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Director, Strategic Assessment  
Department of Planning  
GPO Box 39  
SYDNEY NSW

**Scottish Hospital, 2 Cooper St, Paddington - Paddington  
MP10\_0016 - Project Application for Seniors Housing and Care Facility - Exhibition**

The National Trust provided detailed comment on earlier proposals for the development of the Scottish Hospital Site at 2 Cooper Street, Paddington. On 30 May, 2000 the Trust indicated that it did not support the then Integrated Development Application for the site and on 23 November, 2001 the Trust opposed a new Development Application and repeated many of its earlier comments.

The current Development Application is in the form of a State Significant Development, and the Trust has examined this proposal in terms of those earlier concerns and objections.

**The Significance of the Site**

The Scottish Hospital site is significant because it is the sole remaining, intact gentry estate in Paddington. One of the most important aspects of the site is its central terrace gardens, the large mature trees, and the grassed lawns. The villa, once known as *The Terraces* because of the series of terraces constructed down the slopes in front of it, survives partly as an example of a late 1840s villa.

This property was one of the first subdivisions of the estates granted by the Governors of NSW to the colonial gentry along the ridge and slopes above Rushcutters Bay in the 1830s. Today the original 1849 villa and its grounds are still intact within the 1847 subdivision.

The grounds have aesthetic significance for demonstrating the landscaping practices and tastes of the Victorian gentry with their quest for self sufficiency in vegetables, fruit and flowers, their preference for rainforest trees and their construction of sandstone terracing. The mixed planting of evergreen and deciduous trees and shrubs, together with the vistas and views have produced a landscape with considerable character which is in contrast to the highly developed urban surroundings.

The conversion of the villa to the private hospital in the Arts and Crafts style is regionally representative of the gentry mansions and grounds converted to institutional uses at the turn of the century. It survives as a rare, continually functioning hospital still able to operate within its original buildings and grounds.

The Scottish Hospital site is within the Paddington Urban Conservation Area listed on the National Trust Register in 1984. The reasons for listing of this Area noted that "Paddington makes a major contribution to the heritage of Sydney and its urban form and it was here that local residents first banded together to prevent the character of their suburb from being destroyed by unsympathetic development."

The Scottish Hospital site was also listed on the Register of the National Estate as part of the townscape of Paddington, and in the Woollahra Local Environmental Plan as 2 Cooper Street, Paddington, Scottish Hospital – main hospital building, grounds, gardens, terracing, three Moreton Bay Figs, Port Jackson Fig, Norfolk Island Pine, Weeping Lilly Pilly and Holm Oak. These trees, as well as a Kauri Pine, are also listed on Woollahra Council's Register of Significant Trees. The site is also within Woollahra Council's Paddington Heritage Conservation Area.



The National Trust makes the following comments relating to the project's impacts on the heritage significance of *The Terraces* and the Trust's Paddington Urban Conservation Area: -

1. The Trust welcomes the preparation of a Conservation Management Plan for the site. Such a plan had not been in place when the earlier development applications were considered.
2. The Trust welcomes the preparation of an Urban Design Report to accompany this project application which should set the proposed development in the context of any relevant building types in the area.
3. The cultural landscape components of the site comprise the various layers of interventions across the landscape and the most significant of these appear to be the early (vineyard) terraces and other evidence of layout together with the oldest trees. With regard to the significance of the terraces, both the Musecape and Casey & Lowe reports are in agreement. The Statement of Heritage Significance in the Assessment of Archaeological Impact by Casey & Lowe Pty Ltd states that the "remains of the nineteenth-century garden are likely to be unique within the local area and part of a rare resource generally. The Musecape Landscape Heritage Impact Assessment finds that "the surviving section of terraced garden and the large mature trees on the site have exceptional / high historical, aesthetic and social significance for the area.

These two reports then come to very different accounts of how the development will affect these unique and rare terraces --

*Musecape: "The proposal provides ...for the retention and interpretation of the terraced slope to the north of the historic building" (does this mean the retention of the terraces?), and*

*Casey and Lowe: "The proposed development will impact on the whole area once occupied by the terraced garden. Most of the remains will be removed".*

In the National Trust's view, if the terraces are of such significance as to require archaeological excavation and recording, then they are sufficiently important to be conserved, intact in their entirety.

The Musecape report conclusions do not appear to be based on any demonstrable parameters or evidence. The "considerable changes to the landscape" in the description of the development becomes "acceptable change" in the conclusions, with no indication of how "acceptable change" is measured. This conclusion appears to be subjective and explains why others with equivalent qualifications and experience have come to very different conclusions. These conclusions must be evidence-based to be relevant to the development and heritage assessment process.

Neither the Musecape nor the Casey & Lowe report definitively set out what gives the site its cultural significance. The fabric and layout that make up the cultural significance of the site should have been clearly indicated on a plan. Both reports fail to explain how the loss of the site's "unique" feature is not a major problem.

The Musecape report argues that the place qualifies for listing on the State Heritage Register and acknowledges that "the surviving section of terraced garden and the mature trees .. have exceptional/high historical, aesthetic and social significance for the area". The report fails to demonstrate how this significance can be retained if the development, in its present form, were to proceed.

If the assessed high level of cultural significance of this place cannot be retained, then the documentation supporting the development must acknowledge this. The most significant features should be fully retained and properly conserved, not demolished. The development proposal is intending the latter but seeking to indicate that it is doing the former.

In view of the extent and area of proposed excavations, it is difficult to understand how some of the existing trees which are proposed to be retained could remain viable, for example T119 (the large Kauri Pine) and T81 (a large Holm Oak). The deep excavation would almost certainly have adverse impacts on the watertable and this would manifest itself in impacts on the root system of the Kauri Pine and there is likely to be resulting canopy dieback.

The Tree Wise Men tree assessment is an acceptable arboricultural report but it is not a heritage assessment. The site has not been examined and assessed to reconcile which trees relate to each phase of use / ownership - the site's historical chronology. A thorough landscape conservation analysis would have done this. Trees of historical importance don't necessarily accord with trees that are horticulturally impressive, and vice versa.

It is also disturbing to find that the "Tree Protection Plan" proposes the removal of 88 of the 144 trees on the site (61%). An aerial photograph made available to the Trust illustrates the impacts of the planned tree removal and the remaining tree canopy cover. It is also proposed that the trees to be retained will also be pruned back 2-3 metres from the buildings or basement construction to allow for piling equipment operation and additional space for building construction. The level of adverse impact is, in the Trust's view, unacceptable.

4. The Trust repeats its earlier concerns in regard to the terraces. The terraces proposed are different in number, nature and scale from those in the original estate. The new terraces will cover the original terraces and will be different in configuration. Why attempt to interpret the original terraced forms lying below with new overlays when they already exist? Replacement of the terraces with a terraced development is totally inappropriate as an interpretation of the terraces and would result in the loss of a highly significant part of the garden
5. The Scottish Hospital site is one of the few park-like open spaces with mature 19<sup>th</sup> century trees surviving in Paddington, the key heritage values of the site being its central terraces, gardens, mature trees, expansive grounds and open space. The Musecape report contains a comparative analysis of three extant Colonial vineyards but does not follow this up with any conclusions.

The report does not acknowledge that the terraces at the hospital site are the remains of a Colonial vineyard. There is no discussion on how this site compares with its western counterparts and no conclusion that it is also of significance. In the Trust's view, the comparative analysis does confirm that the hospital site is certainly more than just important at a local level. It is very important at a State level as evidence of Colonial vineyards (particularly within suburban areas) which are very rare and highly significant.

The Casey & Lowe report is dated November 2010 while the architectural plans are dated June 2010. An archaeological assessment and findings should be completed before site planning so that significance can inform the development. In this instance development aspirations appear to be dictating the removal of landscape with consultants being placed in the position of trying to deal with the consequent loss of significance.

With this development proposal there appears to be a breakdown in the normally accepted process of cultural landscape conservation analysis. The Musecape report doesn't have a cultural landscape conservation analysis as it is a Heritage Impact Assessment. The NBRIS report would not do this as it isn't concerned with cultural landscape assessment. Normally there would be a thorough analysis of archival documentation, especially photographs, but also historic surveys, plans and written accounts which would then be used to reconcile early evidence with what presently exists on the site to determine integrity. This is an important phase that seems to be missing and, had it been included, would have helped clarify cultural value and, through a Conservation Management Plan, would have provided clear management policies.

The Casey & Lowe report indicates that the terraces are either buried (which means they still exist and could be conserved) or modified, but with no explanation as to the extent of the modification. Could the terraces be restored / reconstructed to enhance significance or is the modification so minor that it doesn't matter? From either viewpoint there is no justification for removing them. In fact, no convincing justification has been offered in either report on why the terraces (unique in the eastern suburbs and rare nationally) need to be removed.

Relocating the early pathway is not good conservation practice and is only condoned in the Burra Charter in extreme circumstances - this is not such a circumstance. The fabric and layout of high significance should not be re-organised and moved around the new development because this would not retain the cultural value of the place.

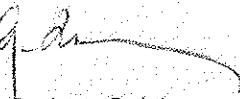
The proposed 9 storey Brown Street independent living units building, the four storey Cooper Street "Gatekeeper's Lodge" independent living units building, the six storey Stephen Street residential aged care facility and the five storey Stephen Street independent living units building will greatly reduce the important cultural landscape setting of the Scottish Hospital. The grounds are important as a curtilage for the hospital and have streetscape values and local amenity value.

6. The four new self-care buildings ranging from four to nine storeys in height will dramatically reduce the visual flow and permeability between the park-like north garden and the surrounding area of Paddington, especially Dillon Reserve and Stephen Street. The significance of the grounds as a remnant gentry estate requires that the views within the site from the original villa over the terraced gardens to the north towards Rushcutters Bay remain. The sense of enclosure of the gardens with the ring of dark foliaged trees to Stephen Street and Brown Street should also remain.

7. The view from Brown Street will no longer be dominated by tree cover. The nine storey ILU building will be only partly shielded by the new plantings. The upper storeys will be visible and even the entire building will be visible when viewed from the park at the closure of Glenview Street. The Brown Street apartments will be 14 metres taller than the existing nursing home. These buildings have a bulk, mass and style which are incompatible with the Paddington urban context.
8. The view lines from Stephen Street (203-40, 401-40 and 803-40) clearly indicate the loss of vegetation cover involved with the construction of the six storey RACF building and the 5 storey Stephen Street Building. These buildings have such a massive footprint that only small replacement trees can be planted along Stephen Street. All of the trees along the Stephen Street frontage from Cooper Street to Glen Street are proposed for removal, many of which are large, mature trees. The buildings proposed are too large and too close to the streetline for effective landscaping. Three 3-D photomontage views clearly show the major impact on the landscape along the Stephen Street frontage (DA604 View 4 - StephenSt.pdf, DA605 View 5 - GlenSt.pdf, DA606 View 6 - GlennSt-Stephen.pdf). None of the major trees along the Stephen Street frontage should be removed and a ten metre setback should be established to protect these trees. The original gully line passed through this site and is the topographic feature which fosters the present luxuriant tree growth which provides ecological benefits and a corridor for fauna such as possums, bandicoots and birds in an otherwise densely populated urban area.
9. This new development proposal appears to be considerably larger than the earlier 2002 scheme (perhaps up to 50% larger). With the 2002 scheme, Woollahra Council approved 13,600 sq m (FSR 0.9:1).
10. The provision for the underground car parking to a depth of 16 metres is excessive. The current proposal would allow for more than 200 cars when the 2002 proposal approval was for only 73 cars.
11. Elements of the main hospital building that are of greatest significance include the verandah and balcony on the northern elevation, the four main northern former reception rooms on the garden level and the four main former bedrooms with bay windows on the first floor level. Details such as original hardware on doors and windows, joinery dating from c1848, 1901 and 1936, the main entrance door and associated windows, and chimney pieces are also of significance.

In conclusion, the National Trust believes that this development proposal is an overdevelopment of this site in Paddington and appears to be predicated on the basis that open space in this area is undeveloped building space. The Trust would contend that the gardens and existing landscape are important features of Paddington which should be valued and respected. We do not suggest that no development is possible on this site but this proposal is excessive and should be rejected in its current form.

Yours sincerely,



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