

**Scottish Hospital, 2 Cooper St, Paddington - Paddington
MP10_0016 - Project Application for Seniors Housing and Care Facility
2 Cooper Street , Paddington**

I write in relation to the above application to register objection to the proposal on a number of grounds –

Urban Form

The impact of the proposal is inappropriate in the local context -

- It is an over development of the site.
- The building form fronting Brown Street is too high and intrusive, being of substantial bulk. It is out of scale with the local character and will dominate and overpower the local heritage streetscape.
- The design has made no effort to respond to the Paddington heritage and local context, with an appearance which is generic to apartment buildings throughout Sydney. It presents large expanses of glass, metal cladding and "Thredbo grey" sandstone. These are clearly inappropriate.

This is difficult issue for the community to accurately judge, as the photo montages provided with the application are of no use, even potentially misleading, relying on tree cover to hide the building, cover which will take many years to mature to that height and may not eventuate.

I request that the Department refer the application to the Government Architect's Office for independent review.

Justification of Bulk and Scale

As the stated basis for imposing an inappropriate development, the proponent should be required to substantiate its claim "*that the financial viability of the scheme relies on funding from the independent living units to offset 45% of the aged care beds as concessional beds*". I request that documentation of this claim should be independently verified. In respect to commercial confidentiality, the information does not need to be publically released, just an independent opinion on the validity of the claim.

Proposed Dwelling Mix

The application states that "*The size and apartment mix was dictated by the market demand analysis undertaken.*"

It is my opinion that the "demand analysis" is a marketing study and does not constitute a housing demand study. It does not utilise accepted methodologies, such as that of NSW Housing's Centre for Housing Affordability. Surprisingly, it makes no reference to the federal benchmarks for the planning of aged care delivery, benchmarks which incorporate ILU provision and upon which their funding allocations are based.

Critically, it provides no data on what the makeup or composition of seniors living within the LGA (eg, their ages (simply providing one figure for people over 65,

ignoring that people 55 and over could enter the facility, and that people over 70 don't move into ILU's), their living arrangements, their living arrangement and family structure, their incomes, where they live, etc).

Without such information and understanding an assessment of the demand side of the housing market cannot possibly be undertaken. It provides no planning basis to conclude that -

the mix of apartments will be critical to both the initial success of the development and the long term operation. One bedroom apartments should be restricted to 5% to 10% of the total apartment numbers. The remainder should be a mix of 2 bedroom apartments (30% to 40%) with 2.5 and 3 bedroom places comprising the remainder. The critical 2, 2.5 and 3 bedroom apartments should comprise an overall area in the range of 95 to 140 square metres, all with 2 bathrooms.

The report provides no evidence or justification to conclude a 5% limit on one bedroom dwellings. Such a conclusion is not only contrary to accepted academic research, but also an understanding of the housing needs of seniors in the Eastern suburbs. Many elderly residents have been living here for many years. Their incomes do not reflect property prices. There is a need to provide an opportunity for local asset rich cash poor elderly to down size, letting them remain here near their networks and services and also freeing their homes up for more appropriate use by families. There is a shortage of smaller, more affordable 1 and 2 bedroom units to meet their needs.

The marketing basis of the proponent's study is demonstrated by the statement that "*The size of the accommodation is also commensurate with nearby accommodation.*" That is, the proposal will reinforce existing issues within the housing market and does not respond to actual need.

The proponent should be required to commission an adequate housing study which justifies the dwelling mix they propose.

Assessment of Traffic Impact

I have reviewed the Traffic Assessment (TA) prepared for the proponent.

The traffic analysis has not considered the cumulative impact of new and proposed developments in the vicinity including the Advanx Residential Site, Sydney Grammar rezoning, the Department of Housing site in Lawson Street, or the potential redevelopment of White City.

The submission documents acknowledge that this is the case, but do not provide any credible explanation as to why cumulative impacts do not matter in this case.

The Advanx site alone (which will soon complete construction) will have around 2,760 sqm of commercial/retail uses and 218 dwellings.

It is also my view that the traffic generation rates utilised by the TA are too low. I understand that the research upon which the RTA based these rates was undertaken in 1981. There have been momentous changes in the nature and composition of seniors since this time. Their lifestyles have dramatically changed as incomes have increased and baby boomers have entered this age group. With this their use of private vehicles has also increased.

I also note that there is no requirement that occupants of the development be retired. In fact, given likely dwelling price points, and the stated target market, it is likely that many will need to be in the workforce.

An appropriate approach would have been if the TA determined rates of traffic generation via a survey of similar developments in the locality. This has not been done and I request that it be required.

The TA has underestimated (1) traffic levels at the time the site is occupied and (2) traffic generation rates and accordingly greatly underestimated the impact on surrounding streets and local amenity.

This is important as the traffic surveys identify that parts of the local road network are already operating beyond capacity.

Also note that the TA states that "*Ideally traffic flows on a local road should be below 300 vehicles per hour and on collector roads below 500 vehicles per hour.*" Rather it is my understanding that the RTA guide states that for collector roads the Maximum Flow is 500 vph in the peak and that the Environmental Goal is 200 vph in the peak.

Parking

In order to preserve local amenity, it is important that the Department condition any approval so that the future residents of the development are not eligible for off-street parking permits. The supply of parking in the locality is inadequate.

Construction management

It is important that the Department condition any approval so that the proponent is required to consult the community in the formulation of a construction management plan.

Yours sincerely,

James Lette

48 Brown Street Paddington

I declare that I have made no political donations in the last 2 years.