

Att:

Roy Wong, Contact Officer

Dept Planning & Infrastructure NSW

16 March 2013

Re: Council Submission by Pitt St Resident

Objections to Environmental Assessment for a Project Application at the Former Rachel Forster Hospital Site, 134-144 Pitt St, Redfern (MP09_0068)

Dear Mr Wong,

I am writing to address the concerns I have with the Environmental Assessment named above. I have attempted to digest the most important parts of the 800+ pages included in the submission, which is a challenge for one person. I acknowledge that some information which I claim has not been provided may in fact be there in the 800+ pages of documentation; it is simply that I have been unable to locate this information and would appreciate your assistance in clarifying those points. Some are more important than others, so I have attempted to put my concerns in order of importance.

I would also like to make clear that I do not object to the development of the site as residential property per se, but as it is a heritage listed item itself and adjacent to two heritage items (130, 132 Pitt Street), I would like to see more design excellence demonstrated in order to make the property a welcome addition to the environment and neighbourhood rather than a weight upon them both.

I would also like to highlight that modifications to the original concept plan from 2007 were sought by State Planning and recommended as conditions of approval of any future project plan. Worth noting in particular: the concept plan for Building 3 was noted as being “not strictly compliant” with the SEPP limits of 3 storeys (and this EPA project plan pushes non-compliance even further); “design excellence is required”; and the consent authority was looking for “ecologically sustainable materials and development” that goes beyond a couple of rainwater tanks and greywater use proposed.

In summary, the specific concerns I have as a resident of the street and area are as follows:

1. There is “scope creep” of the approved concept plan versus this assessment and project plan (despite the argued overall reduction of FSR), especially with regard to Building 3 (Albert st). I would like to know how the new design has achieved an increase in the number of storeys and the number of apartments while reducing their FSR to within the guideline.

2. The dangerous precedent being set for residential amenity through creation of or conversion of existing basement areas to living spaces as opposed to parking or other common spaces, particularly in Building 3 (Albert st)
3. The reduction in size of the dedicated open public space at the front of the property
4. The lack of visible detail of the proposed material finishes in the photomontages (obscured by digital greenery), and lack of information about their environmental friendliness (thermal ratings etc)
5. The lack of realistic scale when showing the relationship of the proposed buildings to the existing streetscape (eg, presenting Pitt St as a 4 lane artery road rather than a quiet suburban street, as pictured on front cover of assessment) and the lack of a photomontage that adequately illustrates the relationship of even bigger Building 3 to the existing streetscape (which was already raised as a serious concern by residents of Albert St terraces at an earlier Town Hall meeting)
6. The lack of direct access to homes from Albert St, as one of the key recommendations of the Director General's Report on the Concept Plan, and the absence of any "townhome" options to be more in keeping with the surrounding architecture/neighbourhood
7. The underestimation of impact on local infrastructure and services (particularly transport); the errors in the facts of the traffic report; and the use of an incompatible model for vehicle flow when looking at peak hour impacts on the Pitt/Redfern St intersection
8. Lack of detail around the extent of bicycle storage facilities will be included in the parking area
9. Addressing the current state of stormwater management in any future design plans

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1. “Scope creep” of EPA vs Concept Plan 2007

I have found it difficult to track the practical changes from Concept Plan through to this project plan, due to an absence of summary detail in the EPA and appendices. In a side-by-side comparison of the existing controls/site, the concept plan and this EPA, I was able to understand the following:

	What exists now	Concept Plan 2007	EPA 2012
Site Area	6,923m2	6,923m2	6,923m2
GFA	?	13,846m2	13,442m2
FSR	?	2:1	1.99:1 (or is it 1.94:1, inconsistent in report?)
Building 1 # of storeys	5	6 + 1 basement (compliant)	7 + 2 basement (non-compliant)
Building 2 # of storeys	2	3 (compliant)	4 + 2 basement (non-compliant)
Building 3 # of storeys (new)	3 (bottom level below ground level)	3 + 1 basement (non-compliant)	4 + 1 basement (non-compliant)
Building 4 # of storeys	-	3 (compliant)	4 + 2 basement (non-compliant)
Total number of apartments	-	150	159
Total number of parking spaces	-	160	170 (11 visitor)
1 bedroom apartments	-	?	67
2 bedroom apartments	-	?	76
3 bedroom apartments	-	?	24
Building #1 GFA / # of apts	?	6,246m2 / ?	? / 67
Building #2 GFA / # of apts	?	1,431m2 / ?	? / 22
Building #3 GFA / # of apts	?	4,546m2 / ?	? / 46
Building #4 GFA / # of apts	?	1,431m2 / ?	? / 14

Unfortunately there remain a few gaps in my information, which would be great to have assistance filling in, so we as residents can make a fair assessment. The issues that stand out are the overall increases in number of storeys (including basement living with poor solar access), and the inequitable weighting of resident numbers in Building 3 when compared to building footprints and proposed levels for the other buildings in the complex.

ACTION SOUGHT: explanation of how reduced FSR was arrived at given increases in all building capacities; reduction of the number of apartments and ensuring the development controls for this site are enforced.

2. Building 3 density and amenity issues.

The existing building on the hospital site that will make way for Building 3 currently reads as a two-storey building from the street (despite the existing basement level) and matches the ridge height of adjacent terraces.

The number of apartments proposed for Building 3 seems out of keeping with the amenity of Albert St, which is already very narrow and primarily made up of 2 storey terrace houses (and 1 storey heritage item on the corner of Albert and Pitt Sts) directly adjacent. In particular the density of the Eastern frontage of Building 3 and the general loss of amenity for new residents to the complex living well below ground level seems a sub-optimal design approach. Visual privacy and acoustic privacy for Albert Street residents both in the new complex and adjacent will almost certainly be a problem given the proposed density, the inclusion of below-ground living spaces, and “high glazing to floor ratios”.

This design appears to attempt to squeeze the maximum number of apartments and people in, with little care for residential amenity or design best practice, in this case. Perhaps the basement spaces could be better put to use as gym, or common areas of some kind, and restricting residence to ground level and above. Or perhaps dual level townhomes could better incorporate the basement living areas as an alternative. I note that direct pedestrian access from Albert St was a modification sought with the original concept plan and I see no attempt at addressing the issue in this proposal. I also note that the elevator shafts rise significantly above approved ridge heights.

***ACTION SOUGHT:** reduction of the density of Building 3; provision of direct access for residents of the new development from Albert St; and improvement in the amenity for neighbouring terraces and buildings in Albert St.*

3. Dedicated public space.

The original concept plan presented a public space with an area of 1,060m² (or 15% of site area) with 15 of 19 mature trees being slated for removal. With the new proposal, the public space has been reduced to 615m² (or 9% of site area), presumably to increase poor solar/acoustic amenity between Bldgs 2 & 3 proposed in the original concept plan. This represents a significant reduction in scale of the original commitment of the developer, and thus it will reduce neighbourhood and residential amenity. Perhaps as a compromise for this reduction in the public space commitment, the developer could be required contribute some common space in the form of childcare, for example, or contribute further to the funds for local infrastructure improvements.

***ACTION SOUGHT:** increased contribution to local infrastructure if public space commitment is reduced.*

4. Photomontage obscuring materials

At the town meeting held prior to this proposal being submitted, some resident complaints were raised by local area architects about the quality and sustainability of the materials being used in the new build. I can't see any changes visible in this new proposal, I cannot find information in the submission about sustainable materials, and it is difficult to even guess at the materials being used in the photomontages because of the digital greenery obscuring them. Without mature plantings and mature trees, this development would look very different and it would be helpful to be able to assess the materials in light of more information.

***ACTION SOUGHT:** photomontages without trees to assess quality of materials chosen; more detail on sustainability/passive thermal control of selected materials to reduce need for air conditioning units, energy waste.*

5. Photomontage scale problems

The primary photomontage in the current proposal pictures Pitt Street as a 4 lane artery road and appears misleading in terms of scale and bulk of buildings as they would appear in reality on this suburban street. There is also no view from Pitt Street looking down Albert Street to gauge the effect of the development on Albert St residents.

***ACTION SOUGHT:** 2 new photomontages – primary photomontage with more realistic streetscape width/context and Albert St view West.*

6. Access from Albert St and home type

To ensure adequate surveillance of Albert Street and to fit with the terrace typology, it was a recommendation in the concept plan assessment that there be direct access to Albert Street and a condition that “new development responds to the predominant terrace house typology along Pitt Street”. The proposed design does not do this. Albert St would be the perfect place to incorporate this request, through a mix of apartment and townhomes in Building 4. This would offer more active surveillance, diversity of choice (4 bedders?) for prospective buyers in the complex, would make the street feel more connected as a neighbourhood and has been demonstrably successful in the nearby 114-124 Pitt Street development.

***ACTION SOUGHT:** design changes to reflect recommendations from Director-General's report regarding Albert Street pedestrian access in the approved concept plan.*

7. Traffic and infrastructure impact.

I estimate from the number and type of apartments being proposed that the population increase will be somewhere in the order of 350-400 new residents, with a percentage being children in the 2 and 3 bedroom apartments. I believe the impact on local infrastructure like childcare will be noticeable. Traffic, too, is of particular concern, and I believe that modifications will need to be made to the traffic signal at the corner of Pitt/Redfern Streets to cope with increased incoming/outgoing traffic at peak hours. There is a childcare centre across the road from the site and many elderly people living in the surrounding terraces, so continued efforts should be made to reduce car use and calm traffic.

I note that the traffic report erroneously refers to existing “LEFT-TURN PERMITTED ON RED signage at signalized intersections of Pitt/Redfern Streets”. These do not currently exist, though if they did, it would perhaps assist in funneling traffic out of Pitt St during peak times.

The report also refers to a comparative metric of St George and Concord Hospitals, which are both busy emergency hospitals, which I would argue do not constitute a fair comparison. According to local residents I have spoken to who lived in the area when it was fully operational, Rachel Forster had the traffic impact of a busy nursing home, not a major hospital located on major arterial roadways.

I note that the proposal only includes 11 visitor car spaces, which is far fewer than the 26 recommended by the traffic report. I also note that only 139 resident spaces are required by law, where 159 are proposed. In order to reduce traffic and pollution and increase liveability, shouldn't we be discouraging vehicle use and encouraging use of public transport, share cars, walking and bicycling? I suggest the number of overall carspaces be reduced to the minimum requirement, the number of visitor spaces be increased to not place extra burden on already crowded street parking and repurpose the difference as secure bicycle storage.

***ACTION SOUGHT:** increase visitor carspaces to 26 (from 11), reduce resident carspaces to 139 (from 159); convert the 5 remaining proposed carspaces for secure bicycle storage (which would allow for at least 50 bicycles as a starting point); modify the Pitt/Redfern street intersection at peak hour.*

8. Bicycle storage.

There is a lack of detail of proposed bike storage in the new development. With nearby access to the Sydney cycleway on George and Bourke Streets, it is important to encourage cycling as an alternative to private vehicle ownership. For a complex that will likely house around 400 men, women and children, it seems reasonable to expect the complex to cater for storage of 200 bicycles (which would take up 15-20 carspaces).

***ACTION SOUGHT:** incorporate secure bicycle storage facilities for at least 200 bikes into proposed design.*

9. Stormwater management.

Currently, 124-134 Pitt Street (a complex of about 30 townhomes and apartments) pumps out their stormwater discharge twice daily, which flows in great quantities south down Pitt Street, past Rachel Forster and into a stormwater drain near the rear-to-kerb parking outside the redbrick apartment complex next door. At present, there is moss and other plants growing in the gutters and a permanent pool of water and silt accumulated at the corner of Pitt and Albert Streets. I imagine that Rachel Forster will need to pump vastly greater quantities of water into the same stormwater system, so I would ask that this be taken into account when planning for stormwater management.

***ACTION SOUGHT:** incorporate and coordinate with timings of existing substantial stormwater loads on Pitt St drains.*

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