged Care Facilities Local Planning Policy (LPP), adopted by the City in April 2020 during Covid lockdown. Fundamental aspects of the LPP were not advertised to the public. These include changes to the draft LPP regarding increased height and plot ratio, including a change from three storeys to four storeys. The LPP is therefore not an appropriate instrument for assessing the application. To the extent the decision maker nevertheless chooses to rely on significant and unadvertised provisions of the LPP, I further object as follows: 1 The proposal entirely contradicts the objectives of the LPP relating to the mitigation of impact on residential amenity. 2 The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. 3 The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 4 Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. 5 The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and pedestrian safety. 6 Notwithstanding claims made by the developer, the community does not support this proposal and has not been properly consulted. 7 The landscaping and green space provisions are inadequate and inconsistent with a salutogenic approach to aged care. 8 The opening of the wellness centre to the general public is inappropriate for residents and further contributes to the facility's negative impact on surrounding amenity. 9 The Proposal does not take account of the recommendations of the Review of Innovative Models of Aged Care. My concerns are set out in detail below.

1 Policy objectives 1.1 One of the primary objectives of the Policy is – “to ensure the appearance and design of residential aged care facilities are of high quality and do not have an undue impact on the residential amenity by way of building bulk and scale, noise, traffic or parking”. The proposal fundamentally conflicts with this objective given the stark and jarring contrast between the surrounding R10 and R12.5 locality and the proposed four storey R80 development. The number of residents proposed to be accommodated will increase the residential capacity of the site by over 1000%. The consequential visual impacts, noise, traffic and parking that will flow from such an intensification will destroy the residential amenity of the locality.

2 Compatibility with setting (bulk, scale and height) 2.1 The Site is surrounded by low density residential development. The land immediately to its east and west is R10 and the land to its north is R12.5. The contrast between the existing density and the proposed R80 coding will be sharp. 2.2 The proposed



plot ratio is wholly incompatible with the broader setting. 2.3 The bulk and scale of the proposal is imposing in its context. The proposal makes no attempt to mitigate the visual impact of its northern and southern walls, which are large and bland, on the adjacent neighbours and streetscape. 2.4 The depicted bulk and scale of the Melvista Lodge land (immediately to the South of the Site) in the development application plans is misleading. There are no such plans proposed or prepared, and the proposal is inconsistent with its setting in that regard. Redevelopment of Melvista Lodge is not likely or imminent given the nature of the landholdings there. 2.5 The proposed street frontage setbacks of 2.5 metres undermine line of sight in the context of the surrounding residential developments which have 9 metre setbacks. This has safety implications for drivers and pedestrians using Doonan Road and Betty Street. The design has complete disregard for its setting. 3 Amenity 3.1 The proposal fails to take into account the existing and future character of the locality. The City has a new local planning scheme, and whilst higher density has been provided for elsewhere, this locality preserved its low density coding. There is a clear intention and understanding that the low density residential nature of the area will be maintained. A high rise intensive aged care development completely undermines that intention. 3.2 The proposal will significantly diminish visual amenity of the area due to its size, scale and design. It is not in keeping with the character or streetscape in the locality. 3.3 The proposal represents a significant intensification in how the site will look and operate. It increases the number of people living on the site by over 1000%. The level of staffing and services required to accommodate 90 high needs aged care residents must not be understated. The cumulative impact of 90 residents, combined with the servicing and operational requirements of the facility and movement of staff, visitors and deliveries, will result in a substantial increase in: 3.3.1 noise from traffic movements, at all hours of the day, to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users; 3.3.2 noise generated from the operations of the proposal, including air-conditioning, services, and an intensive increase of population and people movement; 3.3.3 light spill from 24 hour a day operations; and 3.3.4 odours generated from the operations of the proposal, including catering, laundry and servicing. 3.4 No management plans have been provided to show how the detrimental amenity impacts which will arise from such an intensified use will be mitigated, particularly given its hours of operation. No development condition will be validly capable of managing those impacts. 4 Traffic 4.1 I strongly reject the assertion in the Development Application Report that the proposed facility 'will not have a negative impact on the surrounding road network'. 4.2 The Traffic Impact Statement made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment traffic movements. 4.3 The Transport Impact Statement provides very little detail on the type of vehicle movements and the frequency and timings of those movements. This detail is essential to form a properly considered assessment of traffic movements and their impacts, and the document therefore cannot be relied upon. 4.4 Given the entrance is on Doonan Road and the exit on Betty Street, it is reasonable to assume that all traffic for the facility will need to drive down Doonan Road and Betty Street. The traffic report does not include information on the number of car trips a day through Doonan Road and Betty Street currently (ie in the absence of the facility) and the estimated number of trips down these streets once the facility is operational. 4.5 Further, a high burden of traffic will occur at times that are intrusive and disruptive for local residents, for example overnight and early morning changes of shift for staff, 24-hour arrival of emergency vehicles and early morning deliveries and waste collection. 5 Car Parking 5.1 The 26 planned car bays are highly inadequate to accommodate the amount of administrative, catering, cleaning, medical, allied health and maintenance staff required to support an intensive 90-bed high care facility. This is particularly the case as no parking allowances have been made for deliveries, visitors of residents, or Wellness Centre staff and visitors. 5.2 The surrounding streets are not capable of supporting the street car parking which will necessarily arise due to the lack of sufficient on-site car parking. 6 Community consultation 6.1 The developer relies on consultation it conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different from what is proposed. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed. 6.2 Immediately affected residents have either never been contacted or have only recently been informed about the extent of the proposal. 6.3 Contrary to the assertions of the developer, prior to lodgement of the current development application, there was not 'open and inclusive' consultation with the local community on this proposal, nor indeed any consultation at all. 6.4 The summary of the community consultation at part 1.3.2 of the Development Application Report notes the following: 88% of respondents agree that more aged care services and accommodation are needed in Nedlands 93% of respondents agree that the proposed new residential care facility on privately owned land, adjacent to the Lisle Villages site, will help provide accommodation for the growing number of ageing residents. 6.5 The fact that the majority of respondents agree that more aged care services are needed in Nedlands, and that the proposed new site will help provide accommodation for the aged,

does not mean that surveysuch aged care should be provided on the site proposed OR on the scale proposed (in relation to building bulk and resident capacity) OR entirely in the form of a high-care facility as has been proposed. 6.6 Further, the report does not note the total number of survey respondents, the number who answered each particular question or their suburb of residence. These are critical details which need to be disclosed in order to give meaning to the conclusions. 7 Landscaping and Green Space 7.1 Clause 4.6.2 of the Policy states – “a minimum of twenty-five per cent (25%) of the site area is to be landscaped”. The proposed development does not comply with this requirement of the Policy. 7.2 The Proposal plan indicates removal of 9 mature trees. The tree adjoining the Doonan Road verge should be required to be maintained. Illustrative images of the facility suggest that new tree planning will be of smaller species. These will be inadequate to provide shade, green outlook for residents, and to facilitate fit of the facility with the surrounding local area. 7.3 The proposal will have a significant carbon footprint, and only just exceeds the minimum standards for environmental sustainability under the National Construction Code. 8 Wellness Centre 8.1 The Development Application report suggests a maximum of 30% of patronage for the wellness centre would come from outside the facility, totalling approximately 10 external visits per day. 8.2 It is entirely inappropriate that external customers be allowed to access and use the services offered in the proposed wellness centre. 8.3 This transforms the nature of the wellness centre from provision of service to in-house residents, to a commercial operation. 8.4 The subject site is zoned residential. As such it would not be permissible to operate a commercial physio, gym, hair salon or other wellness service on that site. Nor should it be permissible to operate such commercial undertakings in the guise of providing services for aged care. 8.5 In addition the anticipated 10 external visits a day would further contribute to the traffic and parking burden of the facility. 8.6 Covid infection rates in aged care facilities are indicative of the need to be able to protect our aged population. From an infection control perspective, it is not advisable for consistent volumes of non-related outsiders to be entering the facility. 8.7 From a security perspective, the frequent entry of persons unassociated with the facility is also ill-advised. 9 Recommendations of the Review of Innovative Models of Aged Care 9.1 The proposal fails to take into account the recommendations of the Review of Innovative Models of Aged Care Research Paper, 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety in terms of its design and density. 9.2 A salutogenic approach to aged care requires inclusion of a range of different outdoor areas with which residents can engage. The Proposal lacks adequate green and restful spaces and the design has an institutional feel. Images of the facility included as part of the Proposal show small children, yet the design lacks appropriate spaces where residents could meet and small children play. 10 Strategic and reasoned approach to aged care in Nedlands 10.1 A healthy, balanced community is one which appropriately caters to all age groups and health care needs. I am not opposed to aged care, and respect the desire of many to age ‘in place’. 10.2 What is needed is an holistic, well thought-out approach to aged care throughout the City, rather than ad hoc consideration of each individual development application received. 10.3 As a rate payer and resident I request and expect that the City of Nedlands instead lead aged care development in the City through a strategic and needs-based, whole-of-City approach to aged care, involving:

- comprehensive, objective assessment of the aged care needs of the City’s population;
- consideration of community wishes around living arrangements for aging, including in particular the desire for diverse models of aged care across the full range of options including independent living, support for independent living and residential aged care;
- development of a whole-of-City proposal for aged care arrangements, and meaningful community consultation on that proposal;
- contemporary best practice concerning design and planning of aged care, including consideration of and appropriate response to findings of the Royal Commission into Aged Care;
- preparation of design and planning guidelines which support the City’s vision for aged care; and
- consideration given to a range of aged care providers including for-profit and non-profit providers.

Owing to the flaws in the LPP, lack of consultation and failings in the design of the proposed facility, the proposal is inappropriate for the subject site. I implore the decision maker to reject the development application. I request the City of Nedlands to instead proactively approach the issue of aged care in Nedlands in an holistic, evidence-based and robust manner.

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**Respondent No:** 318

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 12:18:14 pm

**Last Seen:** Jul 18, 2020 07:37:01 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. To the extent the decision maker chooses to rely on significant and unadvertised provisions of the Policy, I further object as follows: 1 The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. 2 The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. 3 The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 4 Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. 5 The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and pedestrian safety. 6 Notwithstanding claims made by the developer, the community does not support this proposal and has not been properly consulted. 7 Policy objectives 7.1 One of the primary objectives of the Policy is – “to ensure the appearance and design of residential aged care facilities are of high quality and do not have an undue impact on the residential amenity by way of building bulk and scale, noise, traffic or parking”. The proposal fundamentally conflicts with this objective given the stark and jarring contrast between the surrounding R10 and R12.5 locality and the proposed four storey R80 development. The number of residents proposed to be accommodated will increase the residential capacity of the site by over 1000%. The consequential visual impacts, noise, traffic and parking that will flow from such an intensification will destroy the residential amenity of the locality. 8 Compatibility with setting (bulk, scale and height) 8.1 The Site is surrounded by low density residential development. The land immediately to its east and west is R10 and the land to its north is R12.5. The contrast between the existing density and the proposed R80 coding will be sharp, and the proposed plot ratio is wholly incompatible with the broader setting. 8.2 The bulk and scale of the proposal is imposing in its context. The proposal makes no attempt to mitigate the visual impact of its northern and southern walls, which are large and bland, on the adjacent neighbours and streetscape. 8.3 The depicted bulk and scale of the Melvista Lodge land (immediately to the South of the Site) in the development application

plans is misleading. There are no such plans proposed or prepared, and the proposal is inconsistent with its setting in that regard. Redevelopment of Melvista Lodge is not likely or imminent given the nature of the landholdings there. 8.4 The proposed street frontage setbacks of 2.5 metres undermine line of sight in the context of the surrounding residential developments which have 9 metre setbacks. This has safety implications for drivers and pedestrians using Doonan Road and Betty Street. The design has complete disregard for its setting. 9 Amenity 9.1 The proposal fails to take into account the existing and future character of the locality. The City has a new local planning scheme, and whilst higher density has been provided for elsewhere, this locality preserved its low density coding. There is a clear intention and understanding that the low density residential nature of the area will be maintained. A high rise intensive aged care development completely undermines that intention. 9.2 The proposal will significantly diminish visual amenity of the area due to its size, scale and design. It is not in keeping with the character or streetscape in the locality. 9.3 The proposal represents a significant intensification in how the site will look and operate. It increases the number of people living on the site by over 1000%. The level of staffing and services required to accommodate 90 high needs aged care residents must not be understated. The cumulative impact of 90 residents, combined with the servicing and operational requirements of the facility and movement of staff, visitors and deliveries, will result in a substantial increase in: 9.3.1 noise from traffic movements, at all hours of the day, to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users; 9.3.2 noise generated from the operations of the proposal, including air-conditioning, services, and an intensive increase of population and people movement; 9.3.3 light spill from 24 hour a day operations; and 9.3.4 odours generated from the operations of the proposal, including catering, laundry and servicing. 9.4 No management plans have been provided to show how the detrimental amenity impacts which will arise from such an intensified use will be mitigated, particularly given its hours of operation. No development condition will be validly capable of managing those impacts. 10 Traffic 10.1 The proposal will result in a significant increase in vehicle movements to and from the site, at all hours of the day. 10.2 The Traffic Impact Statement made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment traffic movements. 10.3 The Transport Impact Statement provides very little detail on the type of vehicle movements and the frequency and timings of those movements. This detail is essential to form a properly considered assessment of traffic movements and their impacts, and the document therefore cannot be relied upon. 11 Car Parking 11.1 The amount of administrative, catering, cleaning, medical, allied health and maintenance staff required to support an intensive 90-bed high care facility will not be supported by 26 bays, particularly given no parking allowances have been made for deliveries, visitors of residents, or the Wellness Centre staff and visitors. 11.2 The surrounding streets are not capable of supporting the street car parking which will necessarily arise due to the lack of sufficient on-site car parking. 12 Community consultation 12.1 The developer relies on consultation it conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different from what is proposed. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed. 12.2 Immediately affected residents have either never been contacted or have only recently been informed about the extent of the proposal. 13 Other 13.1 Clause 4.6.2 of the Policy states – “a minimum of twenty-five per cent (25%) of the site area is to be landscaped”. The proposed development does not comply with this requirement of the Policy. 13.2 The proposal will have a significant carbon footprint, and only just exceeds the minimum standards for environmental sustainability under the National Construction Code. 13.3 The proposal fails to take into account the recommendations of the Review of Innovative Models of Aged Care Research Paper, 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety in terms of its design and density. I urge you not to support this proposal.

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**Respondent No:** 319

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 12:18:39 pm

**Last Seen:** Jul 24, 2020 04:12:10 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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**Q8. Submission : Please give your comments relating to this item in full below.**

I am a teenager in the Nedlands Council. I am incredibly concerned that the Council is placing a development in our street that does not operate in a highly environmentally friendly nature, is not providing a kind and healthy place for our elderly population and is totally out of sync with our neighbourhood. We need to keep trees and open spaces for a healthy environment. I have listed below my key objections. Planning Objections 1. The process of the Council adopting the Residential Aged Care Facilities Local Planning Policy ('LPP') on 26 April 2020 is highly inappropriate, without publicly advertising significant amendments made to the density, height and plot ratio. 2. A residential density coding of R80 as imposed by the LPP is not acceptable or justified at the subject site. It is entirely out of context with a transition from the neighbouring R12.5 and R10 zoned properties. 3. The development is a 24/7 large scale commercial business. It is in no way suited to be dumped in a small suburban street just because a developer thinks it is a good idea. 4. Council has not followed the due process for the adoption of the LPP. I challenge the validity of the adopted LPP when it has not taken into consideration the major changes to scale and size of facility. 5. Pursuant to Schedule 2, Part 9, Clause 67(m) of the Regulations, the proposed development is not compatible with the surrounding residential neighbourhood and particularly the adjoining land zoned R12.5. 6. The community consultation has been an absolute joke. We did not visit April 2016 consultation at Mason's Gardens and were in no way involved in any effective communication from the developer then or at any time since. I have lost substantial trust in the Council's staff over this. Why have they spent numerous years in close communication with the developer and arranging sweetheart deals yet have not provided ANY timely, reasonable consultation with residents? 7. I called the Council at the time of the major Nedlands rezoning to check on whether there were to be any changes along Princess Rd, in particular a property on the corner of Princess & Betty. I was told absolute no change – only Stirling Hwy/Broadway/Waratah absolutely nothing near you. I do not know how such a mammoth change in my street could happen without ANY communication. Why? What are the Council trying to hide? Who is getting paid off? 8. The development is a vast 24/7 development using the absolute full length and breadth of the property. It does not fit in with the residential area. We are absolutely for ageing in place but in a place that feels like my community, not some high rise box to be shoved in and left to die. This is not the style of property that will be desirable for local residents to use. 9. The purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City, however, instead it has imposed an R-coding as a mechanism to deal with scale, bulk and built form. This is not appropriate as the imposition of an R80 R-coding immediately adjacent to properties subject to an R12.5 density coding will result in significant conflict concerning scale, bulk and streetscape impacts. Design Issues: 1. The proposed development will significantly impact the visual amenity of all residential lots to the north on Doonan Road and Betty Street, up to Princess Road, particularly when the development is viewed from private outdoor areas. 2. The plot ratio of 1.0 severely overwhelms the streetscape and is totally out of step with all other properties in the street and the immediate vicinity. No other small street in the council area has this level of plot ratio. 3. The impact of commercial level services has not been considered to any extent from the perspective of the current residents – noise from industrial machinery, reversing motor vehicle noise at all hours, large scale commercial vehicles constantly using small narrow streets. 4. The design is not taking into consideration the disastrous Covid issues we have so recently seen in the Eastern States. We should be awaiting the government's report before making rash decisions that will affect our most vulnerable. 5. The mass and scale of the development in now way fit into a small narrow suburban Nedlands street. The sheer height and scale will negatively impact the sense of community in this quite residential area. There are many other areas of Nedlands that this size of building would look within character – not in a totally residential street. 6. 2.5m setbacks compared to the rest of the street having 9m is abhorrent. Every other property in the surrounding area must be within the 9m set back rules to maintain the sense of community, light, allow for trees and open spaces. Why is this not good planning for this property also? 7. LPP clause 4.6.2 requires 25% of the site to be landscaped. This has in no way been followed. 8. There are no specific design features to allow for an emergency situation such as fire or mass evacuation. This development is in a small narrow residential street; this is a recipe for disaster. 9. Car parking is absolutely underplanned. The car park currently as Masons Gardens is filled to 80% most days all day. Where are staff, visitors, consultants, tradespeople supposed to park? The development is not on a high-level transport window, thinking staff will be able to travel via public transport is incredible to say the least let alone staffing on rosters 24/7. 10. No thought or process has gone into consideration of noise from air conditioning or ventilation. Please do not ruin our neighborhood for future generations.



**Respondent No:** 320

**Login:**

**Email:**

om

**Responded At:** Jul 24, 2020 12:31:48 pm

**Last Seen:** Jul 24, 2020 04:29:39 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the Betty St and Doonan Rd development proposal. The development would be a mistake to the area and is not appropriate for the site.

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**Respondent No:** 321

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 12:40:48 pm

**Last Seen:** Jul 24, 2020 02:55:00 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I was shocked to hear about a hospital building application for Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. My family and I are frequent users of both Doonan Road and Betty Street footpaths to access Masons Gardens. The WA Heritage Council describes Masons Gardens as "having aesthetic, historic and social heritage value. The Council further states the Gardens are an excellent example of an historic site. Though no buildings remain, the park is well maintained for public use. Aesthetically the Gardens add character to the surrounding homes. The many trees provide a shady retreat for visitors to the park. Links with the past use of the place are maintained by the name Masons Gardens and the plaque explaining the history of the area". The proposed building and its attendant servicing requirements will cause this access to be frequently disrupted. The views from the both streets and the gardens will not be enhanced in any way by such a massive and in appropriate development. I believe our street will also be used as an access street for the development by vehicles accessing Stirling Highway. This will occur at all hours of the day and night. My many objections include: 1.0 Planning Objections 1.1 The community has not been engaged in any way with regard to this proposal. The advertising by the council was not appropriate for such a major change to the permitted use of the land. 1.2 A residential density coding of R80 as imposed by the LPP is not acceptable or justified at the subject site. It is completely out of context with a transition from the neighbouring R12.5 and R10 zoned properties. 1.3 A Local Planning Policy imposing density is not appropriate. Density should be imposed via a scheme amendment to LPS3. 1.4 The proposed development is commercial in nature, operating 24/7 and is not suited to a residential area. 1.5 The proposed development is not compatible with the existing amenity of the two streets and nearby neighbourhood due to the height, scale and bulk of the development. Clause 3.1 of the LPP states a development "...not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking". 1.6 In accordance with the zoning table of LPS 3, 'Residential Aged Care Facility' is allocated an 'A' use within the 'Residential' zone, meaning the use is not permitted unless the local government has exercised its discretion by granting development approval. This is an unusual application of additional use provisions given a 'Residential Aged Care Facility' is already a contemplated use within the 'Residential' zone. 1.7 Due to the removal of the proposed special use provisions in LPS 3, no development standards are applicable to the subject site except for the car parking requirements as outlined in LPS 3. A scheme amendment should be initiated to guide appropriate density. 1.8 The increased building height and plot ratio associated with this modification will facilitate increased bulk and scale for any development proposed, we are of the view the modifications to the draft LPP are not minor and are in fact, significant in nature particularly in relation to the locality of surrounding residential area. 1.9 Council has not followed the appropriate process in the adoption of LPP. On this basis we question the validity of the adopted LPP. 1.10 There is absolutely no justification for the application of a R80 density



coding, given the significantly lower R10/R12.5 density coding of the surrounding locality. 1.11 The effect of the local planning policy is that it imposes a higher density coding without the initiation of a scheme amendment to LPS3. 1.12 The purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City, however instead it has imposed an R-coding as a mechanism to deal with scale, bulk and built form. This is not appropriate as the imposition of an R80 R-coding immediately adjacent to properties subject to an R12.5 density coding will result in significant conflict with respect to scale, bulk and streetscape impacts. 1.13 Pursuant to Schedule 2, Part 9, Clause 67(m) of the Regulations, the proposed development is not compatible with the surrounding residential neighbourhood and particularly the adjoining land zoned R12.5. 1.14 In April 2016, the community was consulted on the proposed refurbishment of Melvista Lodge and the development of a 2-storey aged care on adjacent lots at 73-75 Doonan Road and 16-18 Betty Street. What is now proposed is completely different with a 4 storeys plus basement and roof (height approx. 17 metres), 90 bed high care, aged care facility on residential zoned lots and no longer includes the refurbishment of the Melvista Lodge. The community consultation on the new proposal from the developer and City of Nedlands has been mostly non-existent. Clause 5.1 of the LPP states "Consultation with affected landowners will be undertaken in accordance with the City's Local Planning Policy- Consultation of Planning Proposals". The consultation by the Developer with the Community, undertaken on a previous scheme, therefore breaches the LPP – Consultation of Planning Proposals. 1.15 The proposed development at R80, with a plot ratio of 1.0 will significantly impact the adjoining land and surrounding low density residential neighbourhood. 1.16 Clause 4.6.2 of the LPP states "A minimum of twenty-five per cent (25%) of the site area is to be landscaped". The proposed development does not comply with this requirement of the LPP having virtually no landscaped area. 1.17 The set back of the boundary on 71 Doonan Road is non compliant with the LPP Clause 4.5.2 which requires a 7.5m set back and permanent screening to 75% obscure. The proposed plan has a 6.4m setback and NO screening. 1.18 The purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City. The LPP makes no delineation between differing models of care (e.g. independent living units, low care, and high care). The planning guidelines set out in the LPP, as drafted, applies the same planning conditions irrespective of the model of care. Different models of care have differing levels of servicing. This has not been considered in the application of the LPP. This has resulted in a High Care facility with an inappropriate density being located in a precinct unsuited to the facility function. The LPP should be redrafted to reflect the specific function and nature of aged care models of care, with appropriate planning of such facilities contextually. 1.1 There was no development control plan applied to this land at the time of its rezoning. This in effect meant anything could have been built. The rushed endorsement of an R80 equivalent zoning without community consultation has denied the community the opportunity to comment on the appropriateness of this density in a residential zone. 2.0 Design Objections 2.1 The proposed building is a highly inappropriate in terms of scale and size to adjoining properties with box scale of building of approx. 70m overall length x 32m overall width and overall height of approx 17m 2.2 The development includes large, bland featureless walls measuring 35 metres in length (running east/west), a scale that would typically be found in a mixed use or town/activity centre environment. 2.3 The proposed development, should it be constructed as proposed, would result in detrimental impacts to the amenity and character of the low-density residential neighbourhood. 2.4 The four-storey development with a proposed plot ratio of 1.0 would result in a scale of development which is not compatible with the amenity of the locality and is not suitable within a low-density residential neighbourhood. 2.5 The proposed development will significantly impact the visual amenity of all residential lots to the north on Doonan Road and Betty Street, up to Princess Road, particularly when the development is viewed from private outdoor areas. It will also have a massive impact visually on the streetscapes and views from Masons Gardens. 2.6 The Developer's proposal, with its nominated function, size and density, has not considered any technical issues and will have a negative impact to the amenity of the locality. 2.7 The building massing and scale is disproportionate to the surrounding urban vernacular. The mass and height are disrespectful to the scale and pitch lines from the adjoining properties with a consequential negative impact to the Betty Street and Doonan Road streetscapes. Its verticality will project as a dominant insertion on the residential neighbourhood. As a "for-profit" commercial operation it will damage the residential cohesion of the suburb of Nedlands. Clause 3.1 of the LPP states "..... design of residential aged care facilities are of a high quality and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking." The proposed development is therefore non-compliant with clause 3.1 of the LPP. 2.8 Building density provides a poor level of amenity for residents and patients with very limited access to outdoor spaces. The proposal lacks green areas for the residents. The LPP requires 25% of the site to be landscaped. The proposal is nowhere near this and hence it is non compliant with the flawed LPP. 2.9 The facility provides a poor work

environment for nursing staff. No nursing stations or staff lounges/breakout spaces are provided for staff. 2.10 Ramp/through access with a 4.5m high boundary wall on southern boundary will be highly visible from Doonan and Betty Streets and is aesthetically ugly along with inappropriately high unfriendly front boundary walls close to 2m near southern boundaries on Doonan and Betty Streets. 2.11 These front boundary walls are impacted further by the proposed 2.5m setbacks beyond the current street line sets backs of 9m making it impossible to see down the street. The resultant streetscape will be significantly altered with the proposed development jutting out 6.5m beyond the existing street line, neighbouring residents will have no line of sight when driving out of their properties, keeping in mind a pedestrian footpath runs down the east side of Doonan and west side of Betty making this impossible to ensure the safety of any family walking down the street to Masons Gardens, or car driving up the street. 2.12 The visual projection of the development on the north facing Masons Gardens vista will be overbearing and detrimental to the urban fabric of the Betty Street – Doonan Road hillscape and Mason Gardens Precinct. 2.13 The proposed development is not setting a target for environmental sustainability. The development is taking a just above minimum approach, proposing to exceed Part J of the National Construction Code by a stated 10%. This is an inadequate attempt to demonstrate environmental sustainability credentials. As a minimum a Green Star 6-star standard should be set, and consideration should be given to a Passive House rating. This facility will have a significant carbon footprint that represents a substantial increase over the carbon footprint of the existing three (3) residences. 2.14 The Developer has no stated approach to operation of the facility in the instance of a required lockdown nor a stated approach of how to protect vulnerable patients to cross infection from air borne viruses. This is an irresponsible approach to quality aged care services in a post COVID 19 environment where a duty of care exists to protect patients who are in a vulnerable position. The City of Nedlands would be in breach of its duty of care with the foreknowledge that this facility presents an unacceptable risk and has not considered a COVID safe design for high care aged care. 2.15 The development proposes a density of occupancy that maximises the built form on the available land area, leaving limited open space for residents/patients. The LPP, clause 4.6.2 requires 25% of the site area to be landscaped. This has not been provided. Furthermore, the Review of Innovative Models of Aged Care, Research Paper 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety recommended respite is provided in settings aligned to a person's background and offering structured activities. The report further recommends small scale domestic models of aged care where there is an emphasis on providing person centred care models. The proposed developments design and density is not aligned to the objectives of the Royal Commission. 2.16 At ninety (90) beds of non-ambulatory patients over four (4) occupied levels, safe evacuation has been poorly considered. Safe evacuation should necessitate a sprinkler protected building with a zoned smoke management system and designated safe zones. Brigade turn out points for fire truck parking and access to brigade booster points have not been considered in the design. Evacuation of 90 non-ambulatory residents is a risk. 2.17 Brigade access to non-sprinklered areas, such as the roof plant, with access only available along Betty Street and Doonan Road for aerial firefighting, has not been considered. 2.18 No consideration appears to have been given for acoustic treatment for roof located air conditioning plant and roof discharges. A facility such as this, running 24 hours a day and 365 a year, would have a massive acoustic impact on the neighbourhood. 2.19 Lifts in the building are to be used for vertical movement of food services, visitors, patients, maintenance personnel and removal of deceased patients. This is an unhygienic practice and demonstrates poor design practice in this facility. Good design practice would separate different traffic streams in a facility of this size and density, with the minimum provision of a dedicated service lift. 2.20 The car parking provisions are significantly underestimated. This will result in substantial on street parking to Betty St, Doonan Rd, Melvista Ave, Granby Cres and surrounding roads. The impact on this neighbourhood when considering shift changes will be enormous. There will be significant disruption, caused by vehicles accessing the facility in both Betty Street and Doonan Road which are part of the Transperth bus route. It is obvious that staff alone for a 90 bed hospital are going to require more parking than shown on the application, especially since Covid-19 has changed peoples attitude to use of public transport. There will also be a requirement for visiting medical staff, service people and visitors to park cars. 2.21 Grease trap for the kitchen will require truck access for pumping out the grease trap. This does not appear to have been considered in the design. 2.22 Inadequate on-site parking can result in off-site parking for nurses for night shifts. This can result in unsafe practices and security concerns for nursing staff accessing the facility at night having to park in unsecured/unmonitored locations. 2.23 No design provision is shown for kitchen, carpark ventilation and generator exhaust discharges. Discharges from the facility will adversely impact neighbours and have not been considered appropriately. Discharge stacks will also extend beyond the roof line creating further visual impact. 2.24 Truck vehicular access for food delivery, waste removal, medical gas bottle replenishment, diesel fuel delivery, maintenance personnel for mechanical, electrical, fire and communications plant will result in significant increase to truck

movements on Doonan Road and Betty Street. 2.25 Inadequate provision has been made for replacement of roof top air conditioning plant. Access for large plant can only be made via crane access from Betty Street or Doonan Road. 2.26 Light spill for night-time access to carparking and pedestrian entrances will result in light pollution to adjoining neighbours. 2.27 The renders and plans being promoted by the Developer do not correctly illustrate the upper levels and roof form which will be highly visible. These images and plans are misleading. In addition, the elevations do not show the upper level in bold, again misleading. 2.28 Subterranean courtyards on the eastern/western boundaries/northern edge - Doonan Road/Betty Street are unsightly and dark and out of character with the wide, large verges of the suburb. 2.29 The developer, Oryx, is inexperienced. It is noted that the Developer has operated only one aged care facility to date, the recently acquired hotel, The Richardson, West Perth which was refurbished to accommodate aged care. 3.0 Sale of Land Objections 3.1 Nedlands City Council sold 75 Doonan Road by private treaty to the developer before the land was designated 'special use' allowing aged care. The land should have been offered to the open market, particularly when it was widely known the owners of Melvista Lodge directly to the south were also interested in purchasing the land. 3.2 The land was sold as a Residential R10/R12.5 lot when the City knew its intent was always to redesignate the land. Why would the City sell land to a developer, prior to its redesignation. Why did they not designate it for aged care use first and by inference, sell the land at a much higher price? How have the City's ratepayers benefited from this sale? We note the developer paid \$2.6 million for the last residential piece of land required for this proposed development leaving the sale of the land by in question. 4.0 Technical Reports Objections 4.1 The acoustics technical report has not calculated the cumulative noise impact of ventilation systems with the air-cooled condensers. Significant ventilation systems will be required for the kitchen exhaust, evaporative kitchen make up, toilet exhausts, laundry exhausts and flues. To determine the full impact of the facility on adjoining residences, all noise sources should be defined and calculated on a cumulative basis. 4.2 The Sustainability Report does not consider any modelling of obnoxious discharges from kitchen, toilet and laundry exhausts and their impact on the surrounding properties. Dispersion modelling and CFD modelling should be undertaken to determine that there is no undue impact, as required by clause 3.1 of the LPP. 4.3 The Sustainability Report has not considered any heat island impact on the surrounding properties, as a result of rejecting circa 700 - 800 kW of heat from the facility, to determine that there is no undue impact as required by clause 3.1 of the LPP. 4.4 The Sustainability Report has not considered glare and reflectance to properties on the east in the morning and west in the evening to determine that there is no undue impact, as required by clause 3.1 of the LPP. 4.5 The Transport Impact Statement (TIS) has not calculated the total number of staff or visitor numbers in its car parking assessment for a facility of this nature. The TIS has relied on an allowance of 1 car bay per 4 beds. A high dependency aged care facility will have a significant staffing requirement that will exceed this requirement. It will also have significant visitor numbers. The TIS has made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment of car parking and traffic movements. 4.6 Developer's Traffic Report also provides very little detail on the type of vehicle movements, their frequency and times during the week. This detail is also needed to form proper considered assessment of traffic movements and noise levels, which detail

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**Respondent No:** 322

**Login:**

**Email:** j

**Responded At:** Jul 24, 2020 12:45:05 pm

**Last Seen:** Jul 24, 2020 04:39:21 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. To the extent the decision maker chooses to rely on significant and unadvertised provisions of the Policy, I further object as follows: 1 The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. 2 The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. 3 The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 4 Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. This is particularly relevant to the location I reside in Granby Crescent. It is very likely Granby Crescent and Granby Park will be subjected to cars parking when visiting the home. 5 The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and pedestrian safety. 6 Notwithstanding claims made by the developer, the community does not support this proposal and has not been properly consulted. I urge you not to support this proposal.

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**Respondent No:** 323

**Login:** [redacted]

**Email:** [redacted]

**Responded At:** Jul 24, 2020 12:51:46 pm

**Last Seen:** Jul 24, 2020 04:48:11 am

**IP Address:** [redacted]

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. This is very likely to impact me in Granby Cres as cars will be driving through this area and parking in front of my home or on Granby Park. I urge you not to support this proposal.

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**Respondent No:** 324

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 12:55:31 pm

**Last Seen:** Jul 25, 2020 04:34:56 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. To the extent the decision maker chooses to rely on significant and unadvertised provisions of the Policy, I further object as follows: 1 The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. 2 The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. 3 The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 4 Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. 5 The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and pedestrian safety. 6 Notwithstanding claims made by the developer, the community does not support this proposal and has not been properly consulted. I urge you not to support this proposal. 7 Policy objectives 7.1 One of the primary objectives of the Policy is – “to ensure the appearance and design of residential aged care facilities are of high quality and do not have an undue impact on the residential amenity by way of building bulk and scale, noise, traffic or parking”. The proposal fundamentally conflicts with this objective given the stark and jarring contrast between the surrounding R10 and R12.5 locality and the proposed four storey R80 development. The number of residents proposed to be accommodated will increase the residential capacity of the site by over 1000%. The consequential visual impacts, noise, traffic and parking that will flow from such an intensification will destroy the residential amenity of the locality. 8 Compatibility with setting (bulk, scale and height) 8.1 The Site is surrounded by low density residential development. The land immediately to its east and west is R10 and the land to its north is R12.5. The contrast between the existing density and the proposed R80 coding will be sharp, and the proposed plot ratio is wholly incompatible with the broader setting. 8.2 The bulk and scale of the proposal is imposing in its context. The proposal makes no attempt to mitigate the visual impact of its northern and southern walls, which are large and bland, on the adjacent neighbours and streetscape. 8.3 The depicted bulk and scale of the Melvista Lodge land (immediately to the South of the Site) in the development application plans is misleading. There are no such plans proposed or prepared, and the proposal is

inconsistent with its setting in that regard. Redevelopment of Melvista Lodge is not likely or imminent given the nature of the landholdings there. 8.4 The proposed street frontage setbacks of 2.5 metres undermine line of sight in the context of the surrounding residential developments which have 9 metre setbacks. This has safety implications for drivers and pedestrians using Doonan Road and Betty Street. The design has complete disregard for its setting. 9 Amenity 9.1 The proposal fails to take into account the existing and future character of the locality. The City has a new local planning scheme, and whilst higher density has been provided for elsewhere, this locality preserved its low density coding. There is a clear intention and understanding that the low density residential nature of the area will be maintained. A high rise intensive aged care development completely undermines that intention. 9.2 The proposal will significantly diminish visual amenity of the area due to its size, scale and design. It is not in keeping with the character or streetscape in the locality. 9.3 The proposal represents a significant intensification in how the site will look and operate. It increases the number of people living on the site by over 1000%. The level of staffing and services required to accommodate 90 high needs aged care residents must not be understated. The cumulative impact of 90 residents, combined with the servicing and operational requirements of the facility and movement of staff, visitors and deliveries, will result in a substantial increase in:

9.3.1 noise from traffic movements, at all hours of the day, to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users; 9.3.2 noise generated from the operations of the proposal, including air-conditioning, services, and an intensive increase of population and people movement; 9.3.3 light spill from 24 hour a day operations; and 9.3.4 odours generated from the operations of the proposal, including catering, laundry and servicing. 9.4 No management plans have been provided to show how the detrimental amenity impacts which will arise from such an intensified use will be mitigated, particularly given its hours of operation. No development condition will be validly capable of managing those impacts. 10 Traffic 10.1 The proposal will result in a significant increase in vehicle movements to and from the site, at all hours of the day. 10.2 The Traffic Impact Statement made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment traffic movements. 10.3 The Transport Impact Statement provides very little detail on the type of vehicle movements and the frequency and timings of those movements. This detail is essential to form a properly considered assessment of traffic movements and their impacts, and the document therefore cannot be relied upon. 11 Car Parking 11.1 The amount of administrative, catering, cleaning, medical, allied health and maintenance staff required to support an intensive 90-bed high care facility will not be supported by 26 bays, particularly given no parking allowances have been made for deliveries, visitors of residents, or the Wellness Centre staff and visitors. 11.2 The surrounding streets are not capable of supporting the street car parking which will necessarily arise due to the lack of sufficient on-site car parking. 12 Community consultation 12.1 The developer relies on consultation it conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different from what is proposed. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed. 12.2 Immediately affected residents have either never been contacted or have only recently been informed about the extent of the proposal. 13 Other 13.1 Clause 4.6.2 of the Policy states – “a minimum of twenty-five per cent (25%) of the site area is to be landscaped”. The proposed development does not comply with this requirement of the Policy. 13.2 The proposal will have a significant carbon footprint, and only just exceeds the minimum standards for environmental sustainability under the National Construction Code. 13.3 The proposal fails to take into account the recommendations of the Review of Innovative Models of Aged Care Research Paper, 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety in terms of its design and density.

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**Respondent No:** 325

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 12:59:28 pm

**Last Seen:** Jul 25, 2020 04:33:52 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 326

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 13:07:02 pm

**Last Seen:** Jul 24, 2020 04:57:26 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: The proposal will dramatically increase the amount and congestion of traffic on Vincent Street, I am particularly concerned about the impact of this at the Princess Rd intersection. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 327

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 13:13:55 pm

**Last Seen:** Jul 24, 2020 04:52:39 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

Below is a list of technical reasons for objection. In summary this is an industrial scale development in a suburban / residential area where it doesn't fit either aesthetically or practically. It is an appropriate area for a suitably sized aged care facility (maybe one third of the proposed number of rooms) which would limit impact on noise, traffic, and streetscape. I/We strongly object to the development application for a Residential Aged Care Facility located at 73-75 Doonan Road and 16-18 Betty Street, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of this local, low density residential area. SAMPLE SUBMISSION POINTS 1.0 Planning Objections 1.1 The manner in which Council adopted the Residential Aged Care Facilities Local Planning Policy ('LPP') on 26 April 2020 is highly inappropriate, without publicly advertising major amendments made to the density, height and plot ratio. 1.2 A residential density coding of R80 as imposed by the LPP is not acceptable or justified at the subject site. It is completely out of context with a transition from the neighbouring R12.5 and R10 zoned properties. 1.3 A Local Planning Policy imposing density is not appropriate. Density should be imposed via a scheme amendment to LPS3. 1.4 The proposed development is commercial in nature, operating 24/7 and is not suited to a residential area. 1.5 The proposed development is not compatible with the existing amenity surrounding / abutting development due to the height, scale and bulk of the development. The proposed development therefore does not comply with Clause 3.1 of the LPP which states "...and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking". 1.6 In accordance with the zoning table of LPS 3, 'Residential Aged Care Facility' is allocated an 'A' use within the 'Residential' zone, meaning the use is not permitted unless the local government has exercised its discretion by granting development approval. This is an unusual application of additional use provisions given a 'Residential Aged Care Facility' is already a contemplated use within the 'Residential' zone. 1.7 Due to the removal of the proposed special use provisions in LPS 3, no development standards are applicable to the subject site except for the car parking requirements as outlined in LPS 3. A scheme amendment should be initiated to guide appropriate density. 1.8 Given the increased building height and plot ratio associated with this modification will facilitate increased bulk and scale for any development proposed, we are of the view the modifications to the draft LPP are not minor and are in fact, significant in nature particularly in relation to the locality of surrounding residential area. 1.9 Council has not followed the appropriate process in the adoption of LPP. On this basis we question the validity of the adopted LPP. 1.10 There is absolutely no justification for the application of a R80 density coding, given the significantly lower R10/R12.5 density coding of the surrounding locality. 1.11 The effect of the local planning policy is that it imposes a higher density coding without the initiation of a scheme amendment to LPS3. 1.12 The purpose of the LPP is to provide guidance and development

requirements for residential aged care facilities within the City, however instead it has imposed an R-coding as a mechanism to deal with scale, bulk and built form. This is not appropriate as the imposition of an R80 R-coding immediately adjacent to properties subject to an R12.5 density coding will result in significant conflict with respect to scale, bulk and streetscape impacts. 1.13 Pursuant to Schedule 2, Part 9, Clause 67(m) of the Regulations, the proposed development is not compatible with the surrounding residential neighbourhood and particularly the adjoining land zoned R12.5. 1.14 In April 2016, the community was consulted on the proposed refurbishment of Melvista Lodge and the development of a 2-storey aged care on adjacent lots at 73-75 Doonan Road and 16-18 Betty Street. What is now proposed is completely different with a 4 storey plus basement and roof (height approx. 17 metres), 90 bed high care, aged care facility on residential zoned lots and no longer includes the refurbishment of the Melvista Lodge. The community consultation on the new proposal from the developer and City of Nedlands has been mostly non-existent. Clause 5.1 of the LPP states "Consultation with affected landowners will be undertaken in accordance with the City's Local Planning Policy- Consultation of Planning Proposals". The consultation by the Developer with the Community, undertaken on a previous scheme, therefore breaches the LPP – Consultation of Planning Proposals. 1.15 The proposed development at R80, with a plot ratio of 1.0 will significantly impact the adjoining land and surrounding low density residential neighbourhood. 1.16 Clause 4.6.2 of the LPP states "A minimum of twenty-five per cent (25%) of the site area is to be landscaped". The proposed development does not comply with this requirement of the LPP. 1.17 The set back of the boundary on 71 Doonan Road is non compliant with the LPP Clause 4.5.2 which requires a 7.5m set back and permanent screening to 75% obscure. The proposed plan has a 6.4m setback and NO screening. 1.18 The purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City. The LPP makes no delineation between differing models of care (e.g. independent living units, low care, high care). The planning guidelines set out in the LPP, as drafted, applies the same planning conditions irrespective of the model of care. Different models of care have differing levels of servicing. This has not been considered in the application of the LPP. This has resulted in a High Care facility with an inappropriate density being located in a precinct unsuited to the facility function. The LPP should be redrafted to reflect the specific function and nature of aged care models of care, with appropriate planning of such facilities contextually. 1.1 There was no development control plan applied to this land at the time of its rezoning. This in effect meant anything could have been built. The rushed endorsement of an R80 equivalent zoning without community consultation has denied the community the opportunity to comment on the appropriateness of this density in a residential zone. 2.0 Design Objections 2.1 The built form is a highly inappropriate in terms of scale and size to adjoining properties with box scale of building of approx. 70m overall length x 32m overall width and overall height of approx 17m 2.2 The development includes large, bland featureless walls measuring 35 metres in length (running east/west), a scale that would typically be found in a mixed use or town/activity centre environment. 2.3 The proposed development, should it be constructed as proposed, would result in detrimental impacts to the amenity and character of the low-density residential neighbourhood. 2.4 The four-storey development with a proposed plot ratio of 1.0 would result in a scale of development which is not compatible with the amenity of the locality and is not suitable within a low-density residential neighbourhood. 2.5 The proposed development will significantly impact the visual amenity of all residential lots to the north on Doonan Road and Betty Street, up to Princess Road, particularly when the development is viewed from private outdoor areas. 2.6 The Developer's proposal, with its nominated function, size and density, has not considered any technical issues and will have a material negative impact to the amenity of the locality. 2.7 Building massing and scale is disproportionate to the surrounding urban vernacular. The mass and height are disrespectful to the scale and pitch lines from the adjoining properties with a consequential negative impact to the Betty Street and Doonan Road streetscapes. Its verticality will project as a dominant insertion on the residential neighbourhood. As a "for-profit" commercial operation it will damage the residential cohesion of the suburb of Nedlands. Clause 3.1 of the LPP states "..... design of residential aged care facilities are of a high quality and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking." The proposed development is therefore non-compliant with clause 3.1 of the LPP. 2.8 Building density provides a poor level of amenity for residents and patients with very limited access to outdoor spaces. Lack of green areas for the residents. The LPP requires 25% of the site to be landscaped. The proposal is nowhere near this and hence it is non compliant with the flawed LPP. 2.9 The facility provides a poor work environment for nursing staff. No nursing stations or staff lounges/breakout spaces are provided for staff. 2.10 Ramp/through access with a 4.5m high boundary wall on southern boundary will be highly visible from Doonan and Betty Streets and is aesthetically ugly along with inappropriately high unfriendly front boundary walls close to 2m near southern boundaries on Doonan and Betty Streets. 2.11 These front

boundary walls are impacted further by the proposed 2.5m setbacks beyond the current street line sets backs of 9m making it impossible to see down the street. This will result in the streetscape significantly altered with the proposed development jutting out 6.5m beyond the existing street line, Residents reversing out of their driveway will have no line of sight, keeping in mind a pedestrian footpath runs down the east side of Doonan and west side of Betty making this impossible to ensure the safety of any family walking down the street to Masons Gardens, or car driving up the street. 2.12 The visual projection of the development on the north facing Masons Gardens vista will be overbearing and detrimental to the urban fabric of the Betty Street – Doonan Road hillscape and Mason Gardens Precinct. 2.13 The proposed development is not setting a target for environmental sustainability. The development is taking a just above minimum approach, proposing to exceed Part J of the National Construction Code by a stated 10%. This is an inadequate attempt to demonstrate environmental sustainability credentials. As a minimum a Green Star 6-star standard should be set, and consideration should be given to a Passive House rating. This facility will have a significant carbon footprint that will represent a substantial increase over the carbon footprint of the existing three (3) residences. 2.14 The Developer has no stated approach to operation of the facility in the instance of a required lockdown nor a stated approach of how to protect vulnerable patients to cross infection from air borne viruses. This is an irresponsible approach to quality aged care services in a post COVID 19 environment where a duty of care exists to protect patients who are in a vulnerable position. The City of Nedlands would be in breach of your duty of care now with the foreknowledge that this facility presents an unacceptable risk and has not considered a COVID safe design. 2.15 The proposed development proposes a density of occupancy that maximises the built form on the available land area, leaving limited open space for residents/patients. The LPP, clause 4.6.2 requires 25% of the site area to be landscaped. This has not been provided. Furthermore, the Review of Innovative Models of Aged Care, Research Paper 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety recommended respite is provided in settings aligned to a person's background and offering structured activities. The report further recommends small scale domestic models of aged care where there is an emphasis on providing person centred care models. The proposed developments design and density is not aligned to the objectives of the Royal Commission. 2.16 At ninety (90) beds of non-ambulatory patients over four (4) occupied levels, safe evacuation has been poorly considered. Safe evacuation should necessitate a sprinkler protected building with a zoned smoke management system and designated safe zones. Brigade turn out points for fire truck parking and access to brigade booster points have not been considered in the design. Evacuation of 90 non-ambulatory residents is a risk. 2.17 Brigade access to non-sprinklered areas, such as the roof plantroom, with access only available along Betty Street and Doonan Road for aerial firefighting, has not been considered. 2.18 No consideration appears to have been given for acoustic treatment for roof located air conditioning plant and roof discharges. 2.19 Lifts in the building are to be used for vertical movement of food services, visitors, patients, maintenance personnel and removal of deceased patients. This is an unhygienic practice and demonstrates poor design practice in this facility. Good design practice would separate different traffic streams in a facility of this size and density, with the minimum provision of a dedicated goods lift. 2.20 The car parking provisions are significantly underestimated. This will result in substantial on street parking to Betty St, Doonan Rd, Melvista Ave, Granby Cres and surrounding roads. Staffing numbers for the Wellness Centre (3 treatment bays + hair salon – circa 4 staff), full commercial kitchen for up 540 food services per day (circa 4-5 staff), facilities manager (1 staff), full laundry (circa 2 staff), on site admin (circa 7 staff), on-site coffee shop (1 staff), cleaning staff (circa 3-4), orderlies and support staff (circa 2), plus nursing and staff for 90 patients (minimum 15 staff) significantly exceeds carparking allowances. Shift changeover of nursing staff, visitors and maintenance staff further results in carparking being significantly undersized and inadequate for a facility of this size and density. 2.21 Grease trap for the kitchen will require truck access for pumping out the grease trap. This does not appear to have been considered in the design. 2.22 Inadequate on-site parking can result in off-site parking for nurses for night shifts. This can result in unsafe practices and security concerns for nursing staff accessing the facility at night having to park in unsecured/unmonitored locations. 2.23 No design provision is shown for kitchen exhaust discharges, carpark ventilation discharges, generator exhaust discharge. Discharges from the facility will adversely impact neighbours and have not been considered appropriately. Discharge stacks will also extend beyond the roof line creating further visual impact. 2.24 Truck vehicular access for food delivery, waste removal, medical gas bottle replenishment, diesel fuel delivery, maintenance personnel for mechanical, electrical, fire and communications plant will result in significant increase to truck movements on Doonan Road and Betty Street. 2.25 Inadequate provision has been made for replacement of roof top air conditioning plant. Access for large plant can only be made via crane access from Betty Street or Doonan Road. 2.26 Light spill for night-time access to carparking and pedestrian entrances will result in light pollution to adjoining neighbours. 2.27 The renders and plans being promoted by the Developer do not correctly illustrate the upper

levels and roof form which will be highly visible. These images and plans are misleading. In addition, the elevations do not show the upper level in bold, again misleading.

2.28 Subterranean courtyards on the eastern/western boundaries/northern edge - Doonan Road/Betty Street are unsightly/dark and out of character with the wide, large verges of the suburb.

2.29 The developer, Oryx, is inexperienced. It is noted that the Developer has operated only one aged care facility to date, the recently acquired hotel, The Richardson in West Perth. Following acquisition that was subsequently refurbished to accommodate aged care.

2.30 Only 5 of the direct neighbours were afforded a one on one meeting with the Developer's consultants on the week of 22 June 2020. This was the first time the neighbours had been approached regarding this proposal. The Developer was not present at the resident meetings with representation being made by their Stakeholder Engagement Consultant, Creating Communities, and Town Planning Consultant, Planning Solutions.

3.0 Sale of Land

3.1 75 Doonan Road was sold by private treaty to the developer before the land was designated 'special use' allowing aged care. The land should have been offered to the open market, particularly when it was widely known the owners of Melvista Lodge directly to the south were also interested in purchasing the land.

3.2 The land was sold as a Residential R10/R12.5 lot when the City knew its intent was always to redesignate the land. Why would the City sell land to a developer, prior to its redesignation. Why did they not designate it for aged care use first and by inference, sell the land at a much higher price? How have the City's ratepayers benefited from this sale? We note the developer paid \$2.6 million for the last residential piece of land required for this proposed development leaving the sale of the land by The City in question.

4.0 Technical Reports

4.1 The acoustics technical report has not calculated the cumulative noise impact of ventilation systems with the air-cooled condensers. Significant ventilation systems will be required for the kitchen exhaust, evaporative kitchen make up, toilet exhausts, laundry exhausts and flues. To determine the full impact of the facility on adjoining residences, all noise sources should be defined and calculated on a cumulative basis.

4.2 The Sustainability Report does not consider any modelling of obnoxious discharges from kitchen, toilet and laundry exhausts and their impact on the surrounding properties. Dispersion modelling and CFD modelling should be undertaken to determine that there is no undue impact, as required by clause 3.1 of the LPP.

4.3 The Sustainability Report has not considered any heat island impact on the surrounding properties as a result of rejecting circa 700 - 800 kW of heat from the facility to determine that there is no undue impact, as required by clause 3.1 of the LPP.

4.4 The Sustainability Report has not considered glare and reflectance to properties on the east in the morning and west in the evening to determine that there is no undue impact, as required by clause 3.1 of the LPP.

4.5 The Transport Impact Statement (TIS) has not calculated the total number of staff or visitor numbers in its car parking assessment for a facility of this nature. The TIS has relied on an allowance of 1 car bay per 4 beds. A high dependency aged care facility will have a significant staffing requirement that will exceed this requirement. It will also have significant visitor numbers. The TIS has made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment of carparking and traffic movements.

4.6 Developer's Traffic Report also provides very little detail on the type of vehicle movements and their frequency and times during the week. This detail is also needed to form proper considered assessment of traffic movements and noise levels, which detail is also wholly lacking in the Developer's Transport Impact Statement and Acoustic Report.

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**Respondent No:** 328

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 13:29:24 pm

**Last Seen:** Jul 24, 2020 05:26:58 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Occupier of a property
<input type="checkbox"/>	Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated.

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**Respondent No:** 329

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 13:37:05 pm

**Last Seen:** Jul 24, 2020 05:30:05 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

As a old resident of Melvista Ave I find the scale, bulk of the proposed project unbelievable. Traffic will be hugely impacted in a quiet residential area. The people that live behind it on Betty and Doonan street with be hugely impacted on their property values, outlooks & privacy. Do something more in keeping with area in scale that does not adversely effect people living in those roads.

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**Respondent No:** 330

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 13:39:42 pm

**Last Seen:** Jul 24, 2020 05:41:43 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated.

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**Respondent No:** 331

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 13:43:27 pm

**Last Seen:** Jul 23, 2020 03:29:46 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated.

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**Respondent No:** 332

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 13:47:49 pm

**Last Seen:** Jul 24, 2020 05:44:34 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

As a long-term resident of Doonan Road I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. To the extent the decision maker chooses to rely on significant and unadvertised provisions of the Policy, I further object as follows: 1 The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. 2 The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. 3 The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 4 Traffic management and car parking have been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. 5 The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and pedestrian safety. 6 Notwithstanding any claims made by the developer, the community does not support this proposal and has not been properly consulted. To expand further on some of these objections: • With regard to planning policy - In my opinion, the proposal fails to take into account the existing and future character of the locality. The City has a new local planning scheme, and whilst higher density has been provided for elsewhere, this locality preserved its low density coding. There is a clear intention and understanding that the low density residential nature of the area will be maintained. A high rise intensive aged care development completely undermines that intention. The City has repeatedly claimed that it had no alternative but to accept the recent planning scheme changes and this has led to a headlong rush to high-density redevelopment in the broad corridor along Stirling Highway. Against this background it seems inconceivable that the City should have voluntarily amended the zoning of this low density residential site to accommodate the proposed development. A development such as this would be more appropriately sited in the recently-rezoned Stirling Highway corridor or in the existing Hollywood/QE2 hospital precinct. • With regard to amenity - The proposal will significantly diminish visual amenity of the area due to its size, scale and design. It is not in keeping with the character or streetscape in the locality and it will greatly increase the number of people living and working on the site. The level of staffing and services required to accommodate 90 high-needs aged care residents must not be understated. The cumulative impact will be a substantial

increase in: • noise from traffic movements, at all hours of the day, to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users; • noise generated from the operations of the proposal, including air-conditioning, services, and an intensive increase of population and people movement; • light spill from 24 hour a day operations; and • odours generated from the operations of the proposal, including catering, laundry and servicing. No management plans have been provided to show how the detrimental amenity impacts which will arise from such an intensified use will be mitigated, particularly given its hours of operation. No development condition will be validly capable of managing those impacts. • With regard to traffic - as a long-term resident of Doonan Road I can assert with some authority that Doonan Road is barely able to cope with 'normal' traffic during construction activity on single dwellings, as is currently occurring between Princess Road and Jenkins Avenue. The traffic impact at the southern end of Doonan Road and Betty Street during the construction phase for the proposed development will be enormous, especially since this area forms part of the Transperth number 25 bus route, and long-lasting. This will be a precursor to the ongoing significant increase in vehicle movements to and from the site, at all hours of the day, during its normal operations. The Traffic Impact Statement made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment traffic movements. The Transport Impact Statement provides very little detail on the type of vehicle movements and the frequency and timings of those movements. This detail is essential to form a properly considered assessment of traffic movements and their impacts, and the document therefore cannot be relied upon. • With regard to car parking - The 26 bays of onsite parking appear woefully inadequate, particularly given no allowance has been made for parking for deliveries, visitors of residents, or the Wellness Centre staff and visitors. Also, there does not appear to be any allowance for ambulance parking in the planned proposal. The surrounding streets are not capable of supporting the street car parking which will necessarily arise due to the lack of sufficient on-site car parking. Doonan Road and Betty Street are narrow residential streets which can, at best, accommodate parked vehicles on one side only. Both streets and the connecting portion of Melvista Avenue also form part of the Transperth number 25 bus route and will need to be sufficiently free of parked vehicles to allow bus access. The parking capacity on Melvista Avenue is already minimal due to the existing bus stop. • With regard to community consultation - The developer relies on consultation conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different from what is proposed. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed. Immediately affected residents have either never been contacted or have only recently been informed about the extent of the proposal. I urge you not to support this proposal.

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**Respondent No:** 333

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 14:10:33 pm

**Last Seen:** Jul 24, 2020 06:02:55 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

Unsuitable for the location proposed and very unfair for the surrounding houses what other commercial will follow if this allowed to go ahead

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**Respondent No:** 334

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 14:10:35 pm

**Last Seen:** Jul 25, 2020 02:46:35 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

---

Q5. **State how your interests are affected (select all relevant boxes)**  Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I live at Nedlands, with my family. The planned building is right across the road from us. I'm only 11, but I've been to many meetings with my parents and my neighbours and I understand some of the problems. My brother and I have talked about it too. I think the building will be much too big compared to the houses around it. There are many big trees that will be lost, which is bad for the environment and all the birds in our area. The new trees will take a long time to grow. The people at Melvista Lodge have solar panels and they won't work as well if a big building blocks the sun. There will be a lot more traffic and more cars parked on the street, and lots more people we don't know in the area, so it won't be as safe for me to walk to the park and to school, or to ride my bike. The building will look really big from the park, as well as from our home, particularly when we're upstairs. There will be more noise from the traffic and the building, which will be annoying. I think there should be a new plan to make sure older people have somewhere to live, but make it a bit smaller and more like a home and the houses in the street.

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**Respondent No:** 335

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 14:18:39 pm

**Last Seen:** Jul 25, 2020 02:45:27 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

My Mama and brother helped me write this. I'm 9 and I live at      Nedlands, with my family. The planned building is right across the road from us. I've had to go to many meetings with my parents and my neighbours and I understand some of the problems. My brother and I have talked about it too. I think the building will be much too big compared to the houses around it. There are many big trees that will be cut down, which is bad for the environment and all the birds in our area. The new trees will take a long time to grow. The people at Melvista Lodge have solar panels and they won't work as well if a big building blocks the sun. There will be a lot more traffic and more cars parked on the street, and lots more people we don't know in the area, so it won't be as safe for me to walk to the park and to school, or to ride my bike. The building will look really big from the park, as well as from our home, particularly when we're upstairs. There will be more noise from the traffic and the building, which will be annoying. I think there should be a new plan to make sure older people have somewhere to live, but make it a bit smaller and more like a home and the houses in our street. I don't think they should be allowed to build such a big building in our street.

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**Respondent No:** 336

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 14:53:20 pm

**Last Seen:** Jul 24, 2020 06:49:27 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

We strongly object to the development application for a Residential Aged Care Facility located at 73-75 Doonan Road and 16-18 Betty Street, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of this local, low density residential area. SUBMISSION POINTS 1.0 Planning Objections 1.1 A residential density coding of R80 as imposed by the LPP is not acceptable or justified at the subject site. It is completely out of context with a transition from the neighbouring R12.5 and R10 zoned properties. 1.2 A Local Planning Policy imposing density is not appropriate. Density should be imposed via a scheme amendment to LPS3. 1.3 The proposed development is commercial in nature, operating 24/7 and is not suited to a residential area. 1.4 The proposed development is not compatible with the existing amenity surrounding / abutting development due to the height, scale and bulk of the development. The proposed development therefore does not comply with Clause 3.1 of the LPP which states "...and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking". 1.5 There is absolutely no justification for the application of a R80 density coding, given the significantly lower R10/R12.5 density coding of the surrounding locality. 1.6 Pursuant to Schedule 2, Part 9, Clause 67(m) of the Regulations, the proposed development is not compatible with the surrounding residential neighbourhood and particularly the adjoining land zoned R12.5. 1.7 The proposed development at R80, with a plot ratio of 1.0 will significantly impact the adjoining land and surrounding low density residential neighbourhood. 1.8 Clause 4.6.2 of the LPP states "A minimum of twenty-five per cent (25%) of the site area is to be landscaped". The proposed development does not comply with this requirement of the LPP. 1.9 The set back of the boundary on 71 Doonan Road is non compliant with the LPP Clause 4.5.2 which requires a 7.5m set back and permanent screening to 75% obscure. The proposed plan has a 6.4m setback and NO screening. 1.1 There was no development control plan applied to this land at the time of its rezoning. This in effect meant anything could have been built. The rushed endorsement of an R80 equivalent zoning without community consultation has denied the community the opportunity to comment on the appropriateness of this density in a residential zone. 2.0 Design Objections 2.1 The built form is a highly inappropriate in terms of scale and size to adjoining properties with box scale of building of approx. 70m overall length x 32m overall width and overall height of approximately 17m 2.2 The development includes large, bland featureless walls measuring 35 metres in length (running east/west), a scale that would typically be found in a mixed use or town/activity centre environment. 2.3 The proposed development, should it be constructed as proposed, would result in detrimental impacts to the amenity and character of the low-density residential neighbourhood. 2.4 The four-storey development with a proposed plot ratio of 1.0 would result in a scale of development which is not compatible with the amenity of the locality and is not suitable within a low-density residential neighbourhood. 2.5 The proposed development will significantly impact the visual amenity of all residential lots to the north on Doonan Road and Betty Street,

up to Princess Road, particularly when the development is viewed from private outdoor areas. 2.6 The Developer's proposal, with its nominated function, size and density, has not considered any technical issues and will have a material negative impact to the amenity of the locality. 2.7 Building massing and scale is disproportionate to the surrounding urban vernacular. The mass and height are disrespectful to the scale and pitch lines from the adjoining properties with a consequential negative impact to the Betty Street and Doonan Road streetscapes. Its verticality will project as a dominant insertion on the residential neighbourhood. As a "for-profit" commercial operation it will damage the residential cohesion of the suburb of Nedlands. Clause 3.1 of the LPP states "..... design of residential aged care facilities are of a high quality and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking." The proposed development is therefore non-compliant with clause 3.1 of the LPP. 2.8 Building density provides a poor level of amenity for residents and patients with very limited access to outdoor spaces. Lack of green areas for the residents. The LPP requires 25% of the site to be landscaped. The proposal is nowhere near this and hence it is non-compliant with the flawed LPP. 2.9 The facility provides a poor work environment for nursing staff. No nursing stations or staff lounges/breakout spaces are provided for staff. 2.10 Ramp/through access with a 4.5m high boundary wall on southern boundary will be highly visible from Doonan and Betty Streets and is aesthetically ugly along with inappropriately high unfriendly front boundary walls close to 2m near southern boundaries on Doonan and Betty Streets. 2.11 The visual projection of the development on the north facing Masons Gardens vista will be overbearing and detrimental to the urban fabric of the Betty Street – Doonan Road hillscape and Mason Gardens Precinct. 2.12 The Developer has no stated approach to operation of the facility in the instance of a required lockdown nor a stated approach of how to protect vulnerable patients to cross infection from air borne viruses. This is an irresponsible approach to quality aged care services in a post COVID 19 environment where a duty of care exists to protect patients who are in a vulnerable position. The City of Nedlands would be in breach of your duty of care now with the foreknowledge that this facility presents an unacceptable risk and has not considered a COVID safe design. 2.13 No consideration appears to have been given for acoustic treatment for roof located air conditioning plant and roof discharges. 2.14 The car parking provisions are significantly underestimated. This will result in substantial on street parking to Betty St, Doonan Rd, Melvista Ave, Granby Cres and surrounding roads. Staffing numbers for the Wellness Centre (3 treatment bays + hair salon – circa 4 staff), full commercial kitchen for up 540 food services per day (circa 4-5 staff), facilities manager (1 staff), full laundry (circa 2 staff), on site admin (circa 7 staff), on-site coffee shop (1 staff), cleaning staff (circa 3-4), orderlies and support staff (circa 2), plus nursing and staff for 90 patients (minimum 15 staff) significantly exceeds car-parking allowances. Shift changeover of nursing staff, visitors and maintenance staff further results in car-parking being significantly undersized and inadequate for a facility of this size and density. 2.15 No design provision is shown for kitchen exhaust discharges, carpark ventilation discharges, generator exhaust discharge. Discharges from the facility will adversely impact neighbours and have not been considered appropriately. Discharge stacks will also extend beyond the roof line creating further visual impact. 2.16 Truck vehicular access for food delivery, waste removal, medical gas bottle replenishment, diesel fuel delivery, maintenance personnel for mechanical, electrical, fire and communications plant will result in significant increase to truck movements on Doonan Road and Betty Street. 3.0 Sale of Land Objections 3.1 75 Doonan Road was sold by private treaty to the developer before the land was designated 'special use' allowing aged care. The land should have been offered to the open market, particularly when it was widely known the owners of Melvista Lodge directly to the south were also interested in purchasing the land. 3.2 The land was sold as a Residential R10/R12.5 lot when the City knew its intent was always to re-designate the land. Why would the City sell land to a developer, prior to its re-designation. Why did they not designate it for aged care use first and by inference, sell the land at a much higher price? How have the City's ratepayers benefited from this sale? We note the developer paid \$2.6 million for the last residential piece of land required for this proposed development leaving the sale of the land bThe Sustainability Report has not considered glare and reflectance to properties on the east in the morning and west in the evening to determine that there is no undue impact, as required by clause 3.1 of the LPP. 3.3 The Transport Impact Statement (TIS) has not calculated the total number of staff or visitor numbers in its car parking assessment for a facility of this nature. The TIS has relied on an allowance of 1 car bay per 4 beds. A high dependency aged care facility will have a significant staffing requirement that will exceed this requirement. It will also have significant visitor numbers. The TIS has made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment of car-parking and traffic movements. 3.4 Developer's Traffic Report also provides very little detail on the type of vehicle movements and their frequency and times during the week. This detail is also needed to form proper



considered assessment of traffic movements and noise levels, which detail is also wholly lacking in the Developer's Transport Impact Statement and Acoustic Report.

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**Respondent No:** 337

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 15:26:38 pm

**Last Seen:** Jul 24, 2020 07:22:43 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Not appropriate for residential area development is proposed

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**Respondent No:** 338

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 15:33:39 pm

**Last Seen:** Jul 23, 2020 03:28:28 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. I am particularly concerned that Council planning staff would appear to be acting for the benefit of the developers of this proposal rather than Nedlands rate payers who employ them! The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 339

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 15:37:32 pm

**Last Seen:** Jul 24, 2020 07:24:02 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property
Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:** I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

As a long-term resident of Doonan Road I am writing to OBJECT to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. To the extent the decision maker chooses to rely on significant and unadvertised provisions of the Policy, I further object as follows: 1 The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. 2 The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. 3 The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 4 Traffic management and car parking have been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. 5 The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and pedestrian safety. 6 Notwithstanding any claims made by the developer, the community does not support this proposal and has not been properly consulted. To expand further on some of these objections: • With regard to planning policy - In my opinion, the proposal fails to take into account the existing and future character of the locality. The City has a new local planning scheme, and whilst higher density has been provided for elsewhere, this locality preserved its low density coding. There is a clear intention and understanding that the low density residential nature of the area will be maintained. A high rise intensive aged care development completely undermines that intention. The City has repeatedly claimed that it had no alternative but to accept the recent planning scheme changes and this has led to a headlong rush to high-density redevelopment in the broad corridor along Stirling Highway. Against this background it seems inconceivable that the City should have voluntarily amended the zoning of this low density residential site to accommodate the proposed development. A development such as this would be more appropriately sited in the recently-rezoned Stirling Highway corridor or in the existing Hollywood/QE2 hospital precinct. • With regard to amenity - The proposal will significantly diminish visual amenity of the area due to its size, scale and design. It is not in keeping with the character or streetscape in the locality and it will greatly increase the number of people living and working on the site. The level of staffing and services required to

accommodate 90 high-needs aged care residents must not be understated. The cumulative impact will be a substantial increase in: • noise from traffic movements, at all hours of the day, to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users; • noise generated from the operations of the proposal, including air-conditioning, services, and an intensive increase of population and people movement; • light spill from 24 hour a day operations; and • odours generated from the operations of the proposal, including catering, laundry and servicing. No management plans have been provided to show how the detrimental amenity impacts which will arise from such an intensified use will be mitigated, particularly given its hours of operation. No development condition will be validly capable of managing those impacts.

• With regard to traffic - as a long-term resident of Doonan Road I can assert with some authority that Doonan Road is barely able to cope with 'normal' traffic during construction activity on single dwellings, as is currently occurring between Princess Road and Jenkins Avenue. The traffic impact at the southern end of Doonan Road and Betty Street during the construction phase for the proposed development will be enormous, especially since this area forms part of the Transperth number 25 bus route, and long-lasting. This will be a precursor to the ongoing significant increase in vehicle movements to and from the site, at all hours of the day, during its normal operations. The Traffic Impact Statement made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment traffic movements. The Transport Impact Statement provides very little detail on the type of vehicle movements and the frequency and timings of those movements. This detail is essential to form a properly considered assessment of traffic movements and their impacts, and the document therefore cannot be relied upon.

• With regard to car parking - The 26 bays of onsite parking appear woefully inadequate, particularly given no allowance has been made for parking for deliveries, visitors of residents, or the Wellness Centre staff and visitors. Also, there does not appear to be any allowance for ambulance parking in the planned proposal. The surrounding streets are not capable of supporting the street car parking which will necessarily arise due to the lack of sufficient on-site car parking. Doonan Road and Betty Street are narrow residential streets which can, at best, accommodate parked vehicles on one side only. Both streets and the connecting portion of Melvista Avenue also form part of the Transperth number 25 bus route and will need to be sufficiently free of parked vehicles to allow bus access. The parking capacity on Melvista Avenue is already minimal due to the existing bus stop.

• With regard to community consultation - The developer relies on consultation conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different from what is proposed. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed. Immediately affected residents have either never been contacted or have only recently been informed about the extent of the proposal. I urge you not to support this proposal.

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**Respondent No:** 340

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 15:40:56 pm

**Last Seen:** Jul 24, 2020 07:34:13 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I wholeheartedly endorse the objection to the development application for a Residential Aged Care Facility located at 73-75 Doonan Road and 16-18 Betty Street, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of this local, low density residential area. I therefore agree with all the following objections: 1.0 Planning Objections 1.1 The manner in which Council adopted the Residential Aged Care Facilities Local Planning Policy ('LPP') on 26 April 2020 is highly inappropriate, without publicly advertising major amendments made to the density, height and plot ratio. 1.2 A residential density coding of R80 as imposed by the LPP is not acceptable or justified at the subject site. It is completely out of context with a transition from the neighbouring R12.5 and R10 zoned properties. 1.3 A Local Planning Policy imposing density is not appropriate. Density should be imposed via a scheme amendment to LPS3. 1.4 The proposed development is commercial in nature, operating 24/7 and is not suited to a residential area. 1.5 The proposed development is not compatible with the existing amenity surrounding / abutting development due to the height, scale and bulk of the development. The proposed development therefore does not comply with Clause 3.1 of the LPP which states "...and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking". 1.6 In accordance with the zoning table of LPS 3, 'Residential Aged Care Facility' is allocated an 'A' use within the 'Residential' zone, meaning the use is not permitted unless the local government has exercised its discretion by granting development approval. This is an unusual application of additional use provisions given a 'Residential Aged Care Facility' is already a contemplated use within the 'Residential' zone. 1.7 Due to the removal of the proposed special use provisions in LPS 3, no development standards are applicable to the subject site except for the car parking requirements as outlined in LPS 3. A scheme amendment should be initiated to guide appropriate density. 1.8 Given the increased building height and plot ratio associated with this modification will facilitate increased bulk and scale for any development proposed, we are of the view the modifications to the draft LPP are not minor and are in fact, significant in nature particularly in relation to the locality of surrounding residential area. 1.9 Council has not followed the appropriate process in the adoption of LPP. On this basis we question the validity of the adopted LPP. 1.10 There is absolutely no justification for the application of a R80 density coding, given the significantly lower R10/R12.5 density coding of the surrounding locality. 1.11 The effect of the local planning policy is that it imposes a higher density coding without the initiation of a scheme amendment to LPS3. 1.12 The purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City, however instead it has imposed an R-coding as a mechanism to deal with scale, bulk and built form. This is not appropriate as the imposition of an R80 R-coding immediately adjacent to properties subject to an R12.5 density coding will result in significant conflict with respect to scale, bulk and streetscape impacts. 1.13 Pursuant to Schedule 2, Part 9, Clause 67(m) of the Regulations, the proposed

development is not compatible with the surrounding residential neighbourhood and particularly the adjoining land zoned R12.5. 1.14 In April 2016, the community was consulted on the proposed refurbishment of Melvista Lodge and the development of a 2-storey aged care on adjacent lots at 73-75 Doonan Road and 16-18 Betty Street. What is now proposed is completely different with a 4 storey plus basement and roof (height approx. 17 metres), 90 bed high care, aged care facility on residential zoned lots and no longer includes the refurbishment of the Melvista Lodge. The community consultation on the new proposal from the developer and City of Nedlands has been mostly non-existent. Clause 5.1 of the LPP states "Consultation with affected landowners will be undertaken in accordance with the City's Local Planning Policy- Consultation of Planning Proposals". The consultation by the Developer with the Community, undertaken on a previous scheme, therefore breaches the LPP – Consultation of Planning Proposals. 1.15 The proposed development at R80, with a plot ratio of 1.0 will significantly impact the adjoining land and surrounding low density residential neighbourhood. 1.16 Clause 4.6.2 of the LPP states "A minimum of twenty-five per cent (25%) of the site area is to be landscaped". The proposed development does not comply with this requirement of the LPP. 1.17 The set back of the boundary on 71 Doonan Road is non compliant with the LPP Clause 4.5.2 which requires a 7.5m set back and permanent screening to 75% obscure. The proposed plan has a 6.4m setback and NO screening. 1.18 The purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City. The LPP makes no delineation between differing models of care (e.g. independent living units, low care, high care). The planning guidelines set out in the LPP, as drafted, applies the same planning conditions irrespective of the model of care. Different models of care have differing levels of servicing. This has not been considered in the application of the LPP. This has resulted in a High Care facility with an inappropriate density being located in a precinct unsuited to the facility function. The LPP should be redrafted to reflect the specific function and nature of aged care models of care, with appropriate planning of such facilities contextually. 1.1 9 There was no development control plan applied to this land at the time of its rezoning. This in effect meant anything could have been built. The rushed endorsement of an R80 equivalent zoning without community consultation has denied the community the opportunity to comment on the appropriateness of this density in a residential zone. 2.0 Design Objections 2.1 The built form is a highly inappropriate in terms of scale and size to adjoining properties with box scale of building of approx. 70m overall length x 32m overall width and overall height of approx 17m 2.2 The development includes large, bland featureless walls measuring 35 metres in length (running east/west), a scale that would typically be found in a mixed use or town/activity centre environment. 2.3 The proposed development, should it be constructed as proposed, would result in detrimental impacts to the amenity and character of the low-density residential neighbourhood. 2.4 The four-storey development with a proposed plot ratio of 1.0 would result in a scale of development which is not compatible with the amenity of the locality and is not suitable within a low-density residential neighbourhood. 2.5 The proposed development will significantly impact the visual amenity of all residential lots to the north on Doonan Road and Betty Street, up to Princess Road, particularly when the development is viewed from private outdoor areas. 2.6 The Developer's proposal, with its nominated function, size and density, has not considered any technical issues and will have a material negative impact to the amenity of the locality. 2.7 Building massing and scale is disproportionate to the surrounding urban vernacular. The mass and height are disrespectful to the scale and pitch lines from the adjoining properties with a consequential negative impact to the Betty Street and Doonan Road streetscapes. Its verticality will project as a dominant insertion on the residential neighbourhood. As a "for-profit" commercial operation it will damage the residential cohesion of the suburb of Nedlands. Clause 3.1 of the LPP states "..... design of residential aged care facilities are of a high quality and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking." The proposed development is therefore non-compliant with clause 3.1 of the LPP. 2.8 Building density provides a poor level of amenity for residents and patients with very limited access to outdoor spaces. Lack of green areas for the residents. The LPP requires 25% of the site to be landscaped. The proposal is nowhere near this and hence it is non compliant with the flawed LPP. 2.9 The facility provides a poor work environment for nursing staff. No nursing stations or staff lounges/breakout spaces are provided for staff. 2.10 Ramp/through access with a 4.5m high boundary wall on southern boundary will be highly visible from Doonan and Betty Streets and is aesthetically ugly along with inappropriately high unfriendly front boundary walls close to 2m near southern boundaries on Doonan and Betty Streets. 2.11 These front boundary walls are impacted further by the proposed 2.5m setbacks beyond the current street line sets backs of 9m making it impossible to see down the street. This will result in the streetscape significantly altered with the proposed development jutting out 6.5m beyond the existing street line, Residents reversing out of their driveway will have no line of sight, keeping in mind a pedestrian footpath runs down the east side of Doonan and west side of Betty making this

impossible to ensure the safety of any family walking down the street to Masons Gardens, or car driving up the street. 2.12 The visual projection of the development on the north facing Masons Gardens vista will be overbearing and detrimental to the urban fabric of the Betty Street – Doonan Road hillscape and Mason Gardens Precinct. 2.13 The proposed development is not setting a target for environmental sustainability. The development is taking a just above minimum approach, proposing to exceed Part J of the National Construction Code by a stated 10%. This is an inadequate attempt to demonstrate environmental sustainability credentials. As a minimum a Green Star 6-star standard should be set, and consideration should be given to a Passive House rating. This facility will have a significant carbon footprint that will represent a substantial increase over the carbon footprint of the existing three (3) residences. 2.14 The Developer has no stated approach to operation of the facility in the instance of a required lockdown nor a stated approach of how to protect vulnerable patients to cross infection from air borne viruses. This is an irresponsible approach to quality aged care services in a post COVID 19 environment where a duty of care exists to protect patients who are in a vulnerable position. The City of Nedlands would be in breach of your duty of care now with the foreknowledge that this facility presents an unacceptable risk and has not considered a COVID safe design. 2.15 The proposed development proposes a density of occupancy that maximises the built form on the available land area, leaving limited open space for residents/patients. The LPP, clause 4.6.2 requires 25% of the site area to be landscaped. This has not been provided. Furthermore, the Review of Innovative Models of Aged Care, Research Paper 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety recommended respite is provided in settings aligned to a person's background and offering structured activities. The report further recommends small scale domestic models of aged care where there is an emphasis on providing person centred care models. The proposed developments design and density is not aligned to the objectives of the Royal Commission. 2.16 At ninety (90) beds of non-ambulatory patients over four (4) occupied levels, safe evacuation has been poorly considered. Safe evacuation should necessitate a sprinkler protected building with a zoned smoke management system and designated safe zones. Brigade turn out points for fire truck parking and access to brigade booster points have not been considered in the design. Evacuation of 90 non-ambulatory residents is a risk. 2.17 Brigade access to non-sprinklered areas, such as the roof plantroom, with access only available along Betty Street and Doonan Road for aerial firefighting, has not been considered. 2.18 No consideration appears to have been given for acoustic treatment for roof located air conditioning plant and roof discharges. 2.19 Lifts in the building are to be used for vertical movement of food services, visitors, patients, maintenance personnel and removal of deceased patients. This is an unhygienic practice and demonstrates poor design practice in this facility. Good design practice would separate different traffic streams in a facility of this size and density, with the minimum provision of a dedicated goods lift. 2.20 The car parking provisions are significantly underestimated. This will result in substantial on street parking to Betty St, Doonan Rd, Melvista Ave, Granby Cres and surrounding roads. Staffing numbers for the Wellness Centre (3 treatment bays + hair salon – circa 4 staff), full commercial kitchen for up 540 food services per day (circa 4-5 staff), facilities manager (1 staff), full laundry (circa 2 staff), on site admin (circa 7 staff), on-site coffee shop (1 staff), cleaning staff (circa 3-4), orderlies and support staff (circa 2), plus nursing and staff for 90 patients (minimum 15 staff) significantly exceeds carparking allowances. Shift changeover of nursing staff, visitors and maintenance staff further results in carparking being significantly undersized and inadequate for a facility of this size and density. 2.21 Grease trap for the kitchen will require truck access for pumping out the grease trap. This does not appear to have been considered in the design. 2.22 Inadequate on-site parking can result in off-site parking for nurses for night shifts. This can result in unsafe practices and security concerns for nursing staff accessing the facility at night having to park in unsecured/unmonitored locations. 2.23 No design provision is shown for kitchen exhaust discharges, carpark ventilation discharges, generator exhaust discharge. Discharges from the facility will adversely impact neighbours and have not been considered appropriately. Discharge stacks will also extend beyond the roof line creating further visual impact. 2.24 Truck vehicular access for food delivery, waste removal, medical gas bottle replenishment, diesel fuel delivery, maintenance personnel for mechanical, electrical, fire and communications plant will result in significant increase to truck movements on Doonan Road and Betty Street. 2.25 Inadequate provision has been made for replacement of roof top air conditioning plant. Access for large plant can only be made via crane access from Betty Street or Doonan Road. 2.26 Light spill for night-time access to carparking and pedestrian entrances will result in light pollution to adjoining neighbours. 2.27 The renders and plans being promoted by the Developer do not correctly illustrate the upper levels and roof form which will be highly visible. These images and plans are misleading. In addition, the elevations do not show the upper level in bold, again misleading. 2.28 Subterranean courtyards on the eastern/western boundaries/northern edge - Doonan Road/Betty Street are unsightly/dark and out of character with the wide, large verges of the suburb. 2.29 The developer, Oryx, is inexperienced. It is noted that the Developer has operated only one aged care facility to date, the



recently acquired hotel, The Richardson in West Perth. Following acquisition that was subsequently refurbished to accommodate aged care. 2.30 Only 5 of the direct neighbours were afforded a one on one meeting with the Developer's consultants on the week of 22 June 2020. This was the first time the neighbours had been approached regarding this proposal. The Developer was not present at the resident meetings with representation being made by their Stakeholder Engagement Consultant, Creating Communities, and Town Planning Consultant, Planning Solutions. 3.0 Sale of Land Objections 3.1 75 Doonan Road was sold by private treaty to the developer before the land was designated 'special use' allowing aged care. The land should have been offered to the open market, particularly when it was widely known the owners of Melvista Lodge directly to the south were also interested in purchasing the land. 3.2 The land was sold as a Residential R10/R12.5 lot when the City knew its intent was always to redesignate the land. Why would the City sell land to a developer, prior to its redesignation. Why did they not designate it for aged care use first and by inference, sell the land at a much higher price? How have the City's ratepayers benefited from this sale? We note the developer paid \$2.6 million for the last residential piece of land required for this proposed development leaving the sale of the land by The City in question. 4.0 Technical Reports Objections 4.1 The acoustics technical report has not calculated the cumulative noise impact of ventilation systems with the air-cooled condensers. Significant ventilation systems will be required for the kitchen exhaust, evaporative kitchen make up, toilet exhausts, laundry exhausts and flues. To determine the full impact of the facility on adjoining residences, all noise sources should be defined and calculated on a cumulative basis. 4.2 The Sustainability Report does not consider any modelling of obnoxious discharges from kitchen, toilet and laundry exhausts and their impact on the surrounding properties. Dispersion modelling and CFD modelling should be undertaken to determine that there is no undue impact, as required by clause 3.1 of the LPP. 4.3 The Sustainability Report has not considered any heat island impact on the surrounding properties as a result of rejecting circa 700 - 800 kW of heat from the facility to determine that there is no undue impact, as required by clause 3.1 of the LPP. 4.4 The Sustainability Report has not considered glare and reflectance to properties on the east in the morning and west in the evening to determine that there is no undue impact, as required by clause 3.1 of the LPP. 4.5 The Transport Impact Statement (TIS) has not calculated the total number of staff or visitor numbers in its car parking assessment for a facility of this nature. The TIS has relied on an allowance of 1 car bay per 4 beds. A high dependency aged care facility will have a significant staffing requirement that will exceed this requirement. It will also have significant visitor numbers. The TIS has made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment of carparking and traffic movements. 4.6 Developer's Traffic Report also provides very little detail on the type of vehicle movements and their frequency and times during the week. This detail is also needed to form proper considered assessment of traffic movements and noise levels, which detail is also wholly lacking in the Developer's Transport Impact Statement and Acoustic Report.

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**Respondent No:** 341

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 15:42:04 pm

**Last Seen:** Jul 24, 2020 07:39:32 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am write to strongly object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I strongly object because the proposal relies on provisions of the current Local Planning Policy: Residential Aged Care Facilities, which was not advertised to the public and as a result the LPP is not valid at law and so the proposal should not be considered having regard to the LPP. The changes made to the draft LPP increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. I further object as follows: 1 The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. 2 The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. 3 The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 4 Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. 5 The facility proposes third party mixed use, physio, beauty parlour, 'wellness centre' and other facilities. It is not appropriate for these services to be made available to people outside the residence of the aged care facility given the location of the proposed development is in a quiet residential street and it is not in a commercial centre or 'high zone' locality. No consideration has been given on the impact of such services to the surrounding area and its amenity. 6 The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and pedestrian safety. 7 Notwithstanding claims made by the developer, the community does not support this proposal and has not been properly consulted. Policy objectives 8 One of the primary objectives of the Policy is – "to ensure the appearance and design of residential aged care facilities are of high quality and do not have an undue impact on the residential amenity by way of building bulk and scale, noise, traffic or parking". 9 The proposal fundamentally conflicts with this objective given the stark and jarring contrast between the surrounding R10 and R12.5 locality and the proposed four storey R80 development. The number of residents proposed to be accommodated will increase the residential capacity of the site by over 1000%. The consequential visual impacts, noise, traffic and parking that will flow from such an intensification will destroy the residential amenity of the locality. Compatibility with setting (bulk, scale and height) 10 The built form is completely inappropriate in scale and size to adjoining properties and the general character of the suburb - 70m o/a length x 32m o/a width, 5 levels in height from the southern boundary – overall height is in excess of 17m above natural ground level on southern boundary. 11 Front setback of 2.5m to balconies compared with 9m to

adjoining properties. This will result in building significantly 'sticking out' from existing streetscape line of the street. 12 The Site is surrounded by low density residential development. The land immediately to its east and west is R10 and the land to its north is R12.5. The contrast between the existing density and the proposed R80 coding will be sharp, and the proposed plot ratio is wholly incompatible with the broader setting. 13 The bulk and scale of the proposal is imposing in its context. The proposal makes no attempt to mitigate the visual impact of its northern and southern walls, which are large and bland, on the adjacent neighbours and streetscape. 14 The depicted bulk and scale of the Melvista Lodge land (immediately to the South of the Site) in the development application plans is misleading. There are no such plans proposed or prepared, and the proposal is inconsistent with its setting in that regard. Redevelopment of Melvista Lodge is not likely or imminent given the nature of the landholdings there. 15 The proposed street frontage setbacks of 2.5 metres undermine line of sight in the context of the surrounding residential developments which have 9 metre setbacks. This has safety implications for drivers and pedestrians using Doonan Road and Betty Street. The design has complete disregard for its setting. Amenity 16 The proposal fails to take into account the existing and future character of the locality. The City has a new local planning scheme, and whilst higher density has been provided for elsewhere, this locality preserved its low density coding. There is a clear intention and understanding that the low density residential nature of the area will be maintained. A high rise intensive aged care development completely undermines that intention. 17 The proposal will significantly diminish visual amenity of the area due to its size, scale and design. It is not in keeping with the character or streetscape in the locality. 18 The 'Institutional' response to the façade treatment is not appropriate and does not reflect the residential grain of the suburb- flat façades with minimal articulation, continuous balconies, and repetitive window/opening locations. 19 The proposal represents a significant intensification in how the site will look and operate. It increases the number of people living on the site by over 1000%. The level of staffing and services required to accommodate 90 high needs aged care residents must not be understated. The cumulative impact of 90 residents, combined with the servicing and operational requirements of the facility and movement of staff, visitors and deliveries, will result in a substantial increase in: 20 noise from traffic movements, at all hours of the day, to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users; 21 noise generated from the operations of the proposal, including air-conditioning, services, and an intensive increase of population and people movement; 22 light spill from 24 hour a day operations; and 23 odours generated from the operations of the proposal, including catering, laundry and servicing. 24 No management plans have been provided to show how the detrimental amenity impacts which will arise from such an intensified use will be mitigated, particularly given its hours of operation. No development condition will be validly capable of managing those impacts. 25 High unfriendly front boundary walls (2m near southern boundaries on Doonan and Betty Streets) 26 Ramp/through access is unsightly with 4.5m high boundary wall on southern boundary will be highly visible from Doonan and Betty Streets. 27 Subterranean courtyards on the eastern/western boundaries/northern edge are inappropriate for the locality and also residential aged used and are unsightly/dark and out of character with the wide, large verges of the suburb. 28 The imagery does not correctly illustrate the upper levels and roof form. Greyed out. This is misleading and not accurate and as a result, public consultation has not been conducted properly and will not yield full objections. 29 The elevations do not show upper level in bold. This is misleading. Traffic 30 The proposal will result in a significant increase in vehicle movements to and from the site, at all hours of the day. 31 The Traffic Impact Statement made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment traffic movements. 32 The Transport Impact Statement provides very little detail on the type of vehicle movements and the frequency and timings of those movements. This detail is essential to form a properly considered assessment of traffic movements and their impacts, and the document therefore cannot be relied upon. Car Parking 33 The amount of administrative, catering, cleaning, medical, allied health and maintenance staff required to support an intensive 90-bed high care facility will not be supported by 26 bays, particularly given no parking allowances have been made for deliveries, visitors of residents, or the Wellness Centre staff and visitors. 34 The surrounding streets are not capable of supporting the street car parking which will necessarily arise due to the lack of sufficient on-site car parking. 35 There is no details on where visitor parking is located. Community consultation 36 The developer relies on consultation it conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different from what is proposed. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed. 37 Immediately affected residents have either never been contacted or have only recently been informed about the extent of the proposal. Other 38 Clause 4.6.2 of the Policy states – "a minimum of twenty-five per cent (25%) of the site area is to be landscaped".

The proposed development does not comply with this requirement of the Policy. 39 The proposal will have a significant carbon footprint, and only just exceeds the minimum standards for environmental sustainability under the National Construction Code. 40 The proposal fails to take into account the recommendations of the Review of Innovative Models of Aged Care Research Paper, 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety in terms of its design and density. 41 Main sewer located behind proposed basement wall (northern boundary) – future access has not been considered including piling requirements etc. 42 Fire Booster Connection located on front eastern boundary is unsightly. No consideration has been given to emergency fire brigade parking and access and firefighting into the building. 43 The Aged Care facility contains a subterranean dementia ward with high windows looking out at blank wall, which is grossly inadequate for care of this type. 44 Proper consideration has not been given to the noise emission from the building and the effect of this noise on surrounding residents. Broad assumptions are made in the technical report which are not supported, including no regard to the actual plant and equipment that will be installed in the roof space and other noise emissions including kitchen venting, vehicle and truck movements.

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**Respondent No:** 342

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 16:18:55 pm

**Last Seen:** Jul 24, 2020 08:13:19 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**  Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). I have the following concerns relating to the proposal: 1 The impact on amenity. 2 The increase in noise, traffic and potentially, odour. 3 The lack of on-site car parking. 4 The intensive height, bulk and scale as compared to the low density residential surround. 5 The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing developments and the proposed. 6 The lack of management plans or mitigation strategies. 7 The lack of proper community consultation. I know I may have not been "looking out" for it - but I only received any information at all about this proposal after the initial feedback deadline, and then only through concerned neighbours. This lower level of consultation, and the need to submit a submission by the new deadline without time for detailed consideration, has certainly framed my opinion more conservatively than it otherwise might have been. Thanks in advance for your consideration of this submission.

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**Respondent No:** 343

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 17:44:59 pm

**Last Seen:** Jul 24, 2020 08:41:41 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property

Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**

I object to the proposal

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**Q8. Submission : Please give your comments relating to this item in full below.**

The height and bulk of the project is incompatible with the location particularly as the setbacks are so small, thus resulting in insufficient room to include landscaping that would help to reduce the visual impact. The building is just too big for the site. It needs to be a maximum of 3 storeys above ground, not 4 and have the same setbacks as the houses nearby. There are nowhere near enough carbays for - staff, visiting professionals including the residents' GPs, people who provide activities and entertainment for residents (eg music groups, speakers, therapy animals etc), the residents' family members and friends who visit them. These people will have to park in neighbouring streets and walk to the complex - not an easy thing to do if visitors are elderly themselves or have mobility issues. Visiting GPs will expect a dedicated carbay for them otherwise they may drop their patients when they move into the complex (many GPs choose not to care for patients in aged care facilities. The few who are prepared to do this work will expect a carbay so their visits can be easily managed. Family members often stay with their loved ones for hours particularly if they are very sick or dying. Some family members like to visit for a few hours every day and help with feeding, encouraging their loved one to join in the activities etc. This is encouraged by the staff. Where will these visitors be able to park for a long period? The complex needs to have a second basement level carpark ie 2 basement level carparks are needed in order to provide sufficient parking. Importantly there is no Drop off/Pick up zone for the residents - who get a lift or want to catch a taxi to attend an appointment, go shopping, visit family, go to church etc. Where are they supposed to wait for their lift? And how will they be able to easily access the vehicle ? If it's raining or very hot, how far are they expected to go in order to get to the vehicle? Where will the vehicle stop to enable them to easily access the vehicle? Often they will be in a wheelchair or using a walker or walking stick. Some will have cognitive issues. As the street parking near the two entrances at ground level is likely to be full at all times these vehicles may have to double park in the street and hold up traffic. Or they could stop in the lane in the basement carpark and hold up anyone trying to use the carpark? The alternative of the car being parked some distance away and up/down a hill wouldn't work for such frail people particularly in hot or wet weather. An undercover drop off/pick up zone at ground level close to one of the entrance doors to the building is needed. I note there doesn't seem to be room or facilities for residents to wait in the basement carpark for their lift. It wouldn't be safe for residents with limited mobility, limited vision or cognitive issues to wait down there anyway. Where will residents have pick up/drop off for small buses for resident outings? Or the community bus? There is no area for ambulances to wait while a patient is transferred into or out of the complex. They will probably have to park in the middle of the street or again, hover in the carpark and block traffic down there. In terms of residents' health and happiness, it is essential that they are able to safely and easily leave the premises by vehicles and equally essential that their visitors can use their vehicles to easily visit their loved ones. The present design doesn't seem to have given any consideration to this or the fact that both the residents and many of their visitors will be elderly, frail, have mobility issues, have vision problems etc. This will be a miserable place for the residents to live particularly as there are in effect not even any garden areas they can wander about it/be pushed in their wheelchairs. The 2019 Aged care Quality Standards talk about fostering social inclusion and well being. They also talk about residents being able to live the life they choose and maintain their identity; live as independently as possible and enjoy life. I don't think this development adequately complies with those criteria. I also object to this project being called the Melvista when it doesn't have a Melvista Avenue boundary and there is scope for confusion with the neighbouring facility Melvista Lodge.

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**Respondent No:** 344

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 17:53:24 pm

**Last Seen:** Jul 24, 2020 09:39:08 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

It is such a large development for 4 blocks which I would have thought should be residential only ... the parking will be horrendous for everyone nearby , the traffic in such a small residential part of Nedlands will be terrible and the side effects will go onto all the residents in Princess Road and nearby streets .. there must be better sites for a 90 bed hospital .. it should be in the precinct near Hollywood .. it will affect everyone in the area ... it really is madness that it is even being considered by the council and that it has got to this stage ...

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**Respondent No:** 345

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 19:13:11 pm

**Last Seen:** Jul 24, 2020 09:14:45 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property

Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**

I object to the proposal

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**Q8. Submission : Please give your comments relating to this item in full below.**

The following comments are made on behalf of my husband of 62 Goldsmith Road Dalkeith and myself. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for a four story development in a low density residential area. We are extremely concerned that the changes to the policy which allowed for a significant increase in development capability were not advertised to the public. We do not believe the Policy should be taken into consideration for this reason alone. However if it is, then the provisions changed without public notice should not apply. We also strongly object to the proposal for the following reasons: 1. The proposal severely diminishes the visual amenity of the locality and has not been designed in any respect to reflect its setting (a quiet residential - not commercial area) nor to mitigate the visual pollution it will necessarily impose on many residents in surrounding residential streets (including on our property on the corner of Goldsmith and Hackett Roads in Dalkeith) and all users of Masons Gardens by the destruction of large and medium sized existing trees on the side of a hill rising steeply from Melvista Ave and Masons Gardens. The height, bulk and scale of the proposal is totally inconsistent and incompatible with the locality. 2. Due to its intensive nature , the proposal will be unacceptably detrimental to the amenity of the locality and its residents particularly in relation to the significant increase in noise, traffic, light at night and odour which will be created by the proposed building and its usage. 3.The roads around the proposal are all very narrow and it is impossible for cars to simultaneously use the two lanes available if there is a car parked on one of those lanes. Already it is a slow and laborious process for residents to drive up Betty or Doonan Street to reach one of the major roads, Princess Road, running through the suburb. Car parking and traffic have been inadequately considered and inadequately accommodated in the proposal. The likely reasonable needs of the the development and those visiting it, working in it and supplying it with goods on a daily basis have been completely understated. It is obviously foreseeable that because the parking needs have been inadequately estimated and vastly inadequately provided for by the developers of the proposed building, that the surrounding narrow residential streets will be used by large numbers of staff, and visitors day and night with attendant increases in noise as well as inconvenience to residents and those residents' invitees. Of particular concern is the likelihood that Masons Gardens -already a very well used community facility by many diverse groups including young families who regularly use the children's playground will become ringed by parked cars and much related traffic. The relatively few number of parking bays opposite the Children's Early Childhood Education Centre on the corner of Melvista Avenue and Hackett Road will become completely inadequate when parents try to drop their children off at the Centre and collect their children from the Centre and compete with staff and visitors at the proposed development for limited parking spaces. The potential danger to the safety of children of so much traffic and parking activity ringing a relatively small park with a children's playground and adjacent to a Children's Early Education Centre should not be underestimated and must be very seriously considered NOW! 4.The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in respect of its objectives and landscaping requirements. It provides institutionalised aged care, no gardens, no courtyards, 23 sqm wards, dementia locked ward subterranean. A commercial hospital operating 90 wards 24 hours per day 7 days per week with its attendant noise, lights, air conditioning units, staffing levels, deliveries of food, preparation of meals, laundry facilities, and necessary evacuation and other emergency facilities has no place in a peaceful quiet residential area.

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**Respondent No:** 346 **Login:**

**Email:**

**Responded At:** Jul 24, 2020 20:20:12 pm

**Last Seen:** Jul 24, 2020 12:08:55 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

The open day at Mason's Gardens on 30 April 2016 showed plans for a two-storey development, the current proposal far exceeds that. I therefore feel that there was misleading community consultation I also feel that a four story development is inappropriate for a residential setting. It will look out of place and will also substantially disturb the peaceful and quiet neighborhood setting.

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**Respondent No:** 347

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 20:41:09 pm

**Last Seen:** Jul 25, 2020 06:55:16 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Although I am in principle in favour of an increase in aged care facilities in the City of Nedlands I have the following concerns relating to the proposal: 1. The deleterious impact on amenity for surrounding residents caused by the proposed massive multi storey structure which is not in keeping with the scale and form of the area. As a Masons Garden user and former Nedlands resident of 28 years the massive structure would upset any plans for future visitations. 2. The increase in noise, traffic and odour of this quiet residential and parkland neighbourhood. Have traffic management plans been prepared? 3. The lack of on-site car parking. The development plans indicate just 26 cars bays in total. Where are visitors going to park? On the street? This impact relates to dot points 1 and 2. 4. The intensive height, bulk and scale as compared to the low density residential surround. The original 2016 Hassell development proposal of two storeys is more in accord with the scale of surrounding existing private residential dwellings. 5. The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing developments and the proposed. 6. The lack of management plans, eg traffic management plans, or mitigation strategies. 7. The lack of proper community consultation. This relates to the recent new proposed multi storey 90 bed facility which is not in accord with the earlier consultative process in the 2016 joint Oryx Lisle Villages document.

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**Respondent No:** 348

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 20:52:00 pm

**Last Seen:** Jul 24, 2020 12:48:40 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 349

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 20:54:19 pm

**Last Seen:** Jul 24, 2020 12:45:43 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

---

Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. The original Oryx proposal was for 29 beds and 2 storey. Now 3 times more and residents have been lied to. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality and looks like an English Assylum! People will be parked there to die without sunlight or taken outside. It is inhumane. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated and misrepresented. this is just highly profitable business at the expense of the local residents. 24 hour care will have 3 shifts of staff.... Massive amounts of deliveries, noisy air conditioners 24/7, parking, vehicle movement, waste management and it will impact on the use of Council park owned by the City and its ratepayers. Nursing homes need to have their own outdoor areas and give dignity to occupiers. There are many examples in Perth that work - mainly 1 -2 levels

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**Respondent No:** 350

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 20:59:29 pm

**Last Seen:** Jul 24, 2020 12:49:11 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of this local, low density residential area.

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**Respondent No:** 351

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 21:17:26 pm

**Last Seen:** Jul 24, 2020 12:57:45 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Occupier of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:** I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. 6 The proposal involves low levels of green space and envisages the removal of 9 mature trees on the subject site. The tree on the Doonan Rd verge is significant for the bird life it attracts and would be a major loss. The developer should be required to keep this tree, and to plant new, native, large tree species to replace the other trees. I urge you not to support this proposal.

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**Respondent No:** 352

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 21:17:38 pm

**Last Seen:** Jul 24, 2020 13:01:45 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated.

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**Respondent No:** 353

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 21:32:27 pm

**Last Seen:** Jul 24, 2020 13:26:33 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**  Occupier of a property

---

Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. My objection is made on the following grounds: 1 The proposal is inconsistent with the Residential Aged Care Facilities Local Planning Policy because of the undue impact it will have on the residential amenity of the area. 2 The height, bulk and scale of a four-storey development proposal is incompatible with the locality and surrounding developments. 3 The proposal will result in unacceptable increases in noise, traffic, odours, car parking congestion and light pollution. 4 The proposal fails to adequately manage or mitigate the impacts it will have on the existing and future residential amenity. 5 The design of the proposal is imposing and unsympathetic to the existing character of the area. Not only does that have aesthetic implications, the contrast in setbacks affects sight lines, and therefore vehicle and pedestrian safety. 6 The car parking and traffic assessments do not adequately take into account the realistic vehicle movements the proposal will generate. 7 As a child I will feel less safe walking to the park owing to the additional traffic and busyness of the area. Please reject this application.

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**Respondent No:** 354

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 21:33:06 pm

**Last Seen:** Jul 24, 2020 13:04:26 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I have made a proforma submission as per comment below. Notwithstanding this, I consider this the development proposal by Oryx for an Aged Care in Betty St and Doonan Rd completely inappropriate for this residential area. I certainly wouldn't want it next to me. I have no trouble understanding the objections of nearby (and not so nearby) residents. This is a massive intrusion on their lives which they simply don't deserve. It all very well constantly quoting planning law and other regulations. We are talking about peoples chosen lifestyles here that will be severely impacted. Related to this is financial damage that many will suffer. I am also very concerned about the circumstances surrounding the sale of the Lot in Doonan Road. I am not happy about the circumstances in which it was sold to an aged care provider who could reasonably be assumed to be assembling a site for aged care. I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 355

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 22:18:46 pm

**Last Seen:** Jul 24, 2020 14:16:31 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The 3 proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. To the extent the decision maker chooses to rely on significant and unadvertised provisions of the Policy, I further object as follows: 1 The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. 5 The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. 6 The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 7 Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. 8 The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and pedestrian safety. 9 Notwithstanding claims made by the developer, the community does not support this proposal and has not been properly consulted. I urge you not to support this proposal.

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**Respondent No:** 356

**Login:**

**Email:**

**Responded At:** Jul 24, 2020 22:24:59 pm

**Last Seen:** Jul 24, 2020 14:01:36 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**  Occupier of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to firmly object to the proposed Residential Aged Care Facility at Lots 10&11 Betty Street and Lots 19&18 Doonan Rd, Nedlands. I am firstly concerned because of the bulk scale of the (commercial) development which is absolutely incompatible with the surrounding locality and low-density residential housing. Secondly, the manner in which this group of housing blocks have been acquired and rezoned without any public consultation is of grave concern and suggest foul play; which should be investigated. In keeping with the first point raised above, however, my objection is based on the following grounds: 1. The scale of the proposed design is absolutely incompatible with the locality and surrounding low-density housing 2. The design of the proposed development is completely incongruent with the existing streetscape and style. Height limits and building setbacks are completely uneven and will not only be visually unaesthetic, but pose safety implications to pedestrian traffic. 3. The proposal will result in unacceptable increases in noise, vehicle traffic, pedestrian traffic, noise, pollution and potentially increase security issues with such a high volume of public access. 4. The proposal lacks any consideration / completely ignores the operational impact (points listed above) 5. There has been an extreme lack of PROPER community consultation on the proposal (and the requisite rezoning process) 6. The community seems to have been misled to believe that the proposed plans were in fact to re-vamp the existing Melvista Lodge; but in actual fact have absolutely nothing to do with the current aged care facility. 7. The severe impact such a development will have on residential amenity. It is really disappointing to see that such a proposal has progressed to the stage it has, and that the council has allowed potentially underhand dealings to take place. I urge you to put a stop to this proposal immediately.

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**Respondent No:** 357 **Login:**

**Email:**

**Responded At:** Jul 24, 2020 22:56:18 pm

**Last Seen:** Jul 24, 2020 13:55:47 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**  Occupier of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am absolutely opposed to this facility around the corner in Doonan Rd. This is not the place for a high care 90 bed RACF with a wellness centre. How would you like to be the neighbours to this. It is wrong to have this next to residential homes in a narrow street. The community is outraged and I don't blame them. The fact that an LPP allowed this doesn't seem fair and this LPP should be revoked. The LPP should start again and go through the appropriate channels and be fashioned so that that residential age care in narrow streets next to single residential houses can't be built. I oppose the front setback and I would not want this built next to me. I hope the RAR recommends refusal. I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

---



**Respondent No:** 358

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 04:50:53 am

**Last Seen:** Jul 24, 2020 18:12:26 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75 Doonan Road, Nedlands). This proposed development is a material change to the existing facility and its current capacity. It will have a significant impact on parking, traffic and noise in the area and is completely out of character with the locality. In turn, this will have a detrimental impact to the amenity of local residents. Parking - the proposal does not seem to allow for sufficient parking to support staff and visitors for 90 beds. This will result in additional overflow to surrounding streets and Mason Gardens, which already seems under pressure catering for the existing facilities. Traffic and noise - the proposed development will create a considerable amount of congestion in the surrounding streets, namely Betty Street which is extremely narrow. This will compromise both vehicle and pedestrian safety. Further, this will increase the noise levels in the area. Locality - most aged care buildings in the area are low level and no more than 10 metres in height. The current proposal is an intensive height, taking up almost the entire 4 blocks. The scale of the building is disproportionate and completely out of character with the low-density residential surroundings.

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**Respondent No:** 359

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 08:24:33 am

**Last Seen:** Jul 25, 2020 00:22:19 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**  Owner of a property

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Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I object to this proposal as it is inconsistent with the current and future character of the area. The current proposal is significantly different from those previously consulted on and as such that consultation can not be used to justify this development. The excessive traffic is too much for this area

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**Respondent No:** 360

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 08:34:02 am

**Last Seen:** Jul 25, 2020 00:26:52 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

Dear Nedlands Council I wish to register my strong objection to Oryx's proposed development on Lots 10 & 11 (16-18) Betty Street and Lots 18 & 19 (73-75) Doonan Road, Nedlands for a Residential Aged Care Facility. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of this local, low density residential area. My specific objections to Oryx's proposed developments are as follows:-

1.0 Planning Objections

1.1 The manner in which Council adopted the Residential Aged Care Facilities Local Planning Policy ('LPP') on 26 April 2020 is highly inappropriate, without publicly advertising major amendments made to the density, height and plot ratio.

1.2 A residential density coding of R80 as imposed by the LPP is not acceptable or justified at the subject site. It is completely out of context with a transition from the neighbouring R12.5 and R10 zoned properties.

1.3 A Local Planning Policy imposing density is not appropriate. Density should be imposed via a scheme amendment to LPS3.

1.4 The proposed development is commercial in nature, operating 24/7 and is not suited to a residential area.

1.5 The proposed development is not compatible with the existing amenity surrounding / abutting development due to the height, scale and bulk of the development. The proposed development therefore does not comply with Clause 3.1 of the LPP which states "...and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking".

1.6 In accordance with the zoning table of LPS 3, 'Residential Aged Care Facility' is allocated an 'A' use within the 'Residential' zone, meaning the use is not permitted unless the local government has exercised its discretion by granting development approval. This is an unusual application of additional use provisions given a 'Residential Aged Care Facility' is already a contemplated use within the 'Residential' zone.

1.7 Due to the removal of the proposed special use provisions in LPS 3, no development standards are applicable to the subject site except for the car parking requirements as outlined in LPS 3. A scheme amendment should be initiated to guide appropriate density.

1.8 Given the increased building height and plot ratio associated with this modification will facilitate increased bulk and scale for any development proposed, we are of the view the modifications to the draft LPP are not minor and are in fact, significant in nature particularly in relation to the locality of surrounding residential area.

1.9 Council has not followed the appropriate process in the adoption of LPP. On this basis we question the validity of the adopted LPP.

1.10 There is absolutely no justification for the application of a R80 density coding, given the significantly lower R10/R12.5 density coding of the surrounding locality.

1.11 The effect of the local planning policy is that it imposes a higher density coding without the initiation of a scheme amendment to LPS3.

1.12 The purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City, however instead it has imposed an R-coding as a mechanism to deal with scale, bulk and built form. This is not appropriate as the imposition of an R80 R-coding immediately adjacent to properties subject to an R12.5 density coding will result in significant conflict with respect to scale, bulk and streetscape impacts.

1.13 Pursuant

to Schedule 2, Part 9, Clause 67(m) of the Regulations, the proposed development is not compatible with the surrounding residential neighbourhood and particularly the adjoining land zoned R12.5. 1.14 In April 2016, the community was consulted on the proposed refurbishment of Melvista Lodge and the development of a 2-storey aged care on adjacent lots at 73-75 Doonan Road and 16-18 Betty Street. What is now proposed is completely different with a 4 storey plus basement and roof (height approx. 17 metres), 90 bed high care, aged care facility on residential zoned lots and no longer includes the refurbishment of the Melvista Lodge. The community consultation on the new proposal from the developer and City of Nedlands has been mostly non-existent. Clause 5.1 of the LPP states "Consultation with affected landowners will be undertaken in accordance with the City's Local Planning Policy- Consultation of Planning Proposals". The consultation by the Developer with the Community, undertaken on a previous scheme, therefore breaches the LPP – Consultation of Planning Proposals. 1.15 The proposed development at R80, with a plot ratio of 1.0 will significantly impact the adjoining land and surrounding low density residential neighbourhood. 1.16 Clause 4.6.2 of the LPP states "A minimum of twenty-five per cent (25%) of the site area is to be landscaped". The proposed development does not comply with this requirement of the LPP. 1.17 The set back of the boundary on 71 Doonan Road is non compliant with the LPP Clause 4.5.2 which requires a 7.5m set back and permanent screening to 75% obscure. The proposed plan has a 6.4m setback and NO screening. 1.18 The purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City. The LPP makes no delineation between differing models of care (e.g. independent living units, low care, high care). The planning guidelines set out in the LPP, as drafted, applies the same planning conditions irrespective of the model of care. Different models of care have differing levels of servicing. This has not been considered in the application of the LPP. This has resulted in a High Care facility with an inappropriate density being located in a precinct unsuited to the facility function. The LPP should be redrafted to reflect the specific function and nature of aged care models of care, with appropriate planning of such facilities contextually. 1.1 There was no development control plan applied to this land at the time of its rezoning. This in effect meant anything could have been built. The rushed endorsement of an R80 equivalent zoning without community consultation has denied the community the opportunity to comment on the appropriateness of this density in a residential zone. 2.0 Design Objections 2.1 The built form is a highly inappropriate in terms of scale and size to adjoining properties with box scale of building of approx. 70m overall length x 32m overall width and overall height of approx 17m 2.2 The development includes large, bland featureless walls measuring 35 metres in length (running east/west), a scale that would typically be found in a mixed use or town/activity centre environment. 2.3 The proposed development, should it be constructed as proposed, would result in detrimental impacts to the amenity and character of the low-density residential neighbourhood. 2.4 The four-storey development with a proposed plot ratio of 1.0 would result in a scale of development which is not compatible with the amenity of the locality and is not suitable within a low-density residential neighbourhood. 2.5 The proposed development will significantly impact the visual amenity of all residential lots to the north on Doonan Road and Betty Street, up to Princess Road, particularly when the development is viewed from private outdoor areas. 2.6 The Developer's proposal, with its nominated function, size and density, has not considered any technical issues and will have a material negative impact to the amenity of the locality. 2.7 Building massing and scale is disproportionate to the surrounding urban vernacular. The mass and height are disrespectful to the scale and pitch lines from the adjoining properties with a consequential negative impact to the Betty Street and Doonan Road streetscapes. Its verticality will project as a dominant insertion on the residential neighbourhood. As a "for-profit" commercial operation it will damage the residential cohesion of the suburb of Nedlands. Clause 3.1 of the LPP states "..... design of residential aged care facilities are of a high quality and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking." The proposed development is therefore non-compliant with clause 3.1 of the LPP. 2.8 Building density provides a poor level of amenity for residents and patients with very limited access to outdoor spaces. Lack of green areas for the residents. The LPP requires 25% of the site to be landscaped. The proposal is nowhere near this and hence it is non compliant with the flawed LPP. 2.9 The facility provides a poor work environment for nursing staff. No nursing stations or staff lounges/breakout spaces are provided for staff. 2.10 Ramp/through access with a 4.5m high boundary wall on southern boundary will be highly visible from Doonan and Betty Streets and is aesthetically ugly along with inappropriately high unfriendly front boundary walls close to 2m near southern boundaries on Doonan and Betty Streets. 2.11 These front boundary walls are impacted further by the proposed 2.5m setbacks beyond the current street line sets backs of 9m making it impossible to see down the street. This will result in the streetscape significantly altered with the proposed development jutting out 6.5m beyond the existing street line, Residents reversing out of their driveway will have no line of sight, keeping in mind a pedestrian footpath runs down the east side of Doonan and west side

of Betty making this impossible to ensure the safety of any family walking down the street to Masons Gardens, or car driving up the street. 2.12 The visual projection of the development on the north facing Masons Gardens vista will be overbearing and detrimental to the urban fabric of the Betty Street – Doonan Road hillscape and Mason Gardens Precinct. 2.13 The proposed development is not setting a target for environmental sustainability. The development is taking a just above minimum approach, proposing to exceed Part J of the National Construction Code by a stated 10%. This is an inadequate attempt to demonstrate environmental sustainability credentials. As a minimum a Green Star 6-star standard should be set, and consideration should be given to a Passive House rating. This facility will have a significant carbon footprint that will represent a substantial increase over the carbon footprint of the existing three (3) residences. 2.14 The Developer has no stated approach to operation of the facility in the instance of a required lockdown nor a stated approach of how to protect vulnerable patients to cross infection from air borne viruses. This is an irresponsible approach to quality aged care services in a post COVID 19 environment where a duty of care exists to protect patients who are in a vulnerable position. The City of Nedlands would be in breach of your duty of care now with the foreknowledge that this facility presents an unacceptable risk and has not considered a COVID safe design. 2.15 The proposed development proposes a density of occupancy that maximises the built form on the available land area, leaving limited open space for residents/patients. The LPP, clause 4.6.2 requires 25% of the site area to be landscaped. This has not been provided. Furthermore, the Review of Innovative Models of Aged Care, Research Paper 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety recommended respite is provided in settings aligned to a person's background and offering structured activities. The report further recommends small scale domestic models of aged care where there is an emphasis on providing person centred care models. The proposed developments design and density is not aligned to the objectives of the Royal Commission. 2.16 At ninety (90) beds of non-ambulatory patients over four (4) occupied levels, safe evacuation has been poorly considered. Safe evacuation should necessitate a sprinkler protected building with a zoned smoke management system and designated safe zones. Brigade turn out points for fire truck parking and access to brigade booster points have not been considered in the design. Evacuation of 90 non-ambulatory residents is a risk. 2.17 Brigade access to non-sprinklered areas, such as the roof plantroom, with access only available along Betty Street and Doonan Road for aerial firefighting, has not been considered. 2.18 No consideration appears to have been given for acoustic treatment for roof located air conditioning plant and roof discharges. 2.19 Lifts in the building are to be used for vertical movement of food services, visitors, patients, maintenance personnel and removal of deceased patients. This is an unhygienic practice and demonstrates poor design practice in this facility. Good design practice would separate different traffic streams in a facility of this size and density, with the minimum provision of a dedicated goods lift. 2.20 The car parking provisions are significantly underestimated. This will result in substantial on street parking to Betty St, Doonan Rd, Melvista Ave, Granby Cres and surrounding roads. Staffing numbers for the Wellness Centre (3 treatment bays + hair salon – circa 4 staff), full commercial kitchen for up 540 food services per day (circa 4-5 staff), facilities manager (1 staff), full laundry (circa 2 staff), on site admin (circa 7 staff), on-site coffee shop (1 staff), cleaning staff (circa 3-4), orderlies and support staff (circa 2), plus nursing and staff for 90 patients (minimum 15 staff) significantly exceeds carparking allowances. Shift changeover of nursing staff, visitors and maintenance staff further results in carparking being significantly undersized and inadequate for a facility of this size and density. 2.21 Grease trap for the kitchen will require truck access for pumping out the grease trap. This does not appear to have been considered in the design. 2.22 Inadequate on-site parking can result in off-site parking for nurses for night shifts. This can result in unsafe practices and security concerns for nursing staff accessing the facility at night having to park in unsecured/unmonitored locations. 2.23 No design provision is shown for kitchen exhaust discharges, carpark ventilation discharges, generator exhaust discharge. Discharges from the facility will adversely impact neighbours and have not been considered appropriately. Discharge stacks will also extend beyond the roof line creating further visual impact. 2.24 Truck vehicular access for food delivery, waste removal, medical gas bottle replenishment, diesel fuel delivery, maintenance personnel for mechanical, electrical, fire and communications plant will result in significant increase to truck movements on Doonan Road and Betty Street. 2.25 Inadequate provision has been made for replacement of roof top air conditioning plant. Access for large plant can only be made via crane access from Betty Street or Doonan Road. 2.26 Light spill for night-time access to carparking and pedestrian entrances will result in light pollution to adjoining neighbours. 2.27 The renders and plans being promoted by the Developer do not correctly illustrate the upper levels and roof form which will be highly visible. These images and plans are misleading. In addition, the elevations do not show the upper level in bold, again misleading. 2.28 Subterranean courtyards on the eastern/western boundaries/northern edge - Doonan Road/Betty Street are unsightly/dark and out of character with the wide, large verges of the suburb. 2.29 The developer, Oryx, is inexperienced. It is noted that the Developer has operated only one aged care facility to date, the

recently acquired hotel, The Richardson in West Perth. Following acquisition that was subsequently refurbished to accommodate aged care. 2.30 Only 5 of the direct neighbours were afforded a one on one meeting with the Developer's consultants on the week of 22 June 2020. This was the first time the neighbours had been approached regarding this proposal. The Developer was not present at the resident meetings with representation being made by their Stakeholder Engagement Consultant, Creating Communities, and Town Planning Consultant, Planning Solutions. 3.0 Sale of Land Objections 3.1 75 Doonan Road was sold by private treaty to the developer before the land was designated 'special use' allowing aged care. The land should have been offered to the open market, particularly when it was widely known the owners of Melvista Lodge directly to the south were also interested in purchasing the land. 3.2 The land was sold as a Residential R10/R12.5 lot when the City knew its intent was always to redesignate the land. Why would the City sell land to a developer, prior to its redesignation. Why did they not designate it for aged care use first and by inference, sell the land at a much higher price? How have the City's ratepayers benefited from this sale? We note the developer paid \$2.6 million for the last residential piece of land required for this proposed development leaving the sale of the land by The City in question. 4.0 Technical Reports Objections 4.1 The acoustics technical report has not calculated the cumulative noise impact of ventilation systems with the air-cooled condensers. Significant ventilation systems will be required for the kitchen exhaust, evaporative kitchen make up, toilet exhausts, laundry exhausts and flues. To determine the full impact of the facility on adjoining residences, all noise sources should be defined and calculated on a cumulative basis. 4.2 The Sustainability Report does not consider any modelling of obnoxious discharges from kitchen, toilet and laundry exhausts and their impact on the surrounding properties. Dispersion modelling and CFD modelling should be undertaken to determine that there is no undue impact, as required by clause 3.1 of the LPP. 4.3 The Sustainability Report has not considered any heat island impact on the surrounding properties as a result of rejecting circa 700 - 800 kW of heat from the facility to determine that there is no undue impact, as required by clause 3.1 of the LPP. 4.4 The Sustainability Report has not considered glare and reflectance to properties on the east in the morning and west in the evening to determine that there is no undue impact, as required by clause 3.1 of the LPP. 4.5 The Transport Impact Statement (TIS) has not calculated the total number of staff or visitor numbers in its car parking assessment for a facility of this nature. The TIS has relied on an allowance of 1 car bay per 4 beds. A high dependency aged care facility will have a significant staffing requirement that will exceed this requirement. It will also have significant visitor numbers. The TIS has made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment of carparking and traffic movements. 4.6 Developer's Traffic Report also provides very little detail on the type of vehicle movements and their frequency and times during the week. This detail is also needed to form proper considered assessment of traffic movements and noise levels, which detail is also wholly lacking in the Developer's Transport Impact Statement and Acoustic Report. The Royal Commission into Aged Care Quality and Safety is due to release its final report in March 2021. It would be prudent for the Council to wait for the findings and recommendations before approving a residential aged care development on the Lots 10 & 11 Betty Street/Lots 18 & 19 Doonan Road site or any other site. I urge the Council to reject the proposed Oryx development and instigate an appropriate development plan for the site that will adopt recommendations from the Royal Commission and ensure a high-quality facility that complements the streetscape and its surrounding neighbours.

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**Respondent No:** 361

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 09:28:07 am

**Last Seen:** Jul 25, 2020 01:25:26 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). I have the following concerns relating to the proposal: 1. The impact on amenity. 2. The increase in noise, and traffic. 3. The significant level of overlooking onto private property of northern neighbours into swimming pool area, backyards, windows of living areas and bedrooms. 4. The lack of on-site car parking. 5. The intensive height, bulk and scale as compared to the low density residential surround. 6. The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing resident setback and that of the proposed development. 7. The lack of proper community consultation 8. The lack of landscaping with deep root planted trees and garden space 9. Health risk for the aged care residents due to high-density facility during COVID/post COVID times. 10. The 24/7 nature of the building use and the proposal for deliveries etc. to occur even on weekends will have undue impact on amenity

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**Respondent No:** 362

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 09:35:57 am

**Last Seen:** Jul 25, 2020 01:30:49 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). I have the following concerns relating to the proposal: 1.The impact on amenity. 2.The increase in noise, traffic and odour. 3.The lack of on-site car parking. 4.The intensive height, bulk and scale as compared to the low density residential surround. 5.The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing developments and the proposed. 6.The lack of management plans or mitigation strategies. 7.The lack of proper community consultation.

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**Respondent No:** 363

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 09:39:45 am

**Last Seen:** Jul 25, 2020 01:38:04 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). I have the following concerns relating to the proposal: 1.The impact on amenity. 2.The increase in noise, traffic and odour. 3.The lack of on-site car parking. 4.The intensive height, bulk and scale as compared to the low density residential surround. 5.The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing developments and the proposed. 6.The lack of management plans or mitigation strategies. 7.The lack of proper community consultation.

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**Respondent No:** 364

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 09:42:15 am

**Last Seen:** Jul 25, 2020 01:15:59 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      On behalf of a company

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

<p> I am writing to <strong><u>object</u></strong> to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. </p> <p> - This development is in a LOW DENSITY residential area. The scale is not appropriate. </p> <p> - Provisions of the Residential Aged Care Facilities Local Planning Policy - <strong>were not</strong> advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant increased scale of what could be developed on the site. The Council needs to examine this error closely. </p> <p> - The development application has significant flaws; an overall <strong>INACCURATE</strong> assessment of; the traffic impact (e.g stating there is no bus route on Betty/Doonan – when there is), inaccuracies regarding community consultation (for an entirely different proposal). </p> <p> - This is not a low care facility. A High care facility of this nature, requires staff movements 24/7, increased traffic, noise and waste pollution. The residential streets surrounding the area are not equipped for this. Diesel pollution from generators, odours emanating from the facility are not appropriate for this area – particularly with a nearby kids playground, daycare and residential lots immediately in the vicinity. This is totally different to the Monash high rise aged care development which is in a hospital precinct. </p> <p> - I urge the council, and its planners to consider the current state of world affairs. The Covid pandemic has changed how people should live. A high density aged care facility, with movement of staff within the facility and visitors in/out, is in essence, a breeding ground for infections. Contrast this to apartment living of a similar nature where there is no movement of staff between rooms. I think it should be recognised that <strong>it will be on the 'council's hands' </strong>(and its planners/councillors/staff), if they were to approve this high density nursing home in the midst of a pandemic, and that it was later determined that a change could have been made (as they were fully aware of all the issues of the world at the time)!! </p> <p> Ratepayers like myself are not opposed to an aged care facility in the area, but the scale of this proposal, its high density and lack of transparency in process is CONCERNING. </p> <p> I strongly urge the council to <strong>REJECT</strong> this proposal </p>





**Respondent No:** 365

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 10:01:52 am

**Last Seen:** Jul 25, 2020 01:56:08 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

This was a sneaky deal made under the table, without proper consultation. The development is incongruous with the neighbouring properties. Any tower like that proposed should be placed on the highway or next to a hospital. Traffic and parking will be chaos.

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**Respondent No:** 366

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 10:03:45 am

**Last Seen:** Jul 25, 2020 02:01:10 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

<p> I am writing to <strong><u>object</u></strong> to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (<strong>Site</strong>)(<strong>proposal</strong>). </p> <p> I have the following concerns relating to the proposal and have read the development application in detail. </p> <p> There are some glaring errors that NEED FURTHER CLARIFICATION with the developer, as the document is otherwise a false representation of what is being proposed. I raise the following points from examining the documents provided; </p> <p> <u>The Development Application Report (provided by the Developer)</u> </p> <p> 1.3.1- States that Oryx purchased council owned land in March 2018 (75 Doonan), to form a land parcel with three other oryx –owned properties. This is factually incorrect as 16 Betty St was sold in July 2019 (so Oryx were not the owners at the time) </p> <p> 1.3.2- States that community consultation occurred, and provides percentages of a survey the developer conducted. These percentages can NOT be relied upon, and published in the DA report, when it was for a TWO storey NOT a FOUR/FIVE Storey proposal. </p> <p> Quoted from the document - “92% of respondents support the creation of a new residential care facility on adjoining privately owned land (63% Strongly Agree; 25% Agree)”. THIS IS A SURVEY FOR A TWO STOREY FACILITY. Also, 63% plus 25% = 88%. So again, the numbers don't even add up, the developers ARE INFLATING THE FIGURES. They can not be trusted and a survey of this quality in the professional world would (and should) be immediately disregarded. </p> <p> 3.1- In this section, re: development particulars. They mention the café is for resident use. Does this mean it excludes visiting family/members of public? This has implications regarding traffic/parking in the area, and is clearly not taken in to account. </p> <p> It is also unclear how many residents will be in the nursing home (couples vs singles). </p> <p> 3.1.2- It is stated that the use of the wellness centre, “it is anticipated that external customers will constitute no greater than 30% of total patronage, totalling a maximum of approximately 10 external client sessions per day”. It is not explained how this number derived? When there is; a physio/gym area (52.6m2 ), 3 x treatment rooms, hair Salon (19.6m2 ), Consulting room. So, essentially there are six rooms which can have clients (assuming the gym can only have 1 client)? </p> <p> The developer is also stating only 10 people will come from external clientele? i.e. they are implying that each room is used on average by 1.5 external clients, in total, per day. I find this hard to believe as a business model (for a gym operator, allied health operator or hair salon operator), and I think they are understating the external clientele numbers for the purposes of this application. </p> <p> How will this be monitored by council? How does this affect traffic and parking in the area, given that the numbers are clearly understated? </p> <p> Similarly, the numbers calculated by the developer also imply that there are 24 clients per day (from the facility), which also only means four clients per room during the course of the day. These numbers are clearly understated, as no operator could survive financially on 4 + 1.5 clients per day. The developer should provide a realistic estimate of external clientele –

as these numbers do not add up, and one would expect many more visits from external clientele with again the same issues regarding parking/traffic on residential streets. </p><p> 6. Conclusion - the DA states "The operator has engaged in extensive community consultation that has demonstrated wide-standing support for a residential aged care facility in this location". </p><p> As outlined previously, the survey /consultation can not be relied upon as it was for a completely different proposal. The company should consult the community again, re conduct a survey for the current proposal. </p><p> <u>The developers - Traffic impact Statement</u> </p><p> There is false information provided regarding public transport use on the surrounding streets. It is stated in their report there is no bus route on Betty, Doonan, Melvista- when there actually is! Betty and Doonan are two lane widths, and the bus already weaves through the few parked cars on the street. Add in the traffic/street parking from visitors on these streets from the proposed development. This poses a significant safety risk given the increased traffic volume. As such, the impact statement is an unreliable assessment of the current traffic movements. </p><p> Quoted from 2.7- "Having in mind the proposed number of parking bays and the additional parallel on street parking on Betty Street it is not expected that the proposed development will have any issues with parking demand". </p><p> Can the council outline how many marked parallel parking bays are on Betty Street- and what the impact of these bays, and the current bus route have? Doonan road is the same width as Betty, with a bus route. So, is there any parallel parking planned here? </p><p> Quoted from 2.11- "Note - It is expected the vast majority of wellness centre users would be residents, while around 30% of patrons would be external. For the purposes of calculations, a 70% reciprocity has been applied to expected traffic volumes" </p><p> This number of \*22, is MADE UP. See my point earlier that, 22 external clientele would mean each of the wellness centre rooms is used by 1.5 clients in total PER DAY. Given that this is highly implausible, I think estimating traffic volumes can not be accurately made. </p><p> Quoted 2.12- Note - For a more detailed plan of the estimated vehicular traffic volumes and distribution please refer to the plans provided in Appendix 2. Appendix 2 has not been attached? </p><p> There will be significant traffic concerns at the bottom of the Melvista Rd, intersecting with Betty St and Hackett Rd. There are a few parking bays on the corner of Mason's gardens- for park use, and drop offs for children at the daycare (Kids Galore). Children under the age 4 are crossing these streets regularly, and adding in high density living (as per this proposal) will no doubt impact on the risk of traffic incidents. Spill over parking from visitors to the home are likely to result in illegal parking around this area, further adding to the possibility of traffic accidents. 23 bays is grossly insufficient for staff, visitors, and wellness centre users (Two of these bays at the either end of the proposed basement parking will be unusable). The council and the developer will need to strongly consider that any traffic-related deaths, to drivers, pedestrians and children, will be laid squarely on their shoulders. </p><p> Aside from the errors in the documents above. I make the following general points regarding the proposal. </p><p> - There is significant impact on amenity, <strong>out of</strong> keeping with a low density, residential area. This includes the height, bulk and scale </p><p> - The increase in noise, traffic , odour and potential for diesel pollution to nearby residents, daycare and kids playground area. </p><p> - A lack of onsite parking (as above, with unusable bays in the basement based on their proximity to the boundary wall of the building) </p><p> - There was essentially no communication on THIS proposal (community consultation occurred in 2016 on a different two storey proposal). </p><p> - The covid pandemic has educated all of us that high density nursing homes should NOT be the way forward. The council needs to recognise that they are complicit to potential mortality in the future, and cannot pursue this development claiming a lack of awareness of this FORSEEABLE risk. </p><p> I urge the council to REJECT the proposal. </p>

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**Respondent No:** 367

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 10:05:12 am

**Last Seen:** Jul 25, 2020 02:03:09 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**  Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. My objection is made on the following grounds: 1 The proposal is inconsistent with the Residential Aged Care Facilities Local Planning Policy because of the undue impact it will have on the residential amenity of the area. 2 The height, bulk and scale of a four-storey development proposal is incompatible with the locality and surrounding developments. 3 The proposal will result in unacceptable increases in noise, traffic, odours, car parking congestion and light pollution. 4 The proposal fails to adequately manage or mitigate the impacts it will have on the existing and future residential amenity. 5 The design of the proposal is imposing and unsympathetic to the existing character of the area. Not only does that have aesthetic implications, the contrast in setbacks affects sight lines, and therefore vehicle and pedestrian safety. 6 The car parking and traffic assessments do not adequately take into account the realistic vehicle movements the proposal will generate.

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**Respondent No:** 368

**Login:**

**Email:**

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**Responded At:** Jul 25, 2020 10:17:14 am

**Last Seen:** Jul 25, 2020 02:11:55 am

**IP Address:**

Q1. **Your name:**

Q2. **Your address:**

Q3. **Your email address:**

Q4. **Your telephone number:**

Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

Q6. **Address of the property affected (if applicable)**

Q7. **My response to the proposal:**      I object to the proposal

Q8. **Submission : Please give your comments relating to this item in full below.**

strongly object to the development application for a Residential Aged Care Facility located at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. This proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of this local, low density residential area. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 1 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 2 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 3 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 4 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been massively understated. I strongly urge you not to support this proposal.



**Respondent No:** 369

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 10:25:26 am

**Last Seen:** Jul 25, 2020 02:15:07 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

It will cause terrible traffic & parking issues Traffic will be a risk to children walking & riding to Masons Gardens It is already difficult to use streets around here with cars always parked on the roads & regular buses We live in a residential area not a commercial area The height of the building is not appropriate for this area I am concerned about big residential care facilities given the onset of viruses like COVID 19 Noise & pollution problem Such a residential care facility needs to be built near regular public transport routes - it would be detrimental to have another parking issue like at SCGH which is not on a train line I strongly oppose the project

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**Respondent No:** 370

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 10:29:10 am

**Last Seen:** Jul 25, 2020 02:13:48 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated.

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**Respondent No:** 371

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 10:38:12 am

**Last Seen:** Jul 25, 2020 02:29:42 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Our property sits directly opposite the development site and the vacant block of land previously owned by ratepayers. I am writing to strongly object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is inappropriate in scale compared to our neighbourhood, which is a low density residential area. The development is highly unlikely to either protect or enhance the current and future amenity and character of our neighbourhood. I am concerned that the current proposal relies upon provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for significant intensification of what could be developed on the site, without appropriate justification. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified within the surrounding R coding, particularly given the nature of the locality. To the extent the decision maker chooses to rely on these significant and unadvertised provisions of the Policy, I further object as follows:

- Policy objectives 1.1 One of the primary objectives of the Policy is – “to ensure the appearance and design of residential aged care facilities are of high quality and do not have an undue impact on the residential amenity by way of building bulk and scale, noise, traffic or parking”. The proposal fundamentally conflicts with this objective given the stark and jarring contrast between the surrounding R10 and R12.5 locality and the proposed four storey R80 development. The number of residents proposed to be accommodated will increase the residential capacity of the site by over 1000%. This facility will only accommodate elderly people in need of high levels of physical care, so the actual level of daily occupation will be further increased by staffing numbers. The consequential visual impact, noise, traffic and parking that will flow from such an intensification will destroy the residential amenity of the locality.
- Compatibility with setting (bulk, scale and height)
  - The Site is surrounded by low density residential development. The land immediately to its east and west is R10 and the land to its north is R12.5. The contrast between the existing density and the proposed R80 coding will be sharp, and the proposed plot ratio is wholly incompatible with the broader setting. It will dominate the surrounding streetscapes forever changing the locality.
  - The bulk and scale of the proposal is imposing in its context. The proposal makes no attempt to mitigate the visual impact of its northern and southern walls, which are large and bland, on the adjacent neighbours and streetscape. The visual impact from the public setting of Masons Gardens is equally imposing and stark and akin to a cruise ship sitting above the park.
  - The depicted bulk and scale of the Melvista Lodge land (immediately to the South of the Site) in the development application plans is misleading. There are no such plans proposed or prepared, and the proposal is inconsistent with its setting in that regard. Redevelopment of Melvista Lodge is



not likely or imminent given the nature of the landholdings there. Council minutes from 23 June 2020 indicate that the City of Nedlands is not involved in any discussions about planned development of the site.

2.4 The proposed street frontage setbacks of 2.5 metres undermine line of sight in the context of the surrounding residential developments which have 9 metre setbacks. This has significant negative visual impact with complete disregard for the local setting. Additionally, this has safety implications for drivers, cyclists and pedestrians using Doonan Road and Betty Street.

2.5 The proposed development exceeds the plot ratio of 1.0 permitted by the Residential Aged Care LPP. The developer has excluded areas that should be included in the stated calculations.

3. Amenity

3.1 The proposal fails to take into account the existing and future character of the locality. The City has a new local planning scheme, and whilst higher density has been provided for elsewhere, this locality preserved its low density coding. There is a clear intention and understanding that the low density residential nature of the area should be maintained. A high rise intensive aged care development completely undermines that intention.

3.2 The proposal will significantly diminish visual amenity of the area due to its size, scale and design. It is not in keeping with the character or streetscape in the locality.

3.3 The proposal represents a significant intensification in how the site will look and operate. It increases the number of people living on the site by over 1000%. The level of staffing and services required to accommodate 90 high needs aged care residents must not be understated. The developers have failed to adequately account for likely staffing numbers in information sessions with residents and in the Development Application Report. The cumulative impact of 90 residents, combined with the servicing and operational requirements of the facility and movement of staff, visitors and deliveries, will result in a substantial increase in:

3.3.1 noise from traffic movements, at all hours of the day, to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users;

3.3.2 noise generated from the operations of the proposal, including air-conditioning, services, and an intensive increase of population and people movement;

3.3.3 light spill from 24 hour a day operations; and

3.3.4 odours generated from the operations of the proposal, including catering, laundry and servicing.

3.4 No management plans have been provided to show how the detrimental amenity impacts which will arise from such an intensified use will be mitigated, particularly given its hours of operation. No development condition will be validly capable of managing those impacts.

4. Traffic

4.1 The proposal will result in a significant increase in vehicle movements to and from the site, at all hours of the day.

4.2 The Traffic Impact Statement made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high care facility. It is therefore an inappropriate document upon which to base the assessment traffic movements.

4.3 The Transport Impact Statement provides very little detail on the type of vehicle movements and the frequency and timings of those movements. This detail is essential to form a properly considered assessment of traffic movements and their impacts, and the document therefore cannot be relied upon.

4.4 The Development Application Report and Traffic Impact Statement report that there is no need for service vehicle bays, as service vehicles can safely navigate through the parking garage. However, the Acoustic Report section 3.3 reports that trucks will not be able to access the basement due to the horizontal and vertical clearances of the sunken laneway. The Acoustic Report only allows for delivery vans. These are contradictory reports and therefore the Traffic Impact Statement report cannot be relied upon.

4.5 The proposed facility has a "Wellness Centre" with gymnasium, hair salon and consultation rooms that will be open to the public, according to the Development Application Report. There have been conflicting and varying statements about external use in written information provided by the developer to the community and in the Development Application Report, so the Traffic Impact Statement cannot be relied upon to detail additional traffic impact from this component of the development.

5. Car Parking

5.1 The number of administrative, catering, cleaning, medical, allied health and maintenance staff required to support a 24/7 90-bed high care facility is not likely to be supported by 26 bays. No details of total staffing number, breakdown of staff across the facility, distribution of staff across times of day, or likely numbers of regular visiting health care providers and regular visiting supportive care providers have been given. No parking allowances have been made for deliveries. The developer has made assumption about numbers and visiting time of expected visitors, which are inconsistent with the repeated promotion of the facility allowing residents to age in their local neighbourhood. The number of "Wellness Centre" staff has not been provided and the number of external patrons is vaguely reported. The car parking provided is well below ratios provided by similar care providers in the City of Nedlands, and the Council's ratio of allocation in its Local Planning Policy is well below what other Councils mandate for Aged Care Facilities (City of Melville: 1 bay per 3 beds plus 0.5 bays per staff member).

5.2 The surrounding streets are not capable of supporting the street car parking which will necessarily arise due to the lack of sufficient on-site car parking. Furthermore, the Development Application Report and the Traffic Impact Statement have not detailed the loss of street parking due to the entrance and exit of the basement car parking at the southern ends of Betty St and Doonan Rd. The area is already significantly impacted by street parking by residents, visitors and care providers at Melvista Lodge, which does

not have on site parking for all residents. 6. Community consultation 6.1 The developer relies on consultation it conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different from what is currently proposed. It included refurbishment of the derelict nursing home on Betty St, provision of aged care services to residents of Lisle Villages/Melvista Lodge, and a two storey residential aged care facility. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed. 6.2 The developer has not been transparent about the extent of community support for its original proposal in 2016. The Development Application Report states that 160 people attended "open days" and gives percentages of responses to its "Community Survey" in 2016. However, the developer has failed to state that only 79 people responded to the Survey (Creating Communities Report for Oryx in May 2016). The presentation of data in the Development Application Report is misleading. Furthermore, the largest single group of respondents to the survey were residents of Lisle Villages, which included residents from Leaweena Lodge and Lisle Lodge ie not from the "local" area the proposal is suggesting it will serve. Only 34 people from Nedlands (excluding Melvista Lodge residents) responded to the survey. This is a completely unrepresentative, statistically insignificant sample size and should not be considered as evidence of wide community support. 6.3 Immediately affected residents have either never been contacted or have only recently been informed about the extent of the proposal. I have been a property owner and resident at 80 Doonan Rd, Nedlands (directly opposite the development site) since December 2016. I had never been contacted by Oryx prior to an unaddressed letter being left in my letterbox on 16 June 2020. I am aware that many residents in Doonan Rd and Betty St did not receive any contact. I met with Creating Communities (on behalf of Oryx) on 23 June 2020. They initially refused to provide information materials prior to the meeting and only did so after repeated requests. The information brochure was only provided the evening before the meeting. The representatives were unable to answer the majority of pertinent and fundamental questions asked about the development and the functioning of the facility. I did not receive a timely response to questions asked at the meeting and still have not had answers to basic questions, including total number of staff and breakdown of staff numbers. I had to email to request answers 2 weeks after the meeting, despite assurances they would be forwarded within 2-3 days. I note that Council members received a copy of answers to Community FAQs from Oryx prior to all affected residents in Betty St/Doonan Rd. Directors of Oryx have refused to meet with the affected community residents and property owners as a group to address common concerns, despite having met with residents of Melvista Lodge as a group.

7. Other 7.1 Clause 4.6.2 of the Policy states – "a minimum of twenty-five per cent (25%) of the site area is to be landscaped". The proposed development does not comply with this requirement of the Policy. 7.2 Section 4.6.3 of the Residential Aged Care Local Planning Policy states that the design should maximise the retention of existing mature trees as well as existing verge trees. No plot trees will be maintained. There is insufficient deep soil area and rootable soil zone to sustain adequate growth of replacement trees on the development plot, given the setbacks and planned planting of trees in close proximity to the building. Additionally, a mature tree on the southern verge of Doonan Rd is marked as being retained. It is within 3-4m of the southern boundary at the planned location of the entrance to the basement and clearly will be extremely vulnerable to irretrievable root damage during construction and is unlikely to be retained. On page 4 of the Architectural Documents (the site plan), this tree at the southern boundary of the verge on Doonan Rd is not illustrated to scale. In reality, it is significantly larger than the tree illustrated on the opposite verge at 80 Doonan Rd. This is misleading. Mature trees on the northern verges of Betty St and Doonan Rd are marked as being retained. Given that they are both within 3m of areas that will undergo deep soil excavation for construction, it is unlikely that they will be retained. The significant loss of tree canopy undermines the local character of the neighbourhood and will contribute to heat island effect of such a large building. 7.3 The proposal will have a significant carbon footprint, and only just exceeds the minimum standards for environmental sustainability under the National Construction Code. 7.4 There is inadequate reporting of overshadowing, particularly of Melvista Lodge to the south. Figures are only given for 12pm, not across times of the day, which are relevant given the bulk of the development. Residents are likely to experience negative impact on light and solar capture panels. 7.5 Section 6.2 of the Residential Aged Care Facility Local Planning Policy states that the Development Application Report should include hours of visitation and staff numbers (which should include on site staff and visiting staff). The Report does not include either. 7.6 The Café and "Wellness Centre" (including gym, hair salon and consulting rooms) do not appear to conform to residential zoning "incidental use" if open to the public, particularly if the services are subcontracted. There does not appear to be any means of regulating external patronage of the Wellness Centre beyond inconsistent assurances by the developer. Of note, the information provided in person in "community consultation" stated maximum of 10% external use, while the Development Application Report states 10-30% of total use and up to 10 external

patrons per day. Using these figures, this would require 33 residents (of 90) to be treated each day for the Wellness Centre to fulfil the criteria of “incidental use” with the reported external patronage if the generous figure of 30% is considered incidental. This appears to be a commercial use that is not in keeping with the intent of “incidental use” in an aged care facility. A hair salon does not fit within the criteria of “standard Allied Health aged care services”, neither does a gym, unless it is solely staffed and supervised by qualified Allied Health Providers, including Physiotherapists and Occupational Therapists. 7.7 The proposal fails to take into account the recommendations of the Review of Innovative Models of Aged Care Research Paper, 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety in terms of its design and density. The report details factors associated with better health and quality of life outcomes for elderly people in residential care. These factors should be considered in Aged Care Planning as they are known to reduce negative outcomes, including rates of depression, rates of behavioural disturbance and rates of physical and/or chemical restraint. Forward planning of aged care should “future proof” for the community. 7.7.1 It does not resemble a “homelike” environment that maximises independence and participation in daily activities. 7.7.2 It is a large scale living environment. 7.7.3 Independent access to outdoor areas is limited to terraces/balconies. 7.7.4 There are no true green spaces or gardens, only small courtyards. 7.7.5 There are no designated activity areas. I urge you not to support this development.

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**Respondent No:** 372

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 10:41:05 am

**Last Seen:** Jul 25, 2020 02:36:19 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated.

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**Respondent No:** 373

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 10:41:20 am

**Last Seen:** Jul 25, 2020 01:36:19 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I formally place on record my OBJECTION to the proposed Residential Aged Care Facility at Lots 10 and 11 ( ie 16 to 18 Betty Street) and Lots 18 and 19 ( ie 73 and 75 Doonan Road ) Nedlands. The Developer will comprehensively rely on the City's Residential Aged Care Local Planning Policy in seeking and applying for approval for this intensive four storey ( 6 storey if you consider the underground aspect ) development in a LOW DENSITY RESIDENTIAL AREA. I am extremely and deeply concerned that such a major change made to the Policy which allows for a very significant increase in Development capability was NOT made to the PUBLIC nor the directly involved immediate surrounding and existing residential owners within a radius of at least 5km. The Sale of the 4 blocks with R 10/R 12.5 zoning was conducted without FULL DISCLOSURE to the residents of Nedlands or the General Public and even more importantly, the complete silence on the Intent of the Council to change/ rezone the 4 Blocks to A9 zoning which allows for this Incorrect Commercial Development of a Residential Aged Care facility in what is a Residential area and has been so since Mr Nedlands first made this area into a residential precinct. In addition, I also strongly object for the following reasons: 1) The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2) The height, bulk and scale of the proposal is inconsistent and incompatible with the locality 3) Due to the intensive nature of this development, this proposal is unacceptable with respect to the detriment of the amenity to the locality in relation to noise, light, traffic, odour, safety to children and adults, unnecessary crowding and other potential dangers that are currently not present. 4) the proposal diminishes the visual amenity of the locality with this 4 storey development sticking out like a sore thumb and being completely out of place and character ; I note the vastly different setbacks of this proposed development and the existing area and this is not in character with the existing aesthetics and visuality of the area. 5) Car parking and traffic have been inadequately considered for a development of this size. It has been understated and with unsatisfactory due diligence and thought process that has been made with respect to traffic. The nature of this whole proposal the Aged Care Facility Development has been made with intent of conversion of a residential area to a commercial area under the guise of providing aged care facilities which only benefits selective parties concerned. I strongly OBJECT to this proposal.

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**Respondent No:** 374

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 10:47:43 am

**Last Seen:** Jul 25, 2020 02:30:11 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property

Occupier of a property

Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**

I object to the proposal

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**Q8. Submission : Please give your comments relating to this item in full below.**

I wish to voice my objection to the proposed "Melvista" Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. Notwithstanding the need for sensitive and appropriate additional aged care in our community, I believe this proposal is inappropriate in scale and density in the context of the surrounding, low density residential area. In addition, I object to the proposal being considered without consideration to the entire "A9 additional use" plot of which it is part. While I understand the two sites, as they exist, are currently owned and operated separately, it is imperative the entire "A9 site" and its potential development impact be considered with transparent community consultation and guidelines put in place to ensure proper outcomes for all existing and future residents of this specific "A9" area and the wider community. The proposed high density, R80 development presents an intensification to zoning density which completely contradicts the established surrounding low density residential setting and the potential impact of this and future development of the adjoining Melvista Lodge site is simply too important not to be considered and properly overseen by our community. I am further concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which I believe were not sufficiently communicated to the public and allow significant intensification both in height and plot ratio of what could be developed on the site. The increase is not justified, particularly within the context of the locality. On these concerns alone, I urge you not to support this proposal. I believe the City should require further community consultation and agreement before any proposal relating to this site is considered. With particular regard to the provisions of the subject LPP, I further object as follows: Zoning, Density and Setting. The proposed 4 storey R80 development dramatically increases the density of the surrounding R10 and R12.5 setting. This marked density increase imposes a commercial scale impact with regard to parking, traffic flow, plant and service generated noise, and visual impact not only to the surrounding residences but on the community amenity of Masons Gardens. The intention of the Planning Policy and the community understanding of the nature of the site is undermined by such a development and appropriate community consultation and agreement is needed. Parking and Traffic. Given the specific requirements for a high level of staffing provisions around the clock for administration, medical and nursing care, cleaning, catering, maintenance services and additional associated deliveries, resident visitors and wellness centre staff and clients, the assumptions made by the Traffic Impact Statement and the provision of parking on site are plainly inadequate. If not considered adequately, the impact caused by the lack of parking on site will detrimentally impact the adjoining streets and indeed eventually require the City to provide public space for this to be resolved. Street parking in a low density, residential area for what is essentially a commercial venture is completely at odds with the provisions of the City's LPPs on aged care development and parking. The visual impact of street parking alone would absolutely destroy the surrounding residential setting. This in addition to added noise, safety and traffic flow. The developer's assertion that the proposed parking provisions are excess to requirements is an assumption only. The consequences on the community do not justify approval based on a generic policy provision which has not thoroughly considered the specific site. Community Consultation The proposal cites consultation conducted several years ago to assert that the community is in support of this proposal. To my knowledge this background consultation was limited, conducted by Lisle Villages not Oryx as the primary developer and presented a fundamentally different proposal. To this extent, the community has been misled and any support given then should not be misconstrued as support for what is currently proposed. Meaningful consultation amongst the general and immediate community needs to be carried out prior to any development on the site. I urge the City not to support this proposal until full and considered consultation is undertaken, until appropriate structural guidelines are drafted for the entire "A9" (additional use) site, and until the community can be duly satisfied that any development will satisfy the community's need for best practice in aged care provision. Your sincerely,

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**Respondent No:** 375

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 10:49:17 am

**Last Seen:** Jul 25, 2020 02:43:39 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property
Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I strongly object to the development application for a large scale Residential Aged Care Facility located at 73-75 Doonan Road and 16-18 Betty Street, Nedlands (Proposed Development). Whilst I appreciate the need for aged care facilities in our suburb, the proposed 5 level commercial development covering 4 residential lots is not an appropriate height, scale or size for its setting or for the current or future character of this local, low density residential area, which is characterised by 1 and 2 storey single residential homes. In particular, I object because: 1. Planning Process Objections (a) Nedlands residents have a legitimate expectation that their rights will not be negatively impacted by the City of Nedlands (City) without, at a minimum, the rules of procedural fairness being followed. (b) Whilst I appreciate and support the need for residential aged care facilities in the City to service a proportion of our ageing population, where such facilities will sit in a residential area, they must be designed to complement that residential area. A good example is the Aegis Alfred Carson facility in the Town of Claremont. The size, bulk and scale of the 4-storey plus basement and roof (height approx. 17 metres), 90 bed high care, a residential aged care facility on 73-75 Doonan Rd and 16-18 Betty St, Nedlands is manifestly out of sync with the residential locality for which it is proposed. (c) I believe the City and its Council have not followed the appropriate process in the adoption of PD11.20 Local Planning Scheme 3 – Local Planning Policy: Residential Aged Care Facilities (LPP) and have failed in their duty of care to local ratepayers in making them aware of such significant structural changes which will have a fundamental negative impact on the quiet enjoyment of their homes. In particular: (I) The adoption of the LPP setting out the parameters for the development of residential aged care facilities had substantial implications for impacted residents which were not immediately apparent on its face to any in the community without a planning background, and yet no individual notification was received by any ratepayer in those affected areas and the proposal was minimally advertised and passed during the initial turmoil of the COVID 19 pandemic and then associated shutdowns. (II) The fact that not one comment was received from the community or affected residents on the LPP, as noted in the minutes of the meeting of the City's Council of 26 April 2020, should clearly have highlighted to the City that the community and affected residents had not been made sufficiently aware of the implications of the amendments. Residents had a right to be properly and completely informed of the proposal and to be given fair hearing on it. (III) In addition, the final version of the LPP adopted contained significant amendments to density, height and plot ratio which had not been advertised at all. Given the increased building height, scale and plot ratio associated with these modifications will facilitate increased bulk and scale for any development proposed, I am of the view the modifications to the draft LPP are not minor and are in fact, significant, particularly in relation to the locality of surrounding residential area. The Mayor has



indicated that these changes were rushed through so that the Regis facility on Monash Avenue would not be a non-conforming use, although the rationale for this requiring an urgent amendment to the LPP (without advertising) when it had already been constructed is not apparent. (IV) The Proposed Development fails to satisfy aims of the City's Local Planning Scheme No. 3 (LPS 3) to protect and enhance local character and amenity, respect the vision for the development of local streets or achieve quality residential built form outcomes. (V) The LPP allows for a higher density coding without the initiation of a scheme amendment to LPS 3. The stated purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City. Instead it has imposed an R-coding as a mechanism to deal with scale, bulk and built form. This is not appropriate as an R80 R-coding immediately adjacent to properties subject to an R12.5 density coding (and with R.10 density coding surrounding) will result in significant conflict with respect to scale, bulk and streetscape impacts and will have undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic and parking (LPP cl. 3.1). (VI) A residential density coding of R80 as suggested by the LPP is not acceptable or justified at the subject site. It is completely out of context with a transition from the neighbouring R12.5 and R10 zoned properties. (VII) Density should be imposed via a scheme amendment to LPS3, not through the LPP. LPS 3 states that one of its purposes is to "zone land within the Scheme area for the purposes defined in this Scheme" (LPS 3 cl. 8(c)) but then fails to do so in respect to the subject site. This must be amended in an appropriate manner. (VIII) The LPP also appears to have been developed without due consideration to the individual locational attributes of the various sites within the City to which it will apply. The application of the same density, height and plot ratios that apply to the Regis facility on Monash Avenue without adjacent residential properties and with reciprocal car-parking and easy access for emergency and service vehicles in a medical precinct to a development on 4 lots on Doonan Rd/Betty St surrounded by residential properties, on narrow streets with limited car-parking and limited access for emergency and service vehicles underlines the fact that imposing a broad LPP across various blocks without individual consideration of the areas affected is the wrong approach to a planning policy. Each of these blocks deserves a separate local development policy to address the specific needs of the relevant locale. (IX) The stated purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City. The LPP makes no delineation between differing models of care (e.g. independent living units, low care, high care). The planning guidelines set out in the LPP, as drafted, applies the same planning conditions irrespective of the model of care. Different models of care have differing levels of servicing. This has not been considered if the LPP is applied without the City undertaking further consideration of the relevant sites in question. This has resulted in a High Care facility with an inappropriate density being proposed in a precinct unsuited to the facility function. The LPP should be redrafted to reflect the specific function and nature of aged care models of care, with appropriate planning of such facilities contextually. (X) The rushed endorsement of an R80 equivalent zoning in the LPP without community consultation has denied the community the opportunity to comment on the appropriateness of this density in a residential zone or whether a local planning policy is the appropriate vehicle for this site. (XI) On this basis I question the validity of the adopted LPP. Its approval should urgently be reversed and only be reconsidered by the Council once appropriate due process has been followed with the required levels of community consultation and responses taken account of and due consideration of its appropriateness as a vehicle. (d) However, if the LPP is retained, rather than considering a higher density code under LPP cl. 4.2.4 in respect to the subject site, the City should exercise its discretion under that clause to not accept a higher density code, but rather should take all of the factors relating to impact on the residential amenity of the area by way of building bulk and scale, noise, traffic and parking into account (LPP 3.1) and instead impose an appropriate lower density, lower building height in both metres and storeys, with appropriate set-backs and plot ratio, more in keeping with a transition from the neighbouring R12.5 and R10 zoned residential homes. (e) In any event, the Proposed Development is arguably not permitted under LPS 3: (I) This site is zoned residential with an "A9" additional use, being "Residential Aged Care Facility" as a permitted use under LPS 3, but without applying additional development standards. The definition of "Residential Aged Care Facility" in LPS 3 does not refer to a facility being run for profit on a commercial basis and the site is has no other commercial zoning (such as the "Mixed Use" zoning underlying additional uses "A1" and "A2"). When placed in the residential zoning context, this means that a for-profit, commercial residential aged care facility arguably does not fall within the permitted use under LPS 3 for this site. (II) Furthermore, a "Medical Centre" as defined under LPS 3 is not listed as an additional use permitted on the site (either as a "P" permitted use or an "I" incidental use). This is unlike other sites under LPS 3 which have additional uses permitted. For example, the land zoned for additional uses "A3" or "A4", expressly include a "Medical Centre" as an additional use for those sites together with "Residential Aged Care" (so that use is clearly not included in the definition of "Residential Aged Care Facility", as is suggested in the "Incidental Use" heading on page 21 of the Development Application Report), with

“Residential Aged Care Facility” specified as a “P” use and “Medical Centre” specified as an “I” use (i.e. permitted if it is consequent on, or naturally attaching, appertaining or relating to the predominant use of the land). As a result, the medical centre described as the ‘wellbeing centre’ in the Proposed Development and which is serving not only residents of the facility but also non-residents on a 30% ‘anticipated’ (but uncapped) rate, is not a permitted use for the site under LPS 3. (f) A scheme amendment should be initiated to LPS 3 to deal with the inadequacies and lack of clarity in LPS 3 regarding this site, including introduction of appropriate development standards (including regarding size and scale and car-parking) and to guide appropriate density for any “Residential Aged Care Facility” which falls within the permitted use for this site.

2. Lack of Consultation on the Proposed Development (a) In addition to the failures surrounding the advertising of the LPP, and contrary to statements in the Development Application and by the City’s administration, the community consultation on the development of a Proposed Development from the developer and City has been extremely limited. In April 2016, the developer held information sessions on the proposed refurbishment of Melvista Lodge and the development of a 2-storey aged care facility on adjacent lots at 73-75 Doonan Rd and 16-18 Betty St with residential 9m set-backs (Initial Proposal). This limited interaction on the different Initial Proposal is what is described as ‘community consultation’ in paragraph 1.3.2 of the development application. (b) The 5 level Proposed Development fundamentally differs to the Initial Proposal as it is a 4-storey plus basement and roof (height approx. 17 metres), 90 bed high care, aged care facility with 2m set-backs at ground level and no longer includes the refurbishment of the Melvista Lodge. Clause 5.1 of the LPP states “Consultation with affected landowners will be undertaken in accordance with the City’s Local Planning Policy- Consultation of Planning Proposals”. (c) Neither the developer nor the City communicated with the local community regarding the new and different Proposed Development until after the Proposed Development had been lodged. Communication from the developer was limited to provision of information rather than true consultation. (d) The statements from the City’s administration and the developer and its representatives, Creating Communities, that this Proposed Development fully complies with applicable planning requirements and that as a result there is no basis for the community to object to the Proposed Development, contributes to the perception that the City is not interested in its residents’ opinions or providing them with due process or consultation and that the lack of proper consultation by the Developer and the City on this Proposed Development breaches the City’s own local planning policy on Consultation of Planning Proposals and LPP cl. 5.0. (e) Various images and plans included in the development application for the Proposed Development either avoid angles from which the upper levels and roof form which will be highly visible (for example, in the renders presented in the Architectural Drawings and the Development Application Report there is no render looking south-west from Doonan Rd, or directly east from Betty St) or shadow those upper levels and roof in a manner which I do not believe adequately represent what will be visible to local residents, particularly on sloping streets such as Betty St and Doonan Rd (and as is shown in just one diagram, on page 26 of the Architectural Design Statement). Other images do not appropriately represent the homes surrounding the site. For example, Photo 11 (on page 9 of the Development Application Report) is a photo of the 2 storey homes at 68 and 70 Doonan Rd (approximately 95m North-west of the subject site) but is entitled “View of residential dwellings on Doonan Road facing west towards subject site”, whereas the 1 storey homes at 76 and 78 Doonan Rd, and the 2 storey home at 80 Doonan Rd would be the houses that ‘face west towards the subject site’ (and facing west from the houses pictured will be a view of 2 residential properties).

3. Specific Planning Objections The deemed provisions set out in Schedule 2 of the Planning and Development (Local Planning Schemes) Regulations 2015 are imported into LPS3 (whether or not the LPP is retained or revoked) (LPS3 cl 7(1)(a), 2, 10 and note 2 of cl 18(a)). These require the City and Council to have due regard to: (a) The compatibility of the Proposed Development with its setting including the relationship of the Proposed Development to development on adjoining land or on other land in the locality including the likely effect of the height, bulk, scale, orientation and appearance of the Proposed Development (cl. 67(m)). I do not believe the Proposed Development is compatible with the surrounding residential neighbourhood zoned R10 and R12.5 because: (I) The set-back for the development has been greatly reduced to the other homeowners in the area and does not comply with LPP cl. 4.2.1 which requires compliance with LPS 3 cl. 26(1) (a 9m set-back). (II) The bulk and scale of a 5 level building across 4 residential lots is completely incompatible with the surrounding residential homes, each within the boundaries of single residential constraints. (III) This building will dominate all surrounding buildings and the park in Masons Gardens. (IV) Given the topography of the local area, this large building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens and from various vantages around the neighbourhood. The visual projection of the development will be overbearing and detrimental to the urban fabric of the Betty St/Doonan Rd hill-scape and Mason Gardens Precinct. (V) It is not clear how the Proposed Development achieves the required ratio under the LPP

in any event, or how this building achieves a 1:1 plot ratio as on its face the building footprint covers almost the entirety of the block and has 5 levels. Even excluding common areas such as hallways and communal areas does not appear to achieve the required ratio. In addition, it appears from the "DA –Plot Ratio" drawing in the Architectural Drawings Development Plans for the Proposed Development that all private staff areas (such as offices, the administration area and staff rooms), common areas (including private break-out rooms) and the entire commercial medical 'wellness' centre have been excluded from the developer's plot ratio calculation which is not appropriate. (b) The amenity of the locality, including the character of the locality and the social impacts of the development and potential loss of any community service or benefit resulting from the Proposed Development, including on the community as a whole (cls. 67(n), (v) and (x)). I believe the Proposed Development will have a negative impact on the amenity of the locality and will cause a loss of benefit to the community as a whole because: (I) The Proposed Development is not compatible with the existing amenity surrounding / abutting it due to the height, scale and bulk of the Proposed Development. The Proposed Development therefore does not comply with cl 3.1 of the LPP which states "...and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking". (II) The Proposed Development will introduce 120 patients and employees at any one time not interacting with community in the normal context of a residential area. (III) The Proposed Development is commercial in nature, operating 24/7 and is not suited to a residential area. The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. (IV) All available car-parking in the surrounding areas will be consumed by the Proposed Development, constraining access to and use of Masons Gardens and visitors to local residences. (V) Each of Betty St, Doonan Rd and Granby Cres has a substantial number of houses without front fences, enabling neighbours to interact in the front of our homes. Introducing a large building, with lower set-backs and walled along each street-front, will fundamentally change the character of these streets, and we will lose those neighbourly interactions. (VI) There does not appear to be any independent evidence (other than the questionnaire responses acquired by the developer from 79 respondents to its questionnaire in 2016) of the urgent need for our community for building aged care on this scale south of the highway in Nedlands given the recent opening in the near vicinity of the Regis Nedlands in the Hollywood hospital precinct (141 aged care beds) and the future expansion of those facilities into the Regis Weston; the existing Aegis facilities at Alfred Carson (south of Stirling Hwy, 220 Aged Care beds); together with the developers own The Richardson in West Perth (92 suites) and soon to be completed Queenslea in Claremont (120 Residential Aged Care Suites). (c) Whether adequate provision has been made for the landscaping of the land to which the application relates and whether any trees or other vegetation on the land should be preserved (cl. 67(p)). I believe the Proposed Development fails to make such adequate provision or to preserve trees or other vegetation because: (I) The Proposed Development has a building footprint over most of the site and involves the removal of all trees and vegetation other than the street trees on the verges. (II) In particular, several large and very old trees of local importance will be removed and lost forever as a result of the Proposed Development. These trees provide nesting and resting sites for various different species of birds as their canopies are high and provide the birds with a safe vantage point. (III) Clause 4.6.2 of the LPP states "A minimum of twenty-five per cent (25%) of the site area is to be landscaped". The Proposed Development does not comply with this requirement of the LPP. (d) The suitability of the land for the development taking into account the possible risk to human health or safety (cl. 67(r)). I do not believe that the land chosen is a suitable site for the Proposed Development on this scale as: (I) The Developer has neither stated approach to operation of the facility in the instance of a required lockdown during a pandemic nor a stated approach of how to protect vulnerable patients to cross infection from air borne viruses. This is an irresponsible approach to quality aged care services in a post COVID 19 pandemic environment where a duty of care exists to protect patients who are in a vulnerable position. The Proposed Development presents an unacceptable risk and has not considered a COVID safe design. (II) Furthermore, the Review of Innovative Models of Aged Care, Research Paper 3 January 2020 by the Royal Commission into Aged Care Quality and Safety recommended respite is provided in settings aligned to a person's background and offering structured activities. The report further recommends small scale domestic models of aged care where there is an emphasis on providing person centred care models. The proposed developments design and density is not aligned to the objectives of the Royal Commission. (III) At 90 beds of non-ambulatory patients over 4 occupied levels, safe evacuation has been poorly considered. Safe evacuation should necessitate a sprinkler protected building with a zoned smoke management system and designated safe zones. Brigade turn out points for fire truck parking and access to brigade booster points have not been considered in the design. Evacuation of 90 non-ambulatory residents is a risk. (IV) Emergency services access to non-sprinklered areas, such as the roof plantroom, with access only available along Betty St and Doonan Rd for aerial

firefighting, has not been considered. (V) Lifts in the building are to be used for vertical movement of food services, visitors, patients, maintenance personnel and removal of deceased patients. This is an unhygienic practice and demonstrates poor design practice in this facility. Good design practice would separate different traffic streams in a facility of this size and density, with the minimum provision of a dedicated goods lift. (e) The adequacy of the proposed means of access to and egress from the site; arrangements for the loading, unloading, manoeuvring and parking of vehicles; and the amount of traffic likely to be generated by the development, particularly in relation to the capacity of the road system in the locality and the probable effect on traffic flow and safety (cls. 67(s) and (t)). I believe that the Proposed Development is inadequate in these respects because: (I) The Transport Impact Statement (TIS) has not calculated the total number of staff or visitor numbers in its car parking assessment for a facility of this nature. The TIS has relied on an allowance of 1 car bay per 4 beds. A high dependency aged care facility will have a significant staffing requirement that will exceed this requirement. It will also have significant visitor numbers. The TIS has made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment of car-parking and traffic movements. (II) The 2 streets on which the development will sit are narrow and are not designed to accommodate the amount of traffic for a facility of this size, particularly given the reliance on street parking (as the suggested parking is completely inadequate for the commercial operation of the nature contemplated). (III) The car-parking provisions are significantly underestimated, given the 23 car bays plus 3 Acrod bays for the 'well-being' medical centre (which will serve not only facility residents but also non-residents on a 30% 'anticipated' rate, but uncapped) plus a 90 bed facility with at least 40 employees/contractors plus Allied Services personnel and staff (particularly where there will need to be handover between staff shifts doubling up). This will result in substantial on street parking to Betty St, Doonan Rd, Melvista Ave, Granby Cres and surrounding roads. Staffing numbers for the Wellness Centre (3 treatment bays + hair salon – circa 4 staff), full commercial kitchen for up 540 food services per day (circa 4-5 staff), facilities manager (1 staff), full laundry (circa 2 staff), on site admin (circa 7 staff), on-site coffee shop (1 staff), cleaning staff (circa 3-4), orderlies and support staff (circa 2), plus nursing and staff for 90 patients (minimum 15 staff) significantly exceeds car-parking allowances. Shift changeover of nursing staff, visitors and maintenance staff further results in car-parking being significantly undersized and inadequate for a facility of this size and density. (IV) The increased traffic on the streets, and crossing the footpaths down Doonan Rd and Betty St, will be a danger to the large number of pedestrians, including children, who use the footpath to walk to Mason Gardens and the local childcare centre located less than 100m from the development. (V) Truck access will be required for servicing the grease trap for the kitchen. This does not appear to have been considered in the design. (VI) Inadequate on-site parking can result in off-site parking for nurses for night shifts. This can result in unsafe practices and security concerns for nursing staff accessing the facility at night having to park in unsecured/unmonitored locations (and overwhelming the current car-parking at Masons Gardens). (VII) Truck vehicular access for food delivery, waste removal, medical gas bottle replenishment, diesel fuel delivery, maintenance personnel for mechanical, electrical, fire and communications plant will result in significant increase to truck movements on Doonan Rd and Betty St. (VIII) Inadequate provision has been made for replacement of roof top air conditioning plant. Access for large plant can only be made via crane access from Betty St or Doonan Rd. (IX) Developer's Traffic Report also provides very little detail on the type of vehicle movements and their frequency and times during the week. This detail is also needed to form proper considered assessment of traffic movements and noise levels, which detail is also wholly lacking in the Developer's Transport Impact Statement and Acoustic Report.

#### 4. Objections to the Design

The deemed provisions outlined above and imposed by LPS 3 also require the City and Council to take into account State Planning Policy 7.0 (Design of the Built Environment) and its Design Principles (Sch 1). I believe that the design of the Proposed Development fails on various aspects in relation to each of those Design Principles, as set out below.

(a) Context and character – The design of the Proposed Development does not respond to or enhance the distinctive characteristics of the local area, and does not contribute to a sense of place, because: (I) The distinctive characteristics of the local area, including the adjacent lots, the streetscape and surrounding neighbourhood, are a low-rise, leafy and quiet neighbourhood with large green 9m setbacks and a local green park. (II) A development of the bulk, scale and size contemplated, on 2m set-backs, is not sympathetic to, and will in fact detract from, all of the distinctive characteristics of this local area. (III) The built form is a highly inappropriate in terms of bulk, scale and size to adjoining properties with box scale of building of approx. 70m overall length x 32m overall width and overall height of approximately 17m. The surrounding local homes are constrained to single blocks, and range from single level original 1930's cottages to architecturally designed 2 storey residences, incorporating significant landscaping and retention of large trees. (IV) The Proposed Development includes

large, bland featureless walls measuring 35 metres in length (running east/west), a scale that would typically be found in a mixed use or town/activity centre environment rather than the local residential area where it is proposed. (V) The 4-storey (5 level) Proposed Development with a proposed plot ratio of 1:0 would result in a scale of development which is not compatible with the amenity of the locality and which does not reinforce or respond sympathetically to the locally distinct low-rise, low-density residential neighbourhood. (VI) The density of R80 being considered is not appropriate to the existing densities which surround it (R10 and R12.5) and is not able to be sustained by the transport options provided by the narrow surrounding streets and limited access to public transport. (VII) Ramp/through access with a 4.5m high boundary wall on southern boundary will be highly visible from Doonan and Betty Streets and is aesthetically ugly along with inappropriately high unfriendly front boundary walls close to 2m near southern boundaries on Doonan Rd and Betty St. (VIII) Given the topography of the local area, this large building will be visible not just from the adjacent properties and near-neighbours, but will also be clearly visible from Masons Gardens and from various vantages around the neighbourhood. The visual projection of the development will be overbearing and detrimental to the urban fabric of the Betty St/Doonan Rd hill-scape and Mason Gardens Precinct. (IX) The Proposed Development is commercial in nature, operating 24/7 and is not suited to a residential area. The 24/7 operation of the hospital with shift changes during both the day and night with unavoidable vehicular and pedestrian flow, will destroy the quiet enjoyment of the existing and future residents of the neighbourhood in their homes. (X) The Proposed Development is not compatible with the existing amenity surrounding / abutting it due to the height, scale and bulk of the Proposed Development. The Proposed Development therefore does not comply with cl 3.1 of the LPP which states "...and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking".

(b) Landscape Quality - The design of the Proposed Development fails to recognise that together landscape and buildings operate as an integrated and sustainable system, within a broader ecological context, because:

(I) The visual projection of the development will be overbearing and detrimental to the leafy landscape of the Betty St/Doonan Rd hill-scape and Mason Gardens Precinct. (II) The Proposed Development does not protect existing environmental features and ecosystems as the design is for a building footprint over most of the site and identifies several large and very old trees of local importance which will be removed and lost forever as a result (breaching LPP cl. 4.6.3). These trees provide nesting and resting sites for various different species of birds as their canopies are high and provide the birds with a safe vantage point. (III) There is no provision in the Proposed Development for storm-water and soil management, ground and site conditions, solar access, microclimate, tree canopy, urban heat island impacts, habitat creation and preservation of green infrastructure. (IV) The Proposed Development proposes a density of occupancy that maximises the built form on the available land area, leaving limited open space for residents/patients. (V) There are very limited outdoor spaces proposed for the site, with a lack of green areas other than built-form landscaping. (VI) The LPP (clause 4.6.2) requires 25% of the site area to be landscaped but this has not been provided. (VII) The Proposed Development does not encourage social inclusion for its residents with the public and neighbours, with street-side fences and walls proposed. This does not contribute to the local streetscape where most of the front gardens do not have walls or fences, allowing neighbours to interact on a daily basis.

(c) Built form and scale – The massing and height of the Proposed Development is not appropriate to its setting and does not successfully negotiate between existing built form and the intended future character of the local area because:

(I) The building massing and scale is disproportionate to the surrounding urban vernacular. The mass and height are disrespectful to the scale and pitch lines from the adjoining properties with a consequential negative impact to the Betty St and Doonan Rd streetscapes (in breach of LPP 4.3). Its verticality will project as a dominant insertion on the residential neighbourhood. As a "for-profit" commercial operation it will damage the residential cohesion of the suburb of Nedlands. Clause 3.1 of the LPP states "design of residential aged care facilities are of a high quality and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking". The proposed development is therefore non-compliant with LPP cl. 3.1. (II) The built form is a highly inappropriate in terms of bulk, scale and size to adjoining properties with box scale of building of approx. 70m overall length x 32m overall width and overall height of approximately 17m. The surrounding local homes are constrained to single blocks, and range from single level original 1930's cottages to architecturally designed 2 storey residences, incorporating significant landscaping and retention of large trees. (III) The four-storey (5 level) Proposed Development with a proposed plot ratio of 1:0 would result in a scale of development which is not compatible with the amenity of the residential locality and which does not reinforce or respond sympathetically to the locally distinct low-rise, low-density residential neighbourhood. (IV) The scale, massing and height of new development does not respond positively to that of the adjoining buildings, the topography, the general pattern of heights, and the views, vistas and landmarks of the Doonan Rd/Betty St area, and detracts from a coherent local identity. The orientation, proportion, composition, and

articulation of built form elements should deliver an outcome that is suited to the purpose, defines the public domain, contributes to the character of adjacent streetscapes and parks, and provides good amenity for people at ground level. This Proposed Development fails to do so. (d) Sustainability – The Proposed Development does not optimise the sustainability of the built environment, delivering positive environmental, social and economic outcomes because: (I) The proposed development is not setting a target for environmental sustainability. The development is taking a just above minimum approach, proposing to exceed Part J of the National Construction Code by a stated 10%. This is an inadequate attempt to demonstrate environmental sustainability credentials. As a minimum a Green Star 6-star standard should be set, and consideration should be given to a Passive House rating. This facility will have a significant carbon footprint that will represent a substantial increase over the carbon footprint of the existing three (3) residences. (II) The Sustainability Report does not consider any modelling of obnoxious discharges from kitchen, toilet and laundry exhausts and their impact on the surrounding properties. Dispersion modelling and CFD modelling should be undertaken to determine that there is no undue impact, as required by LPP cl. 3.1. (III) The Sustainability Report has not considered any heat island impact on the surrounding properties as a result of rejecting circa 700 - 800 kW of heat from the facility to determine that there is no undue impact, as required by clause 3.1 of the LPP. (IV) The Sustainability Report has not considered glare and reflectance to properties on the east in the morning and west in the evening to determine that there is no undue impact, as required by clause 3.1 of the LPP. (e) Amenity – The Proposed Development does not offer optimise internal and external amenity for occupants, visitors and neighbours, and does not provide an environment that is comfortable, productive and healthy because: (I) The 24 hour a day noise from the large scale commercial air-conditioning plant and additional traffic and noise from staff during shift-changes, combined with the noise from the operation of the facility, including the commercial laundry and commercial kitchen will destroy the peaceful amenity of the residential locality. (II) The Proposed Development would result in detrimental impacts to the amenity and character of the low-density residential neighbourhood. (III) The proposed development will significantly impact the visual amenity of all residential lots to the east on Doonan Rd and west on Betty St and to the north on both Doonan Rd and Betty St, up to Princess Rd, particularly when the development is viewed from private outdoor areas. (IV) The Developer's proposal, with its nominated function, size and density, has not considered any technical issues and will have a material negative impact to the amenity of the locality. (V) Light spill for night-time access to car-parking and pedestrian entrances will result in light pollution to adjoining neighbours. (VI) No consideration appears to have been given for acoustic treatment for roof located air conditioning plant and roof discharges. Discharges from the facility will adversely impact neighbours and have not been considered appropriately. Discharge stacks will also extend beyond the roof line creating further visual impact. Any consideration of each should take into account the topography of the area (a depression centred around Masons Gardens, creating a 'bowl' of the surrounding streets). (VII) The acoustics technical report has not calculated the cumulative noise impact of ventilation systems with the air-cooled condensers. Significant ventilation systems will be required for the kitchen exhaust, evaporative kitchen make up, toilet exhausts, laundry exhausts and flues. To determine the full impact of the facility on adjoining residences, all noise sources should be defined and calculated on a cumulative basis. (VIII) It is not clear how the development application satisfies noise pollution restrictions when it expressly does not address the issues of the noise from the emergency generator, fire pump and commercial dryers (paras 3.4, 3.7 and 3.8 of Acoustic Report), even where they are identified to be "problematic". These are in addition to the air-conditioning for the 90 bedrooms plus common areas, the commercial kitchen and commercial laundry plus increased traffic and pedestrian noise, all of which are dealt with on a very general basis. (IX) Due to the low-rise nature of the near-neighbours, the Proposed Development will overlook the back and front yards of not just the immediately adjacent residences but also the residences across the road and up each of the surrounding streets. Given my home (at 78 Doonan Rd) is single storey home, and we are immediately to the east of the site, the Proposed Development will overlook both our front and back yards from the windows and balconies (including common areas) on the upper floors. (f) Safety – The Proposed Development does not optimise safety and security, minimising the risk of personal harm and supporting safe behaviour and use, because: (I) The Developer has neither stated approach to operation of the facility in the instance of a required lockdown during a pandemic nor a stated approach of how to protect vulnerable patients to cross infection from air borne viruses. This is an irresponsible approach to quality aged care services in a post COVID 19 environment where a duty of care exists to protect patients who are in a vulnerable position. The City would be in breach of its duty of care now with the foreknowledge that this facility presents an unacceptable risk and has not considered a COVID safe design. (II) Furthermore, the Review of Innovative Models of Aged Care, Research Paper 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety recommended respite

is provided in settings aligned to a person's background and offering structured activities. The report further recommends small scale domestic models of aged care where there is an emphasis on providing person centred care models. The proposed developments design and density is not aligned to the objectives of the Royal Commission. (III) At 90 beds of non-ambulatory patients over four (4) occupied levels, safe evacuation has been poorly considered. Safe evacuation should necessitate a sprinkler protected building with a zoned smoke management system and designated safe zones. Brigade turn out points for fire truck parking and access to brigade booster points have not been considered in the design. Evacuation of 90 non-ambulatory residents is a risk. (IV) Emergency services access to non-sprinklered areas, such as the roof plantroom, with access only available along Betty St and Doonan Rd for aerial firefighting, has not been considered. (V) Lifts in the building are to be used for vertical movement of food services, visitors, patients, maintenance personnel and removal of deceased patients. This is an unhygienic practice and demonstrates poor design practice in this facility. Good design practice would separate different traffic streams in a facility of this size and density, with the minimum provision of a dedicated goods lift. (VI) No design provision is shown for kitchen exhaust discharges, carpark ventilation discharges, generator exhaust discharge. Discharges from the facility will adversely impact neighbours and have not been considered appropriately. Discharge stacks will also extend beyond the roof line creating further visual impact. (VII) The front boundary walls are impacted further by the proposed 2.5mt setbacks beyond the current street line sets backs of 9m making it impossible to see down the street. This will result in the streetscape significantly altered with the proposed development jutting out 6.5m beyond the existing street line. Residents reversing out of their driveway will have no line of sight, keeping in mind a pedestrian footpath runs down the east side of Doonan Rd and west side of Betty St making this impossible to ensure the safety of any family walking down the street to Masons Gardens, or car driving up the street. (VIII) Inadequate on-site parking can result in off-site parking for nurses for night shifts. This can result in unsafe practices and security concerns for nursing staff accessing the facility at night having to park in unsecured/unmonitored locations (and overwhelming the current car-parking at Masons Gardens). (g) Community – The Proposed Development does not appropriately respond to local community needs as well as the wider social context accommodating change over time and responding to new social demands because: (I) Given the current impacts of the COVID-19 pandemic on similar large scale, institutional aged care facilities, it does not seem appropriate to be encouraging the development of these facilities outside a hospital precinct. (II) The Interim Report of the Royal Commission into Aged Care Quality and Safety indicates that the final report will be exploring a shift in focus from institutional style aged care, such as the Proposed Development, into lower scale ageing in place and home care which poses the question – will this Proposed Development be out-dated before it is completed. (III) The best practice recommendations of the Interim Report from the Royal Commission into Aged Care and the final report, once released in December 2020 (and ultimate legislative changes resulting from it) and the lessons learned in the context of the COVID-19 pandemic, should be taken into account in the design and approval of any new aged care facilities in the City, and indeed across the State.

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**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

---

Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I strongly object to the development application for a Residential Aged Care Facility located at 73-75 Doonan Road and 16-18 Betty Street, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of this local, low density residential area.

1.0 Planning Objections

1.1 The manner in which Council adopted the Residential Aged Care Facilities Local Planning Policy ('LPP') on 26 April 2020 is highly inappropriate, without publicly advertising major amendments made to the density, height and plot ratio.

1.2 A residential density coding of R80 as imposed by the LPP is not acceptable or justified at the subject site. It is completely out of context with a transition from the neighbouring R12.5 and R10 zoned properties.

1.3 A Local Planning Policy imposing density is not appropriate. Density should be imposed via a scheme amendment to LPS3.

1.4 The proposed development is commercial in nature, operating 24/7 and is not suited to a residential area.

1.5 The proposed development is not compatible with the existing amenity surrounding / abutting development due to the height, scale and bulk of the development. The proposed development therefore does not comply with Clause 3.1 of the LPP which states "...and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking".

1.6 In accordance with the zoning table of LPS 3, 'Residential Aged Care Facility' is allocated an 'A' use within the 'Residential' zone, meaning the use is not permitted unless the local government has exercised its discretion by granting development approval. This is an unusual application of additional use provisions given a 'Residential Aged Care Facility' is already a contemplated use within the 'Residential' zone.

1.7 Due to the removal of the proposed special use provisions in LPS 3, no development standards are applicable to the subject site except for the car parking requirements as outlined in LPS 3. A scheme amendment should be initiated to guide appropriate density.

1.8 Given the increased building height and plot ratio associated with this modification will facilitate increased bulk and scale for any development proposed, we are of the view the modifications to the draft LPP are not minor and are in fact, significant in nature particularly in relation to the locality of surrounding residential area.

1.9 Council has not followed the appropriate process in the adoption of LPP. On this basis we question the validity of the adopted LPP.

1.10 There is absolutely no justification for the application of a R80 density coding, given the significantly lower R10/R12.5 density coding of the surrounding locality.

1.11 The effect of the local planning policy is that it imposes a higher density coding without the initiation of a scheme amendment to LPS3.

1.12 The purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City, however instead it has imposed an R-coding as a mechanism to deal with scale, bulk and built form. This is not appropriate as the imposition of an R80 R-coding immediately adjacent to properties subject to an R12.5 density coding will result in significant conflict with respect to scale, bulk and streetscape impacts.

1.13 Pursuant to Schedule 2, Part 9, Clause 67(m) of the Regulations, the proposed development is not compatible with the surrounding residential neighbourhood and



particularly the adjoining land zoned R12.5. 1.14 In April 2016, the community was consulted on the proposed refurbishment of Melvista Lodge and the development of a 2-storey aged care on adjacent lots at 73-75 Doonan Road and 16-18 Betty Street. What is now proposed is completely different with a 4 storey plus basement and roof (height approx. 17 metres), 90 bed high care, aged care facility on residential zoned lots and no longer includes the refurbishment of the Melvista Lodge. The community consultation on the new proposal from the developer and City of Nedlands has been mostly non-existent. Clause 5.1 of the LPP states "Consultation with affected landowners will be undertaken in accordance with the City's Local Planning Policy- Consultation of Planning Proposals". The consultation by the Developer with the Community, undertaken on a previous scheme, therefore breaches the LPP – Consultation of Planning Proposals. 1.15 The proposed development at R80, with a plot ratio of 1.0 will significantly impact the adjoining land and surrounding low density residential neighbourhood. 1.16 Clause 4.6.2 of the LPP states "A minimum of twenty-five per cent (25%) of the site area is to be landscaped". The proposed development does not comply with this requirement of the LPP. 1.17 The set back of the boundary on 71 Doonan Road is non compliant with the LPP Clause 4.5.2 which requires a 7.5m set back and permanent screening to 75% obscure. The proposed plan has a 6.4m setback and NO screening. 1.18 The purpose of the LPP is to provide guidance and development requirements for residential aged care facilities within the City. The LPP makes no delineation between differing models of care (e.g. independent living units, low care, high care). The planning guidelines set out in the LPP, as drafted, applies the same planning conditions irrespective of the model of care. Different models of care have differing levels of servicing. This has not been considered in the application of the LPP. This has resulted in a High Care facility with an inappropriate density being located in a precinct unsuited to the facility function. The LPP should be redrafted to reflect the specific function and nature of aged care models of care, with appropriate planning of such facilities contextually. 1.1 There was no development control plan applied to this land at the time of its rezoning. This in effect meant anything could have been built. The rushed endorsement of an R80 equivalent zoning without community consultation has denied the community the opportunity to comment on the appropriateness of this density in a residential zone. 2.0 Design Objections 2.1 The built form is a highly inappropriate in terms of scale and size to adjoining properties with box scale of building of approx. 70m overall length x 32m overall width and overall height of approx 17m 2.2 The development includes large, bland featureless walls measuring 35 metres in length (running east/west), a scale that would typically be found in a mixed use or town/activity centre environment. 2.3 The proposed development, should it be constructed as proposed, would result in detrimental impacts to the amenity and character of the low-density residential neighbourhood. 2.4 The four-storey development with a proposed plot ratio of 1.0 would result in a scale of development which is not compatible with the amenity of the locality and is not suitable within a low-density residential neighbourhood. 2.5 The proposed development will significantly impact the visual amenity of all residential lots to the north on Doonan Road and Betty Street, up to Princess Road, particularly when the development is viewed from private outdoor areas. 2.6 The Developer's proposal, with its nominated function, size and density, has not considered any technical issues and will have a material negative impact to the amenity of the locality. 2.7 Building massing and scale is disproportionate to the surrounding urban vernacular. The mass and height are disrespectful to the scale and pitch lines from the adjoining properties with a consequential negative impact to the Betty Street and Doonan Road streetscapes. Its verticality will project as a dominant insertion on the residential neighbourhood. As a "for-profit" commercial operation it will damage the residential cohesion of the suburb of Nedlands. Clause 3.1 of the LPP states "..... design of residential aged care facilities are of a high quality and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking." The proposed development is therefore non-compliant with clause 3.1 of the LPP. 2.8 Building density provides a poor level of amenity for residents and patients with very limited access to outdoor spaces. Lack of green areas for the residents. The LPP requires 25% of the site to be landscaped. The proposal is nowhere near this and hence it is non compliant with the flawed LPP. 2.9 The facility provides a poor work environment for nursing staff. No nursing stations or staff lounges/breakout spaces are provided for staff. 2.10 Ramp/through access with a 4.5m high boundary wall on southern boundary will be highly visible from Doonan and Betty Streets and is aesthetically ugly along with inappropriately high unfriendly front boundary walls close to 2m near southern boundaries on Doonan and Betty Streets. 2.11 These front boundary walls are impacted further by the proposed 2.5mt setbacks beyond the current street line sets backs of 9m making it impossible to see down the street. This will result in the streetscape significantly altered with the proposed development jutting out 6.5m beyond the existing street line, Residents reversing out of their driveway will have no line of sight, keeping in mind a pedestrian footpath runs down the east side of Doonan and west side of Betty making this impossible to ensure the safety of any family walking down the street to Masons Gardens, or car driving up the

street. 2.12 The visual projection of the development on the north facing Masons Gardens vista will be overbearing and detrimental to the urban fabric of the Betty Street – Doonan Road hillscape and Mason Gardens Precinct. 2.13 The proposed development is not setting a target for environmental sustainability. The development is taking a just above minimum approach, proposing to exceed Part J of the National Construction Code by a stated 10%. This is an inadequate attempt to demonstrate environmental sustainability credentials. As a minimum a Green Star 6-star standard should be set, and consideration should be given to a Passive House rating. This facility will have a significant carbon footprint that will represent a substantial increase over the carbon footprint of the existing three (3) residences. 2.14 The Developer has no stated approach to operation of the facility in the instance of a required lockdown nor a stated approach of how to protect vulnerable patients to cross infection from air borne viruses. This is an irresponsible approach to quality aged care services in a post COVID 19 environment where a duty of care exists to protect patients who are in a vulnerable position. The City of Nedlands would be in breach of your duty of care now with the foreknowledge that this facility presents an unacceptable risk and has not considered a COVID safe design. 2.15 The proposed development proposes a density of occupancy that maximises the built form on the available land area, leaving limited open space for residents/patients. The LPP, clause 4.6.2 requires 25% of the site area to be landscaped. This has not been provided. Furthermore, the Review of Innovative Models of Aged Care, Research Paper 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety recommended respite is provided in settings aligned to a person's background and offering structured activities. The report further recommends small scale domestic models of aged care where there is an emphasis on providing person centred care models. The proposed developments design and density is not aligned to the objectives of the Royal Commission. 2.16 At ninety (90) beds of non-ambulatory patients over four (4) occupied levels, safe evacuation has been poorly considered. Safe evacuation should necessitate a sprinkler protected building with a zoned smoke management system and designated safe zones. Brigade turn out points for fire truck parking and access to brigade booster points have not been considered in the design. Evacuation of 90 non-ambulatory residents is a risk. 2.17 Brigade access to non-sprinklered areas, such as the roof plantroom, with access only available along Betty Street and Doonan Road for aerial firefighting, has not been considered. 2.18 No consideration appears to have been given for acoustic treatment for roof located air conditioning plant and roof discharges. 2.19 Lifts in the building are to be used for vertical movement of food services, visitors, patients, maintenance personnel and removal of deceased patients. This is an unhygienic practice and demonstrates poor design practice in this facility. Good design practice would separate different traffic streams in a facility of this size and density, with the minimum provision of a dedicated goods lift. 2.20 The car parking provisions are significantly underestimated. This will result in substantial on street parking to Betty St, Doonan Rd, Melvista Ave, Granby Cres and surrounding roads. Staffing numbers for the Wellness Centre (3 treatment bays + hair salon – circa 4 staff), full commercial kitchen for up 540 food services per day (circa 4-5 staff), facilities manager (1 staff), full laundry (circa 2 staff), on site admin (circa 7 staff), on-site coffee shop (1 staff), cleaning staff (circa 3-4), orderlies and support staff (circa 2), plus nursing and staff for 90 patients (minimum 15 staff) significantly exceeds carparking allowances. Shift changeover of nursing staff, visitors and maintenance staff further results in carparking being significantly undersized and inadequate for a facility of this size and density. 2.21 Grease trap for the kitchen will require truck access for pumping out the grease trap. This does not appear to have been considered in the design. 2.22 Inadequate on-site parking can result in off-site parking for nurses for night shifts. This can result in unsafe practices and security concerns for nursing staff accessing the facility at night having to park in unsecured/unmonitored locations. 2.23 No design provision is shown for kitchen exhaust discharges, carpark ventilation discharges, generator exhaust discharge. Discharges from the facility will adversely impact neighbours and have not been considered appropriately. Discharge stacks will also extend beyond the roof line creating further visual impact. 2.24 Truck vehicular access for food delivery, waste removal, medical gas bottle replenishment, diesel fuel delivery, maintenance personnel for mechanical, electrical, fire and communications plant will result in significant increase to truck movements on Doonan Road and Betty Street. 2.25 Inadequate provision has been made for replacement of roof top air conditioning plant. Access for large plant can only be made via crane access from Betty Street or Doonan Road. 2.26 Light spill for night-time access to carparking and pedestrian entrances will result in light pollution to adjoining neighbours. 2.27 The renders and plans being promoted by the Developer do not correctly illustrate the upper levels and roof form which will be highly visible. These images and plans are misleading. In addition, the elevations do not show the upper level in bold, again misleading. 2.28 Subterranean courtyards on the eastern/western boundaries/northern edge - Doonan Road/Betty Street are unsightly/dark and out of character with the wide, large verges of the suburb. 2.29 The developer, Oryx, is inexperienced. It is noted that the Developer has operated only one aged care facility to date, the recently acquired hotel, The Richardson in West Perth. Following acquisition that was subsequently refurbished to

accommodate aged care. 2.30 Only 5 of the direct neighbours were afforded a one on one meeting with the Developer's consultants on the week of 22 June 2020. This was the first time the neighbours had been approached regarding this proposal. The Developer was not present at the resident meetings with representation being made by their Stakeholder Engagement Consultant, Creating Communities, and Town Planning Consultant, Planning Solutions.

### 3.0 Sale of Land Objections

#### 3.1 75 Doonan Road

was sold by private treaty to the developer before the land was designated 'special use' allowing aged care. The land should have been offered to the open market, particularly when it was widely known the owners of Melvista Lodge directly to the south were also interested in purchasing the land.

#### 3.2

The land was sold as a Residential R10/R12.5 lot when the City knew its intent was always to redesignate the land. Why would the City sell land to a developer, prior to its redesignation. Why did they not designate it for aged care use first and by inference, sell the land at a much higher price? How have the City's ratepayers benefited from this sale? We note the developer paid \$2.6 million for the last residential piece of land required for this proposed development leaving the sale of the land by The City in question.

### 4.0 Technical Reports Objections

#### 4.1

The acoustics technical report has not calculated the cumulative noise impact of ventilation systems with the air-cooled condensers. Significant ventilation systems will be required for the kitchen exhaust, evaporative kitchen make up, toilet exhausts, laundry exhausts and flues. To determine the full impact of the facility on adjoining residences, all noise sources should be defined and calculated on a cumulative basis.

#### 4.2

The Sustainability Report does not consider any modelling of obnoxious discharges from kitchen, toilet and laundry exhausts and their impact on the surrounding properties. Dispersion modelling and CFD modelling should be undertaken to determine that there is no undue impact, as required by clause 3.1 of the LPP.

#### 4.3

The Sustainability Report has not considered any heat island impact on the surrounding properties as a result of rejecting circa 700 - 800 kW of heat from the facility to determine that there is no undue impact, as required by clause 3.1 of the LPP.

#### 4.4

The Sustainability Report has not considered glare and reflectance to properties on the east in the morning and west in the evening to determine that there is no undue impact, as required by clause 3.1 of the LPP.

#### 4.5

The Transport Impact Statement (TIS) has not calculated the total number of staff or visitor numbers in its car parking assessment for a facility of this nature. The TIS has relied on an allowance of 1 car bay per 4 beds. A high dependency aged care facility will have a significant staffing requirement that will exceed this requirement. It will also have significant visitor numbers. The TIS has made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment of carparking and traffic movements.

#### 4.6

Developer's Traffic Report also provides very little detail on the type of vehicle movements and their frequency and times during the week. This detail is also needed to form proper considered assessment of traffic movements and noise levels, which detail is also wholly lacking in the Developer's Transport Impact Statement and Acoustic Report.

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**Respondent No:** 377

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 10:57:32 am

**Last Seen:** Jul 25, 2020 02:48:05 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

Dear Nedlands Council, I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal. Sincerely,

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**Respondent No:** 378 **Login:**

**Email:**

**Responded At:** Jul 25, 2020 11:01:23 am

**Last Seen:** Jul 25, 2020 02:51:22 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

While we acknowledge the need for aged care facilities, we strongly to object to this particular proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. We consider that this commercial proposal is too large, intrusive and represents extreme over-development. We are concerned at the steps leading up to this proposal. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. We are deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. We do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. We also object for the following reasons: 1. The proposal is INCONSISTENT with the Residential Aged Care Facility Local Planning Policy, particularly in relation to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal are INCONSISTENT and INCOMPATIBLE with the locality. 3. Due to its intensive nature, the proposal will UNACCEPTABLY IMPACT on the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal DIMINISHES THE VISUAL AMENITY of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been INADEQUATELY CONSIDERED or accommodated in the proposal and the likely and reasonable needs of the development have been understated. We urge you not to support this proposal.

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**Respondent No:** 379

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 11:03:26 am

**Last Seen:** Jul 25, 2020 02:54:38 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I object to this Development Application The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. Please reject this development application and update the local policy to ensure that it does not happen again

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**Respondent No:** 380

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 11:05:22 am

**Last Seen:** Jul 25, 2020 03:02:20 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**  Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. My objection is made on the following grounds: 1 The proposal is inconsistent with the Residential Aged Care Facilities Local Planning Policy because of the undue impact it will have on the residential amenity of the area. 2 The height, bulk and scale of a four-storey development proposal is incompatible with the locality and surrounding developments. 3 The proposal will result in unacceptable increases in noise, traffic, odours, car parking congestion and light pollution. 4 The proposal fails to adequately manage or mitigate the impacts it will have on the existing and future residential amenity. 5 The design of the proposal is imposing and unsympathetic to the existing character of the area. Not only does that have aesthetic implications, the contrast in setbacks affects sight lines, and therefore vehicle and pedestrian safety. 6 The car parking and traffic assessments do not adequately take into account the realistic vehicle movements the proposal will generate.

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**Respondent No:** 381

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 11:09:05 am

**Last Seen:** Jul 25, 2020 02:48:54 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I formally place on record my OBJECTION to the proposed Residential Aged Care Facility at Lots 10 and 11 ( ie 16 to 18 Betty Street) and Lots 18 and 19 ( ie 73 and 75 Doonan Road ) Nedlands. The Developer will comprehensively rely on the City's Residential Aged Care Local Planning Policy in seeking and applying for approval for this intensive four storey ( 6 storey if you consider the underground aspect ) development in a LOW DENSITY RESIDENTIAL AREA. I am extremely and deeply concerned that such a major change made to the Policy which allows for a very significant increase in Development capability was NOT made to the PUBLIC nor the directly involved immediate surrounding and existing residential owners within a radius of at least 5km. The Sale of the 4 blocks with R 10/R 12.5 zoning was conducted without FULL DISCLOSURE to the residents of Nedlands or the General Public and even more importantly, the complete silence on the Intent of the Council to change/ rezone the 4 Blocks to A9 zoning which allows for this Incorrect Commercial Development of a Residential Aged Care facility in what is a Residential area and has been so since Mr Nedlands first made this area into a residential precinct. In addition, I also strongly object for the following reasons: 1) The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2) The height, bulk and scale of the proposal is inconsistent and incompatible with the locality 3) Due to the intensive nature of this development, this proposal is unacceptable with respect to the detriment of the amenity to the locality in relation to noise, light, traffic, odour, safety to children and adults, unnecessary crowding and other potential dangers that are currently not present. 4) the proposal diminishes the visual amenity of the locality with this 4 storey development sticking out like a sore thumb and being completely out of place and character ; I note the vastly different setbacks of this proposed development and the existing area and this is not in character with the existing aesthetics and visuality of the area. 5) Car parking and traffic have been inadequately considered for a development of this size. It has been understated and with unsatisfactory due diligence and thought process that has been made with respect to traffic. 6) It poses a Coronavirus disease-19 threat to the aged and local population. Nothing has been mentioned about a Coronavirus disease-19 Safety Plan or Pandemic Plan for this facility. The nature of this whole proposal the Aged Care Facility Development has been made with intent of conversion of a residential area to a commercial area under the guise of providing aged care facilities, which only benefits selective parties concerned. I strongly OBJECT to this proposal.

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**Respondent No:** 382

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 11:10:42 am

**Last Seen:** Jul 25, 2020 03:08:42 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

This development is not needed. There is already MELVISTA Lodge. This will be an eyesore and spoil the beauty of Mason Gardens.

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**Respondent No:** 383

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 11:20:24 am

**Last Seen:** Jul 25, 2020 03:07:22 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

There appears to have been a lack of transparency around the proposal of this development. That in itself is a major concern. This development would in fact be a commercial hospital facility which would require access by many services as well as the families and members of the public wishing to visit residents. As such, this would cause major traffic congestion and an increase in people accessing the facility. This is not in keeping with the residential status of this neighbourhood and would ruin the ambience of this sought after location. My husband and I strongly agree that this proposal is not acceptable and should be rejected by the city of Nedlands.

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**Respondent No:** 384

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 11:29:18 am

**Last Seen:** Jul 25, 2020 03:21:13 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I object to this development application - the proposal relies on components of a local planning policy which were not advertised to the public (and should have been). The proposal fails to take into account both the existing and future amenity of the locality. Further, there is no effort to design in a sympathetic or respectful way given the incredible conflict of development controls that are being applied compared to the applicable residential development controls. For example, the set backs of 2 metres compared to the 6 metre setbacks of the houses nearby. The major featureless external walls mean there is no interface between the surrounding developments and what is proposed. The bulk and scale are so beyond what was contemplated for this area. This is a perfect example of why the Aged Care LPP is completely flawed and a totally inappropriate vehicle for development control.

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**Respondent No:** 385

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 11:32:29 am

**Last Seen:** Jul 25, 2020 03:12:56 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

1. Proposed development will spoil the charm of leafy residential suburb that we lovingly called it our home with large 90 bed commercial/residential aged care facility. We have moved to Nedlands from a suburb of Randwick ( Sydney) where we lived in high rise apartments with limited car parking and heavy traffic. Since moving to WA, we selected to live in Nedlands for the past 13 years as this suburb offers great spacious homes with greenery that we all love with our own backyard... so much an Aussie icon. The development will simply spoil this charm by over populating the suburb by allowing a commercial facility in amongst leafy residential area. 2. Increased traffic flow in Princess Rd, which is already too busy during morning rush hr as lot of motorists use this rd from Bay rd to Hackett drive avoiding traffic signals at Stirling highway 3. Our privacy in our backyard has been compromised by a tall 2 storey residence at Granby Cres now with a 4 storey high development at Betty St 4. The use of Mason garden for our local children and community is a safe area and now with 90 residents, their family and staff this park will become too crowded and potentially unsafe area for our children to play 5. Increased traffic flow from delivery trucks, ambulances, vehicles from occupants around Betty St, Melvista Ave, Vincent St, Princess Rd 6. Environmental pollution from noise, air emissions from vehicles and operations of the facility 7. Multistorey building does not blend with the idyllic settings of Nedlands houses that all have their own character and charm

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**Respondent No:** 386

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 11:33:14 am

**Last Seen:** Jul 25, 2020 03:07:48 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Occupier of a property
<input type="checkbox"/>	Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the proposed development at No. 16 & 18 Betty Street and 73 & 75 Doonan Road on the following grounds: \* Betty St / Doonan Rd and surrounding streets are not designed to handle the significant extra traffic (additional visitors to the area) that would be generated by the creation of 90 new aged care suites. These roads already see more traffic than they were designed for and often require waiting when driving between Princess Road and Melvista Ave. If this development is allowed to go ahead, this traffic problem would be exacerbated to the point that these roads would become practically unusable for large periods of the day. There would be no alternative path to enter or leave the site. \* Insufficient parking has been provided for such a significant development which will have a flow on impact on the surrounding area. Betty St already has its on street parking full with visitors to the existing nursing home during the day and 26 parking bays will not be sufficient to accommodate the significant increase in visitors to the area. The fact that only 2 ACROD bays have been provided for (in the basement of the building) for an aged care facility clearly shows the developer has not taken into account the parking requirements for the development. \* The scale and height of the building is not in keeping with low level residential and other mixed use development in the area. \* The proposed development takes up the entire site and does not provide adequate green space or recreational facilities for its proposed residents, which will necessarily put strain on the facilities in the surrounding area (with associated rubbish etc) including Mason Gardens. I kindly request that you reconsider the proposed development and either reject the proposal or suggest it is amended to make it more suitable for the area, taking into account my above concerns.

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**Respondent No:** 387

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 11:40:07 am

**Last Seen:** Jul 25, 2020 03:14:46 am

**IP Address:** 58.175.64.11

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I formally place on record my OBJECTION to the proposed Residential Aged Care Facility at Lots 10 and 11 ( ie 16 to 18 Betty Street) and Lots 18 and 19 ( ie 73 and 75 Doonan Road ) Nedlands. The Developer will comprehensively rely on the City's Residential Aged Care Local Planning Policy in seeking and applying for approval for this intensive four storey ( 6 storey if you consider the underground aspect ) development in a LOW DENSITY RESIDENTIAL AREA. I am extremely and deeply concerned that such a major change made to the Policy which allows for a very significant increase in Development capability was NOT made to the PUBLIC nor the directly involved immediate surrounding and existing residential owners within a radius of at least 5km. The Sale of the 4 blocks with R 10/R 12.5 zoning was conducted without FULL DISCLOSURE to the residents of Nedlands or the General Public and even more importantly, the complete silence on the Intent of the Council to change/ rezone the 4 Blocks to A9 zoning which allows for this Incorrect Commercial Development of a Residential Aged Care facility in what is a Residential area and has been so since Mr Nedlands first made this area into a residential precinct. In addition, I also strongly object for the following reasons: 1) The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2) The height, bulk and scale of the proposal is inconsistent and incompatible with the locality 3) Due to the intensive nature of this development, this proposal is unacceptable with respect to the detriment of the amenity to the locality in relation to noise, light, traffic, odour, safety to children and adults, unnecessary crowding and other potential dangers that are currently not present. 4) the proposal diminishes the visual amenity of the locality with this 4 storey development sticking out like a sore thumb and being completely out of place and character ; I note the vastly different setbacks of this proposed development and the existing area and this is not in character with the existing aesthetics and visuality of the area. 5) Car parking and traffic have been inadequately considered for a development of this size. It has been understated and with unsatisfactory due diligence and thought process that has been made with respect to traffic. 6) It poses a Coronavirus disease-19 threat to the aged and local population. Nothing has been mentioned about a Coronavirus disease-19 Safety Plan or Pandemic Plan for this facility. The nature of this whole proposal the Aged Care Facility Development has been made with intent of conversion of a residential area to a commercial area under the guise of providing aged care facilities, which only benefits selective parties concerned. I strongly OBJECT to this proposal.

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**Respondent No:** 388

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 11:53:39 am

**Last Seen:** Jul 25, 2020 03:45:12 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. To the extent the decision maker chooses to rely on significant and unadvertised provisions of the Policy, I further object as follows: 1. The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. 2. The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. 3. The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 4. Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. 5. The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and pedestrian safety. 6. Notwithstanding claims made by the developer, the community does not support this proposal and has not been properly consulted. I urge you not to support this proposal. Regards.

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**Respondent No:** 389

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 11:54:14 am

**Last Seen:** Jul 25, 2020 03:52:40 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**  Other

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Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I think it is important to carefully plan any aged care facility especially now with Covid-19 and future viruses like it. There needs to be a focus on low level buildings so it very disappointing to see that the developer is proposing a high-rise hospital like building for old people especially given all the deaths associated with Covid-19. Most aged care buildings seem to be on large sites 10,000sq.m and over, so this building near Masons Gardens, in the middle of a low residential area is completely out of place. I am therefore writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands proposal) I don't think enough consideration has been given by the developer in respect to the significant increase in noise, traffic and odour that will be associated with this building when it becomes operational. Supporting 90 aged care beds will require a significant work force across three shifts 24/7. This will impact on parking and there does not appear to be enough provision for on-site car parking. There will also be many visitors who will require parking spaces. Other aged care places I have visited have a lot more parking bays allocated. This means that there will be a natural overflow to surrounding streets and Masons Gardens, which seem already under pressure catering for the Lisle Village, Kindergarten and Park. · This will also create a lot of congestion in the street causing 'back-ups' as cars wait to access intersections at both ends of Betty and Doonan streets. Most importantly this will mean a significant reduction in vehicle and pedestrian safety. This is further compounded by the large differences in setbacks between existing developments and the proposed development 2-3m vs 9m. · The building itself looks more like an institution with its black bars on balconies. It is an intensive height, taking up almost the entire 4 blocks. The scale of the building as compared to the low density residential surround, looks completely out of character and not a particularly attractive or innovative design. Many aged care buildings are low level, no more than 10 metres in height. This is particularly important in terms of evacuation requirements if ever there was a fire. It would be nice to have an Aged care building more sympathetic to the surrounding environment. The proposed building is completely out of character with the locality. My main concern is that it will have an unacceptable detrimental impact on amenity for local residents as well as the people who take up beds. · There doesn't seem to have been any thought put into the emotional wellbeing and healthfulness for the aged, there are no courtyards or green sitting areas or mature trees over ten metres in the proposal. In fact it seems like the lovely mature gums on Doonan road will be removed. · I haven't been able to find anything about the operational management plans or mitigation strategies.

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**Respondent No:** 390

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 11:55:45 am

**Last Seen:** Jul 25, 2020 03:47:15 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 391

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 12:08:24 pm

**Last Seen:** Jul 25, 2020 04:06:09 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Our property sits directly opposite the development site and the vacant block of land previously owned by ratepayers. I am writing to strongly object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is inappropriate in scale compared to our neighbourhood, which is a low density residential area. The development is highly unlikely to either protect or enhance the current and future amenity and character of our neighbourhood. I am concerned that the current proposal relies upon provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for significant intensification of what could be developed on the site, without appropriate justification. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified within the surrounding R coding, particularly given the nature of the locality. To the extent the decision maker chooses to rely on these significant and unadvertised provisions of the Policy, I further object as follows: 1. Policy objectives 1.1 One of the primary objectives of the Policy is – “to ensure the appearance and design of residential aged care facilities are of high quality and do not have an undue impact on the residential amenity by way of building bulk and scale, noise, traffic or parking”. The proposal fundamentally conflicts with this objective given the stark and jarring contrast between the surrounding R10 and R12.5 locality and the proposed four storey R80 development. The number of residents proposed to be accommodated will increase the residential capacity of the site by over 1000%. This facility will only accommodate elderly people in need of high levels of physical care, so the actual level of daily occupation will be further increased by staffing numbers. The consequential visual impact, noise, traffic and parking that will flow from such an intensification will destroy the residential amenity of the locality. 2. Compatibility with setting (bulk, scale and height) 2.1 The Site is surrounded by low density residential development. The land immediately to its east and west is R10 and the land to its north is R12.5. The contrast between the existing density and the proposed R80 coding will be sharp, and the proposed plot ratio is wholly incompatible with the broader setting. It will dominate the surrounding streetscapes forever changing the locality. 2.2 The bulk and scale of the proposal is imposing in its context. The proposal makes no attempt to mitigate the visual impact of its northern and southern walls, which are large and bland, on the adjacent neighbours and streetscape. The visual impact from the public setting of Masons Gardens is equally imposing and stark and akin to a cruise ship sitting above the park. 2.3 The depicted bulk and scale of the Melvista Lodge land (immediately to the South of the Site) in the development application plans is misleading. There are no such plans

proposed or prepared, and the proposal is inconsistent with its setting in that regard. Redevelopment of Melvista Lodge is not likely or imminent given the nature of the landholdings there. Council minutes from 23 June 2020 indicate that the City of Nedlands is not involved in any discussions about planned development of the site.

2.4 The proposed street frontage setbacks of 2.5 metres undermine line of sight in the context of the surrounding residential developments which have 9 metre setbacks. This has significant negative visual impact with complete disregard for the local setting. Additionally, this has safety implications for drivers, cyclists and pedestrians using Doonan Road and Betty Street.

2.5 The proposed development exceeds the plot ratio of 1.0 permitted by the Residential Aged Care LPP. The developer has excluded areas that should be included in the stated calculations.

3. Amenity

3.1 The proposal fails to take into account the existing and future character of the locality. The City has a new local planning scheme, and whilst higher density has been provided for elsewhere, this locality preserved its low density coding. There is a clear intention and understanding that the low density residential nature of the area should be maintained. A high rise intensive aged care development completely undermines that intention.

3.2 The proposal will significantly diminish visual amenity of the area due to its size, scale and design. It is not in keeping with the character or streetscape in the locality.

3.3 The proposal represents a significant intensification in how the site will look and operate. It increases the number of people living on the site by over 1000%. The level of staffing and services required to accommodate 90 high needs aged care residents must not be understated. The developers have failed to adequately account for likely staffing numbers in information sessions with residents and in the Development Application Report. The cumulative impact of 90 residents, combined with the servicing and operational requirements of the facility and movement of staff, visitors and deliveries, will result in a substantial increase in:

3.3.1 noise from traffic movements, at all hours of the day, to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users;

3.3.2 noise generated from the operations of the proposal, including air-conditioning, services, and an intensive increase of population and people movement;

3.3.3 light spill from 24 hour a day operations; and

3.3.4 odours generated from the operations of the proposal, including catering, laundry and servicing.

3.4 No management plans have been provided to show how the detrimental amenity impacts which will arise from such an intensified use will be mitigated, particularly given its hours of operation. No development condition will be validly capable of managing those impacts.

4. Traffic

4.1 The proposal will result in a significant increase in vehicle movements to and from the site, at all hours of the day.

4.2 The Traffic Impact Statement made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high care facility. It is therefore an inappropriate document upon which to base the assessment traffic movements.

4.3 The Transport Impact Statement provides very little detail on the type of vehicle movements and the frequency and timings of those movements. This detail is essential to form a properly considered assessment of traffic movements and their impacts, and the document therefore cannot be relied upon.

4.4 The Development Application Report and Traffic Impact Statement report that there is no need for service vehicle bays, as service vehicles can safely navigate through the parking garage. However, the Acoustic Report section 3.3 reports that trucks will not be able to access the basement due to the horizontal and vertical clearances of the sunken laneway. The Acoustic Report only allows for delivery vans. These are contradictory reports and therefore the Traffic Impact Statement report cannot be relied upon.

4.5 The proposed facility has a "Wellness Centre" with gymnasium, hair salon and consultation rooms that will be open to the public, according to the Development Application Report. There have been conflicting and varying statements about external use in written information provided by the developer to the community and in the Development Application Report, so the Traffic Impact Statement cannot be relied upon to detail additional traffic impact from this component of the development.

5. Car Parking

5.1 The number of administrative, catering, cleaning, medical, allied health and maintenance staff required to support a 24/7 90-bed high care facility is not likely to be supported by 26 bays. No details of total staffing number, breakdown of staff across the facility, distribution of staff across times of day, or likely numbers of regular visiting health care providers and regular visiting supportive care providers have been given. No parking allowances have been made for deliveries. The developer has made assumption about numbers and visiting time of expected visitors, which are inconsistent with the repeated promotion of the facility allowing residents to age in their local neighbourhood. The number of "Wellness Centre" staff has not been provided and the number of external patrons is vaguely reported. The car parking provided is well below ratios provided by similar care providers in the City of Nedlands, and the Council's ratio of allocation in its Local Planning Policy is well below what other Councils mandate for Aged Care Facilities (City of Melville: 1 bay per 3 beds plus 0.5 bays per staff member).

5.2 The surrounding streets are not capable of supporting the street car parking which will necessarily arise due to the lack of sufficient on-site car parking. Furthermore, the Development Application Report and the Traffic Impact Statement have not detailed the loss of street parking due to the entrance and exit of the basement car parking at the southern ends of Betty St and Doonan Rd. The area

is already significantly impacted by street parking by residents, visitors and care providers at Melvista Lodge, which does not have on site parking for all residents.

6. Community consultation

6.1 The developer relies on consultation it conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different from what is currently proposed. It included refurbishment of the derelict nursing home on Betty St, provision of aged care services to residents of Lisle Villages/Melvista Lodge, and a two storey residential aged care facility. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed.

6.2 The developer has not been transparent about the extent of community support for its original proposal in 2016. The Development Application Report states that 160 people attended “open days” and gives percentages of responses to its “Community Survey” in 2016. However, the developer has failed to state that only 79 people responded to the Survey (Creating Communities Report for Oryx in May 2016). The presentation of data in the Development Application Report is misleading. Furthermore, the largest single group of respondents to the survey were residents of Lisle Villages, which included residents from Leaweena Lodge and Lisle Lodge ie not from the “local” area the proposal is suggesting it will serve. Only 34 people from Nedlands (excluding Melvista Lodge residents) responded to the survey. This is a completely unrepresentative, statistically insignificant sample size and should not be considered as evidence of wide community support.

6.3 Immediately affected residents have either never been contacted or have only recently been informed about the extent of the proposal. I have been a property owner and resident at 80 Doonan Rd, Nedlands (directly opposite the development site) since December 2016. I had never been contacted by Oryx prior to an unaddressed letter being left in my letterbox on 16 June 2020. I am aware that many residents in Doonan Rd and Betty St did not receive any contact. I met with Creating Communities (on behalf of Oryx) on 23 June 2020. They initially refused to provide information materials prior to the meeting and only did so after repeated requests. The information brochure was only provided the evening before the meeting. The representatives were unable to answer the majority of pertinent and fundamental questions asked about the development and the functioning of the facility. I did not receive a timely response to questions asked at the meeting and still have not had answers to basic questions, including total number of staff and breakdown of staff numbers. I had to email to request answers 2 weeks after the meeting, despite assurances they would be forwarded within 2-3 days. I note that Council members received a copy of answers to Community FAQs from Oryx prior to all affected residents in Betty St/Doonan Rd. Directors of Oryx have refused to meet with the affected community residents and property owners as a group to address common concerns, despite having met with residents of Melvista Lodge as a group.

7. Other

7.1 Clause 4.6.2 of the Policy states – “a minimum of twenty-five per cent (25%) of the site area is to be landscaped”. The proposed development does not comply with this requirement of the Policy.

7.2 Section 4.6.3 of the Residential Aged Care Local Planning Policy states that the design should maximise the retention of existing mature trees as well as existing verge trees. No plot trees will be maintained. There is insufficient deep soil area and rootable soil zone to sustain adequate growth of replacement trees on the development plot, given the setbacks and planned planting of trees in close proximity to the building. Additionally, a mature tree on the southern verge of Doonan Rd is marked as being retained. It is within 3-4m of the southern boundary at the planned location of the entrance to the basement and clearly will be extremely vulnerable to irretrievable root damage during construction and is unlikely to be retained. On page 4 of the Architectural Documents (the site plan), this tree at the southern boundary of the verge on Doonan Rd is not illustrated to scale. In reality, it is significantly larger than the tree illustrated on the opposite verge at 80 Doonan Rd. This is misleading. Mature trees on the northern verges of Betty St and Doonan Rd are marked as being retained. Given that they are both within 3m of areas that will undergo deep soil excavation for construction, it is unlikely that they will be retained. The significant loss of tree canopy undermines the local character of the neighbourhood and will contribute to heat island effect of such a large building.

7.3 The proposal will have a significant carbon footprint, and only just exceeds the minimum standards for environmental sustainability under the National Construction Code.

7.4 There is inadequate reporting of overshadowing, particularly of Melvista Lodge to the south. Figures are only given for 12pm, not across times of the day, which are relevant given the bulk of the development. Residents are likely to experience negative impact on light and solar capture panels.

7.5 Section 6.2 of the Residential Aged Care Facility Local Planning Policy states that the Development Application Report should include hours of visitation and staff numbers (which should include on site staff and visiting staff). The Report does not include either.

7.6 The Café and “Wellness Centre” (including gym, hair salon and consulting rooms) do not appear to conform to residential zoning “incidental use” if open to the public, particularly if the services are subcontracted. There does not appear to be any means of regulating external patronage of the Wellness Centre beyond inconsistent assurances by the developer. Of note, the information provided in person in “community consultation” stated

maximum of 10% external use, while the Development Application Report states 10-30% of total use and up to 10 external patrons per day. Using these figures, this would require 33 residents (of 90) to be treated each day for the Wellness Centre to fulfil the criteria of “incidental use” with the reported external patronage if the generous figure of 30% is considered incidental. This appears to be a commercial use that is not in keeping with the intent of “incidental use” in an aged care facility. A hair salon does not fit within the criteria of “standard Allied Health aged care services”, neither does a gym, unless it is solely staffed and supervised by qualified Allied Health Providers, including Physiotherapists and Occupational Therapists. 7.7 The proposal fails to take into account the recommendations of the Review of Innovative Models of Aged Care Research Paper, 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety in terms of its design and density. The report details factors associated with better health and quality of life outcomes for elderly people in residential care. These factors should be considered in Aged Care Planning as they are known to reduce negative outcomes, including rates of depression, rates of behavioural disturbance and rates of physical and/or chemical restraint. Forward planning of aged care should “future proof” for the community. 7.7.1 It does not resemble a “homelike” environment that maximises independence and participation in daily activities. 7.7.2 It is a large scale living environment. 7.7.3 Independent access to outdoor areas is limited to terraces/balconies. 7.7.4 There are no true green spaces or gardens, only small courtyards. 7.7.5 There are no designated activity areas. I urge you not to support this development.

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**Respondent No:** 392

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 12:08:24 pm

**Last Seen:** Jul 25, 2020 03:58:45 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Having read the various documents I have serious concerns about this proposed development. Significant traffic and parking as a result of delivery vehicles, staff cars and visitor cars Noise and vibration pollution from the building plant which will effect quite a wide range of neighbours not just the immediate homes Kitchen odours pervading the neighbourhood Overlooking close neighbours' homes and gardens Potential overshadowing of neighbours This is the wrong place for a multi-storey commercial business. The Council should locate such a facility where there was one for many years - at Sunset Homes.

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**Respondent No:** 393

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 12:17:31 pm

**Last Seen:** Jul 25, 2020 04:31:57 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Occupier of a property
<input type="checkbox"/>	Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). I have the following concerns relating to the proposal: 1 The impact on amenity. 2 The increase in noise, traffic and odour. 3 The lack of on-site car parking. 4 The intensive height, bulk and scale as compared to the low density residential surround. 5 The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing developments and the proposed. 6 The lack of management plans or mitigation strategies. 7 The lack of proper community consultation.

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**Respondent No:** 394

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 12:21:16 pm

**Last Seen:** Jul 25, 2020 04:20:02 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 395

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 12:23:22 pm

**Last Seen:** Jul 25, 2020 04:20:57 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 396

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 12:27:29 pm

**Last Seen:** Jul 25, 2020 04:24:47 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

This proposed development is excessive and should be aged care only, not a hospital and other commercial activities. It should have the same heights as its neighbours (10m limit) and setbacks. It will create traffic and parking issues in its vicinity and add to the cumulative traffic load that all density places on Nedlands.

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**Respondent No:** 397

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 12:28:03 pm

**Last Seen:** Jul 25, 2020 04:26:48 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Occupier of a property  
Other

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. My objection is made on the following grounds: 1 The proposal is inconsistent with the Residential Aged Care Facilities Local Planning Policy because of the undue impact it will have on the residential amenity of the area. 2 The height, bulk and scale of a four-storey development proposal is incompatible with the locality and surrounding developments. 3 The proposal will result in unacceptable increases in noise, traffic, odours, car parking congestion and light pollution. 4 The proposal fails to adequately manage or mitigate the impacts it will have on the existing and future residential amenity. 5 The design of the proposal is imposing and unsympathetic to the existing character of the area. Not only does that have aesthetic implications, the contrast in setbacks affects sight lines, and therefore vehicle and pedestrian safety. 6 The car parking and traffic assessments do not adequately take into account the realistic vehicle movements the proposal will generate.

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**Respondent No:** 398

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 12:33:36 pm

**Last Seen:** Jul 25, 2020 04:29:47 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. My objection is made on the following grounds: - The proposal is inconsistent with the Residential Aged Care Facilities Local Planning Policy because of the undue impact it will have on the residential amenity of the area. - The height, bulk and scale of a four-storey development proposal is incompatible with the locality and surrounding developments. - The proposal will result in unacceptable increases in noise, traffic, odours, car parking congestion and light pollution. - The proposal fails to adequately manage or mitigate the impacts it will have on the existing and future residential amenity. - The design of the proposal is imposing and unsympathetic to the existing character of the area. Not only does that have aesthetic implications, the contrast in setbacks affects sight lines, and therefore vehicle and pedestrian safety. - The car parking and traffic assessments do not adequately take into account the realistic vehicle movements the proposal will generate.

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**Respondent No:** 399

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 12:33:46 pm

**Last Seen:** Jul 25, 2020 04:29:13 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Other

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. To the extent the decision maker chooses to rely on significant and unadvertised provisions of the Policy, I further object as follows: 1 The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. 2 The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. 3 The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 4 Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. 5 The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and pedestrian safety. 6 Notwithstanding claims made by the developer, the community does not support this proposal and has not been properly consulted. I urge you not to support this proposal. 7 Policy objectives 7.1 One of the primary objectives of the Policy is – “to ensure the appearance and design of residential aged care facilities are of high quality and do not have an undue impact on the residential amenity by way of building bulk and scale, noise, traffic or parking”. The proposal fundamentally conflicts with this objective given the stark and jarring contrast between the surrounding R10 and R12.5 locality and the proposed four storey R80 development. The number of residents proposed to be accommodated will increase the residential capacity of the site by over 1000%. The consequential visual impacts, noise, traffic and parking that will flow from such an intensification will destroy the residential amenity of the locality. 8 Compatibility with setting (bulk, scale and height) 8.1 The Site is surrounded by low density residential development. The land immediately to its east and west is R10 and the land to its north is R12.5. The contrast between the existing density and the proposed R80 coding will be sharp, and the proposed plot ratio is wholly incompatible with the broader setting. 8.2 The bulk and scale of the proposal is imposing in its context. The proposal makes no attempt to mitigate the visual impact of its northern and southern walls, which are large and bland, on the adjacent neighbours and streetscape. 8.3 The depicted bulk and scale of the Melvista Lodge land (immediately to the South of the Site) in the development application plans is misleading. There are no such plans proposed or prepared, and the proposal is

inconsistent with its setting in that regard. Redevelopment of Melvista Lodge is not likely or imminent given the nature of the landholdings there. 8.4 The proposed street frontage setbacks of 2.5 metres undermine line of sight in the context of the surrounding residential developments which have 9 metre setbacks. This has safety implications for drivers and pedestrians using Doonan Road and Betty Street. The design has complete disregard for its setting. 9 Amenity 9.1 The proposal fails to take into account the existing and future character of the locality. The City has a new local planning scheme, and whilst higher density has been provided for elsewhere, this locality preserved its low density coding. There is a clear intention and understanding that the low density residential nature of the area will be maintained. A high rise intensive aged care development completely undermines that intention. 9.2 The proposal will significantly diminish visual amenity of the area due to its size, scale and design. It is not in keeping with the character or streetscape in the locality. 9.3 The proposal represents a significant intensification in how the site will look and operate. It increases the number of people living on the site by over 1000%. The level of staffing and services required to accommodate 90 high needs aged care residents must not be understated. The cumulative impact of 90 residents, combined with the servicing and operational requirements of the facility and movement of staff, visitors and deliveries, will result in a substantial increase in:

9.3.1 noise from traffic movements, at all hours of the day, to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users; 9.3.2 noise generated from the operations of the proposal, including air-conditioning, services, and an intensive increase of population and people movement; 9.3.3 light spill from 24 hour a day operations; and 9.3.4 odours generated from the operations of the proposal, including catering, laundry and servicing. 9.4 No management plans have been provided to show how the detrimental amenity impacts which will arise from such an intensified use will be mitigated, particularly given its hours of operation. No development condition will be validly capable of managing those impacts. 10 Traffic 10.1 The proposal will result in a significant increase in vehicle movements to and from the site, at all hours of the day. 10.2 The Traffic Impact Statement made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment traffic movements. 10.3 The Transport Impact Statement provides very little detail on the type of vehicle movements and the frequency and timings of those movements. This detail is essential to form a properly considered assessment of traffic movements and their impacts, and the document therefore cannot be relied upon. 11 Car Parking 11.1 The amount of administrative, catering, cleaning, medical, allied health and maintenance staff required to support an intensive 90-bed high care facility will not be supported by 26 bays, particularly given no parking allowances have been made for deliveries, visitors of residents, or the Wellness Centre staff and visitors. 11.2 The surrounding streets are not capable of supporting the street car parking which will necessarily arise due to the lack of sufficient on-site car parking. 12 Community consultation 12.1 The developer relies on consultation it conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different from what is proposed. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed. 12.2 Immediately affected residents have either never been contacted or have only recently been informed about the extent of the proposal. 13 Other 13.1 Clause 4.6.2 of the Policy states – “a minimum of twenty-five per cent (25%) of the site area is to be landscaped”. The proposed development does not comply with this requirement of the Policy. 13.2 The proposal will have a significant carbon footprint, and only just exceeds the minimum standards for environmental sustainability under the National Construction Code. 13.3 The proposal fails to take into account the recommendations of the Review of Innovative Models of Aged Care Research Paper, 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety in terms of its design and density.

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**Respondent No:** 400

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 12:34:32 pm

**Last Seen:** Jul 25, 2020 00:22:05 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Given the disastrous events happening right now in aged care facilities in Victoria & NSW the whole approach to caring for our parents/grandparents in these types of residences has to be reconsidered throughout Australia. Apart from the above rather urgent need to revise matters, there are a number of issues regarding the immediately proposed facility here: 1. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 2. There is every indication that with a building this size there will be issues with noise, light, traffic, parking and odours emanating from the site. 3. The proposed building is not sympathetic to the surrounding area. 4. This proposal as it is presented is, I believe, vastly different from the one that was presented for consideration previously. Changing "up" in bulk, scale, height and density without notice to the immediate neighbours impacted or advertising to the wider community is not on.

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**Respondent No:** 401

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 12:37:15 pm

**Last Seen:** Jul 25, 2020 04:35:32 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:** I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 402

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 12:37:38 pm

**Last Seen:** Jul 22, 2020 07:52:19 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property
Occupier of a property

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

The development is completely inappropriate for the suburban nature of Nedlands. I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated.

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**Respondent No:** 403

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 12:43:38 pm

**Last Seen:** Jul 25, 2020 05:09:06 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I strongly object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. This site is within a low-density residential area surrounded by R10 and R12.5 zoning, and therefore completely inappropriate for the scale and purpose of the development proposed. Furthermore, I believe that neither the developer nor the Council has given adequate consideration to the significant detrimental impact that this development would have to the character and amenity of our neighborhood if it were to proceed. I am also extremely concerned that due process has not been followed with regards to the lack of advertising and consultation by both the developer and the Council. I am also extremely concerned that the Council's Planning Department appears to be providing false and misleading information to the community regarding this development application. My specific concerns are as follows;

1 Community consultation

1.1 The developer relies on consultation it conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different from what is proposed. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed.

1.2 Immediately affected residents have either never been contacted or have only recently been informed about the extent of the proposal.

1.3 Furthermore, The Council's Planning Officer,                      made a statement at a recent council meeting to indicate that Oryx Communities had undertaken "the best community consultation I have ever seen". Given the lack of community consultation as detailed above, this is an extremely perplexing and concerning statement by a member of the Council's Planning Department.

doubled down on this in our face to face meeting with him at the community information session, where he stated that he respected our view that the community consultation by Oryx had not been adequate, but that he was "yet to form that opinion" himself. Considering that this comment was made after a significant level of community outrage had been expressed to the Council regarding the total lack of consultation, this is also an extremely concerning statement, and calls into question why this individual appears to be in favour of this development proceeding. I ask the Council to reject this development application, and demand that the developer actually undertakes proper and thorough community consultation, so that the Council can gain a true indication of our concerns surrounding this development, rather than the inaccurate and misleading feedback that you are currently receiving from your own Planning Department.

2 Policy objectives

2.1 One of the primary objectives of the Policy is – "to ensure the appearance and design of residential aged care facilities are of high quality and do not have an undue impact on the residential amenity by way of building bulk and scale, noise, traffic or parking". The proposal fundamentally conflicts with this objective given the stark and jarring contrast between the surrounding R10 and R12.5 locality and the proposed four storey R80 development. The number of residents proposed to

be accommodated will increase the residential capacity of the site by over 1000%. The consequential visual impacts, noise, traffic and parking that will flow from such an intensification will destroy the residential amenity of the locality.

**3 Compatibility with setting (bulk, scale and height)**

**3.1** The Site is surrounded by low density residential development. The land immediately to its east and west is R10 and the land to its north is R12.5. The contrast between the existing density and the proposed R80 coding will be sharp, and the proposed plot ratio is wholly incompatible with the broader setting.

**3.2** The bulk and scale of the proposal is imposing in its context. The proposal makes no attempt to mitigate the visual impact of its northern and southern walls, which are large and bland, on the adjacent neighbours and streetscape.

**3.3** The depicted bulk and scale of the Melvista Lodge land (immediately to the South of the Site) in the development application plans is misleading. There are no such plans proposed or prepared, and the proposal is inconsistent with its setting in that regard. Redevelopment of Melvista Lodge is not likely or imminent given the nature of the landholdings there.

**3.4** The proposed street frontage setbacks of 2.5 metres undermine line of sight in the context of the surrounding residential developments which have 9 metre setbacks. This has safety implications for drivers and pedestrians using Doonan Road and Betty Street. The design has complete disregard for its setting.

**4 Amenity**

**4.1** The proposal fails to take into account the existing and future character of the locality. The City has a new local planning scheme, and whilst higher density has been provided for elsewhere, this locality preserved its low density coding. There is a clear intention and understanding that the low density residential nature of the area will be maintained. A high rise intensive aged care development completely undermines that intention.

**4.2** The proposal will significantly diminish visual amenity of the area due to its size, scale and design. It is not in keeping with the character or streetscape in the locality.

**4.3** The proposal represents a significant intensification in how the site will look and operate. It increases the number of people living on the site by over 1000%. The level of staffing and services required to accommodate 90 high needs aged care residents must not be understated. The cumulative impact of 90 residents, combined with the servicing and operational requirements of the facility and movement of staff, visitors and deliveries, will result in a substantial increase in:

**4.3.1** noise from traffic movements, at all hours of the day, to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users;

**4.3.2** noise generated from the operations of the proposal, including air-conditioning, services, and an intensive increase of population and people movement;

**4.3.3** light spill from 24 hour a day operations; and

**4.3.4** odours generated from the operations of the proposal, including catering, laundry and servicing.

**4.4** No management plans have been provided to show how the detrimental amenity impacts which will arise from such an intensified use will be mitigated, particularly given its hours of operation. No development condition will be validly capable of managing those impacts.

**5 Traffic**

**5.1** The proposal will result in a significant increase in vehicle movements to and from the site, at all hours of the day.

**5.2** The Traffic Impact Statement made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment traffic movements.

**5.3** The Transport Impact Statement provides very little detail on the type of vehicle movements and the frequency and timings of those movements. This detail is essential to form a properly considered assessment of traffic movements and their impacts, and the document therefore cannot be relied upon.

**6 Car Parking**

**6.1** The amount of administrative, catering, cleaning, medical, allied health and maintenance staff required to support an intensive 90-bed high care facility will not be supported by 26 bays, particularly given no parking allowances have been made for deliveries, visitors of residents, or the Wellness Centre staff and visitors.

**6.2** The surrounding streets are not capable of supporting the street car parking which will necessarily arise due to the lack of sufficient on-site car parking.

**7 Other**

**7.1** Clause 4.6.2 of the Policy states – “a minimum of twenty-five per cent (25%) of the site area is to be landscaped”. The proposed development does not comply with this requirement of the Policy.

**7.2** The proposal will have a significant carbon footprint, and only just exceeds the minimum standards for environmental sustainability under the National Construction Code.

**7.3** The proposal fails to take into account the recommendations of the Review of Innovative Models of Aged Care Research Paper, 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety in terms of its design and density.

**7.4** Finally, we were informed by City of Nedlands Planning Department that, “unfortunately, the development application is fully compliant and therefore there is nothing for you to object to”. We are aware that other members of the community were also given the same advice from the City of Nedlands Planning Department. Given the issue raised at point 7.1 alone, this is inaccurate and misleading, and may discourage some residents from sharing their genuine concerns. I call on the City of Nedlands to investigate what appears to be an ongoing pattern of concerning conduct by your Planning Department. And once again, I also call on the City of Nedlands to reject this development application and demand that comprehensive community consultation actually takes place, so that you are able to gain an

accurate and full understanding of the community's concerns regarding this proposed development.

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**Respondent No:** 404

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 12:52:44 pm

**Last Seen:** Jul 25, 2020 04:44:05 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**  Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the above proposal. For the following reasons: 1) A property of this size is incongruent with the surrounding low rise residential housing. 2) The proposal is for a high level nursing/ medical facility. The surrounding neighbourhood can not support the 24 hour activity premises such as this require. 24 hour nursing shifts with late night and early morning shift changes. Laundry, catering deliveries at all hours on quiet and narrow residential streets. 3) Insufficient parking is provided to support the double parking required at shift change over times, visits for over 90 residents, support services and catering. 4) I am a doctor and do believe the council should be supporting the building of care homes such as these while aged care is under review. The current global pandemic is catastrophic for high density, aged care facilities and alternative options for future aged care should be considered. 5) Mason's gardens is a busy family recreation area and the increased traffic incurred will be detrimental to this amenity.

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**Respondent No:** 405

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 12:57:43 pm

**Last Seen:** Jul 25, 2020 04:38:56 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

As I work in the Age Care Sector, I do sympathise with the local residents as am aware of the disruptive environment this New Betty St nursing will create to the local community. This includes additional vehicle traffic from Visitors, staff, buses, garbage trucks and ambulances. Disruption to the existing adjacent childcare centre is foreseen in addition to impacts to persons living in the nearby houses having to accept living with the disruptions and the reduced privacy issues also on weekends. My husband and I don't approve of this propose development.

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**Respondent No:** 406

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 13:00:10 pm

**Last Seen:** Jul 25, 2020 04:57:50 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

We are writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. We object because we are concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. To the extent the decision maker chooses to rely on significant and unadvertised provisions of the Policy, we further object as follows: 1 The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. One of the primary objectives of the Policy is – “to ensure the appearance and design of residential aged care facilities are of high quality and do not have an undue impact on the residential amenity by way of building bulk and scale, noise, traffic or parking”. The proposal fundamentally conflicts with this objective given the stark and jarring contrast between the surrounding R10 and R12.5 locality and the proposed four storey R80 development. The number of residents proposed to be accommodated will increase the residential capacity of the site by over 1000%. The consequential visual impacts, noise, traffic and parking that will flow from such an intensification will destroy the residential amenity of the locality. 2 The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments: (1) The Site is surrounded by low density residential development. The land immediately to its east and west is R10 and the land to its north is R12.5. The contrast between the existing density and the proposed R80 coding will be sharp, and the proposed plot ratio is wholly incompatible with the broader setting; (2) The bulk and scale of the proposal is imposing in its context. The proposal makes no attempt to mitigate the visual impact of its northern and southern walls, which are large and bland, on the adjacent neighbours and streetscape; (3) The depicted bulk and scale of the Melvista Lodge land (immediately to the South of the Site) in the development application plans is misleading. There are no such plans proposed or prepared, and the proposal is inconsistent with its setting in that regard. Redevelopment of Melvista Lodge is not likely or imminent given the nature of the landholdings there, and (4) The proposed street frontage setbacks of 2.5 metres undermine line of sight in the context of the surrounding residential developments which have 9 metre setbacks. This has safety implications for drivers and pedestrians using Doonan Road and Betty Street. The design has complete disregard for its setting. 3 The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity in that: (1) It fails to take into account the existing and future character of the locality. The City has a new local planning scheme, and whilst higher density has been provided for elsewhere, this locality preserved its low density coding. There is

a clear intention and understanding that the low density residential nature of the area will be maintained. A high rise intensive aged care development completely undermines that intention. (2) The proposal will significantly diminish visual amenity of the area due to its size, scale and design. It is not in keeping with the character or streetscape in the locality. (3) The proposal represents a significant intensification in how the site will look and operate. It increases the number of people living on the site by over 1000%. The level of staffing and services required to accommodate 90 high needs aged care residents must not be understated. The cumulative impact of 90 residents, combined with the servicing and operational requirements of the facility and movement of staff, visitors and deliveries, will result in a substantial increase in traffic noise at all hours of the day, operational noise from the facility, light pollution, and other commercial impacts on a quiet residential area. No management plans have been provided to show how the detrimental amenity impacts which will arise from such an intensified use will be mitigated, particularly given its hours of operation. No development condition will be validly capable of managing those impacts. 4 A critical issue is that traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. 5 The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and pedestrian safety. Notwithstanding claims made by the developer, the community does not support a proposal for a facility of this scale and has not been properly consulted. We want to emphasise that we in no way oppose an aged care facility on this site. But the combination of the scale of this proposal along with the sneaky way that it was disclosed give us very little confidence in the ability of our local government to look after the interests of the residents of Nedlands. We are deeply disappointed in the role of the council – particularly the planning department – in enabling this stealthy and predatory behaviour by the developer. Sincerely,

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**Respondent No:** 407

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 13:05:00 pm

**Last Seen:** Jul 25, 2020 05:02:32 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I strongly object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. To the extent the decision maker chooses to rely on significant and unadvertised provisions of the Policy, I further object as follows: 1. The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. 2. The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. 3. The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 4. Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow, noise and the safety of local children who often ride bikes or walk dogs in the local area. 5. The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and pedestrian safety. 6. Notwithstanding claims made by the developer, the community does not support this proposal and has not been properly consulted. I strongly urge you to reject this proposal.

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**Respondent No:** 408

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 13:11:14 pm

**Last Seen:** Jul 25, 2020 05:06:06 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Owner of a property

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Not a good location for this type of business, should be in the hospital precinct near Hampden Road. Too high, it will overshadow neighbouring properties, to the detriment of home life, privacy and property values in the area. Increased traffic, for a small residential street. Very hilly surrounds for less-able people, no other supporting businesses for walkability and convenience of residents who will move into the facility.

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**Respondent No:** 409

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 13:17:42 pm

**Last Seen:** Jul 25, 2020 05:09:44 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am not against aged care facilities however I am against the heigh, scale and bulk of the proposal. Any project should respect the nature of the surroundings. I suggest the height is limited to two levels and is set back from the street boundaries as per all other properties in the area.

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**Respondent No:** 410

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 13:21:37 pm

**Last Seen:** Jul 25, 2020 05:18:49 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

OBJECT: Not a good location for this type of business, should be in the hospital precinct near Hampden Road. Too high, it will overshadow neighbouring properties, to the detriment of home life, privacy and property values in the area. Increased traffic, for a small residential street and surrounding streets. Very hilly surrounds for less-able people, no other supporting businesses for walkability and convenience of residents who will move into the facility. Inadequate parking

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**Respondent No:** 411

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 13:21:48 pm

**Last Seen:** Jul 25, 2020 05:19:08 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 412

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 13:25:01 pm

**Last Seen:** Jul 25, 2020 04:59:56 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Other

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I strongly object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). Of significant concern is the proposed size of the development in a largely residential area, impacting the community feel of the area. The size of the development will impact the privacy of neighbouring properties, with many properties being overshadowed or being in public view of the upper floors of the development. The increase in traffic and noise in the area and the nature of operation of the facility will increase the health and safety risks of the area. Many people enjoy the amenity of the nearby park and with increased traffic and competition for parking, it is likely others will be put off from visiting the park or worse, potential impacts to pedestrian safety. As a health care facility, operations will run 24/7 and change the dynamic of the area, turning it into a 7 day a week operational facility in what is a quiet low density residential area.

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**Respondent No:** 413

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 13:29:27 pm

**Last Seen:** Jul 25, 2020 05:27:00 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**      not answered

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. My objection is made on the following grounds: 6 The proposal is inconsistent with the Residential Aged Care Facilities Local Planning Policy because of the undue impact it will have on the residential amenity of the area. 7 The height, bulk and scale of a four-storey development proposal is incompatible with the locality and surrounding developments. 8 The proposal will result in unacceptable increases in noise, traffic, odours, car parking congestion and light pollution. 9 The proposal fails to adequately manage or mitigate the impacts it will have on the existing and future residential amenity. 10 The design of the proposal is imposing and unsympathetic to the existing character of the area. Not only does that have aesthetic implications, the contrast in setbacks affects sight lines, and therefore vehicle and pedestrian safety. 11 The car parking and traffic assessments do not adequately take into account the realistic vehicle movements the proposal will generate. In short I am disgusted that this has even been considered. It's done sneakily and with bad intentions.

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**Respondent No:** 414

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 13:39:33 pm

**Last Seen:** Jul 25, 2020 05:34:00 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** 0418957089

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Q5. **State how your interests are affected (select all relevant boxes)** Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:** I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

Too big - reduce to 2 stories

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**Respondent No:** 415

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 13:39:43 pm

**Last Seen:** Jul 25, 2020 05:31:01 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

The proposed development is far too high, it should be 2 stories and is not an example of good practice aged care. My mother has dementia and she would desperately want garden areas, communal kitchens, courtyards, lots of living spaces, lots of light bright windows, decent size room with queen bed and small space for couches etc. the proposed development does not follow recommendations of royal commission into aged care and is completely wrong for both aged people and the community.

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**Respondent No:** 416

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 13:39:44 pm

**Last Seen:** Jul 25, 2020 05:34:12 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am extremely concerned to find out about the development application for a Residential Aged Care Facility located at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. To even consider such a proposal in this area is absurd. Another concern is how the density zoning planning for the purchased properties was changed without proper notification to ratepayers. Any change to zoning should have been advertised to ratepayers so feedback from people living in the area could be assessed. This proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of this local, low density residential area. I strongly object to this proposal based on the above and the following points. 1) The height and scale of the proposal is incompatible with the area which is restricted to two storey developments.

2) There is inadequate parking for the development which will affect residents in surrounding streets. 3) Traffic in the area will increase significantly and the now quiet locality around maisons garden will become busy, noisy and less safe for kids and the elderly who frequently visit the park. I strongly urge you not to support this proposal.

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**Respondent No:** 417

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 13:43:15 pm

**Last Seen:** Jul 25, 2020 03:35:54 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. My objections are: 1. I live in Betty street and park there every day. When the village is full, it is very difficult to find parking spaces. Any extra burden on this road will ultimately impact congestion at peak times and create queues. I think that traffic flow and noise associated with all of the vehicles including trucks will end up having an unacceptable impact on local amenity. 2. I am very concerned that the proposed development is too big in terms of area to building ratio. Its bulk and height will do nothing to protect or enhance the existing and future amenity and character of this local, low density residential neighbourhood. 3. The LPP was cobbled together quickly in late 2019 and advertised in Jan/Feb 2020 when locals were away, so of course there was no response. It is more relevant to a commercial/hospital zone rather than a small residential plot of 2980sq.m. At least the LPS3 talks to character of the neighbourhood and residential heights. The LPP has given the DA license to commercialise residential properties in a way not intended for the aged care site. 4. It seems that there were changes made to the draft LPPolicy to increase the height and plot ratio such that a commercial building could be proposed for development on the site. This was approved in April 2020 without being advertised. It is not a minor amendment. 5. Looking at those residential properties sitting directly next to and across from the proposed building, the proposed height, bulk, and scale are incompatible. Buildings are no more than 10metres high with 9 metre setbacks. This is going to be 17m high with 2-3m setback. 6. Aged care is important, and this is a nice location, and it needs to be done properly with due consultation to Royal Commission outcomes and with the character of the locality, including the village it will overlook. I fear that it will have an unacceptable detrimental impact on amenity. 7. Safety is an important issue in our narrow streets and the narrow frontage of this building will create a hazard for cars and children alike. 8. I am wondering who Oryx thinks its clientele is when it indicated a two level building in 2016 and then produced a DA for a 90 bed 4 level building in mid-2020. Their promises are like 'pie-crust'. Whilst they might think old people want to live in towers they can't get out, most people want to be able to get fresh air, sit in a nice garden and have visitors enjoy their visits. 9. My last concern goes to the beautiful mature trees on Doonan road that have been deleted from the pictures. Mature trees are a minimum of 10m and grow to have canopies of 15-20m. Given the bulk of this building nothing requiring deep roots will grow and there is no space. Please take my objections seriously as this will completely impact the neighbourhoods way of life and is counter to the Nedlands rate payers vision for their area.

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**Respondent No:** 418

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 13:45:50 pm

**Last Seen:** Jul 26, 2020 05:37:35 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I object to this development proposal. I am greatly concerned that the proponent is seeking to take advantage of an anomaly in the Scheme, and a poor and rushed planning response to that anomaly in the form of the City's LPP, to push through an unreasonable development on this site. The fact that the land has no density coding, and thus has no direct link to the height and other normal building control standards under the R-Codes, is probably an inadvertent error in the Minister's modification made to LPS3. This is compounded by the City's LPP which seeks to 'borrow' R-Codes requirements which i think is questionable at best, but most importantly, fails to properly address the highly specialised nature of a residential aged care facility and the attendant community impacts it creates eg traffic, issues from being a 24/7 operation, specific considerations associated with being a health/well being complex such as bespoke building requirements. I respectfully submit that these critically important matters cannot be adequately assessed by reference to the existing LPP (or the LPS3 residential zone objectives and Scheme Regulations) which do not provide sufficient technical development requirements to evaluate an aged care facility. I further submit that proper planning for this site should be guided by a site specific Local Development Plan which would be able to include appropriate technical guidance for this purpose. This is not a typical residential building proposal able to be sensibly assessed in the typical way. It is a highly specialised operational building which demands assessment using specifically tailored evaluation criteria, not 'general purpose' design objectives which underpin the R-Codes. In the absence of such a LDP or similar appropriate planning instrument, i think there is every chance that any planning decision taken to approve this application will be unsafe and be subject to successful legal challenge. This prospect is likely to be enhanced by arguments which will no doubt be raised regarding the past purchase of the land from the City, the legitimacy of the LPP given changes made to the advertised draft and the finally adopted version, and questions regarding possible misrepresentations made to the Community during the consultation period as to the scale of the development. I submit that the DA cannot be properly dealt with until LPS3 and/or the LPP/LDP has first been 'fixed', and the DA should be deferred until that occurs.

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**Respondent No:** 419

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 13:58:33 pm

**Last Seen:** Jul 25, 2020 05:42:34 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

It is not often that I make comment on development in Nedlands, but in this case I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. While all families need the use of aged care facilities at some stage, they need to be located in appropriate locations. A facility of this size should simply not be built in this residential area. The disruption to the lives and amenity of people who live in the surrounding streets is unfair and unnecessary. There are very suitable other areas adjacent to major roads and highways where this type of facility should be built. That is why we have designated roads which can handle the traffic associate with a facility of this size. We also have designated areas in our suburbs for all levels of medical facilities where a facility of this size and nature should be built. The size, bulk and height of the proposed facility is way out of kilter with the low density surrounding residential area. In addition the facility will pose an unacceptable increase in traffic and congestion in the area.

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**Respondent No:** 420

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 13:59:41 pm

**Last Seen:** Jul 25, 2020 04:26:32 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I strongly object to the proposal to build a hospital in this residential location. There is absolutely no justification for this application and numerous reasons for it to be soundly rejected by the Council. - There is no need for aged care beds in the area., with many other options and a preference for In-home care by many residents. -A multi-story hospital is complexly inappropriate for a peaceful, residential part of the city, (where zoning should be residential with houses of 2 story maximum height). It would mean the destruction of a beautiful area which is now especially private and quiet and chosen by recent and long-term residents for this reason. A hospital operating 24 hours a day, will create excessive noise, lighting, pollution, congestion and inconvenience for close neighbours. -Danger from high volumes of traffic servicing the hospital, as well as lack of parking will be a problem. Visitors and staff vehicles will inevitably be forced to park near Mason's Gardens which will affect the Daycare centre and the numerous people who enjoy the peaceful park. -Developers should not be given permission to destroy a beautiful suburb with no advantage to the people who have invested in the area and continue to pay rates. -Employees of the Nedlands Council should put residents ahead of outside interests. -The impact of a hospital near Masons Gardens, will spread far further than the immediate area, with increased traffic and noise and consequent risks, to say nothing of the visual pollution of a multi storey building in an otherwise low height area. - It is inevitable that some 4story apartments will be built near Stirling Highway and busy transport routes, as long as local residences are considered. However for a hospital to be considered on Betty St and Doonan Rd , is completely illogical. It would be very unfair in a peaceful and beautiful part of Nedlands. The Nedlands Council and all levels of Government should always put the best interests of the people and their environment first. They should not take part in the further destruction of Nedlands and other areas of Perth,.

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**Respondent No:** 421

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 13:59:43 pm

**Last Seen:** Jul 25, 2020 05:57:29 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated.

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**Respondent No:** 422

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 14:00:49 pm

**Last Seen:** Jul 25, 2020 05:55:59 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

---

Q5. **State how your interests are affected (select all relevant boxes)**       Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**       I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I do not agree that what is essentially a commercial use should be built in a residential area.

---





**Respondent No:** 423

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 14:06:30 pm

**Last Seen:** Jul 25, 2020 05:59:57 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**      not answered

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 424

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 14:09:02 pm

**Last Seen:** Jul 25, 2020 06:01:39 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

---

Q6. **Address of the property affected (if applicable)** not answered

---

Q7. **My response to the proposal:** I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. While I am happy for aged care facilities to be built throughout the suburbs, they need to be in keeping with the character of the areas. Ideally they should enhance the amenity of the areas for residences. In this particular case, the height and size of the proposed facility is totally out of character with the surrounding residences and therefore should not be built. The decrease in amenity for residents in the area is not acceptable.

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**Respondent No:** 425

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 14:14:50 pm

**Last Seen:** Jul 25, 2020 06:04:30 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property

Occupier of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**

I object to the proposal

---

**Q8. Submission : Please give your comments relating to this item in full below.**

Dear City of Nedlands, I wish to register my OBJECTION to the Development Application (DA) proposed by Oryx for Lots 10 & 11 (16 & 18) Betty Street, and Lots 18 & 19 (73 & 75) Doonan Road Nedlands, for the following reasons: The DA fails to comply with the following Policies and Schemes: • Local Planning Scheme No. 3 • State Planning Policy 7.3 - Residential Design Codes, and the • Local Planning Policy - Residential Aged Care Facilities The above-mentioned DA will impose a detrimental and lasting impact on the local amenity, in particular relation to: • Height, bulk and scale of the DA not conforming with current and future local design and character • Increased thoroughfare, traffic and parking congestion • Overshadowing of neighbouring sites, in particular, southern neighbours during the winter solstice and afternoons • Noise, light and odour pollution generated from a 90-bed facility The DA is completely out of character for the current and future vision of the area, and despite Oryx's claims, is not supported by the community. There is no transition between the 4-storey DA and the surrounding low-density (R10 & R12.5) neighbouring sites, which results in a significant contrast and compromised aesthetics, which do not align with the local character, or streetscape. Despite adhering to the Local Planning Policy – Parking, the DA does not provide adequate car parking for the realistic increase in traffic and parking requirements that a 90-bed facility will generate. The City of Nedlands has provided higher density allowances in more appropriate locations. This particular location is intended for low-density developments, and there is an understanding that this will be maintained despite the A9 coding assigned to the proposed site. The cumulative impact that a 90-bed facility will generate will be significant, and have lasting, sustained impacts on the surrounding local area. If permitted, this DA will set a precedent for future development in the area; of particular concern is the likely future development, or refurbishment, of the existing Melvista Lodge site, which would result in irreversible destruction of local amenity and character. The thoroughfare and traffic generated from a 90-bed facility, will be likened to that of Monash Avenue in Nedlands. The cumulative impacts from thoroughfare and traffic generated from residence, visitors, staff, service vehicles (catering, linen, waste, medical supplies, etc), maintenance vehicles, will be irreversible and unmanageable, not to mention compromising social distancing requirements brought about by the COVID-19 pandemic, which will continue for the foreseeable future. I question how Oryx calculated their plot ratio (PR), conveniently aligning with the allowable PR of 1.0. I would estimate a more accurate and realistic PR of approx 2.0. I also question the minimum floor allowance for each of the 90-beds, and estimate that, if adhered to, the allowable number of dwellings would be significantly reduced. There has been inadequate community consultation, which has not allowed for an accurate reflection of the community's views toward this DA, which by vast majority is not supported. I object to this proposal and urge the City of Nedlands to refuse the DA proposed by Oryx. I would welcome a significant amendment by Oryx, which incorporates the recommendations outlined by the Royal Commission for Age Care Facility design and objectives. The recommendations compiled by the Royal Commission have been extensively researched and support improvement in this much-needed area of healthcare reform. This DA fails to provide a patient centred, high-quality age care facility, which meets the needs of an aging population and complements the local amenity and streetscape of the area in which it's built. Regards,

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**Respondent No:** 426

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 14:15:00 pm

**Last Seen:** Jul 25, 2020 06:11:24 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I wish to register my strong objection to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. My objection is based on the following:

- The proposed complex fails utterly to respect the area's character as primarily a residential part of Nedlands. The imposition of a R80 development on residential R10 and R12.5, and the resulting 10 times increase in residential living density, is a wholly undesirable outcome and contradicts the City's new local planning scheme which aims to keep the area as low density residential.
- The cumulative effect of 90 residents, combined with the servicing and operational requirements of the facility and movement of staff, visitors and deliveries, will result in unacceptable impacts which include; o noise from traffic movements, at all hours of the day, to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users; o noise generated from the operations of the proposal, including air-conditioning, services, and an intensive increase of population and people movement; o light spill from 24 hour a day operations; and o odours generated from the operations of the proposal, including catering, laundry and servicing. No management plans have been provided to show how these detrimental amenity impacts will be mitigated, particularly given it is a 24 hour operation.
- Traffic management and car parking needs associated with the complex have not been adequately addressed in the proposal. The actual likely traffic movements, noise and parking requirements will result in an unacceptable impact on the local area.
- The complex proposal cites consultation conducted over 3 years ago to assert that the community had been consulted and was in support of this proposal. That assertion is wrong and misleading. The previous building proposal was completely different and, with lower buildings and greater setbacks, was much more suited to the area.
- The present proposal shows hints of a similar scale development occurring on the site of the Melvista Lodge land (immediately to the south of the present development site). To my knowledge, no such plans have been proposed or prepared, and in any regard the implied redevelopment would also be unacceptable for the same reasons set out in this submission. This begs the important question of why a more holistic proposal for both areas has not been done. Surely this would be the best approach given this is clearly being considered, albeit informally. If this is not the case then certainly the impact on the current occupants of Melvista Lodge would be completely overpowering and detrimental.
- Finally, the proposal fails to take into account and seems quite out of step with the recommendations set out in the Review of Innovative Models of Aged Care Research Paper, 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety concerning the now recognised importance of small-scale, domestic models of residential aged care, an approach which would be completely acceptable. I urge you not to support this proposal.

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**Respondent No:** 427

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 14:16:18 pm

**Last Seen:** Jul 25, 2020 06:12:39 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Owner of a property

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 18 and 19 (No. 73 and 75) Doonan Road, Nedlands. My objection is made on the following grounds: The proposal is inconsistent with the Residential Aged Care Facilities Local Planning Policy. In particular is contrary to Objective 3.1 which states "To ensure the appearance and design of residential aged care facilities are of a high quality and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking." The height, bulk and scale of a four-storey development proposal is incompatible with the locality and surrounding developments. The inadequate parking provisions of 26 bays in the development and the consequent overspill into surrounding streets will negatively impact the safe movement of residential traffic and public transport through the area. The undue impact it will have on the residential amenity of the area.

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**Respondent No:** 428

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 14:29:03 pm

**Last Seen:** Jul 25, 2020 06:18:56 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the proposed development on Betty Street and Doonan Road because it would be a large, one-off multistorey development in an entirely single-residential area. There is no transitioning of zones with a gradation of densities and building purposes. It is a complete violation of the reasonable expectations of neighbouring long-standing ratepayers. In particular I object to the bulk, scale and height of the proposed development and the inevitable implications for traffic and parking congestion. I support scheme amendment LPS3 No. 7 to reduce density codes and protect privacy.

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**Respondent No:** 429

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 14:31:09 pm

**Last Seen:** Jul 25, 2020 05:39:41 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. To the extent the decision maker chooses to rely on significant and unadvertised provisions of the Policy, I further object as follows: 1 The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. 2 The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. 3 The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 4 Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. 5 The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and pedestrian safety. 6 Notwithstanding claims made by the developer, the community does not support this proposal and has not been properly consulted. I urge you not to support this proposal. 7 Policy objectives 7.1 One of the primary objectives of the Policy is – “to ensure the appearance and design of residential aged care facilities are of high quality and do not have an undue impact on the residential amenity by way of building bulk and scale, noise, traffic or parking”. The proposal fundamentally conflicts with this objective given the huge contrast between the surrounding R10 and R12.5 locality and the proposed four storey R80 development. The number of residents proposed to be accommodated will increase the residential capacity of the site by over 1000%. The consequential visual impacts, noise, traffic and parking that will flow from such an intensification will destroy the residential amenity of the locality. 8 Compatibility with setting (bulk, scale and height) 8.1 The Site is surrounded by low density residential development. The land immediately to its east and west is R10 and the land to its north is R12.5. The contrast between the existing density and the proposed R80 coding will be sharp, and the proposed plot ratio is wholly incompatible with the broader setting. 8.2 The bulk and scale of the proposal is imposing in its context. The proposal makes no attempt to mitigate the visual impact of its northern and southern walls, which are large and bland, on the adjacent neighbours and streetscape. 8.3 The depicted bulk and scale of the Melvista Lodge land (immediately to the South of the Site) in the development application plans is misleading. There are no such plans proposed or prepared, and the proposal is



inconsistent with its setting in that regard. Redevelopment of Melvista Lodge is not likely or imminent given the nature of the landholdings there. 8.4 The proposed street frontage setbacks of 2.5 metres undermine line of sight in the context of the surrounding residential developments which have 9 metre setbacks. This has safety implications for drivers and pedestrians using Doonan Road and Betty Street. The design has complete disregard for its setting. 9 Amenity 9.1 The proposal fails to take into account the existing and future character of the locality. The City has a new local planning scheme, and whilst higher density has been provided for elsewhere, this locality preserved its low density coding. There is a clear intention and understanding that the low density residential nature of the area will be maintained. A high rise intensive aged care development completely undermines that intention. 9.2 The proposal will significantly diminish visual amenity of the area due to its size, scale and design. It is not in keeping with the character or streetscape in the locality. Mason's Garden is an iconic park which offers residents a green area to relax with their families in a safe and peaceful atmosphere. The development will substantially detract from the visual (and perceived) attractiveness of the park. 9.3 The proposal represents a significant intensification in how the site will look and operate. It increases the number of people living on the site by over 1000%. The level of staffing and services required to accommodate 90 high needs aged care residents must not be understated. The cumulative impact of 90 residents, combined with the servicing and operational requirements of the facility and movement of staff, visitors and deliveries, will result in a substantial increase in: 9.3.1 noise from traffic movements, at all hours of the day, to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users; 9.3.2 noise generated from the operations of the proposal, including air-conditioning, services, and an intensive increase of population and people movement; 9.3.3 light spill from 24 hour a day operations; and 9.3.4 odours generated from the operations of the proposal, including catering, laundry and servicing. 9.4 No management plans have been provided to show how the detrimental amenity impacts which will arise from such an intensified use will be mitigated, particularly given its hours of operation. No development condition will be validly capable of managing those impacts. 10 Traffic 10.1 The proposal will result in a significant increase in vehicle movements to and from the site, at all hours of the day. 10.2 The Traffic Impact Statement made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment traffic movements. 10.3 The Transport Impact Statement provides very little detail on the type of vehicle movements and the frequency and timings of those movements. This detail is essential to form a properly considered assessment of traffic movements and their impacts, and the document therefore cannot be relied upon. 11 Car Parking 11.1 The amount of administrative, catering, cleaning, medical, allied health and maintenance staff required to support an intensive 90-bed high care facility will not be supported by 26 bays, particularly given no parking allowances have been made for deliveries, visitors of residents, or the Wellness Centre staff and visitors. 11.2 The surrounding streets are not capable of supporting the street car parking which will necessarily arise due to the lack of sufficient on-site car parking. 12 Community consultation 12.1 The developer relies on consultation it conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different from what is proposed. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed. 12.2 Immediately affected residents have either never been contacted or have only recently been informed about the extent of the proposal. 13 Other 13.1 Clause 4.6.2 of the Policy states – "a minimum of twenty-five per cent (25%) of the site area is to be landscaped". The proposed development does not comply with this requirement of the Policy. 13.2 The proposal fails to take into account the recommendations of the Review of Innovative Models of Aged Care Research Paper, 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety in terms of its design and density. 13.3 The current pandemic clearly highlights the major health risks surrounding residential aged care facilities and the need to carefully examine future developments of this type to ensure that the health and safety of both their users and the surrounding community.

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**Respondent No:** 430

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 14:32:34 pm

**Last Seen:** Jul 25, 2020 06:29:14 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. My objection is made on the following grounds: The proposal is inconsistent with the Residential Aged Care Facilities Local Planning Policy because of the undue impact it will have on the residential amenity of the area. The height, bulk and scale of a four-storey development proposal is incompatible with the locality and surrounding developments. The proposal will result in unacceptable increases in noise, traffic, odours, car parking congestion and light pollution. The proposal fails to adequately manage or mitigate the impacts it will have on the existing and future residential amenity. The design of the proposal is imposing and unsympathetic to the existing character of the area. Not only does that have aesthetic implications, the contrast in setbacks affects sight lines, and therefore vehicle and pedestrian safety. The car parking and traffic assessments do not adequately take into account the realistic vehicle movements the proposal will generate.

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**Respondent No:** 431

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 14:32:59 pm

**Last Seen:** Jul 25, 2020 06:30:03 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal

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**Respondent No:** 432

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 14:34:26 pm

**Last Seen:** Jul 25, 2020 06:17:05 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**       Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**       I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I wish to retain the quiet, residential aspect of this neighbourhood. A retirement home with adjacent facilities (medical, beauty, restaurant...) will invite untold vehicular congestion and noise. This is unacceptable. Go to Stirling Highway. Thank you.

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**Respondent No:** 433

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 14:34:31 pm

**Last Seen:** Jul 25, 2020 06:06:18 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I recently lost my wife, and still live independently at 93. When it comes time to move I will be looking for somewhere low level like the Moline homes in Karrinyup or the Alfred Carsons in Claremont. I object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands, Nedlands. 'Covid towers' are not the place for the elderly. Whatever model the Developer is working on, I think they have got it wrong. We 'oldies' want to spend our remaining days in a building we can get out of if an emergency occurs. Whilst I can still walk between 600 and 1300 steps per day, I could not walk down 3-4 flights of stairs and definitely not in a hurry. I might only weigh 80kgs, but it would take two strapping men to carry me. I wonder how they would manage with 90 people to help down all those stairs. When I first heard about the development a number of years ago I didn't mind the idea of 2 levels as I felt sure I could secure one on the ground floor. The building reflected in the DA is twice the size and bulk of the one that I saw proposed to locals at Masons Gardens. The idea of this size of facility is ridiculous in the middle of all those low residential buildings, including Lisle village. The problem with this development, is that it is all about making money and not about looking after us 'oldies'. I would find it difficult crossing Melvista Avenue to go to the park because of all the new traffic and congestion in Betty street. I can't see anyone pushing an oldie in a wheel chair back up the hill. From what I can see, the building takes up almost the entire four blocks and provides nowhere for people like me to sit out and enjoy the fresh air and it is spartan of large trees. I don't like the black bars on the balconies, it makes it look like a prison. I hope you take my concerns seriously as I often have respite days with my daughter and if the building was done well I would consider moving in but not at 4 levels.

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**Respondent No:** 434

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 14:40:42 pm

**Last Seen:** Jul 25, 2020 06:38:37 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). I have the following concerns relating to the proposal: 1 The impact on amenity. 2 The increase in noise, traffic and odour. 3 The lack of on-site car parking. 4 The intensive height, bulk and scale as compared to the low density residential surround. 5 The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing developments and the proposed. 6 The lack of management plans or mitigation strategies. 7 The lack of proper community consultation.

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**Respondent No:** 435

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 14:43:26 pm

**Last Seen:** Jul 25, 2020 06:40:53 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property

Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**

I object to the proposal

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**Q8. Submission : Please give your comments relating to this item in full below.**

While I don't object to an aged care facility in this location, the height and bulk of the proposed development is incompatible with the surrounding homes and will adversely affect the amenity of the area. It will also have a serious adverse effect on the enjoyment of homes in the vicinity. The height and bulk are exacerbated by the fact that the setbacks are very small, not allowing sufficient room for landscaping to help minimize the overbearing presence of the building in the landscape. The increased vehicular traffic in the surrounding streets will have a serious impact on the amenity of the area and the enjoyment of properties by local residents particularly residents in Betty Street and Doonan Road. With 90 residents there will need to be a large number of staff coming and going as they change shifts, presumably 3 shifts every 24 hours. On top of that there will be numerous visitors driving to the complex everyday to visit residents. There will also be numerous delivery vans and service vehicles eg kitchen supplies, linen, pharmaceutical deliveries etc The number of carbays is woefully inadequate and unrealistic for a facility of this size which is essentially a type of hospital. Some staff members will need a carbay; the hairdresser and other professionals in the wellness centre will expect a carbay. Visiting GPs will expect a designated carbay (there will be no doctor on site; residents will be cared for by their personal GPs and in many cases will need to have their appointments at the facility as they won't be well or mobile enough to go to the surgery). Visiting chaplains and priests who perform weekly religious services or administer to the dying will need a carbay. The ambulance service will expect a wide carbay. The residents' visitors will expect a carbay or at least a park in the street nearby. Taxis and buses for resident outings will expect a carbay or a park in the street near the entrance. The customers of the wellness centre will expect a carbay or a park in the street nearby. There is just not enough parking in Betty St and Doonan Road to cater for all these people. Expecting people to park some distance away in another street will be unrealistic as many visitors will themselves be elderly or have mobility issues, or items they need to carry etc. Also the site is on a hill, so getting to a car parked on a slope will be difficult for many visitors. When a resident passes the family will be expected to clear furniture and effects from their loved one's room. Where will they park their vehicle when packing the car/trailer? If time restrictions are introduced for parking in Betty Street and Doonan Road, many visitors will find this problematic eg if a resident is ill, family members may wish to remain with them all day; some visitors will regularly spend hours with their loved one at the complex. Families who use the Melvista Child Care Centre will also face parking problems when they drop off or pick up their children. The small carpark opposite the Centre which they currently use will be fully parked out by vehicles parked by people visiting the aged care facility. This will create an unsafe environment for the parents and children using the Centre. This small carpark is also used throughout the day by people using Mason Gardens. The above traffic and parking issues will snowball if/when Melvista Lodge is redeveloped! One of the most important issues is how will residents (particularly frail residents and residents with mobility problems due to a stroke, or in wheelchairs, or using walkers, or with cognitive or vision problems etc) be able to come and go from the complex via a vehicle eg a family member's car, a taxi? They will want/need to go to medical appointments, church, shopping, visit family and friends. There is no drop off/pick up zone for vehicles next to either of the ground level access doors. Where will the vehicle park while the resident walks or is assisted from the building to the vehicle? There needs to be a drive through area with a canopy outside the door where they can be safely picked up/dropped off or at least a covered walkway from the building to a nearby designated parking spot where they can be safely picked up/dropped off. The design seems to assume that when residents come and go from the complex via a vehicle, they can make their way to where ever the car in question is parked in one of the nearby streets - regardless of the distance, the slope of the street, the weather, their mobility issues and other health problems! This is totally unrealistic and would lead to falls and other adverse health outcomes. In other words a serious safety issue for the residents! I also object to the lack of community consultation about this development. I live in Marita Road (which is more or less an extension of Betty Street) and we have not been personally contacted by the developers. Now that details of the unprecedented size, height and bulk of the proposed building in a residential zone have been released, there should have been community consultation at this stage.

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**Respondent No:** 436

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 14:45:37 pm

**Last Seen:** Jul 25, 2020 06:44:14 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 437

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 14:50:08 pm

**Last Seen:** Jul 25, 2020 05:06:17 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. To the extent the decision maker chooses to rely on significant and unadvertised provisions of the Policy, I further object as follows: 1 The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. 2 The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. 3 The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 4 Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. 5 The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and pedestrian safety. 6 Notwithstanding claims made by the developer, the community does not support this proposal and has not been properly consulted. I urge you not to support this proposal.

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**Respondent No:** 438

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 14:50:31 pm

**Last Seen:** Jul 25, 2020 06:35:21 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)** Other

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Q6. **Address of the property affected (if applicable)** not answered

---

Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). My family live in Betty Street and I often walk my dogs through Nedlands, parks and river because it is such a lovely green suburb. I was astonished to learn that this building is being proposed for a non-commercial low density residential area. I have the following concerns relating to the proposal:

- This will have severe impact on amenity for all locals and visitors to Masons Gardens. The idea of having a building double in height to any of those around it is incredible.
- Their will be a large increase in noise, traffic and odour as a result of the operational impact of housing 90 aged people. I understand that all laundry and meals will be done on the premises. This is a major operation and will require intensive and regular deliveries and waste removal.
- It is apparent from the plan that the on-site car parking is inadequate. My estimate is approximately 35 staff onsite in daylight hours and less at night. That does not included visitors which I think in apartments is 1 bay per 12 dwellings (if a bedroom is a dwelling that is at least an extra 9 bays). The local aged care near us in Karrinyup has in excess of 60 bays half underground and half on the property. It is also situated on about 15,000 sq.m not compacted into less than 3000 sq.m and has independent living units all around it. The nearest R10 is 200m away.
- The building itself is of an intensive height, with its bulk taking up almost the entire piece of land, allowing for narrow setbacks which do not match those (9metres) of the surrounding residences. The scale of the building as compared to the low density residential surround, looks completely out of character and not a particularly attractive or innovative design. Where are all the garden sitting areas as there are no gardens to speak of. I notice the mature trees on Doonan will be removed.
- Safety is a major concern for vehicles and pedestrians accessing narrow roads and paths due to huge differences in setbacks between existing developments and the proposed building.
- There is no detail provided on the operational aspects of the building or mitigation strategies.
- My understanding is that the Council is lacking in its proactive planning and should have been engaging with the community in terms of 'best practice' for an aged care development on this site.

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**Respondent No:** 439

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 14:50:54 pm

**Last Seen:** Jul 25, 2020 06:34:07 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property
Occupier of a property

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. I understand that with an aging population that there will be a need for aged care either in the home or in an institution. However, building for the aged needs good, careful design. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval. There have been changes made to the Policy which allowed for a significant increase in development capability. These changes were not advertised to the public. Therefore, I do not believe the Policy with these unadvertised changes should be taken into consideration. The developer relies on consultation it conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different from what is proposed. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed. Moreover, I do not believe that the changes made to the policy are in the best interests of the aged population who might need this care. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. The site has been overdeveloped with inadequate facility for the residents' access to outdoors and green space. The over-development of the site creates safety issues for vehicles and pedestrians given the impact on sight-lines due to vastly different setbacks between the existing area and the proposal. Car parking, ambulance access, visitors' traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I do not support this proposal as it stands.

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**Respondent No:** 440

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 14:52:51 pm

**Last Seen:** Jul 25, 2020 05:25:42 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 441

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 14:53:58 pm

**Last Seen:** Jul 18, 2020 08:40:44 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. To the extent the decision maker chooses to rely on significant and unadvertised provisions of the Policy, I further object as follows: 1 The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. 2 The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. 3 The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 4 Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. 5 The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and pedestrian safety. 6 Notwithstanding claims made by the developer, the community does not support this proposal and has not been properly consulted. I urge you not to support this proposal.

1 Policy objectives 1.1 One of the primary objectives of the Policy is – “to ensure the appearance and design of residential aged care facilities are of high quality and do not have an undue impact on the residential amenity by way of building bulk and scale, noise, traffic or parking”. The proposal fundamentally conflicts with this objective given the stark and jarring contrast between the surrounding R10 and R12.5 locality and the proposed four storey R80 development. The number of residents proposed to be accommodated will increase the residential capacity of the site by over 1000%. The consequential visual impacts, noise, traffic and parking that will flow from such an intensification will destroy the residential amenity of the locality.

2 Compatibility with setting (bulk, scale and height) 2.1 The Site is surrounded by low density residential development. The land immediately to its east and west is R10 and the land to its north is R12.5. The contrast between the existing density and the proposed R80 coding will be sharp, and the proposed plot ratio is wholly incompatible with the broader setting. 2.2 The bulk and scale of the proposal is imposing in its context. The proposal makes no attempt to mitigate the visual impact of its northern and southern walls, which are large and bland, on the adjacent neighbours and

streetscape. 2.3 The depicted bulk and scale of the Melvista Lodge land (immediately to the South of the Site) in the development application plans is misleading. There are no such plans proposed or prepared, and the proposal is inconsistent with its setting in that regard. Redevelopment of Melvista Lodge is not likely or imminent given the nature of the landholdings there. 2.4 The proposed street frontage setbacks of 2.5 metres undermine line of sight in the context of the surrounding residential developments which have 9 metre setbacks. This has safety implications for drivers and pedestrians using Doonan Road and Betty Street. The design has complete disregard for its setting. 3 Amenity 3.1 The proposal fails to take into account the existing and future character of the locality. The City has a new local planning scheme, and whilst higher density has been provided for elsewhere, this locality preserved its low density coding. There is a clear intention and understanding that the low density residential nature of the area will be maintained. A high rise intensive aged care development completely undermines that intention. 3.2 The proposal will significantly diminish visual amenity of the area due to its size, scale and design. It is not in keeping with the character or streetscape in the locality. 3.3 The proposal represents a significant intensification in how the site will look and operate. It increases the number of people living on the site by over 1000%. The level of staffing and services required to accommodate 90 high needs aged care residents must not be understated. The cumulative impact of 90 residents, combined with the servicing and operational requirements of the facility and movement of staff, visitors and deliveries, will result in a substantial increase in: 3.3.1 noise from traffic movements, at all hours of the day, to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users; 3.3.2 noise generated from the operations of the proposal, including air-conditioning, services, and an intensive increase of population and people movement; 3.3.3 light spill from 24 hour a day operations; and 3.3.4 odours generated from the operations of the proposal, including catering, laundry and servicing. 3.4 No management plans have been provided to show how the detrimental amenity impacts which will arise from such an intensified use will be mitigated, particularly given its hours of operation. No development condition will be validly capable of managing those impacts. 4 Traffic 4.1 The proposal will result in a significant increase in vehicle movements to and from the site, at all hours of the day. 4.2 The Traffic Impact Statement made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment traffic movements. 4.3 The Transport Impact Statement provides very little detail on the type of vehicle movements and the frequency and timings of those movements. This detail is essential to form a properly considered assessment of traffic movements and their impacts, and the document therefore cannot be relied upon. 5 Car Parking 5.1 The amount of administrative, catering, cleaning, medical, allied health and maintenance staff required to support an intensive 90-bed high care facility will not be supported by 26 bays, particularly given no parking allowances have been made for deliveries, visitors of residents, or the Wellness Centre staff and visitors. 5.2 The surrounding streets are not capable of supporting the street car parking which will necessarily arise due to the lack of sufficient on-site car parking. 6 Community consultation 6.1 The developer relies on consultation it conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different from what is proposed. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed. 6.2 Immediately affected residents have either never been contacted or have only recently been informed about the extent of the proposal. 7 Other 7.1 Clause 4.6.2 of the Policy states – “a minimum of twenty-five per cent (25%) of the site area is to be landscaped”. The proposed development does not comply with this requirement of the Policy. 7.2 The proposal will have a significant carbon footprint, and only just exceeds the minimum standards for environmental sustainability under the National Construction Code. 7.3 The proposal fails to take into account the recommendations of the Review of Innovative Models of Aged Care Research Paper, 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety in terms of its design and density.

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**Respondent No:** 442

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 14:56:52 pm

**Last Seen:** Jul 25, 2020 06:53:50 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

---

Q6. **Address of the property affected (if applicable)**      not answered

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. My objection is made on the following grounds: 1 The proposal is inconsistent with the Residential Aged Care Facilities Local Planning Policy because of the undue impact it will have on the residential amenity of the area. 2 The height, bulk and scale of a four-storey development proposal is incompatible with the locality and surrounding developments. 3 The proposal will result in unacceptable increases in noise, traffic, odours, car parking congestion and light pollution. 4 The proposal fails to adequately manage or mitigate the impacts it will have on the existing and future residential amenity. 5 The design of the proposal is imposing and unsympathetic to the existing character of the area. Not only does that have aesthetic implications, the contrast in setbacks affects sight lines, and therefore vehicle and pedestrian safety. 6 The car parking and traffic assessments do not adequately take into account the realistic vehicle movements the proposal will generate. --

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**Respondent No:** 443

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 14:58:32 pm

**Last Seen:** Jul 25, 2020 06:57:02 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property
Occupier of a property

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 444

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 14:59:16 pm

**Last Seen:** Jul 25, 2020 06:33:46 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). I have the following concerns relating to the proposal: 1 The impact on amenity. 2 The increase in noise, traffic and odour. 3 The lack of on-site car parking. 4 The intensive height, bulk and scale as compared to the low density residential surround. 5 The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing developments and the proposed. 6 The lack of management plans or mitigation strategies. 7 The lack of proper community consultation - the proposed development is very different from the presentation made several years ago. 8 The effects of intensive construction (including noise, dust, etc) will have a significant impact on the aged residents in Melvista Lodge.

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**Respondent No:** 445

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 15:01:00 pm

**Last Seen:** Jul 25, 2020 06:27:05 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the site bordering Melvista Rd ,Betty and Doonan Rd being extensively altered to incorporate as many beds and facilities as a hospital. At present the Aged Care Facility on this site is low rise ,has no impact upon surrounding single storey homes and is designed in keeping with the area. The contrast of R80 zoning will be in sharp contrast of R12.5 in the north and R10 in the west.The plot ratio is completely out of character with the suburban setting and the homes near the site . Facilities offered in the new development include a hospital and psychiatric accommodation . These facilities do not offer in a normal Aged care Home . The scale and bulk of proposed building is out of scale with the surrounding homes and dominates the landscape when viewed from Masons Gardens. Street frontages for the development are not in keeping with the surrounding homes 2.5m compared to 9m setbacks on existing properties . This will affect the safety of pedestrians and drivers in the surrounding streets . The building design lacks imagination when viewed by neighbours from the north and south .the walls are bulky and bland .The architect had little regard for the visual impact on people living close to the site. The size ,scale and design planned for this development will significantly impact the visual amenity of the location . The increased numbers of occupants 1000% , staff and services required for such a facility will create massive traffic issues and require additional parking to that planned for the development. The impact of increased intensification of this site will result in quiet suburban streets and a neighbourhood park Masons gardens being ruined .

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**Respondent No:** 446

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 15:04:25 pm

**Last Seen:** Jul 25, 2020 06:45:44 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

Scale, height and bulk is excessive and incompatible with the surrounding single residential area. Proposal is overbearing and not in context with the scale of the single residential neighborhood. Adversely affects the amenity of the surrounding residential area. Proposal is inconsistent with the Residential Aged Care Facility LPP, particularly its excessive site coverage and lack of landscape area consistent with the surrounding residential gardens. Car parking and traffic intensification and impact on the surrounding single residential quiet street environment. Safety issues due to increased traffic activity on family residences surrounding the proposal.

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**Respondent No:** 447

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 15:07:45 pm

**Last Seen:** Jul 25, 2020 07:04:21 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**  Occupier of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. My objection is made on the following grounds: The proposal is inconsistent with the Residential Aged Care Facilities Local Planning Policy because of the undue impact it will have on the residential amenity of the area. The height, bulk and scale of a four-storey development proposal is incompatible with the locality and surrounding developments. The proposal will result in unacceptable increases in noise, traffic, odours, car parking congestion and light pollution. The proposal fails to adequately manage or mitigate the impacts it will have on the existing and future residential amenity. The design of the proposal is imposing and unsympathetic to the existing character of the area. Not only does that have aesthetic implications, the contrast in setbacks affects sight lines, and therefore vehicle and pedestrian safety. The car parking and traffic assessments do not adequately take into account the realistic vehicle movements the proposal will generate.

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**Respondent No:** 448

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 15:08:59 pm

**Last Seen:** Jul 25, 2020 07:08:15 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Occupier of a property

---

Q6. **Address of the property affected (if applicable)** not answered

---

Q7. **My response to the proposal:** I object to the proposal

---

**Q8. Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal. -- Short Form Objection Two I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. My objection is made on the following grounds: 1 The proposal is inconsistent with the Residential Aged Care Facilities Local Planning Policy because of the undue impact it will have on the residential amenity of the area. 2 The height, bulk and scale of a four-storey development proposal is incompatible with the locality and surrounding developments. 3 The proposal will result in unacceptable increases in noise, traffic, odours, car parking congestion and light pollution. 4 The proposal fails to adequately manage or mitigate the impacts it will have on the existing and future residential amenity. 5 The design of the proposal is imposing and unsympathetic to the existing character of the area. Not only does that have aesthetic implications, the contrast in setbacks affects sight lines, and therefore vehicle and pedestrian safety. 6 The car parking and traffic assessments do not adequately take into account the realistic vehicle movements the proposal will generate. -- (Very) Short Form Objection Three I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). I have the following concerns relating to the proposal: 1 The impact on amenity. 2 The increase in noise, traffic and odour. 3 The lack of on-site car parking. 4 The intensive height, bulk and scale as compared to the low density residential surround. 5 The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing developments and the proposed. 6 The lack of management plans or mitigation strategies. 7 The lack of proper community consultation.

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**Respondent No:** 449

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 15:13:44 pm

**Last Seen:** Jul 25, 2020 07:11:35 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

---

Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property
Occupier of a property

---

Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). I have the following concerns relating to the proposal: 1 The impact on amenity. 2 The increase in noise, traffic and odour. 3 The lack of on-site car parking. 4 The intensive height, bulk and scale as compared to the low density residential surround. 5 The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing developments and the proposed. 6 The lack of management plans or mitigation strategies. 7 The lack of proper community consultation.

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**Respondent No:** 450

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 15:15:02 pm

**Last Seen:** Jul 25, 2020 06:56:43 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**      not answered

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). I have the following concerns relating to the proposal: 1. The height, bulk and scale of the proposal is incompatible with the low density residential surrounding developments. 2. The increase in noise, traffic and odour. 3. The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing developments and the proposed. 4. Notwithstanding claims made by the developer, the community does not support this proposal and has not been properly consulted. 5. The lack of management plans or mitigation strategies. 6. The proposal is inconsistent with the quiet character of the locality and will have an unacceptable detrimental impact on amenity. I urge you not to support this proposal.

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**Respondent No:** 451

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 15:16:23 pm

**Last Seen:** Jul 25, 2020 07:15:06 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

---

Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

---

Q6. **Address of the property affected (if applicable)**      not answered

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 452

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 15:17:13 pm

**Last Seen:** Jul 25, 2020 07:12:22 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

---

Q6. **Address of the property affected (if applicable)**      As above

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). I have the following concerns relating to the proposal: 1 The impact on amenity. 2 The increase in noise, traffic and odour. 3 The lack of on-site car parking. 4 The intensive height, bulk and scale as compared to the low density residential surround. 5 The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing developments and the proposed. 6 The lack of management plans or mitigation strategies. 7 The lack of proper community consultation.

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**Respondent No:** 453

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 15:18:18 pm

**Last Seen:** Jul 25, 2020 07:17:35 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

---

Q6. **Address of the property affected (if applicable)**      not answered

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 454

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 15:18:49 pm

**Last Seen:** Jul 25, 2020 03:45:02 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

---

Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I object to this proposal for the following reasons: Too much traffic for the neighbourhood Noise from early morning rubbish collection Blocking view from sides of adjoining properties Shadowing over adjoining properties Noise to adjoining properties Increased traffic to local streets Decreased property values to nearby and adjoining properties Too high building for residential area Parking issues

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**Respondent No:** 455

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 15:20:12 pm

**Last Seen:** Jul 25, 2020 07:19:07 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)** not answered

---

Q7. **My response to the proposal:** I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 456

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 15:21:39 pm

**Last Seen:** Jul 25, 2020 07:19:14 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Occupier of a property

---

Q6. **Address of the property affected (if applicable)** not answered

---

Q7. **My response to the proposal:** I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I love playing at Mason Gardens and the proposal will mean there is more traffic around the park that will be dangerous. I believe this type of development should be along Stirling Hwy where more density is permitted and not in a leafy green residential area. Please stop only supporting developers and support children and families in the area.

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**Respondent No:** 457

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 15:23:58 pm

**Last Seen:** Jul 25, 2020 07:17:25 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

---

Q6. **Address of the property affected (if applicable)**      not answered

---

Q7. **My response to the proposal:**      I support the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing in support of the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The City's Residential Aged Care Local Planning Policy has been correctly applied in approving this four storey development. I agree that changes made to the Policy which allowed for an increase in development capability are appropriate. I also support the proposal for the following reasons: 1. The proposal is consistent with the Residential Aged Care Facility Local Planning Policy. 2. The height, bulk and scale of the proposal is consistent and compatible with the locality. 3. The proposal will improve the amenity of the locality. 4. The proposal improves the visual amenity of the locality and has been sympathetically designed to reflect its setting and to mitigate impact. There are no significant safety issues for vehicles and pedestrians. 5. Additional car parking and traffic will be easily accommodated. I urge you to support this proposal.

---





**Respondent No:** 458

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 15:24:42 pm

**Last Seen:** Jul 25, 2020 07:22:35 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

---

Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. My objection is made on the following grounds: The proposal is inconsistent with the Residential Aged Care Facilities Local Planning Policy because of the undue impact it will have on the residential amenity of the area. The height, bulk and scale of a four-storey development proposal is incompatible with the locality and surrounding developments. The proposal will result in unacceptable increases in noise, traffic, odours, car parking congestion and light pollution. The proposal fails to adequately manage or mitigate the impacts it will have on the existing and future residential amenity. The design of the proposal is imposing and unsympathetic to the existing character of the area. Not only does that have aesthetic implications, the contrast in setbacks affects sight lines, and therefore vehicle and pedestrian safety. The car parking and traffic assessments do not adequately take into account the realistic vehicle movements the proposal will generate.

---



**Respondent No:** 459

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 15:31:36 pm

**Last Seen:** Jul 25, 2020 07:24:42 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

---

Q5. **State how your interests are affected (select all relevant boxes)**      Other

---

Q6. **Address of the property affected (if applicable)**      not answered

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

The planning policy that enables this proposed development is flawed and has consequences which were not envisaged when initially drawn up and which could facilitate similar developments in suburban areas which are not fitting for the locality. Further, the proposed development involves bulk and scale that is not representative of the residential precinct it abuts.

---



**Respondent No:** 460

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 15:40:13 pm

**Last Seen:** Jul 25, 2020 07:34:54 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:** I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I OBJECT to the proposal. See comments attached. Development Application for Residential Aged Care Facility, 16 and 18 Betty Street and 73 and 75 Doonan Road, Nedlands. I write to OBJECT to the development application. I object on a number of grounds. Firstly, a 90 bed residential aged care facility would be a medium/high density development in a low density residential area. The new Town Planning Scheme (TPS3) shows the site as low density residential and it should remain as such. The height, bulk and scale of the proposed building is inconsistent with other buildings in the locality. The development will adversely impact the amenity of adjoining/adjacent residents. It will result in overshadowing of properties on the south side and overlooking of other properties. There is insufficient landscaping/deep soil planting. It would significantly increase traffic in the area. The Transport Impact Statement appears unrealistic. It appears to significantly underestimate the likely traffic associated with a facility of the scale proposed. The amount of car parking shown is very much less than that needed for a facility of the scale proposed. Front and side setbacks are insufficient. They should be consistent with those in existing residential areas of Betty Street and adjacent parts of Doonan Road. There has been no real consultation on this proposal which is completely unacceptable. The Council should not support private sector commercial development at the expense of its residents.

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**Respondent No:** 461

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 15:46:16 pm

**Last Seen:** Jul 25, 2020 07:43:34 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Other
<input type="checkbox"/>	Occupier of a property

---

Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

---



**Respondent No:** 462

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 15:48:31 pm

**Last Seen:** Jul 25, 2020 07:47:18 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Occupier of a property
<input type="checkbox"/>	Owner of a property

---

Q6. **Address of the property affected (if applicable)**      not answered

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 463

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 15:50:41 pm

**Last Seen:** Jul 25, 2020 06:10:40 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** 0400200398

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Q5. **State how your interests are affected (select all relevant boxes)** Owner of a property

---

Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

---

**Q8. Submission : Please give your comments relating to this item in full below.**

Dear Mayor/ City of Nedlands Councillors I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy that were not advertised to the public. The changes made to the draft Policy increased the height and plot ratio and allowed for a significant intensification of what could be developed on the site. As a result the developer is seeking approval for a four-story development. The height, scale and bulk of the proposed facility is wholly incompatible with the local setting. The Site is surrounded by low density residential development. The land immediately to the east and west is R10 and to the north R12.5. The contrast between the existing density and the proposed R80 coding will be sharp and the proposed plot ratio is again incompatible with the immediate and wider neighbourhood. The proposal does not at all adequately ensure that the facility will "not have an undue impact on the residential amenity". The proposal represents a significant intensification in how the site will look and operate. It increases the number of people living on the site by over 1000%. The level of staffing and services required to accommodate 90 high needs aged care residents must not be understated. In fact, I don't think it is possible to OVERSTATE the cumulative impact of 90 residents, combined with the servicing and operational requirements of the facility and movement of staff, visitors and deliveries. The noise and light spill generated from such 24/7 operations should not be inflicted on the residents of these two currently very peaceful streets. If approved, the facility would have a major adverse impact on the local residents with respect to: • Quality of life • Safety • Parking and traffic congestion • Noise • Property values The developer relies on consultation it conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different to the development currently proposed. I also raise concern with the following taken from the developer (Oryx) website: 28 November 2017 The City of Nedlands Council resolved to sell 75 Doonan Road to Oryx for the reasons that the sale will provide: above market value for the land; proceeds will assist Council's funding of future strategic projects; allow development of a vacant piece of land for community benefit; and facilitate the proposed establishment of a new high care facility within the City of Nedlands. The fact that the developer paid 'above market rate/value' for the property to the council must surely raise questions of due process. How was the market value determined without offering the property for sale to others? During my discussions with local residents, I have not identified a single individual that supports this development. If you take your CURRENT rate paying residents viewpoint into consideration, and your role to represent them seriously and honestly you must take action to reject this proposal outright. All of the above, does not include the clear problems associated with high density, end stage aged care living in the setting of an ongoing COVID pandemic. I urge you to support your local residents and support common sense.

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**Respondent No:** 464

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 15:52:33 pm

**Last Seen:** Jul 25, 2020 07:51:13 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

---

Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 465

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 15:59:27 pm

**Last Seen:** Jul 25, 2020 07:56:19 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property  
Occupier of a property

---

Q6. **Address of the property affected (if applicable)** not answered

---

Q7. **My response to the proposal:** I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to OBJECT to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. I OBJECT for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 466

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 16:01:21 pm

**Last Seen:** Jul 25, 2020 07:35:56 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**      not answered

---

Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

The significant changes relating to the increased development density of the Residential Aged Care Local Planning Policy formulated by the City of Nedlands was not advertised to the public for consultation. This troubles me greatly ,as local government decisions which potentially have a widespread ,precedent making effect must be taken in a transparent and democratic manner.Public notice of such important changes to an existing Policy need to be made so that the community ,as represented by the City of Nedlands can make an informed observation as to the merits or otherwise of such changes.Democracy in action. I also object to the height , bulk and scale of the proposal as it is out of keeping with the locality and it will create more traffic problems in our already narrow streets ,where current roadside parking makes for congestion and tight driving requirements. The extra car parking and traffic that the implementation of this facility will bring to the area has not been properly addressed by the Developer.

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**Respondent No:** 467

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 16:01:27 pm

**Last Seen:** Jul 25, 2020 07:33:03 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property

Occupier of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**

I object to the proposal

---

**Q8. Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. I totally object to the monstrous scale of this development - The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. As a direct neighbour of this area, and having lived here for over 20 years, I cannot believe that we have been hoodwinked by the sneaky approach taken by the developer. For many years, we have been told that the old Melvista retirement village might be expanded, to move up the road to include 73 and 75 Doonan Rd - but we were always told it would be two-storeys and fit in with the normal requirements for developments along Doonan Rd - with setbacks and height limits taken into account. Yet when the developer finally puts forward their Development Application, it is somehow now a 6-storey building with very little setback ! And I won't even go in to the design faults as I know that many others will point them out. What is worse - it seems like the City of Nedlands planning staff have been partners-in-crime for this outrageous development application ! Over a series of sneaky amendments and planning mumbo-jumbo - about an LPP that is says what is appropriate for the Hollywood Hospital aged-care facility is somehow appropriate in this residential area - it seems like the city planners have hoodwinked the City of Nedlands councillors into supporting this proposal. And they have not even followed the City of Nedlands policy when it comes to consultation !! We have all read that the city planners have massive conflicts of interest when it comes to approving these developments, but this has to stop and the elected councillors must take back control or there will have to be an investigation. We feel that we have been ambushed by this massive development that the developer won't even tell us how high it is, even when we met with their planner and community consultant. And all this is for a "for profit" company when we all know that Aged-Care is going through enormous challenges, with the COVID response and the Royal Commission all bound to enforce changes on the aged-care industry, and very likely to oppose institutional-style developments like the one proposed by Oryx. So we have to ask - why the rush? And the answer seems to be so that a greedy developer can sneakily make a profit at the expense of the aged-care residents of Nedlands and the general Nedlands community. And this is from a developer who has no reason to be trusted as they have made misleading statements over and over again ! Being directly over the road from the proposed development, the proposed building will have a major impact on our day-to-day lives and the amenity of the street we have lived in - and pay rates for - for over 20 years. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light and traffic. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. Note - I am still waiting for the developer to even consult with us about this proposal - and I live less than 20 metres from it - and they have the gall to say they have done lots of consultation for people within 100 metres! And worse, the Nedlands council policy says that this consultation should at least be considered a Complex DA and therefore people at least 200 metres away should be consulted ! How on earth the city of Nedlands planners think this is OK is beyond me. But then, when the council CEO comes out in the newspaper saying that this is the best consultation he has ever seen - you have to wonder whether there is something dodgy going on. We are not against aged-care - we always knew the Melvista site would be developed - and hopefully improved - as the current village is not in good shape. We all know about the financial problems that Lisle Villages faced, but as a not-for-profit organisation at least they are not a greedy and sneaky developer. The sale of 75 Doonan Rd to Oryx, even when Lisle Villages asked the council to consider letting them put forward an offer - just goes to show you how dodgy this developer is. But this sort of corruption of process cannot happen unless there are planners inside the city of Nedlands who allow this to happen and worse, have massive conflicts of interest that you read all about on social media. The City of Nedlands must stop this corrupt process and start the consultation about aged-care in the area, and Nedlands in general, all over again. And this consultation should be about a plan for aged-care across the entire Melvista lodge area, not just a dodgy deal to help a dodgy developer on 4 blocks of residential land. Why on earth the city of Nedlands planners have not done this sort of plan before is beyond me - I thought we paid rates to employ planners who could then come up with a plan - but this is not a plan. It is an ambush by a dodgy developer who want to make profit from the aged-care industry and in doing so take value away from the Nedlands community. It is time for the City of Nedlands to take back control - dodgy developers and dodgy planning must be stopped.

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**Respondent No:** 468

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 16:03:36 pm

**Last Seen:** Jul 25, 2020 07:56:23 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 469

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 16:04:39 pm

**Last Seen:** Jul 25, 2020 07:48:32 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property
Occupier of a property

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

my property is not directly affected by this development. However I am horrified by the changes being forced on the whole area. I used to deliver Nedlands library books to the residents of the high care nursing home on this land and it fitted in fine with the surrounding residential buildings but the 4 storey plan will have a very negative impact. I loathe the hideous changes ruining our beautiful suburb and the extra traffic can only be detrimental to the small quiet streets affected. There should be no buildings more than double storey anywhere within this vicinity.

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**Respondent No:** 470

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 16:06:09 pm

**Last Seen:** Jul 25, 2020 08:04:53 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

---

Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 471

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 16:06:32 pm

**Last Seen:** Jul 25, 2020 08:04:11 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I strongly resent the callous disrespect afforded to Nedlands rate payers by both the developers and the Council in the proceedings to date. Therefore, I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four story development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a very significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. Notwithstanding claims made by the developer, the community does not support a proposal for a facility of this scale and has not been properly consulted. I want to emphasize that I am in no way oppose an aged care facility on this site. But the excessive scale of this proposal along with the underhanded way that it was disclosed give very little confidence in the ability of our local government to look after the interests of the residents of Nedlands. We are disappointed in the role of local government – particularly the planning department – in enabling this stealthy and predatory behaviour by the developer.

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**Respondent No:** 472

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 16:10:18 pm

**Last Seen:** Jul 25, 2020 08:07:56 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 473

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 16:11:01 pm

**Last Seen:** Jul 25, 2020 08:09:28 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**      not answered

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

---



**Respondent No:** 474

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 16:13:26 pm

**Last Seen:** Jul 25, 2020 07:58:43 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. My objection is made on the following grounds: 1 The proposal is inconsistent with the Residential Aged Care Facilities Local Planning Policy because of the undue impact it will have on the residential amenity of the area. 2 The height, bulk and scale of a four-storey development proposal is incompatible with the locality and surrounding developments. 3 The proposal will result in unacceptable increases in noise, traffic, odours, car parking congestion and light pollution. 4 The proposal fails to adequately manage or mitigate the impacts it will have on the existing and future residential amenity. 5 The design of the proposal is imposing and unsympathetic to the existing character of the area. Not only does that have aesthetic implications, the contrast in setbacks affects sight lines, and therefore vehicle and pedestrian safety. 6 The car parking and traffic assessments do not adequately take into account the realistic vehicle movements the proposal will generate.

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**Respondent No:** 475

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 16:18:54 pm

**Last Seen:** Jul 25, 2020 08:16:35 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. • The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. • The proposal fails to take into account the existing and future character of the locality. The City has a new local planning scheme, and whilst higher density has been provided for elsewhere, this locality preserved its low density coding. There is a clear intention and understanding that the low density residential nature of the area will be maintained. A high rise intensive aged care development completely undermines that intention. • The proposal will significantly diminish visual amenity of the area due to its size, scale and design. It is not in keeping with the character or streetscape in the locality. • No management plans have been provided to show how the detrimental amenity impacts which will arise from such an intensified use will be mitigated, particularly given its hours of operation. No development condition will be validly capable of managing those impacts. • The developer relies on consultation it conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different from what is proposed. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed. • The proposal represents a significant intensification in how the site will look and operate. It increases the number of people living on the site by over 1000%. The level of staffing and services required to accommodate 90 high needs aged care residents must not be understated. The cumulative impact of 90 residents, combined with the servicing and operational requirements of the facility and movement of staff, visitors and deliveries, will result in a substantial increase in: noise from traffic movements, at all hours of the day, to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users; noise generated from the operations of the proposal, including air-conditioning, services, and an intensive increase of population and people movement; light spill from 24 hour a day operations;

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**Respondent No:** 476

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 16:20:14 pm

**Last Seen:** Jul 25, 2020 08:14:51 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. As a resident and ratepayer for 45 years of the City of Nedlands it disappoints me to see attempts by developers to profit by "pushing the limits" of our city's plans to accommodate the evolution of our community. The city has a renowned desirability and within its boundaries certain areas offer even greater appeal e.g. River frontage, Parks and gardens, schools, shopping centres and transport systems and attract higher values. In the subject case we have residents who have no doubt purchased their land because of proximity to a park, Masons Gardens, which I have enjoyed sharing with my children and their children for 35 years. Their expectations for and rights to "Quiet Enjoyment" are about to be shattered by a development which is in absolute contrast to any residents understanding of residential zoning or any exception which permits residents in aged care. The existing Melvista facility is subtle and blends with the character of its surroundings. The same can be said for the Alfred Carson centre in Bay Road. The proposed development is an intrusive landmark with adverse visual and physical impact. It should not be allowed in the proposed location. I call on the council to demonstrate its understanding of its community, as it did with Lisle Lodge and only allow such developments where there is minimal impact on the ambience of the precinct.

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**Respondent No:** 477

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 16:23:26 pm

**Last Seen:** Jul 25, 2020 08:07:55 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Submission to Development Proposal I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. 1. Bulk and scale – a. The bulk and scale of the development are inappropriate in a suburban area of low-rise residential houses. b. There are minimal setbacks to north, east, south and west, and these are not in keeping with the setbacks of the surrounding residential streets. 2. Height a. Overlooking – the development will overlook numerous nearby residential houses and gardens, thereby breaching their residents' privacy. b. Overshadowing – the development will overshadow Melvista Lodge and the individual dwelling units to the south, and residential houses and gardens to the east and west, at other times of day to a much greater extent than that shown as at noon in midwinter and midsummer. c. Overtowering – the development will tower over the surrounding parts of Nedlands and Dalkeith, including Masons Gardens, Melvista Lodge and the individual dwelling units, and the local low-rise residential areas. d. Visibility - The height of the development will result the upper floors being visible from substantial areas of Nedlands and Dalkeith 3. Space a. 90 or more patients will be crammed into a prison-like multi-storey block. b. Patients on upper floors will be isolated with no immediate access to ground-level exterior areas. c. Patients on the ground floor will be surrounded by blank walls to north and south with no view. d. No garden areas are provided for patients for sitting, exercise and absorbing Vitamin D from sunshine (important for the elderly). The building will take up almost the entire development site. The development will breach the requirement for 25% of the site to be landscaped. e. One-storey grouped rooms with immediate access to secure garden areas is the preferred accommodation for aged care patients (whether frail-aged patients or dementia patients). 4. Covid-19 a. The recent experience in Victoria, and also in New South Wales, has shown that aged care facilities are particularly at risk of receiving and spreading infections such as Covid-19, (as well as the more usual gastroenteritis and influenza), with their combination of numerous, immobile and frail elderly residents and numerous, mobile and changing staff, all in close proximity. b. The recent experience in Victoria has shown that multi-storey blocks are particularly at risk of receiving and spreading infections such as Covid-19, with their numerous residents, and some immobile and some highly mobile, all in close proximity. c. The proposed development combines the above high-risk situations being both an aged care facility and a multi-storey block. 5. Royal Commission a. The proposal fails to take into account the recommendations of the Review of Innovative Models of Aged Care Research Paper, 3 January 2020 by the Royal Commission into Aged Care Quality and Safety in terms of its design and density. b. The Royal Commission has stated that "Our Final Report will give close consideration to ensure staffing levels, and the mix of staffing, are sufficient to ensure quality and safe care". c. The consideration of this development proposal should await the findings and recommendations of the Royal Commission's Final Report. 6. Traffic a.

During construction – the surrounding streets (including Betty St, Doonan Rd and Melvista Ave) are already at full capacity, and during construction of the development the numerous construction vehicles and workers' private vehicles will cause further congestion and traffic jams, and danger to pedestrians and vehicles, from before 7am to after 6 pm Monday to Saturday. b. During operation – the surrounding streets (including Betty St, Doonan Rd and Melvista Ave) are already at full capacity, and during operation of the development the numerous vehicles of administrative, catering, cleaning, medical, allied health and maintenance staff, and vehicles for deliveries, residents' visitors, Wellness Centre staff and visitors, will cause further congestion and traffic jams, and danger to pedestrians and vehicles, at all hours of the day and night seven days a week.

7. Parking a. During construction i. The building will take up almost all of the development site and during construction there will not be space on the site for parking of construction vehicles and workers' private vehicles, from before 7am to after 6 pm Monday to Saturday. ii. The surrounding streets (including Betty St, Doonan Rd and Melvista Ave) are already required for parking by local residents and their tradesmen and other visitors, and are not capable of supporting the street parking which will necessarily arise due to the lack of sufficient on-site parking b. During operation i. The amount of administrative, catering, cleaning, medical, allied health and maintenance staff required to support an intensive 90-bed high care facility will not be supported by 26 bays, particularly given no parking allowances have been made for deliveries, visitors of residents, or the Wellness Centre staff and visitors. ii. The surrounding streets (including Betty St, Doonan Rd and Melvista Ave) are already required for parking by local residents and their tradesmen and other visitors, and are not capable of supporting the street parking which will necessarily arise due to the lack of sufficient on-site parking.

8. Noise a. During construction i. During construction there will be substantial noise from traffic movements by construction vehicles and workers' private vehicles, from before 7am to after 6 pm Monday to Saturday. ii. During construction there will be substantial noise generated from construction operations for the development from before 7am to after 6 pm Monday to Saturday. b. During operation i. During operation of the facility there will be substantial noise from traffic movements, at all hours of the day and night, seven days a week, for deliveries, supplies, medical support, staffing shifts, tradesmen, residents' visitors and Wellness Centre users; ii. During operation of the facility there will be substantial noise generated from the operations of the development, including air-conditioning, waste management, and other services.

9. Light a. The development will cause light spill from 24 hour a day operations. b. The height of the development will result in light from the upper floors being visible from substantial areas of Nedlands and Dalkeith.

10. Odours a. Odours will be generated from the operations of the development, including catering, laundry and servicing. b. These odours will deleteriously affect surrounding residential areas, and will be blown in varying directions and to varying distances depending on the wind direction and speed.

11. Community consultation a. In 2016 representatives of the developer undertook some community consultation in respect of a low-rise, low-care, aged care facility on a different site which included the Melvista Nursing Home site. b. The current development is for a multi-storey, high-care aged care facility on a different site, being 4 residential blocks to the north of the Melvista Nursing Home, for which no community consultation has taken place.

12. Amenity a. The development is not in keeping with the character or streetscape in the locality. b. For the reasons specified in the above points, the development will significantly diminish the amenity of the area.

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**Respondent No:** 478

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 16:28:32 pm

**Last Seen:** Jul 25, 2020 08:27:31 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

---

Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property  
Occupier of a property

---

Q6. **Address of the property affected (if applicable)** not answered

---

Q7. **My response to the proposal:** I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 479 **Login:**

**Email:**

**Responded At:** Jul 25, 2020 16:38:22 pm

**Last Seen:** Jul 25, 2020 08:19:55 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

---

Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

Good day , I object to this proposal as it seems completely ludicrous to build a 90 bed clinic in the middle of a purely residential area . The opportunity to expand the retirement village with low rise 1 or 2 bedroom villas is required in this suburb , not a clinic . And if it is a frailcare facility that is required , then build a frailcare that is in character of the suburb and the existing aged care complex. Also , the proposal does not respect the rules of : Bulk scale form Adequate traffic planning No enough parking etc etc Regards

---



**Respondent No:** 480

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 16:38:25 pm

**Last Seen:** Jul 25, 2020 08:34:35 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

---

Q6. **Address of the property affected (if applicable)**      not answered

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

---



**Respondent No:** 481

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 16:40:15 pm

**Last Seen:** Jul 25, 2020 07:56:57 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**      not answered

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I consider this large scale commercial operation inappropriate in a residential area and its design already obsolete given the COVID19 evidence now surfacing surrounding such facilities. Clearly Council/Planning should not be influenced by a commercial developer seeking to manipulate the existing errors now apparent in the existing Local Planning Scheme for its fiscal gain. The Council/Planning Dept by selling the adjoining land at 75 Doonan Road to the developer (Oryx) has unwittingly or otherwise acted as an enabler for the Oryx Proposal (by stealth) and at the very least has displayed an inept understanding of the matters at issue and certainly appears no match for the developer Oryx. Accordingly , investigation needs to be implemented without delay in order to establish the facts of the matter.

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**Respondent No:** 482

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 16:41:40 pm

**Last Seen:** Jul 25, 2020 07:21:49 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property
Occupier of a property

---

Q6. **Address of the property affected (if applicable)** not answered

---

Q7. **My response to the proposal:** I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the proposed Residential Aged Care Facility at 16-18 Betty St and 73-75 Doonan Rd Nedlands. Changes made to the City of Nedlands Residential Aged Care Local Planning Policy were not advertised to the public and as a result the size of the proposed development was an unwelcome surprise to the neighbouring residents, accompanied by the lack of consultation by the developers. The height, bulk and scale of the building is not compatible with the existing locality with respect to amenity, including noise, light, and traffic. The number of car parks provided is nowhere near enough to cater for staff, deliveries and visitors. Certainly staff could not be expected to rely on public transport with no train service and a very limited bus service available. This type of facility is not a 9-5 proposition! I am also concerned about a closed Dementia Ward positioning and lack of outdoor landscaped areas for residents' use. Access for emergency vehicles is severely limited as ambulances would need to have easy access at all times.

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**Respondent No:** 483

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 16:41:45 pm

**Last Seen:** Jul 25, 2020 08:36:31 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

---

Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the proposed Residential Aged Care Facility at Lots 10 & 11 Betty St and Lots 18 & 19 Doonan Rd, Nedlands. The City's Aged Care LPP which allowed this proposal to be submitted was not advertised to the public and therefore I do not believe the proposal should even be considered. In addition, the height, scale and bulk of the proposed build is incompatible with the locality and diminishes the visual amenity of the area. Car parking and traffic have not been properly considered and their effects on the local infrastructure and residents are detrimental and not in keeping with the quiet nature of the area. I consider the proposed build is a much too large commercial building and operation for this site.

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**Respondent No:** 484

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 16:43:01 pm

**Last Seen:** Jul 25, 2020 04:40:37 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property

Other

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Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**

I object to the proposal

---

**Q8. Submission : Please give your comments relating to this item in full below.**

I strongly object to the development application for a Residential Aged Care Facility located at 73-75 Doonan Road and 16-18 Betty Street, Nedlands. 1) Scale, Size, Design Inappropriate The scale and size of the proposed development is totally inappropriate for the site being comprehensively commercial while being located totally in a residential area. If that is not sufficiently bad, the scale of its several storeys is overpowering in relation to all structures around it which are low density and totally residential in character and appearance. 2) Set backs Street Frontage The frontage setbacks are not consistent with the remainder of the surrounding streetscape. In this there is total unfairness to residents in that the proposed development has setbacks much less than is required of other ratepayers in residential areas. If an ordinary ratepayer in a residential street wants a setback less than 9m, the council simply rejects it out of hand. But in this proposed development, lesser setbacks are acceptable. That is discrimination against ordinary ratepayers in favouring a big developer by not requiring the same setbacks for this proposed development. Why is it one rule for the average ratepayer like me and another for big business which is proposing this development? This is unacceptable one rule for some and another for all others. 3) Car parking totally inadequate The lack of adequate car parking arrangements will impact Betty Street, Doonan Street and Melvista Avenue. The proposal nominates 90 beds of non-ambulatory patients. My inquiries of single facility operators of facilities of similar size indicate a weekly roster of about 120 staff. They indicate that there could be 40 persons on a shift. That immediately puts 40 vehicles into the area just to cater for staff. That is without catering for the vehicles of those who need to attend the facility on routine business such as State and Federal Health Dept officers, commercial suppliers of goods and services, tradespersons, doctors, physiotherapists and other medical persons etc. 4) Consequent parking and road safety impacts in surrounding areas The inadequate car parking referred to in 3) will mean that Betty and Doonan streets in the area of the proposed development will become clogged with parked cars driven by staff and those other people who need to attend the proposed facility. This will also flow into Melvista Avenue which already caters for large numbers of vehicles and will also impact on a child care facility nearby on Melvista Avenue. Given the clogging nature of the excessive numbers of cars parked in the area due to the facility, there will be increased safety impacts which would likely cause accidents and injury to persons because of the impact of such large numbers of vehicles attracted to the facility and parked in the surrounding streets which were not designed for such impacts. This is especially relevant in its impact on Melvista Avenue because Melvista Avenue has become a throughway for traffic travelling from Dalkeith, Claremont, Christchurch Grammar, MLC college, and beyond and taking people into the city by connecting with either Broadway or more usually, Hackett Drive. It is used for that connection by many drivers in preference to Princess Road. 5) Sale of Land - Potential Duplicitous Dealing The Nedlands City Council could have been duplicitous in its dealings in relation to the private treaty sale of 75 Doonan Road to the developer before the land was designated 'special use' allowing aged care. Normal operational transparency required of a government body was totally lacking in this. This land should have been offered for sale on the open market by the normal tender process. This could have been deceptive dealing by the Council because the Council did not disclose its actions to ratepayers. There is a question as to whether the Council actions in disposing of this land in the manner in which it did might constitute misconduct which would merit investigation by the appropriate authority. 6) Noise Levels - Loss of Amenity There is no indication of any attempt to deal with additional noise levels which will apply with servicing such a facility as the proposed development. A prime element of this is the noise which will be generated by trucks delivering to the premises and especially the sounding of their reversing horns. This will be a source of extreme annoyance and a loss of amenity to local residents. The other noise generators will be the items of plant and equipment on-site which will impact the amenity of local residents. 7) Light Spill - Light Pollution Light spill from on-site illumination will impact on local residents because the lighting will be of commercial type and use and totally inappropriate for residential areas. 8) Visual Pollution The size, height and width of the proposed structure will provide a visual pollution throughout south, south-east and south-west directions of the site and will be especially impactful to all who use Masons Gardens. Persons looking at the hillside will see a giant building which dwarfs all around it and is totally out of place and character being a commercial operation in a totally residential area. 9) Landscaped Area - Non-compliant The proposed development does not comply with the requirement for 25 per cent of the area to be landscaped.

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**Respondent No:** 485  
**Login:** MAlder  
**Email:** melissaalder@outlook.com

**Responded At:** Jul 25, 2020 16:43:36 pm  
**Last Seen:** Jul 25, 2020 08:37:21 am  
**IP Address:** 121.200.35.111

- Q1. **Your name:** Melissa Alder
- 
- Q2. **Your address:** 61 Watkins Road, Dalkeith WA 6009
- 
- Q3. **Your email address:** melissaalder@outlook.com
- 
- Q4. **Your telephone number:** 0409388034
- 
- Q5. **State how your interests are affected (select all relevant boxes)** Owner of a property
- 
- Q6. **Address of the property affected (if applicable)** not answered
- 
- Q7. **My response to the proposal:** I object to the proposal
- 
- Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. My objection is made on the following grounds: 1 The proposal is inconsistent with the Residential Aged Care Facilities Local Planning Policy because of the undue impact it will have on the residential amenity of the area. 2 The height, bulk and scale of a four-storey development proposal is incompatible with the locality and surrounding developments. 3 The proposal will result in unacceptable increases in noise, traffic, odours, car parking congestion and light pollution. 4 The proposal fails to adequately manage or mitigate the impacts it will have on the existing and future residential amenity. 5 The design of the proposal is imposing and unsympathetic to the existing character of the area. Not only does that have aesthetic implications, the contrast in setbacks affects sight lines, and therefore vehicle and pedestrian safety. 6 The car parking and traffic assessments do not adequately take into account the realistic vehicle movements the proposal will generate. I urge you not to support this proposal. Regards,





**Respondent No:** 486

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 16:44:37 pm

**Last Seen:** Jul 25, 2020 08:42:23 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property

Occupier of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**

I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the proposed Residential Aged Care Facility at Lots 10 & 11 Betty St and Lots 18 & 19 Doonan Rd, Nedlands. The City's Aged Care LPP which allowed this proposal to be submitted was not advertised to the public and therefore I do not believe the proposal should even be considered. In addition, the height, scale and bulk of the proposed build is incompatible with the locality and diminishes the visual amenity of the area. Car parking and traffic have not been properly considered and their effects on the local infrastructure and residents are detrimental and not in keeping with the quiet nature of the area. I feel the proposed build is a much too large commercial building and operation for this site.

---



**Respondent No:** 487

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 16:45:46 pm

**Last Seen:** Jul 25, 2020 08:35:14 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Other

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I believe the proposal is totally inappropriate in its location and size. I have no objections to an aged care facility but to locate in the middle of a low rise residential street is just plain awful planning. This facility would be better suited to the Hollywood area of the city.

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**Respondent No:** 488

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 16:48:17 pm

**Last Seen:** Jul 25, 2020 08:46:40 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**      not answered

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 489

**Login:** [REDACTED]

**Email:** [REDACTED]

**Responded At:** Jul 25, 2020 16:50:05 pm

**Last Seen:** Jul 25, 2020 08:49:26 am

**IP Address:** 60.231.224.114

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

---



**Respondent No:** 490

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 16:50:47 pm

**Last Seen:** Jul 25, 2020 08:48:00 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Other

---

Q6. **Address of the property affected (if applicable)** not answered

---

Q7. **My response to the proposal:** I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). I have the following concerns relating to the proposal: 1. The impact on amenity. 2. The increase in noise, and traffic. 3. The significant level of overlooking onto private property of northern neighbours into swimming pool area, backyards, windows of living areas and bedrooms. 4. The lack of on-site car parking. 5. The intensive height, bulk and scale as compared to the low density residential surround. 6. The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing resident setback and that of the proposed development. 7. The lack of proper community consultation 8. The lack of landscaping with deep root planted trees and garden space 9. Health risk for the aged care residents due to high-density facility during COVID/post COVID times. 10. The 24/7 nature of the building use and the proposal for deliveries etc. to occur even on weekends will have undue impact on amenity

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**Respondent No:** 491

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 16:50:53 pm

**Last Seen:** Jul 25, 2020 08:46:49 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I do not support this development. It is too bulky and will create chaos around that area of Nedlands with an on flow to other roads. The collection of rubbish is going to be very disruptive to residents living near by and to residents in the facility.

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**Respondent No:** 492

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 16:51:19 pm

**Last Seen:** Jul 25, 2020 08:48:55 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

---

Q5. **State how your interests are affected (select all relevant boxes)**

Owner of a property
Occupier of a property

---

Q6. **Address of the property affected (if applicable)** not answered

---

Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the proposed Oryx aged care development, My main concerns; • Parking- Cars everywhere- are you really going to destroy the serene suburb we have now with car parks all over the place, where would we walk? Where would we ride bikes? Where would we ENJOY open park spaces? • I do not object to providing places for the elderly to live and be cared for but by building an APARTMENT sized building that overlooks people's private property, ask yourself what good that ACTUALLY DOES for the residents and neighbours of the building Thankyou

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**Respondent No:** 493

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 16:51:27 pm

**Last Seen:** Jul 25, 2020 08:28:37 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**      As above

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. I object and am most concerned for the following reasons. 1. The proposed development is in a low density residential area. It is completely out of keeping with this suburban area, and will inappropriately disrupt the amenities and suburban nature of the area. 2. I do not object to the building of an aged care facility per se. I object to the height, width and scale of the proposal. Any aged care facility should be more consistent with the area. For example, see the small, less obtrusive facility in Bay Rd, Claremont. 3. Given its size it is likely to increase the noise, appearance and traffic in the area in a manner that will adversely impact on living, leisure and enjoyment for residents of the area. Please also bear in mind that this area is not only residential, but contains primary schools with children riding bikes and walking to school. 4. Given the size and number of storeys proposed, it will be aesthetically peculiar for the area. 5. The existence of such a development so close to a public park is inexplicable. The public park, Masons Gardens, is for quiet enjoyment and recreation. I urge you not to support this proposal.

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**Respondent No:** 494

**Login:**

**Email:** s

**Responded At:** Jul 25, 2020 16:53:11 pm

**Last Seen:** Jul 25, 2020 08:26:53 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Other

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Q6. **Address of the property affected (if applicable)**      not answered

---

Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object to proposal due to 1. Height of proposed building. 2. Density of proposed building on current land area. 3 Shadowing to neighbouring properties. 4. Increased Traffic volume in Betty st, Doonan Rd, Grandby Crs and Melvista Ave. 5. Noise pollution due to heavy rubbish and delivery trucks entering at unreasonable hours. 6. Unreasonable demands put on local residents to accept an unreasonable development that is not in keeping with current practices. 7. Parking issues in narrow streets. 8. Accessibiliry to homes by residents due to volume of traffic and lack of parking.

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**Respondent No:** 495

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 16:54:44 pm

**Last Seen:** Jul 25, 2020 08:40:12 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Other

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

What is going on with the planning in the suburb of Nedlands and its surrounds?! It is becoming a joke as the submissions roll in to develop these monstrosities in this area. The purposed building in question, 16 & 18 Betty Street and 73 & 75 Doonan Road, Nedlands, does NOT go with the aesthetic of this beautiful suburb. We do not have the transport network to support this style of development. An aged care facility of that magnitude will have a negative impact on the sense of community and family that makes this lovely old suburb what it is. This area should NOT become a commercial zone, running a business of that magnitude. Nor should the pre-existing residence of the area have to deal with impact of the monster build. The overshadowing and dominance the this build would have should not, and must not be allowed to happen. Do not allow the floodgates to open as accepting this proposed build will lead to more of its like and destruction of this neighbourhood. Let us keep it as a neighbourhood and keep our community, especially in this new age we all face.

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**Respondent No:** 496

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 16:55:02 pm

**Last Seen:** Jul 25, 2020 08:52:07 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Other

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am concerned about the increase in traffic around the current quiet area. I also believe the building is too high for the chosen blocks - It will tower over the houses surrounding it.

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**Respondent No:** 497

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 16:57:10 pm

**Last Seen:** Jul 25, 2020 08:46:38 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)** Other

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Q6. **Address of the property affected (if applicable)** not answered

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

My family live nearby and I am concerned about how this monstrosity of a building will destroy the surrounding area.

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**Respondent No:** 498

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 16:57:31 pm

**Last Seen:** Jul 25, 2020 08:48:51 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:** not answered

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Q5. **State how your interests are affected (select all relevant boxes)**

- Owner of a property
- Occupier of a property
- Other

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

The proposal should be REJECTED in its entirety. It is entirely out of character and unfitting for that part of Nedlands. The process by which the purported development application was made always requires thorough investigation before the purported development application should be considered. Importantly, also, over 100+ ratepayers of Nedlands have called for a special electors meeting for 10 August 2020 (as now advertised by the City as required under the Local Government Act 1995) in order to propose a comprehensive upgrade of traffic impact assessment. This is to address the inadequate assessment mechanisms currently in place for traffic assessment, including non-expert reports submitted which do not undertake cumulative assessment of traffic issues in a locality and have no technical rigour and no minimum professional standards requirement. In accordance with conventions of responsible and representative government, the City ought to take active steps to defer any consideration of this proposal until the convened meeting of ratepayers on traffic assessment issues provides a democratic mandate to the Council as to what is required by those ratepayers.

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**Respondent No:** 499

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 17:01:10 pm

**Last Seen:** Jul 25, 2020 08:18:16 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Occupier of a property

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Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 500

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 17:13:57 pm

**Last Seen:** Jul 25, 2020 08:31:11 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

<input type="checkbox"/>	Owner of a property
<input type="checkbox"/>	Occupier of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**  I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

We wish to lodge our objection to this totally unsuitable proposal on this site. Small residential/care facilities for the aged in familiar suburban surroundings are ideal, but an extremely large, high care, for profit facility forced into a quiet residential area is entirely inappropriate. The support & maintenance required for a 24/7 facility will be constant & extreme, affecting all the surrounding neighbourhood in many unwanted ways, as listed by others. It is difficult to comprehend how this proposal has been able to so easily pass the various requirements that are established for the residents protection, & would normally constrain such an overdevelopment in such an unsuitable situation. The developers must have been confident of success to continue to this stage, despite local comment. We wish the councillors to represent the members of their community & affect the rejection of this excessive proposal.

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**Respondent No:** 501

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 17:17:13 pm

**Last Seen:** Jul 25, 2020 09:13:53 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

The bulk and scale of the proposed development are out of keeping with the surrounding streets, and that it is not wise to be planning this kind of high-density aged-care home in the light of the recent Royal Commission.

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**Respondent No:** 502

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 18:48:52 pm

**Last Seen:** Jul 25, 2020 10:44:10 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

---

Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. To the extent the decision maker chooses to rely on significant and unadvertised provisions of the Policy, I further object as follows: 1 The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. 2 The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. 3 The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 4 Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. 5 The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and pedestrian safety. 6 Notwithstanding claims made by the developer, the community does not support this proposal and has not been properly consulted. I urge you not to support this proposal. Proforma additional paragraphs, to be added as relevant to the objector if desired: 7 Policy objectives 7.1 One of the primary objectives of the Policy is – “to ensure the appearance and design of residential aged care facilities are of high quality and do not have an undue impact on the residential amenity by way of building bulk and scale, noise, traffic or parking”. The proposal fundamentally conflicts with this objective given the stark and jarring contrast between the surrounding R10 and R12.5 locality and the proposed four storey R80 development. The number of residents proposed to be accommodated will increase the residential capacity of the site by over 1000%. The consequential visual impacts, noise, traffic and parking that will flow from such an intensification will destroy the residential amenity of the locality. 8 Compatibility with setting (bulk, scale and height) 8.1 The Site is surrounded by low density residential development. The land immediately to its east and west is R10 and the land to its north is R12.5. The contrast between the existing density and the proposed R80 coding will be sharp, and the proposed plot ratio is wholly incompatible with the broader setting. 8.2 The bulk and scale of the proposal is imposing in its context. The proposal makes no attempt to mitigate the visual impact of its northern and southern walls, which are large and bland, on the adjacent neighbours and streetscape. 8.3 The depicted bulk and scale of the Melvista Lodge land (immediately to the South of the Site) in the development application

plans is misleading. There are no such plans proposed or prepared, and the proposal is inconsistent with its setting in that regard. Redevelopment of Melvista Lodge is not likely or imminent given the nature of the landholdings there. 8.4 The proposed street frontage setbacks of 2.5 metres undermine line of sight in the context of the surrounding residential developments which have 9 metre setbacks. This has safety implications for drivers and pedestrians using Doonan Road and Betty Street. The design has complete disregard for its setting. 9 Amenity 9.1 The proposal fails to take into account the existing and future character of the locality. The City has a new local planning scheme, and whilst higher density has been provided for elsewhere, this locality preserved its low density coding. There is a clear intention and understanding that the low density residential nature of the area will be maintained. A high rise intensive aged care development completely undermines that intention. 9.2 The proposal will significantly diminish visual amenity of the area due to its size, scale and design. It is not in keeping with the character or streetscape in the locality. 9.3 The proposal represents a significant intensification in how the site will look and operate. It increases the number of people living on the site by over 1000%. The level of staffing and services required to accommodate 90 high needs aged care residents must not be understated. The cumulative impact of 90 residents, combined with the servicing and operational requirements of the facility and movement of staff, visitors and deliveries, will result in a substantial increase in: 9.3.1 noise from traffic movements, at all hours of the day, to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users; 9.3.2 noise generated from the operations of the proposal, including air-conditioning, services, and an intensive increase of population and people movement; 9.3.3 light spill from 24 hour a day operations; and 9.3.4 odours generated from the operations of the proposal, including catering, laundry and servicing. 9.4 No management plans have been provided to show how the detrimental amenity impacts which will arise from such an intensified use will be mitigated, particularly given its hours of operation. No development condition will be validly capable of managing those impacts. 10 Traffic 10.1 The proposal will result in a significant increase in vehicle movements to and from the site, at all hours of the day. 10.2 The Traffic Impact Statement made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment traffic movements. 10.3 The Transport Impact Statement provides very little detail on the type of vehicle movements and the frequency and timings of those movements. This detail is essential to form a properly considered assessment of traffic movements and their impacts, and the document therefore cannot be relied upon. 11 Car Parking 11.1 The amount of administrative, catering, cleaning, medical, allied health and maintenance staff required to support an intensive 90-bed high care facility will not be supported by 26 bays, particularly given no parking allowances have been made for deliveries, visitors of residents, or the Wellness Centre staff and visitors. 11.2 The surrounding streets are not capable of supporting the street car parking which will necessarily arise due to the lack of sufficient on-site car parking. 12 Community consultation 12.1 The developer relies on consultation it conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different from what is proposed. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed. 12.2 Immediately affected residents have either never been contacted or have only recently been informed about the extent of the proposal. 13 Other 13.1 Clause 4.6.2 of the Policy states – “a minimum of twenty-five per cent (25%) of the site area is to be landscaped”. The proposed development does not comply with this requirement of the Policy. 13.2 The proposal will have a significant carbon footprint, and only just exceeds the minimum standards for environmental sustainability under the National Construction Code. 13.3 The proposal fails to take into account the recommendations of the Review of Innovative Models of Aged Care Research Paper, 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety in terms of its design and density.

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**Respondent No:** 503

**Login:**

**Email:**

**Responded At:** Jul 25, 2020 23:09:17 pm

**Last Seen:** Jul 25, 2020 14:49:10 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

The proposal is inconsistent with the Residential Aged Care Facility local planning policy, particularly in regards to its objectives and landscaping requirements Due to its intensive nature, the proposal will unacceptable detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour.

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**Respondent No:** 504

**Login:**

**Email:**

**Responded At:** Jul 26, 2020 08:01:15 am

**Last Seen:** Jul 25, 2020 23:37:20 pm

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**      I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Do not support the current proposal. The facility proposed is not appropriate for the current location. There is not adequate road services or space in the residential roads for the increased traffic, the size and purpose of the facility is inappropriate for area and surroundings, car parking and access will be an issue given the size, increased noise and traffic is difficult to foresee but given the size and purpose of the facility believe would not meet guidelines once built. A smaller scale more residential focuses facility would be less imposing and less strain on nearby roads and residents.

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**Respondent No:** 505

**Login:**

**Email:**

**Responded At:** Jul 26, 2020 11:40:29 am

**Last Seen:** Jul 26, 2020 03:37:52 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**      Owner of a property

---

Q6. **Address of the property affected (if applicable)**      not answered

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Q7. **My response to the proposal:**      I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). I have the following concerns relating to the proposal: 1 The impact on amenity. 2 The increase in noise, traffic and odour. 3 The lack of on-site car parking. 4 The intensive height, bulk and scale as compared to the low density residential surround. 5 The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing developments and the proposed. 6 The lack of management plans or mitigation strategies. 7 The lack of proper community consultation. -- Long form 'Build your own' Objection I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. To the extent the decision maker chooses to rely on significant and unadvertised provisions of the Policy, I further object as follows: 1 The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. 2 The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. 3 The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 4 Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. 5 The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and pedestrian safety. 6 Notwithstanding claims made by the developer, the community does not support this proposal and has not been properly consulted. I urge you not to support this proposal. Proforma additional paragraphs, to be added as relevant to the objector if desired: 7 Policy objectives 7.1 One of the primary objectives of the Policy is – "to ensure the appearance and design of residential aged care facilities are of high quality and do not have an undue impact on the residential amenity by way of building bulk and scale, noise, traffic or parking". The proposal fundamentally conflicts with this objective given the stark and jarring contrast between the surrounding R10 and R12.5 locality and the proposed four storey R80 development. The number of residents proposed to be accommodated will increase the residential capacity of the site by over 1000%. The consequential visual impacts, noise, traffic and parking that will flow from such an intensification will destroy the residential amenity of the locality. 8

Compatibility with setting (bulk, scale and height) 8.1 The Site is surrounded by low density residential development. The land immediately to its east and west is R10 and the land to its north is R12.5. The contrast between the existing density and the proposed R80 coding will be sharp, and the proposed plot ratio is wholly incompatible with the broader setting. 8.2 The bulk and scale of the proposal is imposing in its context. The proposal makes no attempt to mitigate the visual impact of its northern and southern walls, which are large and bland, on the adjacent neighbours and streetscape. 8.3 The depicted bulk and scale of the Melvista Lodge land (immediately to the South of the Site) in the development application plans is misleading. There are no such plans proposed or prepared, and the proposal is inconsistent with its setting in that regard. Redevelopment of Melvista Lodge is not likely or imminent given the nature of the landholdings there. 8.4 The proposed street frontage setbacks of 2.5 metres undermine line of sight in the context of the surrounding residential developments which have 9 metre setbacks. This has safety implications for drivers and pedestrians using Doonan Road and Betty Street. The design has complete disregard for its setting. 9 Amenity 9.1 The proposal fails to take into account the existing and future character of the locality. The City has a new local planning scheme, and whilst higher density has been provided for elsewhere, this locality preserved its low density coding. There is a clear intention and understanding that the low density residential nature of the area will be maintained. A high rise intensive aged care development completely undermines that intention. 9.2 The proposal will significantly diminish visual amenity of the area due to its size, scale and design. It is not in keeping with the character or streetscape in the locality. 9.3 The proposal represents a significant intensification in how the site will look and operate. It increases the number of people living on the site by over 1000%. The level of staffing and services required to accommodate 90 high needs aged care residents must not be understated. The cumulative impact of 90 residents, combined with the servicing and operational requirements of the facility and movement of staff, visitors and deliveries, will result in a substantial increase in: 9.3.1 noise from traffic movements, at all hours of the day, to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users; 9.3.2 noise generated from the operations of the proposal, including air-conditioning, services, and an intensive increase of population and people movement; 9.3.3 light spill from 24 hour a day operations; and 9.3.4 odours generated from the operations of the proposal, including catering, laundry and servicing. 9.4 No management plans have been provided to show how the detrimental amenity impacts which will arise from such an intensified use will be mitigated, particularly given its hours of operation. No development condition will be validly capable of managing those impacts. 10 Traffic 10.1 The proposal will result in a significant increase in vehicle movements to and from the site, at all hours of the day. 10.2 The Traffic Impact Statement made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment traffic movements. 10.3 The Transport Impact Statement provides very little detail on the type of vehicle movements and the frequency and timings of those movements. This detail is essential to form a properly considered assessment of traffic movements and their impacts, and the document therefore cannot be relied upon. 11 Car Parking 11.1 The amount of administrative, catering, cleaning, medical, allied health and maintenance staff required to support an intensive 90-bed high care facility will not be supported by 26 bays, particularly given no parking allowances have been made for deliveries, visitors of residents, or the Wellness Centre staff and visitors. 11.2 The surrounding streets are not capable of supporting the street car parking which will necessarily arise due to the lack of sufficient on-site car parking. 12 Community consultation 12.1 The developer relies on consultation it conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different from what is proposed. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed. 12.2 Immediately affected residents have either never been contacted or have only recently been informed about the extent of the proposal. 13 Other 13.1 Clause 4.6.2 of the Policy states – “a minimum of twenty-five per cent (25%) of the site area is to be landscaped”. The proposed development does not comply with this requirement of the Policy. 13.2 The proposal will have a significant carbon footprint, and only just exceeds the minimum standards for environmental sustainability under the National Construction Code. 13.3 The proposal fails to take into account the recommendations of the Review of Innovative Models of Aged Care Research Paper, 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety in terms of its design and density.

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**Respondent No:** 506

**Login:** [redacted]

**Email:** [redacted]

**Responded At:** Aug 03, 2020 11:44:38 am

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:** [redacted]

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

---

Q4. **Your telephone number:**

---

Q5. **State how your interests are affected (select all relevant boxes)**

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:** I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to OBJECT to the proposed Residential Care Facility at Lots 10 and 11 (No.16 and 18 ) Betty Street and Lots 19 and 18 (No 73 and 75 ) Doonan Road , Nedlands . My objection is made for the following reasons. 1. No further public on site development talks were given by the developer after the 2016 meeting , in a Marquee in Mason's Gardens . ( In 2016 a two (2) storey Nursing Home was being considered. ) 2. The height , bulk and scale of this proposal is inconsistent and incompatible with this residential locality . 3. It would be "squeezed " in between residential homes to the North and residential houses in the South , with a minor road on the West ( Betty Street ) and a minor road on the East ( Doonan Road) with no on site space for outdoor parking , trees or gardens . 4. Due to it's intensive nature , the proposal will be an unacceptable amenity of the locality ,with overshadowing of houses to the South and noise , odours , lights in the building , particularly at night , will be problems . 5. Parking for staff , traffic flow for walkers , cyclists , trucks / vans , buses and cars have been inadequately considered or accommodated in the proposal and the reasonable needs of the development have been understated . A main consideration for the happiness for people living there , would be for family and friends to have easy parking facilities. Trust you will take into account my total objection,

I Resident and rate payer for 55 years at

Nedlands .6009

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**Respondent No:** 507

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 11:46:09 am

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

Q2. **Your address:**

Q3. **Your email address:**

Q4. **Your telephone number:**

Q5. **State how your interests are affected (select all relevant boxes)**

Q6. **Address of the property affected (if applicable)**

Q7. **My response to the proposal:**

I object to the proposal

Q8. **Submission : Please give your comments relating to this item in full below.**

I oppose the development application for a four storey building comprising 90 aged care suites & associated facilities/amenities, and with a basement carpark for 26 car bays & two ACROD bays. Having grown up in Dalkeith Rd., and then living in Philip Rd., the area around Masons' Gardens is a part of life for myself and my family, including our young children. The proposed four storey high building is inappropriate for this area, and there is insufficient on-site parking included in the proposal. As a regular visitor to other aged/residential care facilities in Nedlands and Subiaco that accommodate 80 to 100 residents, I have noted the considerable amount of traffic and parking associated with them and a care facility with 90 suites would result in a huge increase in traffic in Betty St., Doonan Rd., Melvista Ave., and around Mason's Gardens, which is an important and well used recreational area. Provision of aged care facilities in this area of Nedlands is a worthy aim and should be designed and built with due regard to the context of the area. I consider the height and bulk of the proposed building is excessive and inappropriate for these streets and this locality. It would over-shadow and overlook nearby residences and the area beyond, including Mason's Gardens. It would result in loss of privacy and amenity for local residents. It is not in keeping with the existing character of the area, where single and multi-residential buildings are single or two-storey buildings. Large buildings higher than 2 or three storeys should not be built in this residential area. A City planning policy for the area is required and applications should be held in abeyance in the meantime. I request respectfully that the Council consider my submission and refuse this development application.





**Respondent No:** 508

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 11:50:29 am

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**

I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I think that the height is inappropriate for the area which has no more than 2 storey dwellings. Traffic in a residential area will increase greatly also noise and lighting of the building will impact on neighbours. This is being built on a rise? which will make the impact even greater. The masons garden park is well used by children. Insufficient parking for visitors

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**Respondent No:** 509

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 11:51:53 am

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

---

Q5. **State how your interests are affected (select all relevant boxes)**

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**

I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

We were only recently informed by our neighbours of a major development that has been proposed relating to Aged Care on blocks in Doonan Road and Betty Street. We then received an advertisement dropped in our letterbox by Oryx Communities regarding this proposal. This was the very first time we have been contacted or received any communication from Oryx Communities. As more information comes to light, this Aged Care home appears to be a 24 hour commercial high care facility with additional outpatient services to the public. This will have significant impact on the quiet neighbourhood around Doonan Road and Betty Street with one of the biggest concerns the traffic safety both during construction and after completion particularly with family and children and the nearby Mason Gardens and College Park. We wish to express our concern that such a large development has reached this stage without any previous direct communication to us who live on Doonan Road. This is also vastly different to the proposed redevelopment of Melvista Lodge and development of a 2-storey Aged Care facility that was mentioned in 2016 which we would welcome. Based on the information that has been provided by Oryx Communities and Council, we wish to object to the current Development Application.

---



**Respondent No:** 510

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 12:30:43 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**

I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

I do not agree with a 4/5 storey aged care facility being built in a residential (quiet at the moment)! It will take up a lot of area with delivery trucks, ambulances, staff and many other services. These should not be built in an area like this.

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**Respondent No:** 511

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 12:33:12 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**

I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

As landowners in Dalkeith both my wife, and myself oppose the MASONS GARDENS - 5 STOREY 90 BED AGED CARE development. THIS IS NOT THE EXISTING MELVISTA LODGE THIS IS A NEW DEVELOPMENT ON RESIDENTIAL ZONED LAND. AND WE MAKE IT VERY CLEAR WE ARE 'PRO AGED CARE' BUT MORE IMPORTANTLY APPROPRIATE AGED CARE DEVELOPMENT This DA was lodged with no consultation with the community and is vastly different from the 2 storey re-development and refurbishment of Melvista Lodge we were 'sold' in 2016 by Oryx Communities, which we welcomed.

---



**Respondent No:** 512

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 12:35:20 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

---

Q5. **State how your interests are affected (select all relevant boxes)**

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**

I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

As landowners in Dalkeith, we oppose the MASONS GARDENS - 5 STOREY 90 BED AGED CARE development. THIS IS NOT A REDEVELOPMENT OF THE EXISTING MELVISTA LODGE THIS IS A NEW DEVELOPMENT ON RESIDENTIAL ZONED LAND. AND WE MAKE IT VERY CLEAR WE ARE 'PRO AGED CARE' BUT MORE IMPORTANTLY APPROPRIATE AGED CARE DEVELOPMENT This DA was lodged with no consultation with the community and is vastly different from the 2 storey re-development and refurbishment of Melvista Lodge we were 'sold' in 2016 by Oryx Communities, which we welcomed.

---



**Respondent No:** 513

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 12:36:59 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

---

Q5. **State how your interests are affected (select all relevant boxes)**

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**

I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

4/5 storeys is too high, 2 storeys is more than enough

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**Respondent No:** 514

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 12:38:48 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

---

Q5. **State how your interests are affected (select all relevant boxes)**

---

Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**

I neither support nor object, however any comments or concerns I have outlined below

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Q8. **Submission : Please give your comments relating to this item in full below.**

In relation to the proposed development at 16-18 Betty & 73-75 Doonan, I put to council that council:

- Is aware or ought to be aware that the land at 16-18 Betty & 73-75 Doonan is potentially contaminated due to its proximity to the former industrial use gasometer on the site adjacent.
- Profited by selling the land to the purchaser without disclosing the potential contamination of said land.
- Changed the use of the land to allow a health facility without consideration of the potential contamination of said land.
- Is now poised to approve a development without consideration of the potential contamination of said land.

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**Respondent No:** 515

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 12:43:40 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

Q2. **Your address:**

Q3. **Your email address:**

Q4. **Your telephone number:**

Q5. **State how your interests are affected (select all relevant boxes)**

Q6. **Address of the property affected (if applicable)**

Q7. **My response to the proposal:** I object to the proposal

Q8. **Submission : Please give your comments relating to this item in full below.**

Please refer to 32 page document sent to [redacted] or content that supports our objection. This correspondence is provided as a submission on the proposed Residential Aged Care Facility at Lots 10 and 11 (Nos. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (the 'subject site'), which is currently being advertised by the City of Nedlands (the 'City') for public comment. Rowe Group acts on behalf of the landowner of [redacted]

(our 'Client') which abuts the subject site to [redacted]. The preparation of this submission has been undertaken in conjunction with input from the following: • Moharich and More Planning and Environmental Law • Transcore Traffic Consultants • Encycle Consulting • Paterson Architects We provide this submission as an objection to the proposed Residential Aged Care Facility for a number of reasons, as detailed below. Central to the objections outlined herein are the following key concerns: - The manner in which Council adopted the Residential Aged Care Facilities Local Planning Policy ('LPP') is inappropriate; - The interpretation of plot ratio based upon applicable statutory controls results in a substantially larger plot ratio for the development than indicated by the proponent; Page 2 9229\_20jul01L\_ad - The use of a Local Planning Policy to impose development standards associated with a density which is significantly greater than the surrounding locality is not appropriate; and - The proposed development is not compatible with the existing amenity surrounding / abutting development due to the height, scale and bulk of the development. In summary, and as outlined in detail below, this submission represents an objection to the proposed Residential Aged Care Facility in its current form and request that Council recommend refusal of the proposed development in its Responsible Authority Report. BACKGROUND – PLANNING FRAMEWORK Local Planning Scheme Under the provisions of the previous City of Nedlands Town Planning Scheme No. 2 ('TPS 2') the subject site was zoned 'Residential', with an applicable R-code of R12.5. It is noted that Lot 25 (No. 69) Melvista Avenue, located immediately south of the subject site and containing an existing residential aged care facility, was also zoned 'Residential' with an applicable R-Code of R12.5. At the City's Special Council Meeting on 13 December 2016, Council adopted the draft Local Planning Scheme No. 3 ('Draft LPS 3') for advertising. Under the provisions of the Draft LPS 3 the subject site and No. 69 Melvista Avenue were identified as being within 'Special Use 8', which removed the 'Residential' zoning and applicable R-code. The following condition was also included within 'Special Use 8': (1) The City reserves the right to request a Local Development Plan for any redevelopment, substantial addition, change of use or modification, as the City deems necessary. Following referral of the Draft LPS3 to the Western Australian Planning Commission (WAPC), the WAPC removed the above condition as part of modifications to be undertaken prior to public consultation. Notwithstanding the resolution of Council at its meeting of 31st July 2018 to not support the draft LPS 3, the version forwarded to the City to the WAPC incorporated the following condition: (2) Development standards may be



provided by an approved Structure Plan, Local Development Plan and/or Activity Centre Plan. It is evident the City was attempting to impose a condition within the 'Special Use' zoning to provide a mechanism to control the bulk, scale of development through the use of a Structure Plan, Local Development Plan, and/or an Activity Centre Plan. We note that the gazetted version of the City's LPS 3 incorporates the following in relation to the subject site: - The Scheme Map includes the subject lots within the 'Residential' zone and identifies the subject lots, together with No.69 Melvista Avenue, as 'Additional Use A9'; - The Scheme Map does not apply a density coding to the Additional Use A9 area; Page 3 9229\_20jul01L\_ad - Within 'Table 4 – Specified additional uses for zoned land in Scheme area' of the Scheme Text, Additional Use A9 is included and notes that development within this additional use is subject to one condition which states that "Residential aged care facility is a 'P' use". The implications of the above are that: - The City's intention to require development standards within Additional Use A9 to be mandated by a Structure Plan, Local Development Plan or Activity Centre Plan was removed; and - Given that the Scheme Map does not specify a density coding for the subject site, in accordance with Clause 25(4) the R-Codes do not apply to development on land within Additional Use A9.

**PROPOSED DEVELOPMENT** The proposed development seeks to redevelop the subject site as a residential aged care facility, which involves the demolition of the existing buildings and construction of a new four-storey development. The proposed development can be summarised as follows: - 90 x aged care suites; - Four (4) storey development with basement car parking; - Incidental café and multipurpose rooms available for resident use; and - 26 x car parking bays including two (2) ACROD bays located within the basement level.

**Concern with adoption of Local Planning Policy** At the City's Ordinary Council Meeting ('OCM') on 17 December 2019, Council resolved to advertise the Draft Residential Aged Care Facilities Local Planning Policy ('draft LPP') for a period of 21 days. It is noted that within the advertised draft LPP, Table 2.1 states that multiple dwelling style development on sites greater than 2000m<sup>2</sup> would be subject to an R80 density coding, a maximum building height of three (3) storeys and a plot ratio of 0.8. However, at the City's OCM on 28 April 2020, Council resolved to adopt the Residential Aged Care Facility Local Planning Policy ('LPP') with modifications. The modifications (among others) adopted by Council relevant to the subject site included increasing the maximum building height to four (4) storeys, and a plot ratio of 1.0, for multiple dwelling style development on sites greater than 2,000m<sup>2</sup>. We note, these provisions were altered without further consultation with potentially affected parties in accordance with the Planning and Development (Local Planning Schemes) Regulations 2015 (the 'Regulations') Schedule 2, Part 2, Clause 4(3)(b)(ii). It is noted, Schedule 2, Part 2, Clause 5(2) of the Regulations outlines the following: (2) Despite subclause (1), the local government may make an amendment to a local planning policy without advertising the amendment if, in the opinion of the local government, the amendment is a minor amendment. Given the increased building height and plot ratio associated with this modification will facilitate increased bulk and scale for any development proposed, we are of the view the modifications to the draft LPP are not minor and are in fact, significant in nature particularly in relation to the locality of surrounding residential area, and Page 4 9229\_20jul01L\_ad Council has not followed the appropriate process in the adoption of the LPP. On this basis we would question the validity of the adopted LPP.

**Application of the Local Planning Policy** The Residential Aged Care Facilities Local Planning Policy ('LPP') applies a methodology to determine acceptable built form through the application of development standards from the Residential Design Codes. This is of significant concern for the following reasons: - As previously noted, LPS 3 does not specify an R-Coding for the site and therefore the R-Codes are not applicable; and - The policy imposes controls relating to building height, setbacks and plot ratio in accordance with the R80 density coding. The imposition of the above is fundamentally flawed and would result in a totally unacceptable development outcome, as the site is surrounded by residential lots which are subject to density codings which are far lower than R80. To the west and east of the site an R10 density coding is applicable, whilst lots immediately to the north are coded R12.5. We consider that this would result in serious conflict with respect to scale, bulk and streetscape impacts, through the Policy providing the ability for development at 4 storeys as of right which is at least double the height permitted within the lower density codings. In addition, the application of these development standards demonstrates no regard for the existing streetscape and built form within the locality. Within LPS 3, the adoption of the R-Codes is subject to modifications which include an increase to the deemed-to-comply front setback standard within R10 and R12.5 density coded areas from 7.5m to 9m. The LPP disregards the provisions of LPS 3 and facilitates a considerably reduced setback of 2m. Should development be proposed which incorporates the minimum front setback as per the LPP, the resulting built form outcome would have a detrimental impact to the established streetscape. The application of the LPP will also result in further impacts which are detailed in the following points.

**Bulk and Scale of Proposed Development** In accordance with Schedule 2, Part 9, Clause 67(m) of the Regulations, when considering an application for development

approval the local government is to have due regard to (underlining is our emphasis): (m) the compatibility of the development with its setting including the relationship of the development on adjoining land or on other land in the locality including, but not limited to, the likely effect on height, bulk, scale, orientation and appearance of the development. As outlined above, we are of the view the proposed development is not compatible with the surrounding locality and in particular the adjoining land. The adjoining land to the north is subject to a density code of R12.5, whilst residential land to the west and east is within the R10 density coding. The City's attempt to impose a plot ratio of 1.0 within the Additional Use A9 area represents a dramatically larger scale and built form than envisaged within the surrounding low density codings and will detrimentally impact the adjoining land and surrounding locality. This is outlined in greater detail within the submission prepared by Paterson Architects which is included at Attachment Three of this submission. Page 5 9229\_20jul01L\_ad Further to the above, we are of the view the plot ratio of the proposed development has been incorrectly calculated and is in fact, significantly higher than a plot ratio of 1.0. The City's LPS provides a definition for 'plot ratio' but does not provide a definition for 'plot ratio area'. The definition for 'plot ratio' within LPS 3 is as follows: Means the ratio of the floor area of a building to an area of land within the boundaries of the lot or lots on which the building is located. As previously outlined, as the R-Codes do not apply to the subject site in accordance with Clause 25(4) of LPS 3, the project team and our client consider that the above definition for 'plot ratio' from LPS 3 must then be applied. Therefore, the application of the entire floor area of the building to the area of land within the boundaries of the lots, would result in a plot ratio in the order of 2.5:1, which is substantially larger than contemplated by the proponent. As outlined throughout this submission, the proposed development would substantially impact the streetscape of the area. As shown in the development plans, justification for the bulk and scale is provided by illustrating the application of the LPP provisions over Lot 69 (No. 25) Melvista Avenue as "future development potential of the neighbouring site". We consider this to be inappropriate given the validity of the adopted LPP and also as we are not aware of any redevelopment intentions for this site. In any event, the potential redevelopment of the neighbouring property would be assessed on its own merits and should not be used as a basis for support to the current proposal.

Impact on Amenity In accordance with Schedule 2, Part 9, Clause 67(n) of the Regulations, the local government must also have due regard to (underlining is our emphasis): (n) the amenity of the locality including the following – (i) environmental impacts of the development; (ii) the character of the locality; and (iii) social impacts of the development. Within the Regulations, 'amenity' is defined as follows: Means all those factors which combine to form the character of an area and include the present and likely future amenity. The proposed development, should it be constructed as proposed, would result in detrimental impacts to the amenity of the locality. The locality is characterised as a low-density residential neighbourhood. Therefore, we are of the view the four-storey development with a proposed plot ratio of 1.0 would result in a scale of development which is not compatible with the amenity of the locality and is not suitable within a low-density residential neighbourhood. As outlined above, the proposed development would impact the visual amenity of our Client's lot, particularly when the development is viewed from private outdoor areas. Page 6 9229\_20jul01L\_ad

FURTHER CONSIDERATIONS In the preparation of this submission, a number of sub-consultants have also been engaged to review the proposed development and provide an expert assessment with regard to the traffic, waste management and architectural design. These assessments have revealed a number of shortcomings with respect to the supporting documentation, which would potentially exacerbate amenity impacts already identified in association with the proposed development. Further information relating to this is detailed below: Traffic Impact Transcore has undertaken a detailed peer review of the Transport Impact Statement report prepared by KCTT with respect to the proposed development and is provided at Attachment One. A summary of the findings is outlined below: - The proposed development has a 12 parking bay shortfall. - The development proposal fails to provide adequate justification for not providing any designated service bays. - Waste collection is proposed to be undertaken via the car park driveway which would effectively render car parking inaccessible for the duration of the waste loading process. - No turn path plans have been provided as part of the service vehicle access and egress assessment. - KCTT has used outdated trip rate guidelines which ultimately underestimates the actual traffic impact. These issues create uncertainties in relation to the traffic movement and impact on the immediate road network. Waste Management Impact Encycle has undertaken peer review of the Waste Management Plan with respect to the proposed development and is provided at Attachment Two. A summary of the findings is outlined below: - The proposed Waste Management Plan does not provide enough general waste bins and over provides commingled recycling bins. - The proposed development only provides a single chute for general waste only which increases the risk of contaminated recycling. - Consistent with the issue Transcore identified with regard to access, waste collection is proposed to be undertaken via the car park access which would render the car parking inaccessible for the duration of the waste loading process (approximately 10 mins). - Also consistent with Transcore's findings, a swept

path assessment is required to ensure adequate turn paths have been provided for service vehicles. Architectural Design Paterson Architects has also been engaged to prepare an expert assessment of the architectural design of the proposed development. A summary of the assessment is outlined below: - The allowable plot ratio has been exceeded. Page 7 9229\_20jul01L\_ad - With regard to built form and scale, the proposed development does not respond positively to the adjoining buildings and fails to mitigate the potential amenity impacts on private land and the public realm. - The potential light spill from the 44 northern oriented rooms is not controlled. - The proposed development will have a detrimental effect to the enjoyment of our Client's residence. - The northern façade proposed a large monolithic area of material, colour and texture with no landscape screening to soften the impact of screen the habitable rooms raising privacy concerns.

**CONCLUSION** As outlined throughout this submission, our Client objects to the proposed Residential Aged Care Facility at Lots 10 and 11 (Nos. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands for the following reasons: - The manner in which Council adopted the Residential Aged Facilities Local Planning Policy is inappropriate; - The LPP imposes development standards to the subject site from the R80 density coding with no consideration given to the associated impact on the surrounding low density environment; - The plot ratio of the proposed development is substantially larger than that contemplated by the proponent; - The proposed bulk and scale of development is contrary to the advertised development standards for the subject site; - The proposed development is not consistent with Schedule 2, Part 9, Clause 67(m) and (n) of the Planning and Development (Local Planning Schemes) Regulations 2015; and - An independent expert assessment of the Traffic Impact Statement report, Waste Management Plan and architectural design of the proposed development has identified a number of issues and flaws with respect to the Residential Aged Care Facility. For the reasons outlined throughout this submission, and as summarised above, it is requested that Council recommend refusal of the proposed development in its Responsible Authority Report. Should you require any further information or clarification in relation to this matter, please contact the undersigned on

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**Respondent No:** 516

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 12:46:11 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

Q2. **Your address:**

Q3. **Your email address:**

Q4. **Your telephone number:**

Q5. **State how your interests are affected (select all relevant boxes)**

Q6. **Address of the property affected (if applicable)**

Q7. **My response to the proposal:**

I object to the proposal

Q8. **Submission : Please give your comments relating to this item in full below.**

My family and I live at \_\_\_\_\_ We have lived in Nedlands since 2005. I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. To the extent the decision maker chooses to rely on significant and unadvertised provisions of the Policy, I further object as follows: 1 The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. 2 The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. 3 The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 4 Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. 5 The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and pedestrian safety. 6 Notwithstanding claims made by the developer, the community does not support this proposal and has not been properly consulted. I urge you not to support this proposal. 1 Policy objectives 2 1.1 One of the primary objectives of the Policy is – “to ensure the appearance and design of residential aged care facilities are of high quality and do not have an undue impact on the residential amenity by way of building bulk and scale, noise, traffic or parking”. The proposal fundamentally conflicts with this objective given the stark and jarring contrast between the surrounding R10 and R12.5 locality and the proposed four storey R80 development. The number of residents proposed to be accommodated will increase the residential capacity of the site by over 1000%. The consequential visual impacts, noise, traffic and parking that will flow from such an intensification will destroy the residential amenity of the locality. 2 Compatibility with setting (bulk, scale and height) 2.1 The Site is surrounded by low density residential development. The land immediately to its east and west is R10 and the land to its north is R12.5. The contrast between the existing density and the proposed R80 coding will be sharp, and the proposed plot ratio is wholly incompatible with the broader setting. 2.2 The bulk and scale of the proposal is imposing in its context. The proposal makes no attempt to mitigate the visual impact of its northern and southern walls, which are large and bland, on the adjacent neighbours and streetscape. 2.3 The

depicted bulk and scale of the Melvista Lodge land (immediately to the South of the Site) in the development application plans is misleading. There are no such plans proposed or prepared, and the proposal is inconsistent with its setting in that regard. Redevelopment of Melvista Lodge is not likely or imminent given the nature of the landholdings there. 2.4 The proposed street frontage setbacks of 2.5 metres undermine line of sight in the context of the surrounding residential developments which have 9 metre setbacks. This has safety implications for drivers and pedestrians using Doonan Road and Betty Street. The design has complete disregard for its setting. 3 Amenity 3.1 The proposal fails to take into account the existing and future character of the locality. The City has a new local planning scheme, and whilst higher density has been provided for elsewhere, this locality preserved its low density coding. There is a clear intention and understanding that the low density residential nature of the area will be maintained. A high rise intensive aged care development completely undermines that intention. 3.2 The proposal will significantly diminish visual amenity of the area due to its size, scale and design. It is not in keeping with the character or streetscape in the locality. 3.3 The proposal represents a significant intensification in how the site will look and operate. It increases the number of people living on the site by over 1000%. The level of staffing and services required to accommodate 90 high needs aged care residents must not be understated. The cumulative impact of 90 residents, combined with the servicing and operational requirements of the facility and movement of staff, visitors and deliveries, will result in a substantial increase in: 3.3.1 noise from traffic movements, at all hours of the day, to facilitate deliveries, supplies, medical support, staffing shifts, visitors and external users; 3.3.2 noise generated from the operations of the proposal, including air-conditioning, services, and an intensive increase of population and people movement; 3.3.3 light spill from 24 hour a day operations; and 3.3.4 odours generated from the operations of the proposal, including catering, laundry and servicing. 3.4 No management plans have been provided to show how the detrimental amenity impacts which will arise from such an intensified use will be mitigated, particularly given its hours of operation. No development condition will be validly capable of managing those impacts. 4 Traffic 4.1 The proposal will result in a significant increase in vehicle movements to and from the site, at all hours of the day. 4.2 The Traffic Impact Statement made incorrect assumptions as to the nature of the facility, the likely traffic patterns and car parking associated with a high dependency facility. It is therefore an inappropriate document upon which to base the assessment traffic movements. 4.3 The Transport Impact Statement provides very little detail on the type of vehicle movements and the frequency and timings of those movements. This detail is essential to form a properly considered assessment of traffic movements and their impacts, and the document therefore cannot be relied upon. 5 Car Parking 5.1 The amount of administrative, catering, cleaning, medical, allied health and maintenance staff required to support an intensive 90-bed high care facility will not be supported by 26 bays, particularly given no parking allowances have been made for deliveries, visitors of residents, or the Wellness Centre staff and visitors. 5.2 The surrounding streets are not capable of supporting the street car parking which will necessarily arise due to the lack of sufficient on-site car parking. 6 Community consultation 6.1 The developer relies on consultation it conducted years ago to assert that the community is in support of this proposal. The development the community was consulted on is fundamentally different from what is proposed. The community has been misled and any support given then should not be misconstrued as support for what is currently proposed. 6.2 Immediately affected residents have either never been contacted or have only recently been informed about the extent of the proposal. 7 Other 7.1 Clause 4.6.2 of the Policy states – “a minimum of twenty-five per cent (25%) of the site area is to be landscaped”. The proposed development does not comply with this requirement of the Policy. 7.2 The proposal will have a significant carbon footprint, and only just exceeds the minimum standards for environmental sustainability under the National Construction Code. 7.3 The proposal fails to take into account the recommendations of the Review of Innovative Models of Aged Care Research Paper, 3 January 2020 by the Royal Commission in to Aged Care Quality and Safety in terms of its design and density. I will be attending the Council meeting on 28 July 2020.

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**Respondent No:** 517

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 13:08:38 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**

I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands (Site)(proposal). I have the following concerns relating to the proposal: 1 The impact on amenity. 1 The increase in noise, traffic and odour. 2 The lack of on-site car parking. 3 The intensive height, bulk and scale as compared to the low density residential surround. 4 The reduction in vehicle and pedestrian safety due to huge differences in setbacks between existing developments and the proposed. 5 The lack of management plans or mitigation strategies. 6 The lack of proper community consultation. I was one of a large crowd who attended the meeting at the Dalkeith Bowling Club where all of the above points were expanded in great detail , plus many more areas of concern. The speakers were very articulate and intelligent . There was only one person in the large crowd who gave a comment suggesting sufficient consultation had taken place because some obscure minutes had been available to read sometime before now. He left the meeting early and I later learned that he is a consultant for Oryx.

Regards,

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**Respondent No:** 518

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 13:12:15 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

Q2. **Your address:**

Q3. **Your email address:**

Q4. **Your telephone number:**

Q5. **State how your interests are affected (select all relevant boxes)**

Q6. **Address of the property affected (if applicable)**

Q7. **My response to the proposal:** I object to the proposal

Q8. **Submission : Please give your comments relating to this item in full below.**

We moved residence to Dalkeith last December and had no prior awareness of this proposed development. Thus our knowledge is all derived from conversation with other Local Residents, including attending public awareness meetings, and Internet Research subsequent to a public information briefing document received in June. As Octogenarians we have a serious interest in Aged Care/Nursing Home facilities which is relevant and important so we have decided to address our appraisal of the project from 2 distinct viewpoints; (1) How do we, as resident of Dalkeith, feel about the Proposal; and (2) Would we consider becoming residents. (1) THE ORYX PROPOSAL; A residents view. Do we believe it is acceptable or not? Our initial thought process when reading the Oryx briefing document created a huge list of questions in our minds. e.g. - What definition of need is there for locating such a huge high intensity Nursing Home in the suburb? - Why was it proposed to be built in such a peaceful, stable residential area? - What prompted the Developer to propose such a large complex, other than maximising income generation from the available land? - is it fully compliant with existing Town Planning and zoning category? In the short available time we have sensed that, the Development Proponent and some Council staff employees are treating the proposal as a fait accompli. It is also evident that the vast majority of residents are angry with the Council for not adequately ensuring full transparency of the proposed changes being adopted during the period when the Developer was spending much time and money in preparing a DA notice. This preparation time must necessarily have included many discussions and meetings with Council and its staff, albeit informally. Going back some 4-5 years there was an implied public acceptable and awareness of a Nursing home being developed on the site. CONCON The scale of the project considered at that time was, apparently, for a 2 level standard nursing home. O.K. no issues. Suddenly, last month without any prior knowledge or advice, the residents learn that the project scale had morphed into a High Intensity Aged Care, 90 patient 5 level complex! Even more bewildering is that the building only includes some 29 onsite parking bays! Our opinion is that this number is not even sufficient parking space for permanent staff and management personnel, What about service staff, maintenance personnel and convenient parking space for visiting professionals, of whom there is an obvious and frequent need, consumable suppliers, waste collectors, patient visitors and sundry others? Well they will have to find spaces where the nearby local residents usually park their cars in front of their homes! The congestion and potential traffic difficulties are painfully obvious and to argue otherwise is absolute nonsense which ignores logic, common sense and community experience generally with traffic growth. After all the 4 building blocks probably currently supports some 20 persons plus visitors which is being increased to, in our opinion more like 150 persons at peak times plus patients visitors; with only 29 off-street parking bays! The volume of traffic in both streets and surrounds will not please the locals! There are many other issues of concern including noise and lighting at night which are an

essential by-product of a 24/7 operation. As for the technical issues such as Zoning changes, building code requirements, such as set-backs, height allowances and building footprint, only the council staff and ORYX management seem to jointly understand how the normally enforced rules can be interpreted or ignored. So we will leave that to the professionals and to the submissions by more knowledgeable persons than us to resolve. One obvious impact of the proposed development is that being such a huge and bulky structure, it will visibly dominate the area including the view for people enjoying the peace and surroundings provided by Mason's Gardens. The south facing facade will always cast a huge sun shadow over nearby properties lower down the slope. Whatever it's architectural style the simple determination we have made is that it will be UGLY. This project submission may tick all the boxes' but the same applies to the 2 level standard nursing which would be more acceptable to local residents including ourselves. The current proposal we find to be UNACCEPTABLE. 2-3 (2) WOULD WE CONSIDER BEING RESIDENTS IN THE FACILITY? We have a few necessary features to be part of and available to us in any Aged Care/Nursing Home before we could consider becoming residents. There must be some outdoor quiet peaceful areas to occupy, weather permitting, which are away from the "madding crowd". The facility must be part of, or very close to, external services such as coffee shop/cafe, newsagent, and other miscellaneous commercial enterprises to which we can ride on our electric powered tri/quad wheeled carts. Obviously the access must be level, not too crowded and without any traffic crossings and presenting no potential risk to an 'oldie'. Having medical.dental providers and a barber also available with a Shopping Centre would be great. These needs are of fundamental significance to Aged people generally. The ORYX project is lacking in terms of these very basic and not unusual services which is inconsistent with similar places we have visited in the past to see friends, acquaintances, old work mates and relatives who are less fortunate than us and already residing in various types of nursing homes. Thus, the obvious conclusion we have reached in respect of the ORYX proposal is simply this, WE WOULDN'T WANT TO LIVE THERE! AFTERWORD: Would it not be prudent for the council to delaying consideration of this proposal until the release of the Final Report from The Royal Commission into Aged Care, Quality and Safety?

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**Respondent No:** 519

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 13:13:52 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

Q2. **Your address:**

Q3. **Your email address:**

Q4. **Your telephone number:**

Q5. **State how your interests are affected (select all relevant boxes)**

Q6. **Address of the property affected (if applicable)**

Q7. **My response to the proposal:**

I object to the proposal

Q8. **Submission : Please give your comments relating to this item in full below.**

I Do not support the proposed development at lots 10 & !1 Betty St & lots 18 & 19 Doonan road. I am concerned that originally, the development was advertised as a three-storey development and it was then passed through Council at four storeys. Personally, I believe the site is not suitable for what Oryx have planned. Rather it is suited only as a residential aged care facility. Comparing this development with Alfred Carson Nursing Home in Bay Road Claremont, I know where I would rather be placed! At Alfred Carson, there are approximately 30 car bays, however if there is an overflow of visitors, Bay Road is considerably wider than either Doonan or Betty for parking. There is also parking off Bay Road in Barcoo and in Dunbar Rd behind the facility. Hence once again my chief concern with developments being presented in Nedlands at present, all add to the significant increase in traffic that there is no solution for! Is it possible for the Developer to propose a two storey development which fits in with the surrounding homes, it isn't as if it is being proposed for Stirling Highway!



**Respondent No:** 520

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 13:15:33 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

Q2. **Your address:**

Q3. **Your email address:**

Q4. **Your telephone number:**

Q5. **State how your interests are affected (select all relevant boxes)**

Q6. **Address of the property affected (if applicable)**

Q7. **My response to the proposal:**

I object to the proposal

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 1 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 2 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.



**Respondent No:** 521

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 13:16:59 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

Q2. **Your address:**

Q3. **Your email address:**

Q4. **Your telephone number:**

Q5. **State how your interests are affected (select all relevant boxes)**

Q6. **Address of the property affected (if applicable)**

Q7. **My response to the proposal:**

I object to the proposal

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The proposed development is not of an appropriate scale to either protect or enhance the current and future amenity and character of the local, low density residential area. I object because I am concerned that the proposal relies on provisions of the Residential Aged Care Facilities Local Planning Policy which were not advertised to the public. The changes made to the draft Policy increased height and plot ratio and allowed for a significant intensification of what could be developed on the site. The proposal is in excess of the advertised provisions of the Policy in respect of height and plot ratio. The increase is not justified, particularly given the context of the locality. To the extent the decision maker chooses to rely on significant and unadvertised provisions of the Policy, I further object as follows: 1. The proposal entirely contradicts the objectives of the Policy relating to the mitigation of impact on residential amenity. 2. The height, bulk and scale of the proposal is incompatible with the setting and surrounding developments. 3. The proposal is inconsistent with the character of the locality and will have an unacceptable detrimental impact on amenity. 4. Traffic management and car parking has been understated in the proposal and the actual likely movements and parking requirements will result in an unacceptable impact on amenity, traffic flow and noise. 5. The inconsistencies between the proposal and the existing surrounding developments in terms of setbacks are so severe that they impact sightlines, and consequently threaten vehicle and pedestrian safety. 6. Notwithstanding claims made by the developer, the community does not support this proposal and has not been properly consulted. I urge you not to support this proposal.



**Respondent No:** 522

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 13:21:25 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**

I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Despite the Council warning of circulating misleading and unauthorised information, blind freddy could see that the Council's own website information of 90 suites, 4 storeys plus basement, cafe, physio room, hair salon etc predominately for residents is a large facility in a residential area. Both the streets are narrow, already cater for local residents use, Melvista Lodge, a bus route, a child care facility and a much valued park. The provision of 26 car parks must be a hoax!! The Council likes to take pride in their professed grandiose statements of caring for the environment, desired streetscapes, valuing ratepayers etc. TIME TO TAKE A LONG HARD LOOK AT YOUR OWN WORDS. They are rubbish when it comes to developments.

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**Respondent No:** 523

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 13:23:45 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**

I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

This development is another excessive intrusion by council/developers in our suburb. 90 suites plus added facilities and 26 car parks?? The traffic increase is a threat - to a child minding centre and popular park across the road - where the overflow will have to park.

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**Respondent No:** 524

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 13:30:22 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**

I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I do not object to nursing homes in Nedlands nor do I object to high rise buildings in their proper place (ie. in accordance with the City of Nedlands plan for height restrictions). But I do object strongly to a special deal allowing a massive 4/5 storey building in this neighbourhood which is nowhere near the appropriate zones. As it is quite clear that the amenity and tranquility of residents here would be permanently affected, I ask that the Oryx proposal be rejected.

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**Respondent No:** 525

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 13:35:41 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

Q2. **Your address:**

Q3. **Your email address:**

Q4. **Your telephone number:**

Q5. **State how your interests are affected (select all relevant boxes)**

Q6. **Address of the property affected (if applicable)**

Q7. **My response to the proposal:**

I object to the proposal

**Q8. Submission : Please give your comments relating to this item in full below.**

Homeowner and resident of Nedlands for over 22 years. I strongly object to the development application above titled. 1. The building is set to completely dominate the entire streets and surrounding neighbourhoods and places of recreation and tranquillity (Mason Gardens). It will tower over the existing homes and Melvista Lodge creating an overbearing and looming presence. 2. It does not preserve "green space and deep soil planting" that are enshrined in the Aim, Planning Principles and Strategy of both the Nedlands City Plan or the WA State LP3 scheme. It absolutely destroys the character and nature of the leafy green suburb. 3. The bulk and scale of the development is completely inappropriate for the residential area and residential codes that abut the site on ALL SIDES. Whilst I am in favour of aged care sites in the area, this cannot set a precedent for style of aged care facilities going forward. More appropriate is the precedent set by ALFRED CARSON on nearby Bay Road. 4. If this development was allowed to proceed, it would open up the area for more commercial business type buildings, next it would be, why not a 5 or 6 storey hotel? Commercial businesses in this highly residential area MUST be kept to fit and enhance the style of the neighbourhood, i.e. low rise quality built and recently renovated homes. This development would destroy property values in the entire area, not just in Doonan and Betty Streets. 5. Traffic. These are small residential streets, not even as wide as some other streets in the Nedlands area. Such a large commercial building would require not only staff and visitors coming and going 24 hrs a day, 7 days a week, but also would require an endless procession of large delivery vehicles for food, supplies, waste and also the regular attendance of ambulances and hearses. 6. Parking. Parking is so inadequate that this alone should disqualify this building for approval. Not only is there inadequate parking onsite for staff, visitors, maintenance personnel and emergency vehicles, there is inadequate off-site parking along Doonan, Betty and Melvista. 7. Noise and other pollution. A building of this size servicing some 90 residents is a 24 hr 7 day week operation. Noise from traffic, air conditioning, exhaust will be constant and disruptive to residents of all nearby streets. Local residents will lose the amenities that they bought into (at some considerable cost in this highly sought after area) and helped preserve over many, many years. 8. As the report from The Royal Commission on Aging is due within months, there is no way of knowing if this building will be compliant with any new regulations. In a post Covid-19 world, it is highly unlikely that a densely packed high rise building of highly vulnerable patients is going to be one of the recommendations. Both potential high exposure risk to viruses from within (staff, service people and visitors) and the inability to quickly evacuate such residents in case of fire emergency are things that have not been adequately addressed in the scale and design of the building. 9. Natural flow of air. This is a completely air conditioned building. Viruses can spread quickly throughout the building. It is a huge drain on the environment in general and "gives nothing back". There is no attempt to employ green energy or water saving or ameliorization of climatic impacts. Such a building will be a heat trap that will impact the local area. I urge City of Nedlands to reject this development application in its entirety.

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**Respondent No:** 526

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 13:37:36 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**

I support the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am unable to attend any meetings but I would just like to say I fully support the proposed aged care facility development on Doonan Road and Betty Street. I live next door in Masons Gardens. I was in the aged care industry for 3 decades and I know first hand the stress and anxiety of not being able to place loved ones in residential aged care, close to home, their family and friends. I understand there might be a bit of inconvenience during the building phase but we are saying 'short term pain for long term gain'. We used to have a Nursing Home next door and we sorely miss it. In summary - this development has my full support. Thank you. Have a Great Day

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**Respondent No:** 527

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 13:39:25 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

Q2. **Your address:**

Q3. **Your email address:**

Q4. **Your telephone number:**

Q5. **State how your interests are affected (select all relevant boxes)**

Q6. **Address of the property affected (if applicable)**

Q7. **My response to the proposal:**

I object to the proposal

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.



**Respondent No:** 528

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 13:42:58 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

Q2. **Your address:**

Q3. **Your email address:**

Q4. **Your telephone number:**

Q5. **State how your interests are affected (select all relevant boxes)**

Q6. **Address of the property affected (if applicable)**

Q7. **My response to the proposal:**

I object to the proposal

Q8. **Submission : Please give your comments relating to this item in full below.**

I strongly object to the development application being considered for the Residential Aged Care building to be located at 73-75 Doonan Road and 16-18 Betty Street, Nedlands, for the following reasons: 1. It is completely out of character with the surrounding low density R10-R12.5 residential properties. (Appendix 1) a. According to the LPS3 the area stipulated in Appendix 1 marked in 'red' is A9 – one parcel of land, I am not sure how it has happened that a DA has been put forward on 30% of the total lot. I don't believe that was the intention of the State Government's infill strategy. This has certainly been made possible as the result of the recently created LPP. b. The height, scale and bulk of the proposed building are not sympathetic to the residential area. c. It will take up 90% of the usable land area for the building without regard for garden sitting areas. (I believe there is a requirement of 25% for gardens). d. It will sit at an elevation that does not complement the surrounding area. e. The bulk of the building will be visible as a 'scar' from the Melvista Avenue - Masons gardens presentation, in what is a 'leafy' suburb. Something that follows the contours of the land would have been more in keeping. f. The building setbacks will affect sight lines for pedestrian and vehicle safety. g. It will also block light to the south for two local residences, that will face a 17-metre wall (albeit broken up to comply with regulations) that will run approximately 50+ metres east to west. h. Aesthetics – The building's facade looks like an institution with foreboding black metal bars and black trim. It does not look like a high-quality build, as the marketing would suggest it is 5 Star. There are no stone trims or interesting architecture. It looks like another 'box'. 2. Technical building aspects to brief have been overlooked and do not break the stereotypes of healthcare design (see Appendix 2 for examples) a. There is no luxury aged care appeal, as it is so deemed - it appears to be more hospital than 'resort'. b. It needs to take the 'clinical' feeling out of its hospital design – as the building presented looks like a conventional box with central elevator access on each floor and small resident rooms running along three external walls. c. There appears to be little use of passive energy noted. d. There is a complete lack of light filled and nature-oriented spaces for healing, like small gardens and sitting areas, aside from an obligatory band of green on the building boundaries. e. Wellness and socialisation does not mean designating a 'Wellness Centre' which is little more than a series of treatment rooms. Whether people are ambulant or not, they need to have meaningful interactions with others in comfortable spaces. The only two areas I discovered were a small library on the 4th floor (no bigger than a bedroom) and a small lounge, not much bigger, on the ground level. Presumably this is for all visitors might to take their 'loved ones'. f. Sensitive design in a low residential area could easily have been achieved through the building design following the natural contour of the land and parcelled with the Lisle Village as set out in LPS3 designated area 9, rather than 'shoe-horned' into four residential blocks. 3. Technical operational considerations are lacking. a. Fire evacuation and testing on site. (This needs to be referred to the DFES.) i. There is little access to roof

plant room for fire brigade ii. Limited space to safely evacuate the building of a considerable number of non-ambulant aged care residents. iii. There do not appear to be wide stairways only standard apartment Exit stairs, that reach all levels. I believe wide (4 metre min.) stairs would be necessary for safe evacuation of non-ambulant residents. b. Infectious disease control, like Covid-19 and lock downs, will be difficult to manage, as we have seen in many aged care facilities across the world. c. Elevator operations – There does not appear to be a dedicated lift for removal of the deceased, which would be a common occurrence in such a facility. Using common area lifts that take people between floors also seem to be the ones used for food delivery and removal. Is it likely that a ‘dumbwaiter’ could be incorporated? d. Industrial Kitchen and Laundry in the car park basement. Insufficient consideration has been given to the management of exhausts and fumes, given there will be 480 meals and snacks prepared daily for residents. e. Waste management – I notice Alfred Carsons (Aged Care, Bay Road, Claremont) has a separate facility across from its building which is accessed by a wide road. The proposed DA will have trucks running East to West through a narrow lane accessing the building through the underground car park, where waste will be held. f. Noise and light issue in an operation that is 24/7 within a bulky 17m high building. i. Air conditioning and exhaust systems for such a large building would undoubtedly be above 45db? ii. Lights will be on all the time around the perimeter, paths and car parks. g. Staffing has been inadequately estimated. i. Having recently surveyed Alfred Carsons, their staff numbers sit at 110 -120 for 90 beds. The Royal Commission estimates staffing to cover 3.5-4.2 hours per resident per day. The estimates suggested by Oryx are 15 people per shift, no allowance for Admin. Maintenance, Technical, Utility Services. ii. There are no adequate staff areas where staff can leave belongings, take meals etc., for the number of staff required to operate this facility. iii. Parking is insufficient for a shift change of 30-40 staff during peak periods, the Wellness Centre and visitors. Alfred Carsons has 54 bays for staff and visitors. iv. Street parking is already provided on Doonan and Betty for the Lisle village due to the lack of parking existing for their 26 dwellings (12 bays available on site only). v. Masons gardens car park already shares its 13 bays with the peak drop off/collections for the Early Learning Centre adjacent. vi. Parking will end up overflowing into streets like Granby, Leopold, Marita, Melvista and Princess as well as on local verges, and Masons Gardens on Kathryn Street. h. Traffic congestion. i. It will impede access by locals due to congestion. ii. Betty Street and Doonan Road run 200m in length between Princess and Melvista. iii. The TIS says the 6m roads (Betty and Doonan) can adequately handle high volume of cars each day – a Traffic Impact Assessment is required in the consideration of congestion, that has been overlooked. iv. There is the issue of one side of the road consistently having parked cars on it. v. Buses go both ways on a regular basis and are often seen waiting at the top or bottom of the streets waiting to access, while traffic is heading toward them. vi. Local traffic already sits and queues because the road is effectively a one-way street during peak times. vii. Both Streets have T junctions at Princess and Melvista, which in peak times will lead to the backing up of cars waiting to enter the intersections (approximately 200m of road). Peak queues will send traffic from Betty through Granby as a ‘Rat Run’.

4. The Process of block sales, rezoning without due consultation. a. This is a commercial for-profit enterprise (in the middle of suburbia) adjacent to a not for profit retirement and aged care village. It would be more in keeping in West Perth with The Richardson. The Stirling Highway Corridor is for commercial use. b. The sale of the four R10-R12.5 blocks were conducted without full disclosure to residents, given the intent of the Council to rezone them aged care. c. The blocks should have been parcelled with Lisle village and any development considered wholistically with a strategic plan for aged care. There is still no strategic plan for Lisle Village. d. There should have been a consultation process with residents about this new proposed development, not four years of silence. i. It has no resemblance to what was agreed in principle with residents in mid-2016. This proposal has come as a ‘fait accompli’ because of the Council’s complete lack of pro-activity around aged care in Nedlands over the past decade. “to retain and restore the building ‘Melvista Nursing Home’” (p.8), “proposed new residential care facility... the building design will achieve a sensitive integration with the surrounding low scale, residential area.... and retention of significant mature trees in the building setback.” P.7“...ensuring a residential scale for the new building that is typical of contemporary homes in the Nedlands area.”P.12 “...the building is to be appropriate in its height and setback.....comprise two floors of accommodation over a basement parking level excavated into the hill.” P.18 ii. The LPP does not reflect the majority of aged care facilities in and around Perth metropolitan area (of the 20 I reviewed, 17 were between 1-2 levels) only the new Regis building that was opened on Monash Avenue, the proposed Queenslea (by Oryx) in Claremont, The Richardson (by Oryx) in West Perth are between 4 and 9 levels. iii. The LPP fails to take into consideration the impact of the Royal Commission findings, available in January 2020 that states there needs to be a rethink to ‘small scale domestic models of aged care’.

5. There are no buffer R zones between it and the residential properties as there are at other aged care facilities, where height is or will be an issue. I have walked each of the following sites: a. Lisle Claremont (designated

aged care) follows the contour of the land and sits between 1-2 levels currently with buffer R ratings R20-40 around it. b. Regent Park, Mt Claremont Village (designated aged care) existing sits at 1-2 levels currently with buffer R ratings surrounding it. c. Regis Weston aged care sits on a 17200sq.m site with 'aging in place' fronting Monash avenue, Nedlands a major hospital zone, sits with buffer R ratings surrounding it. The closest residence is 230 metres away. d. Aegis Montgomery House, Mt Claremont sits on a 16,700 sq.m lot which is buffered by spacious land. It is 3-4 levels, a refurbished existing building. Its elevation does not impede local resident's access and views and complements the surrounding homes. (many of which R20, the few that are R12.5 sit higher than the House).

5 | Page APPENDIX 1: RESIDENTIAL AREA AND R CODES According to the LPS3 the area stipulated below is A9 – one parcel of land, I am not sure how it has happened that a DA has been put forward on 30% of the total lot. I don't believe that was the intention of the State Government's infill strategy. Photo provided in pdf form to Planning.

APPENDIX 2: Technical Design to Meet the Needs of the AGED – Some Examples. The new John Wesley Gardens community is a residential care facility designed to promote wellness, socialisation and autonomy. Located in a quiet residential street of Geebung in northern Brisbane, it was built to replace a small, outdated facility that was built in the 1960s. The brief It was important that the design prioritised residents' wellbeing and social involvement. The new centre needed to be a welcoming, non-institutional environment for residents and their families, carers and the broader community. The building also needed to create an environment where residents could have choice and autonomy and feel respected. Sustainability The project has achieved a six leaf EnviroDevelopment Certification by the Urban Development Institute of Australia, achieving the required criteria for Ecosystems, Waste, Energy, Materials, Water, and Community.

Is aged care morphing into resort care? Seven Hills Road Baulkham Hills NSW 2154 Aged care facilities were not always the most stylish of places, with some earning monikers like 'God's waiting rooms'. However, things have changed for this growing sector. Designed by architects Boffa Robertson Group and exterior detail architect Jackson Teece Architects as well as interior architectural practice, CHADA, the brief was influenced by research into consumer demands and future needs, as well a range of newly-available construction materials. For its part, CHADA is better known for its high-end hotel and residential designs including The Hilton, Hayman Island Resort, and the Pan Pacific in Singapore. According to SummitCare director, Peter Wohl, the move to hire a practice with such strong hospitality experience was done deliberately because consumer expectations for future aged care environments are rapidly changing. The SummitCare design, "is made to cater to the needs of the residents' while keeping the beautiful feel of a hotel and a home" she says. At the same time, notes Payne, the design is also such that local community involvement is not only possible, but actively encouraged. "We will genuinely become an extension of the local community," she says.

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**Respondent No:** 529

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 13:44:10 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

Q2. **Your address:**

Q3. **Your email address:**

Q4. **Your telephone number:**

Q5. **State how your interests are affected (select all relevant boxes)**

Q6. **Address of the property affected (if applicable)**

Q7. **My response to the proposal:**

I object to the proposal

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to express my great concern at the proposal for a large multi-story commercial development on the above addresses. My family and I own and live We enjoy the quiet neighbourhood and local streets, with my small children frequently playing on the front lawn and verge, and walking from our house to Masons Gardens, College Park, nearby friend's houses, and along Princess Road to their local school. I object to this development as it is of a physical and commercial scale far too large for the surrounding area. The development is completely out of character for its location deep in the heart of quiet inner Nedlands streets, with a well-loved children's playground nearby and well established, traditional residential blocks. The bulk of the building will overshadow neighbouring properties and spoil views from Masons Gardens. It is a poor choice of location for adequate access and traffic movement. The increase of traffic (from both staff and visitors EVERY day of the week) will greatly lower the amenity of the neighbouring park and severely restrict the ability for children to safely walk there and cross on each access corner along Melvista Ave. I am also extremely concerned about the increased flow of traffic from Stirling Hwy along Taylor, Marita, Doonan, Princess and surrounding roads to feed into the site. The safety of parents and children moving from within the childcare centre opposite will also be at risk with greater road traffic. This will not only affect those living on immediately adjacent properties to the development. Neighbours such as my family will be restricted in our ability to comfortably and safely wander the local streets and access our local parks with such a high-density commercial development in our midst. I dread the day I don't allow my children to walk to a park two blocks away because the road crossings are too busy. The nature of the proposed operation (medical facilities, in house laundry etc) will have a significantly damaging impact on the character, liveability and desirability of surrounding properties, as well as those in neighbouring streets. The 24-hour operation of the facility will generate substantial noise and light pollution which will be hugely detrimental to the entire community. I hope the Council will do the right thing by their long term resident ratepayers and prevent this development from progressing at its full proposed scale.



**Respondent No:** 530

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 13:45:40 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

Q2. **Your address:**

Q3. **Your email address:**

Q4. **Your telephone number:**

Q5. **State how your interests are affected (select all relevant boxes)**

Q6. **Address of the property affected (if applicable)**

Q7. **My response to the proposal:**

I object to the proposal

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to express my great concern at the proposal for a large multi-story commercial development on the above addresses. While we live in Victoria Avenue, we are very concerned at the precedent set by this development, the dubious consultation process that has supposedly been followed and at the impact on friends and family who live adjacent to and nearby the proposed development. The approval process from what we have been able to discover seems as though it has been designed to mislead neighbours and completely misrepresent the nature of the development. It is a disgrace for a supposedly transparent local government to be a party to. I object to this development as it is of a physical and commercial scale far too large for the surrounding area. The development is completely out of character for its location deep in the heart of quiet inner Nedlands streets, with a well-loved children's playground nearby and well established, traditional residential blocks. The bulk of the building will overshadow neighbouring properties and spoil views from Masons Gardens. It is a poor choice of location for adequate access and traffic movement. The increase of traffic (from both staff and visitors EVERY day of the week) will greatly lower the amenity of the neighbouring park and severely restrict the ability for children to safely walk there and cross on each access corner along Melvista Ave. I am also extremely concerned about the increased flow of traffic from Stirling Hwy along Taylor, Marita, Doonan, Princess and surrounding roads to feed into the site. The safety of parents and children moving from within the childcare centre opposite will also be at risk with greater road traffic. This will not only affect those living on immediately adjacent properties to the development. Neighbours such as our daughter and her family will be restricted in their ability to comfortably and safely wander the local streets and access local parks with such a high-density commercial development in their midst. The nature of the proposed operation (medical facilities, in house laundry etc) will have a significantly damaging impact on the character, liveability and desirability of surrounding properties, as well as those in neighbouring streets. The 24-hour operation of the facility will generate substantial noise and light pollution which will be hugely detrimental to the entire community. I hope the Council will do the right thing by their long term resident ratepayers, instead of favouring underhand development proposals and prevent this development from progressing at its full proposed scale.



**Respondent No:** 531

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 13:46:55 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

Q2. **Your address:**

Q3. **Your email address:**

Q4. **Your telephone number:**

Q5. **State how your interests are affected (select all relevant boxes)**

Q6. **Address of the property affected (if applicable)**

Q7. **My response to the proposal:**

I object to the proposal

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to express my great concern at the proposal for a large multi-story commercial development on the above addresses. While we live in Victoria Avenue, we are very concerned at the precedent set by this development, the dubious consultation process that appears to have been followed and at the impact on friends and family who live adjacent to and nearby the proposed development. The process and the development proposal itself are both a very poor reflection on City of Nedlands planners and elected representatives. The approval process from what we have been able to discover seems as though it has been designed to mislead neighbours and to completely misrepresent the nature of the development. It is a disgrace for a supposedly transparent local government to be involved in such a process. I object to this development as it is of a physical and commercial scale far too large for the surrounding area and its approval would place all our properties at risk. The development is completely out of character for its location deep in the heart of quiet inner Nedlands streets, with a well-loved children's playground nearby and well established, traditional residential blocks. The bulk of the building will overshadow neighbouring properties and spoil views from Masons Gardens. It is a poor choice of location for adequate access and traffic movement. The increase of traffic (from both staff and visitors EVERY day and at ALL HOURS of the week) will greatly lower the amenity of the neighbouring park and severely restrict the ability for children to safely walk there and cross on each access corner along Melvista Ave. I am also extremely concerned about the increased flow of traffic from Stirling Hwy along Taylor, Marita, Doonan, Princess and surrounding roads to feed into the site. The safety of parents and children moving from within the childcare centre opposite will also be at risk with greater road traffic. This will not only affect those people, such as our friends, who on immediately adjacent properties to the development, but it will impact less immediate neighbours such as our daughter in Marita Rd. She and her family will be restricted in their ability to comfortably and safely wander the local streets and access local parks with such a high-density commercial development in their midst. The nature of the proposed operation (medical facilities, in house laundry etc) will have a significant, damaging impact on the character, liveability and desirability of surrounding properties, as well as those in neighbouring streets. The 24-hour operation of the facility will generate substantial noise and light pollution which will be hugely detrimental to the entire community. I hope the Council will do the right thing by their long term resident ratepayers, instead of favouring dubious development processes and out-of-all-reasonable scale proposals and prevent this development from progressing at its full proposed scale. To do otherwise would be an absolute betrayal of the people who elected you.





**Respondent No:** 532

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 13:48:23 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**

I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am resident at \_\_\_\_\_ I have received notice that a development has been proposed for an Aged Care facility to be built on Betty Street/Doonan Road without proper community consultation. I herewith strenuously object to the manner in which this development has come about and the lack of consultation. I implore you to undertake due diligence with proper community consultation as a matter of urgency. As I have only become aware of this proposal, please consider this my preliminary objection. I will seek further advice on the matter and review any available plans such that I may provide a more thorough response.

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**Respondent No:** 533

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 13:50:09 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**

I support the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

no comments

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**Respondent No:** 534

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 13:59:05 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

Q2. **Your address:**

Q3. **Your email address:**

Q4. **Your telephone number:**

Q5. **State how your interests are affected (select all relevant boxes)**

Q6. **Address of the property affected (if applicable)**

Q7. **My response to the proposal:**

I object to the proposal

Q8. **Submission : Please give your comments relating to this item in full below.**

The proposed building at 16 & 18 Betty Street and 73 & 75 Doonan Road Nedlands is much too large for a residential single family dwelling street. 4/5 storeys would change the character of the whole area there is no provision for a garden area for residents to sit and it has already shown during hotel isolation during the current COVID19 pandemic that people in 24 air conditioning develop mental health issues. How much worse for an old person physically restricted by poor health it would be like putting them in jail, which is what the building will look like. Put them in a wheelchair and roll down to the park, yes but pushing up the hill would be daunting. Traffic: There are children in these streets. With the increase of heavy traffic (trucks) there would be an increased risk to pedestrians, dog walkers and children on bikes. Parking: There is already a struggle for parking on the street in this area with staff, visitors and deliveries to the proposed nursing home (class hospital) or residential aged care, it is the same thing non-ambulant residents needing 24 hour attention which takes a lot of physical time from (?) trained staff. In a seriously commercial establishment a lot of personal attention would be expected therefore more than govt required level of staff to resident would need to be employed, putting pressure on the number of carpark bays planned for the underground. Noise: the roof top aircon units running 24 hours/7 days would surely be extremely irritating for all in the area. The fumes/exhaust from the kitchen, laundry and rubbish collection site would be a serious problem. Govt regulations on such matters are designed for industrial use but a quiet usually pleasant residential area needs more consideration. There are residential aged care facilities within a reasonable distance from Nedlands. We do not need a 4/5 storey edge to edge building in betty/doonan vicinity.



**Respondent No:** 535

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 14:04:51 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

Q2. **Your address:**

Q3. **Your email address:**

Q4. **Your telephone number:**

Q5. **State how your interests are affected (select all relevant boxes)**

Q6. **Address of the property affected (if applicable)**

Q7. **My response to the proposal:**

I object to the proposal

Q8. **Submission : Please give your comments relating to this item in full below.**

1. The proposed construction would completely overshadow my unit particularly in winter, creating a dark, depressing home. This overshadowing would also cover my solar panels, increasing power usage, and creating my financial distress. The studies provided by Oryx are wrong and misleading. 2. during the demolition phase of this proposal. the noise, dust and increased traffic would render my unit virtually uninhabitable. 3. 7am to 7pm allowable, six days a week for the construction. Who thought that would be acceptable or tolerable? A normal residence construction would have 2-4 tradesperson at a time - this could have innumber able tradespersons at any one time. The noist would make my unit unbearable. 4. The increased traffic, parking provlems during and after the constriction have not been adequately considered. 5. There has been no communication from Oryx or council since 2016. At that time, my option was that this was not an appropriate development for the location. I have not changed my opinion. 6. this development would destroy my right to live in a quiet safe and comfortable home.



**Respondent No:** 536

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 14:10:09 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**

I support the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I fully support the proposed residential aged care facility. We desperately need more residential aged care in our area. I have been involved in residential aged care for over 2 decades. They are an asset to the community in many, many ways. We must support this and look at the positive, big picture and not just individuals who are concerned with themselves. We should look at the community as a whole - benefits to the majority. This is what we need urgently. The nearest aged care facility (in claremont) has a long waiting list. I witnessed a resident here heartbroken he had to leave his friends and go to fremantle as their was no empty beds closer. i do not want to see other members of our community, having to leave the area.

---



**Respondent No:** 537

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 14:13:20 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**

I object to the proposal

---

Q8. **Submission : Please give your comments relating to this item in full below.**

Th height, Design and Location is grossly inappropriate for this development, lacking the fundamental infrastructure to service its requirements. There is insufficient parking for staff, cleaners and visitors. No consideration is given to the residents living in or around these two streets. There is no easy access for emergency vehicles, delivery trucks and rubbish collection. There will be a noise problem with air conditioning units running 24/7 and the extra people and vehicular traffic. There will be a devaluation of surrounding family homes with a loss of trees, shrubbery and birdlife. The impact on people's lives and community will be considerable if this proposed care facility, in its planned format, is approved.

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**Respondent No:** 538

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 14:17:36 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

Q2. **Your address:**

Q3. **Your email address:**

Q4. **Your telephone number:**

Q5. **State how your interests are affected (select all relevant boxes)**

Q6. **Address of the property affected (if applicable)**

Q7. **My response to the proposal:**

I object to the proposal

Q8. **Submission : Please give your comments relating to this item in full below.**

I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 1 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 2 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.



**Respondent No:** 539

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 14:22:25 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

Q2. **Your address:**

Q3. **Your email address:**

Q4. **Your telephone number:**

Q5. **State how your interests are affected (select all relevant boxes)**

Q6. **Address of the property affected (if applicable)**

Q7. **My response to the proposal:**

I object to the proposal

Q8. **Submission : Please give your comments relating to this item in full below.**

Formatted version recieved by planning. I wish to register my objection to Oryx's proposed development on Lots 10 & 11 Betty Street and Lots 18 & 19 Doonan Road, Nedlands. The Local Planning Policy Residential Aged Care Facilities is inconsistent with the intent of Local Planning Scheme No. 3, Residential Design Codes Volume 2 and the WAPC's Draft Position Statement: Residential Aged Care. The Local Planning Policy Residential Aged Care Facilities is not an appropriate instrument for assessing a residential aged care facility on Lots 10 & 11 Betty Street and Lots 18 & 19 Doonan Road, Nedlands. The main purpose of a Local Planning Policy is to enhance and augment its source documents to provide better outcomes for the community. In many instances the Local Planning Policy Residential Aged Care Facilities takes a backward step. The Local Planning Policy Residential Aged Care Facilities and Oryx's proposed development appear to be driven by commercial outcomes rather than achieving high quality aged care. My specific objections to Oryx's proposed development are as follows: Non-compliance with Local Planning Scheme No. 3 Gazetted on 16 April 2019 (LPS3) 1. LPS3, Part 3, Section 19 (1) Table 4, permits the use of site "A9" (Lots 10 & 11 Betty Street and 18 & 19 Doonan Road) as a Residential Aged Care Facility. 2. LPS3, Part 6 defines a Residential Aged Care Facility as "a residential facility providing personal and/or nursing care primarily to people who are frail and aged and which, as well as accommodation, includes appropriate staffing to meet the nursing and personal care needs of residents; meals and cleaning services; furnishings, furniture and equipment. May also include residential respite (short term) care but does not include a hospital or psychiatric facility." 3. Health Services Act 2016 Part 1, Section 8 (4) (a) provides the definition of a "Hospital" which includes: "premises where medical, surgical or dental treatment, or nursing care, is provided for ill or injured persons and at which overnight accommodation may be provided", and Section 8 (5) determines that "In subsection (4) an ill person includes a person who has a mental illness (as defined in the Mental Health Act 2014 Section 4). 4. Mental Health Act 2014, Part 2, Division 1, Section 4 references Division 2 Section 6 (1) which determines that "A person has a mental illness if the person has a condition that — (a) is characterised by a disturbance of thought, mood, volition, perception, orientation or memory; and (b) significantly impairs (temporarily or permanently) the person's judgment or behaviour." 5. The Oryx proposed development spanning Lots 10 & 11 Betty Street and Lots 18 & 19 Doonan Road provides for a Dementia Ward for 14 patients, falls within the definition of a Hospital and therefore is not permitted under LPS3, Part 3, Section 19. Non-compliance with Residential Design Codes Volume 2 (R-Codes Vol 2) and Local Planning Policy Residential Aged Care Facilities (LPP) Part 2 Section 2.2 Height 6. The proposed development fails to achieve the following Element Objectives: O 2.2.1 The height of development responds to the desired future scale and character of the street and local area, including existing buildings that are unlikely to change. O 2.2.2 The height of buildings within a development responds to



changes in topography. 7. The top level of Oryx's proposed facility is setback allegedly to eliminate its visibility from the street. This will only be the case for residents directly opposite the facility at 11 Betty Street / 2 Granby Crescent and 78 and 80 Doonan Road—a distance of approximately 40m in each street. The top level of the proposed facility becomes increasing visible from further up and down Betty Street and Doonan Road. 8. The top level of the facility will be clearly visible for approximately 185m of Betty Street; the remaining 210m of Doonan Road; 250m of Melvista Avenue from the Vincent Street/Adelma Road roundabout through to the Kindergarten; northern half of Masons Gardens; 100m of Adelma Road south of the roundabout and 125m of Hackett Rd between Melvista Avenue and Riley Road. 9. Far from being obscured the top level of the proposed Oryx facility will be clearly visible from 950m of road verge and obscured from just 80m. 10. This type of roof augmentation can work in areas where there are several multistorey buildings adjacent to one another, however, it does not work for the proposed Oryx facility which has a building height that vastly exceeds that of all other residences along the streetscape. 11. The proposed Oryx facility dominates the single storey house at 14 Betty Street and towers over Melvista Lodge to the south. It dominates and dramatically changes the nature of Betty Street, Doonan Road and Melvista Avenue. 12. Of further concern is the precedent that would be set for future development of the Melvista Lodge site which, if undertaken, would result in complete and irreversible destruction of local residents' amenity and the quiet enjoyment of their properties. Part 2 Section 2.3 Setbacks 13. Oryx's proposed development fails to meet the following Element Objectives: O 2.3.1 The setback of the development from the street reinforces and/or complements the existing or proposed landscape character of the street. 14. The intent of R-Codes Vol 2, Section 2.3 is that "The setback of the building from the street shall be planned to complement the streetscape character and to provide residents with a distinct sense of address, arrival and privacy as appropriate." 15. Section 2.3 provides latitude so that "local governments may amend, replace or augment the settings for street setbacks through the local planning framework, to suit the local context and intended development outcome, to promote a particular streetscape character and to respond to site-specific conditions". The intention is to allow the Primary Controls to be adjusted where necessary so that the intended development can complement its surroundings fitting within the streetscape and local context. It is not intended that section 2.3 be used to redefine the local context or streetscape. 16. R-Codes Vol 2, Figure 2.3 a, b & c clearly demonstrates that "Street setbacks should be consistent with existing setback patterns in the street or setbacks that achieve the desired future character of the area" and that the intended development should follow the dominant setback for the area. 17. The dominant setback on Betty Street and Doonan Road is 9m and the proposed Oryx development should therefore also have a 9m setback. Part 2 Section 2.4 Side and Rear Setbacks 18. The proposed Oryx development fails to achieve the following Element Objectives: O 2.4.2 Building boundary setbacks are consistent with the existing streetscape pattern or the desired streetscape character. O 2.4.3 The setback of development from side and rear boundaries enables retention of existing trees and provision of deep soil areas that reinforce the landscape character of the area, support tree canopy and assist with storm water management. O 2.4.4 The setback of development from side and rear boundaries provides a transition between sites with different land uses or intensity of development. 19. As demonstrated above in 2.3 Setbacks building boundary setbacks are not consistent with the existing streetscape pattern or the desired streetscape character. 20. The Oryx proposal removes all existing trees inside the site boundary including 6 large trees (10 – 30m high) and 8 medium trees (5 – 10m high) 21. There are insufficient deep soil areas to accommodate replacement trees in accordance with sect 3.9. 22. Storm water runoff will require careful hydraulic analysis due to the large catchment area, limited deep soil areas and potential impact on downstream residents. 23. Oryx's proposed development doesn't provide for a transition between the different intensity of development resulting in an R-80 zone hard up against an R-12.5 zone. Part 2 Section 2.5 Plot Ratio 24. The proposed Oryx development fails to achieve the Element Objective: O 2.5.1 The overall bulk and scale of development is appropriate for the existing or planned character of the area 25. The proposed Oryx development does not comply with Acceptable Outcomes A 2.5.1., the plot ratio requirements set out in Table 2.1 nor the LPP. 26. Table 2.1 refers to Definitions for calculation of the plot ratio, being the plot ratio area of the building divided by the site area. The plot ratio area is calculated from "the gross total area of all floors of buildings on a development site, including the area of any internal and external walls but not including: —the areas of any lift shafts —stairs or stair landings common to two or more dwellings —machinery, air conditioning and equipment rooms —space that is wholly below natural ground level —areas used exclusively for the parking of wheeled vehicles at or below natural ground level; —storerooms —lobbies, bin storage areas, passageways to bin storage areas or amenities areas common to more than one dwelling —balconies, eaves, verandas, courtyards and roof terraces" 27. The Definitions determine that a dwelling is "a building or portion of a building being used, adapted, or designed or intended to be used for the purpose of human habitation on a

permanent basis by a single person, a single family, or no more than six persons who do not comprise a single family.” 28. With reference to R-Codes Vol 2 the Oryx residential care building is not a “dwelling” as it will accommodate “more than six persons who do not comprise a single family”. 29. For the definition of plot ratio area to apply the Oryx residential aged care facility must be considered as 90 multiple dwellings within the one building, however, the LPP stipulates the zoning to be R80 which restricts the number dwellings on the 2980m<sup>2</sup> site to a maximum of 23. 30. If the Oryx facility is not a single dwelling and is to be considered a multiple dwelling it violates R-Codes Vol 2. To comply with the R-Codes Vol 2 as a multiple dwelling the number of beds would need to be reduced from 90 to 23. 31. The dilemma this poses calls into question whether it is valid to exclude: “—stairs or stair landings common to two or more dwellings —lobbies, bin storage areas, passageways to bin storage areas or amenities areas common to more than one dwelling” when calculating the plot ratio area. 32. Realistically passageways and amenities areas should be included in the plot ratio area of as is the case for a single dwelling but arguably the stairwells servicing all floors and providing a fire escape route should be excluded. 33. Making a generous allowance for lift shafts, stairs and store rooms and complying with the other requirements of the definition for plot ratio area, Table 1 calculates the Actual Plot Ratio. Table 1 Ground level (m<sup>2</sup>) Level 1 (m<sup>2</sup>) Level 2 (m<sup>2</sup>) Level 3 (m<sup>2</sup>) Total (m<sup>2</sup>) Gross Floor Area 1679 1857 1857 1307 6700 less Lifts /Service Ducts 130 130 130 130 520 less Store Rooms 35.2 7.1 42.3 Assessable Floor Area 1513.8 1727 1727 1169.9 6137.7 Site Area 2980 Permitted Plot Ratio 1.0 Actual Plot Ratio 2.06 34. The Oryx facility’s plot ratio is estimated to be double the 1.0 ratio permitted by the LPP. 35. The Oryx drawing SK\_0040 is misleading showing only 50% of the building elevation disguising the true bulk and height of the building in the context of the streetscape. Part 3 Section 3.3 Tree canopy and deep soil areas 36. The proposed Oryx development fails to achieve the following Element Objectives: O 3.3.1 Site planning maximises retention of existing healthy and appropriate trees and protects the viability of adjoining trees. O 3.3.2 Adequate measures are taken to improve tree canopy (long term) or to offset reduction of tree canopy from pre-development condition. O 3.3.3 Development includes deep soil areas, or other infrastructure to support planting on structures, with sufficient area and volume to sustain healthy plant and tree growth. 37. The Oryx proposed development does not retain any of the 6 large trees (10 – 30m high) nor any of the medium trees (5 – 10m high). 38. Oryx does not comply with the minimum requirement for trees in accordance with Table 3.3a. At least one large tree and 5 medium trees, or 3 large trees are required by Table 3.3a. 39. With reference to Oryx’s Architectural Design Statement (page 22) only medium and small trees are shown. There is no provision in Oryx’s proposed development for large trees. 40. With Reference to Oryx’s Development Plans (Rev 1) there is insufficient Deep Soil Area (DSA) and insufficient Rootable Soil Zone (RSZ) to comply with the requirements of Table 3.3b: i. the northern face of Level 00 is 3.5m from the northern boundary. Immediately below, the northern wall of the basement is 2.4 m from the northern boundary and a sewer line is located in the boundary corridor. ii. there is insufficient DSA and RSZ to the east, south and west of the building 3.9 Car and bicycle parking 41. The proposed Oryx development fails to achieve the following Element Objectives: O 3.9.2 Car parking provision is appropriate to the location, with reduced provision possible in areas that are highly walkable and/or have good public transport or cycle networks and/or are close to employment centres. O 3.9.4 The design and location of car parking minimises negative visual and environmental impacts on amenity and the streetscape. 42. With reference to LPP section 4.11.1 “Vehicle parking shall be contained on-site to avoid street and verge parking associated with the use”; and section 4.11.4 “Parking ratios shall be in accordance with the City’s Local Planning Policy Parking”. 43. Parking standards for Residential land use represent a Council-adopted position. They do not apply as a “Deemed to Comply” provision under the Residential Design Codes - Volume 1 (R - Codes Volume 1) until the Western Australian Planning Commission (WAPC) has granted approval in accordance with Clause 7.3.2 of the R – Codes Volume 1. 44. It is unclear whether approval has been granted by WAPC for the parking standards per Local Planning Policy Parking to be used for R-Codes Vol 2 in accordance with 1.2.3. 45. R-Codes Vol 2, Part 3, section 3.9, Table 3.9 requires “0.75 bays per resident” and for visitors “1 bay per four dwellings up to 12 dwellings” and “1 bay per eight dwellings for the 13th dwelling and above”. 46. Residential Aged Care residents do not have driver’s licences hence there is no requirement for residents’ parking spaces. This is offset by parking requirements for employees working in the residential aged care facility which are not required in the context of a normal residential apartment building. To comply with LPP section 4.11.1 parking must be provided for the full complement of employees on-site. 47. The Local Planning Policy Parking does not address visitor parking requirements for residential aged care facilities and hence the default requirement is provided by RCodes Vol 2. 48. The requirement for visitor bays must not be ignored and under R-Codes Vol 2, Part 3, section 3.9, Table 3.9 Oryx is obliged to provide a total of 13 visitors bays. 49. The Royal Commission into Aged Care Quality and Safety is relevant to the proper assessment of staffing numbers and hence parking requirements. Research Paper 1 “How Australian Residential Aged Care Staffing Levels Compare with International and National

Benchmarks cites a 4-star facility as one that provides a good level of care with nursing staff levels of 242 – 264 minutes (4 – 4.4 hrs) of care per resident per day; and a 5-star facility (“best practice”) nursing staff levels in excess of 264 minutes per resident day. Nursing staff include Registered Nurses (RN), Enrolled Nurses (EN) and Personal Care Workers (PCW). 50. Research undertaken by the Australian Nursing and Midwifery Federation (ANMF) has shown that the average individual living in residential aged care needs 4.3 hours of care per day and a ratio of one RN to 5-6 ENs /PCWs. 51. Assuming the 4.3 hours is split over: morning shift – 2 hours afternoon shift – 2 hours night shift – 0.3 hours and an 8-hour shift comprises 6 hours of resident care, 1 hour paperwork and a 1 hour break, 90 residents will require 30 nursing staff. 52. An estimate of the total staffing requirements (typical morning or afternoon shift) to meet community expectations for a high quality residential aged care facility in the City of Nedlands is shown in Table 2. Added is the anticipated number of visitors in accordance with R-Codes Vol 2, Table 3.9. Table 2 Typical Numbers - Staff and Visitors Morning and Afternoon Shifts

Staff Numbers	Comments
Administration Facility Manager	1
Administration	3
Receptionist	1
Cafe Attendant	1
Wellness Centre Receptionist	1
Physio/ Gym	1
Hair Salon	1
Podiatrist	1
Nursing Staff Registered Nurses	6
ANMF research Enrolled Nurses/Personal Care Workers	24
ANMF research Housekeeping Supervisor	1
Cleaners	4
Kitchen Dietary Manager	1
Chef	1
Cooks/ Servers	5
Laundry Laundry	3

53. The number of staff required to run the facility is almost double that envisaged by Oryx. 54. Oryx’s proposed development allows a total of 24 car bays plus 2 ACROD bays. Bays 1 and 23 will be problematic for parking when a vehicle is parked next to them (in bays 2 and 23)—egress will be difficult without reversing the full distance to the exit and foreseeably these two bays will end up as additional storage areas. 55. Hence for staff parking there are usable 22 bays and an overall demand of 72 implying a shortfall of approximately 50 car parking bays. The parking problem compounds at shift changeover with at least nurses and kitchen staff handing over. This could increase the shortfall to in excess of 80 bays during the morning/ afternoon shift changeover. 56. Some staff will use public transport however this will most probably be limited to those who live on a local bus route. The bus journey between Perth CBD and the proposed facility is 50 minutes and between Claremont Quarter and the proposed facility is 28 minutes. Bus journeys requiring a transit through Perth CBD or Claremont Quarter will potentially average 1-1.5 hours each way (perhaps longer) and hence there will be a strong incentive for most staff to drive and park. 57. Even if it is optimistically assumed 20% of the staff will use public or other transport the shortfall will still be approximately 40 car bays (60 – 70 bays shortfall during shift change)—bearing in mind that staff on afternoon and night shifts are unlikely to risk late night journeys on public transport. Security Security Officer 1 General Maintenance 1 Handyman 1 Call-out services and other 1 Allow 1 full time equivalent Courier Electrician Plumber HVAC Painters Gardener Window cleaners Total Staff 59 Visitors 13 Per R-Codes Vol 2 Table 3.9 TOTAL non-resident attendance per shift (morning/ afternoon) 72 58. The carpark on Hackett Road has 14 car bays including one ACROD bay. It services the Kindergarten opposite and is largely occupied. Generally, there are 2-3 bays free during business hours on weekdays, however, there is significant pressure on the carpark during kindergarten drop-off and pick-up times. Betty Street and Doonan Road have street parking, the southern ends of which are used by residents in Melvista Lodge and are generally 50 % full most days. Melvista Lodge is not fully occupied at the current time so as occupancy increases parking pressure will increase. 59. The shortfall in parking will transfer to the surrounding street verges. Except for the night shift period the verges on Betty St, Doonan Rd, Granby Crescent, Melvista Avenue from Leopold St to Vincent St and the car park in Hackett Road will be full most of the time. 60. The significant increase in parking will have a major impact on the residents’ quiet enjoyment of their properties and will restrict access for their own outsourced services (e.g. parcel deliveries, tradesmen, gardeners, cleaners etc.). Royal Commission into Aged Care Quality and Safety 61. The Royal Commission into Aged Care Quality and Safety is due to release its final report in March 2021. It would be prudent for the Council to wait for the findings and recommendations before approving a residential aged care development on the Lots 10 & 11 Betty Street/ Lots 18 & 19 Doonan Road site or any other site. The Royal Commission has already asserted that “Our Final Report will give close consideration to options to ensure staffing levels, and the mix of staffing, are sufficient to ensure quality and safe care”. 62. An excerpt from the conclusions of the Royal Commission into Aged Care Quality and Safety Interim Report (Vol 1, p255): “As you have read in this Interim Report, the systemic problems with the aged care system include that it: • is designed around transactions, not relationships or care • minimises the voices of people receiving care and their loved ones • is hard to navigate and does not provide the information people need to make informed choices about their care • relies on a regulatory model that does not provide transparency or an incentive to improve • has a workforce that is under pressure, under-appreciated and lacks key skills. All of these problems need to be resolved. Australia’s aged care system has not kept pace with the expectations of care that can be provided in a modern, wealthy and compassionate society. The Australian aged care system is failing and

needs fundamental reform. The Royal Commission will recommend steps to achieve this transformation in our Final Report.” 63. I urge the Council to reject the proposed Oryx development and instigate an appropriate development plan for the site that will adopt recommendations from the Royal Commission and ensure a high-quality facility that complements the streetscape and its surrounding neighbours.

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**Respondent No:** 540

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 14:25:23 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**

I support the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

no comment.

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**Respondent No:** 541

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 14:26:25 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**

I support the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I have followed the discussion about the facility proposed for Betty/Doonan St. To me it seems an appropriate development in that location. Reasonable in scale, good location close to Waratah Ave shops, close to major private and public transport routes, bus stop nearby, close to major hospitals. And with an ageing population in the inner-west, it would appear to be meeting a likely need.

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**Respondent No:** 542

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 14:35:32 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

Q2. **Your address:**

Q3. **Your email address:**

Q4. **Your telephone number:**

Q5. **State how your interests are affected (select all relevant boxes)**

Q6. **Address of the property affected (if applicable)**

Q7. **My response to the proposal:**

I object to the proposal

Q8. **Submission : Please give your comments relating to this item in full below.**

I am 19 years old and have lived in the suburb since I was two years old. I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1 The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2 The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3 Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 1 The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 2 Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.



**Respondent No:** 543

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 14:43:35 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**

I support the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

no comment

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**Respondent No:** 544

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 14:45:23 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

Q2. **Your address:**

Q3. **Your email address:**

Q4. **Your telephone number:**

Q5. **State how your interests are affected (select all relevant boxes)**

Q6. **Address of the property affected (if applicable)**

Q7. **My response to the proposal:** I object to the proposal

Q8. **Submission : Please give your comments relating to this item in full below.**

Development of an Aged Care Facility at 16 & 18 Betty Street and 73 & 75 Doonan Road I wish to object to the development as described above for the following reasons: 1. Adverse Effect on the Amenity of the Area A brief description of the proposed development is as follows: It is to be a 90-bed high care aged facility housed in a 4 storey building having a basement to roof height of approximately 17 metres, a length of approximately 70 m and an overall width of approximately 32 m. The proposed use of this building and its size, which takes advantage of a flawed City of Nedlands Council land use review process which has resulted in the subject area being redesignated "additional use" and having an R80 coding, is completely out of character with the amenity of the surrounding residential area wherein the R codes are generally R10/R12.5. Given the size, form and the bulk of the proposed development and consideration of the surrounding residential area it is clearly evident that it conflicts with Clause 3.1 of the Local Planning Policy (LPP) which states: "...and do not have an undue impact on the residential amenity of the area by way of building bulk and scale, noise, traffic or parking". It is also clearly evident that the proposed development conflicts with provisions in a document produced by the DPLH on behalf of the WAPC (Ref. 1) which advises firstly, in Section 5.1 - Strategic planning considerations - Local planning strategies and/or local housing strategies: "consideration of acceptable development standards, including built form outcomes, design criteria, streetscape requirements, permissible height, density and development setbacks. and secondly, in Section 5.2 STATUTORY PLANNING REQUIREMENTS - Local planning schemes, Development approvals for residential aged care facilities and retirement villages, "A LDP should ensure the development is compatible and integrated with streetscape(s) and existing or future desired built form of the locality." 2. Lack of Community Consultation On Monday 6th of July 2020 over 100 Nedlands City residents including myself, attended a community consultation meeting organised by ratepayers at the Dalkeith Bowling Club. At that meeting it was obvious that the attendees were clearly opposed to the proposed aged care development on the 4 lots between Betty Street and Doonan Road and many voiced their displeasure. Evidently, on the 22nd June 2020, only 5 neighbours, directly affected by the proposed development, were afforded a one on one meeting with the developer's consultants: Stakeholder Engagement Consultant - Creating Communities and Town planning Consultant - Planning Solutions but not the developer. The Creating Communities web site advises: "Creating Communities works alongside organisations and communities to uncover new pathways to move forward together." and the Planning Solutions website advises, under a section titled STRATEGIC PLANNING, "Stakeholder identification and engagement" Thus, consideration of the community back lash and the claimed qualifications and experience of the developer's consultants it should have been obvious to these consultants that their consultations, with only 5 ratepayers, in lieu of widespread community consultation, were wholly inadequate and in breach of values espoused on their

organisation's websites. Consequently, it is recommended that the NCC ignore any future submissions made by these organisations on behalf of the developer. That the community consultative process for this proposed development was wholly inadequate should have also been obvious to the Nedlands City Council. In connection with this matter it is appropriate to note Clause 5.1 of the LPP which states: "Consultation with affected landowners will be undertaken in accordance with the City's Local Planning Policy- Consultation of Planning Proposals". Given the scale of the proposed development and the consequent inevitable creation of noise, traffic congestion and parking problems should it go ahead, it must have been obvious to both the developer, the developer's consultants and the NCC that consultation with only 5 directly affected residents was both wholly inadequate and insulting to the NCC community.

3. Opportunity for Comment - Duplicitous Conduct Evidently, in April 2016, the community was consulted by the developer regarding a proposal to redevelop Melvista Lodge and Melvista Nursing Home. At that time the proposed development was modest and attracted very little adverse comment for the reason that it was generally adjudged to have a neutral effect on the amenity of the area. On the 26th of June 2020 the NCC made available to the community the manifestly revised development plans for lots at 73-75 Doonan Road and 16-18 Betty Street. Awareness of these plans by the community was hampered for three reasons: The originally short time given by the NCC to the community to respond to the proposed development. Initially objections were to be submitted by 18th July 2020. Due to pressure from ratepayers the NCC has extended this submission date to 25th July 2020. Communication difficulties during the ongoing pandemic. Many residents being of the belief that the development plans were as before. The failure of the proponents to ensure that the community was fully aware of the development proposal changes could be construed as conduct that was duplicitous, particularly at a time where several different digital communication options now exist to overcome problems with communication methods in use pre-covid.

4. Dubious Sale of Land Evidently 75 Doonan Road was sold as a residential R10/R12.5 lot by private treaty by the NCC to the developer at a time when there was an intent by the Council to redesignate the lot from residential R10/R12.5 to "additional use". Redesignation of land from R10/R12.5 residential to special use invariably results in an increase in its value and it is therefore possible the developer benefited at the expense of ratepayers. If the actions described above did transpire the NCC executive could be accused of impropriety. Obviously, to guard against such accusations, the lot sale should have been via a tender process.

5. Property Value Uncertainty – Councillor/Staff Disconnect The apparent ease by which the developer has managed to gain the acquiescence, or probably more correctly, the approval, of the NCC to develop a commercial "for profit" behemoth in a residential area is very troubling. It is very troubling for two reasons: Firstly, it will serve as a precedent for more commercial developments in hitherto NCC residential areas. When it becomes general knowledge that the NCC is amenable to redesignation of residential property, development/redesignation applications will increase and residents will be faced with the uncertainty of either selling out or staying put. Inevitably this uncertainty will undermine community spirit and cohesion. Secondly, given the high level of disquiet created by the development proposal amongst ratepayers it would be expected that the development proposal would have similarly created, at an earlier date, a high level of disquiet amongst Councillors. Evidently councillors were not overly concerned about the development proposal and it is tempting to conclude that councillors were not adequately briefed by the planning department and, more generally, that a worrying disconnect exists between councillor's and council staff.

6. Safety of Aged Care Facilities - Risk Experience gathered from the current epidemic has demonstrated clearly that cruise ships, aircraft, high density, high rise residential buildings and, in particular, aged care facilities are excellent incubators for infectious diseases. Therefore, the design of aged care facilities, where traditionally there have been a large number of residents in a confined space, i.e. high density, must evolve and improve. Consequently, those who sign off on the design of an aged care facility, such as the NCC's planning department, must be aware of their responsibilities and, in the event of a high mortality rate in a newly constructed aged care facility, must also be aware that it could be subject to legal redress and/or a class action. Ultimately, ratepayers must bear this risk and the possible consequences. -----

Reference: 1. Draft Position statement – Residential Aged Care, October 2019 prepared by Department of Planning, Lands and Heritage on behalf of the Western Australian Planning Commission.

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**Respondent No:** 545

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 14:47:36 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**

I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

i feel the 4 storey building is too high next to the retirement village. It will spoil the landscape of doonan road and betty road.  
I do not mind if the building is 2 storey. I feel this project should not be approved in its present form.

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**Respondent No:** 546

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 14:52:18 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**

I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I object to the proposal on the grounds on lost amenity in the area with further traffic, parking (there's a shortage already) the noise from a 90 room facility. Additionally, the height will impede on the view from Mason Gardens and people will be able to look into my courtyard from the development. I have worked in aged care facilities for over 50 years and am well aware of all the associated noise, deliveries, and staff requirements before you even consider visitors and their parking requirements. This development is more suited to the Sir Charles Gardiner precinct. Finally, you have people parking in the vicinity already to utilise the transperth buses. They park here and ride.

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**Respondent No:** 547

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 14:54:16 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

Q2. **Your address:**

Q3. **Your email address:**

Q4. **Your telephone number:**

Q5. **State how your interests are affected (select all relevant boxes)**

Q6. **Address of the property affected (if applicable)**

Q7. **My response to the proposal:**

I object to the proposal

Q8. **Submission : Please give your comments relating to this item in full below.**

As a Nedlands ratepayer I write this letter to OBJECT to this proposed development for the following reasons:- Contrary to statements made by some of the Council's officers I do not believe that the West Australian Planning Commission has dictated the nature of Local Planning Scheme No 3 to the Council. LPS3 and Residential Design Codes Vol 2 Section 2.2. leave the height of the facility to be determined by local government. LPS3 aims to:- Protect and enhance the local character of the amenity And Respect the community vision for the development of the district Clearly this is not the case as evidenced by the volume of objections to the current proposal and by the sheer scale and height of the structure and operations proposed. Communication with local Nedlands residents has been minimal. Could this have been intentional ? A 4 story aged care development with 90 beds is not appropriate and requires significant changes in planning and R-codes. Consultation with the Nedlands community has been ineffective and misleading. There has been an attempt by the Council and the developers, Oryx, to imply that a proposal outlined in 2016 is similar to the current proposal. It is completely different. The current proposal is for 4 stories and the 2016 proposal was 2. . The current proposal does not even include the old Melvista Lodge/Lisle Villages. It is a totally new proposal based on doubtful rezoning. Oryx recently circulated a document which, amongst other issues, contained comment upon traffic flows, parking and staffing. The impact is woefully under estimated for Nedlands as a whole but particularly for narrow local streets which, remarkably, carry buses from time to time. There will be heavy additional on street parking and movement of traffic way beyond the estimates of Oryx's Traffic Impact Statement. I would be happy to substantiate this statement. Similarly staffing levels for aged care homes. I also have doubts relating to Oryx's purported experience in the aged care sector. To date their only experience has been with The Richardson, West Perth. This was originally built as a hotel. As far as I can see Oryx have no experience with construction of aged care facilities nor consultation with the community. My understanding is that Oryx is having difficulty with the alterations and operations of The Richardson. This is a bad proposal, badly managed.



**Respondent No:** 548

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 14:56:07 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**

I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I am a long term rate paying resident of Nedlands. I am writing to totally object to the proposed Residential Aged Care Facility at Lot 10 & 11, Numbers 16 & 17 Betty Street and Lots 19 & 18 Numbers 73 & 75 Doonan Road Nedlands. The height, bulk, scale & visual design of the proposed buildings does not fit into the quite surrounding residential tree lined streets of Nedlands. A commercial project of this kind will increase traffic and noise pollution and will affect the local amenities. I beseech you to outright reject & condemn this proposal.

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**Respondent No:** 549

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 14:58:43 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**

I support the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I wanted to write and express my support for this development. As I am sure you are aware, Ray White has undertaken an extensive and lavishly funded campaign to undermine this proposal which I think is underhanded and unfairly tips the scales in democracy; not all causes are able to have generous financiers backing them. Worse, they are misrepresenting the truth in their flyers. I support the establishment of additional Aged Care facilities in our lovely, quiet and safe suburb. I have personally lived with the hardship of having a loved one in a medical facility a long way from where I live and feel that it's important that our aging population is able to seek care near where they live so they feel safe and secure. I think we can gesture to the nearby Bethesda Hospital as proof positive that such a facility is neither disruptive nor a disservice to it's surroundings, as Ray White alleges the new facility will be. I accuse Ray White of having a special interest in the outcome of this decision as an aggressive property developer. Were we all to live the 'Ray White way', we would all be renters and property would be unattainable except for the very few most privileged. Perhaps they feel that this land could have been better put to use as apartments, no doubt. Thanks for your time.

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**Respondent No:** 550

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 15:00:58 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)**

---

Q7. **My response to the proposal:**

I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

I Object to the above Proposed Development Application by Oryx Communities. My reasons are: 1. The huge building is inappropriate for the area. 2. It is a 24 hour high care facility and not a retirement home 3.Noise problems with ambulances coming in and going out 4. Excessive movements of service providers and staff 5. Traffic congestion and parking problems

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**Respondent No:** 551

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 15:02:44 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

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Q2. **Your address:**

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Q3. **Your email address:**

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Q4. **Your telephone number:**

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Q5. **State how your interests are affected (select all relevant boxes)**

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Q6. **Address of the property affected (if applicable)**

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Q7. **My response to the proposal:**

I object to the proposal

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Q8. **Submission : Please give your comments relating to this item in full below.**

Dear Sirs, As a resident of Nedlands for the last 20 years, I am writing to object to the proposed Residential Aged Care Facility at Lots 10 and 11 (No. 16 and 18) Betty Street and Lots 19 and 18 (No. 73 and 75) Doonan Road, Nedlands. The developer relies on the City's Residential Aged Care Local Planning Policy in seeking approval for an intensive four storey development in a low density residential area. I am deeply concerned that changes made to the Policy which allowed for a significant increase in development capability were not advertised to the public. I do not believe the Policy should be taken into consideration, but if it is, then the provisions changed without public notice should not apply. I also object for the following reasons: 1. The proposal is inconsistent with the Residential Aged Care Facility Local Planning Policy, particularly in regards to its objectives and landscaping requirements. 2. The height, bulk and scale of the proposal is inconsistent and incompatible with the locality. 3. Due to its intensive nature, the proposal will unacceptably detriment the amenity of the locality, particularly in relation to noise, light, traffic and odour. 4. The proposal diminishes the visual amenity of the locality and has not been sympathetically designed to reflect its setting or to mitigate impact. Whilst this has aesthetic consequences, it also creates safety issues for vehicles and pedestrians given the impact on sightlines due to vastly different setbacks between the existing area and the proposal. 5. Car parking and traffic have been inadequately considered or accommodated in the proposal and the likely and reasonable needs of the development have been understated. I urge you not to support this proposal.

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**Respondent No:** 552

**Login:**

**Email:**

**Responded At:** Aug 03, 2020 15:06:02 pm

**Last Seen:** Aug 04, 2020 05:05:11 am

**IP Address:**

Q1. **Your name:**

Q2. **Your address:**

Q3. **Your email address:**

Q4. **Your telephone number:**

Q5. **State how your interests are affected (select all relevant boxes)**

Q6. **Address of the property affected (if applicable)**

Q7. **My response to the proposal:** I object to the proposal

Q8. **Submission : Please give your comments relating to this item in full below.**

Western Australians Against Corruption in Local Government ( previously known as Western Australians for Accountable Local Government ) has several hundred members from across WA. A number reside within the Nedlands local government district. At the behest of members our committee has resolved to write with the following concerns, observations and to register on behalf of our members an objection to the forementioned proposed development. Our concerns and grounds for objection are as summarised below: 1. Objection to the private treaty sale of the site. WAACLG understands that 75 Doonan Road was sold by private treaty to the developer before the land was designated ' special purpose use ' thereby allowing aged care. It is WAACLG's position that the land should have been offered under open market conditions and particularly as the owners of Melvista Lodge ( to the south of the site ) expressed an interest in purchasing the site. 2. The manner in which Council adopted its Residential Aged Care Facilities Policy ( LPP ) on 26 April 2020 without publicly advertising the major amendments made to density, height and plot ratio was not appropriate. There was NO community participation. A local planning policy imposing density is not appropriate - density should be set via a scheme amendment to LPS3. Hence it is WAACLG's overall position that the policy should not apply but should it be given some consideration then those provisions changed without public consultation should not be given any weight. 3. The proposal is in fact inconsistent with the ' LPP ' and particularly so in regard to its objectives and landscaping requirements. 4. The height, bulk and scale of the proposal is inconsistent and incompatible with its surrounds and locality. 5. Due to its bulk and intensive nature the development will be detrimental to the amenity of the locality particularly in regard noise, light, traffic and prospectively odour. 6. From the provided details it can be concluded that the proposal will diminish the visual amenity of the locality. It is not a design sympathetic to its setting nor designed to mitigate its impact on the environment. We note that there are safety issues that arise from the impact on sight lines as a consequence of the vastly different setbacks between this proposal and what is existing. 7. Car parking and traffic issues have not been adequately considered. The likely needs of the development have been understated. Hence WAACLG committee is of the opinion that this proposal does not meet community expectations and hence should not be supported. We thank you for the opportunity to summarise the concerns of our members. Yours sincerely,