

64

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CC: <jvrichardson@optusnet.com.au>
Date: 17/12/2010 9:36 am
Subject: Scottish Hospital 2 Cooper Street, Paddington, Environmental Assessment for Seniors Living Development, MP 10_0016
Attachments: THE SCOTTISH HOSPITAL Objection 1.doc

Dear Shivesh,

Please find attached our objection to this project.

We have made no political donations.

Regards,

John

John Richardson
Director

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Our office will be closed from 5:30pm Friday 24th December 2010 and will reopen on Monday 10th January 2011.

We would like to take this opportunity to wish you a Merry Christmas and a Happy, Safe and Prosperous New Year.

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**Att. Director
Strategic Assessment
Department of Planning
GPO Box 39
Sydney NSW**

**Re: SENIORS LIVING DEVELOPMENT at THE SCOTTISH HOSPITAL
2 Cooper St., Paddington MP10_0016, Part 3A**

As residents of Stephen St and lovers of Paddington we are submitting our objection to the proposed development at the Scottish Hospital Site. We will present our argument under the following headings.

- Site Suitability
- The Garden and Grounds
- Buildings - Siting, Bulk and Scale, Built Form
- Traffic
- Impact
- Utilities
- Consultation

In general, we object the scale of the proposed development, the destruction of a heritage site and the disregard for the amenity of the local community all for the addition of just 12 aged care beds.

Site Suitability

This is not now, and never will be a good site for housing the elderly, where ease of access is a fundamental requirement. This site is situated at the bottom of the Paddington slopes, meaning access to all services, even the closest bus stop, requires a steep up-hill walk. It was amusing to read in the developers submission the rather quaint suggestion, that to go to the post office or bank, one merely has to walk 290m to a bus stop, twice the distance necessary, as the path gradient to the closest stop is too great, and catch a bus to Woollahra or Bondi junction, an excursion that could take ½ day and impossible for the infirm.

Climate is the other problem with this site— being essentially in a gully it receives very little winter sun – it is cold. Old bones need the sun! The height of the proposed buildings will only increase the problem, casting shadows over the central open space morning and afternoon, but particularly in the afternoon .

The bats are also a problem, but they will probably disappear with the trees!

The Garden and Grounds

As the last remaining largely in-tact gentry estate, this site is of huge significance to Paddington and eastern Sydney. The garden is what it is about – the house being but a part of the whole. In fact the house without the garden would be of little significance. The developer has focused on the house and seems not to understand the importance of the garden.

Over the years the Church has allowed the garden sink into an awful state of disrepair, just through sheer neglect, and now seeks to almost completely destroy it. In the words of their own arborist, " A significant feature of the site is the heavy woody weed invasion and a general lack of grounds maintenance undertaken clear of the functioning buildings over recent years."

Of the 144 assessed trees on the site 88 are to be removed, of these 72 are healthy trees.

Of the original 9 heritage listed trees, 1 has gone 1 is to be removed and 4 will be under serious threat with buildings sited within their TPZ (Tree Protection Zone) and branches to be pruned to allow for building and /or construction under their canopies.

If buildings are sited within TPZ's, it stands to reason that, construction zones will be much more invasive.

For example –T18 -the Port Jackson Fig situated on the lower lawn – arguably the most important tree on the site with a TPZ radius of 15m is to have the a basement carpark wall 7.5m from its trunk. Excavation in sand and pile driving will undoubtedly encroach a deal further than this.

The completed building –Stephen St. ILU –at a height of 15m, will encroach 7m into its TPZ and its canopy will require pruning, to accommodate this.

According to the arborist's report, 7 of the retained trees will have piling or shoring within their canopy spread.

Another listed tree, the Kauri pine –T119 to the west of the existing nursing home building, is one of these, showing building within 5m of its trunk. The arborist calls for a TPZ of 15m and a SRZ radius (structural root zone – where earth works should be prohibited) of 5.5.

Similarly, the Norfolk Island Pine- T100, and the Holm Oak- T81, in the south western corner of the site will be under threat with the construction of the "Gatekeepers Lodge" within the TPZ of both these trees.

These heritage trees are fundamental to the garden – if they go the garden is gone.

To ensure their survival, there should be no construction work of any sort carried out within their TPZ's .

A close look at the arborists report and plan show the majority of trees to be retained are on the western side, or Brown St side of the site, with a few on the lower lawn and terraces, all others are to be removed, including every tree along Stephen St except for two at the north east corner . If you draw a line through the middle of the site from north to south the only tree remaining of any size on the eastern side is the listed Port Jackson Fig. This rather makes a mockery of the statement on P80 of their Policy Assessment. To quote,

"Locating the built form between the trees to enable the maximum retention of vegetation is a positive outcome as it maintains the current landscape character around the site, mitigates the visual impact of any development and continues the visual and heritage contribution of the site to the surrounding area."

This statement is blatant rubbish and an insult to the intelligence. An existing wall of trees along Stephen St. is to become a wall of buildings with no chance of planting a substantial screen due to the limited space left between building and boundary and the basements below ground .

Statements that the trees will be replaced are nonsense – where the trees were, there will now be buildings.

Another threat to the trees – the basement parking stretching across the site will interrupt natural ground water flows- resulting inevitably in changes to the water table. This must have an adverse effect on the trees to the north of the basements, possibly also affecting trees below the site.

The most important part of the garden is the terraces to the north of the house. We know little of these as they have been hidden from public view for many years, but the developer's own experts

agree "the terraces at the Scottish Hospital site are rare if not unique in the eastern part of Sydney...." and "the.... site has exceptional and high cultural landscape heritage significance....". And yet the terraces are to be demolished.

The fundamental question here is, if 88 of the 144 trees are to be removed and the terraces are to be demolished, can we call what remains a garden, let alone one of historical significance? What significance is left?

The Buildings

Siting In terms of planning principles, the decision to locate the RACF building immediately adjacent to the most populous section of the surrounding neighbourhood is an extremely poor one. The position of the existing is perfect, set well into the site and screened by trees on the Brown St. boundary where there are few overlooking neighbours, it has little or no impact on the local residents.

This is a site usage with very high impact, proposed to be located very close to the boundary across a quiet, 10m wide cul-de-sac from 61 apartments. So close to the boundary as to make any planting of substantial screening impossible and with commercial kitchen, laundry and garbage store with attendant loading bay directly opposite, it is the worst possible outcome for 100+ local residents. We understand the need for staging, but this is their problem and should not be one the community has to shoulder.

The siting of the Stephen St. ILU so that it blocks the view from Dillon reserve into the terraces and removes the view into the garden down Glen St. runs counter the initial planning principles and all requests by the community.

Scale Next to the destruction of the garden this is the most contentious issue. The scale of the new development is such that it completely overwhelms the existing heritage building and negates the heritage significance of the garden.

Why do the developers think that they can exceed the 9.5 m LEP height limit at all, let alone by as much as almost 20m in the case of the Brown St. ILU building and over 10m for the RACF building on Stephen St. - a wall of building replaces a wall of trees. Even the so called Gate Keepers lodge exceeds the limit by 3-5m.

They consistently sight 40 Stephen St as an example, which, along with 176 Glenmore Rd to the south and a number of nasty walk ups were built at a time when Paddington was not a heritage suburb and was ripe for re-development. Fortunately, this is not the case today – the predominant height of surrounding buildings is 2-3 storeys - not 6 and 9.

The volume of building is also excessive, floor areas exceeding that of the previously approved development by 45%.

The proposed buildings do not comply with many aspects of the Paddington DCP, 2008, in particular 4.1.8, C3 "The height, bulk and scale of infill and new development must be consistent with the predominant height, bulk, form and scale of appropriate adjoining buildings. Conformity with adjoining buildings is not appropriate in circumstances where the development site adjoins a building which is a substantially taller landmark building or a building which is considered to be intrusive due to its excessive height and incompatible design."

Built Form is heavy handed and ponderous, with messy detailing and the use of far too many materials on facades in an attempt to try to reduce its visual scale. It is completely out of context.

In general , too high, too bulky, poor architecture showing blatant disregard for both its heritage site and its neighbours. It does not comply with the Woollahra council LEP Height limit or the Paddington DCP , 2008, clauses 4.1.8, C3 (see above) and 4.4 Infill Development, O1,2&3, C2 Character,C3, Scale, C4, Form , C11- most important-“ Infill development must be sited to have no adverse impact on significant trees on the site..” and ,C12, ‘Materials, finishes ,textures and colours must be appropriate to the historic context .”

Traffic

In regard to the developers transport assessment a correction needs to be made. In the description of the local road network, Stephen St. is described as being relatively wide for a local street with one parking lane and one traffic lane each way between Lawson and Glen St. In fact, Stephen St. narrows at about the Scottish Hospital northern boundary to become only one travel lane with parking each side up to Glen St. From there it continues to the southern end cul-de-sac with only parking on one side due to a narrower carriageway, wider footpath.

Not mentioned in the assessment is the fact that Glen St. also narrows at the eastern or Goodhope St end to become one travel lane and one side of parking. These are the streets that are to take service traffic for the RACF - streets that for the most part can only take traffic in one direction at a time and in which larger vehicles often have difficulty manoeuvring.

It is not so much the increase in traffic that is worrying it is the fact they will all be larger vehicles and large vehicles simply do not work in these streets. The assessment compares the increase in traffic generation to that if there were 8-10 new terrace houses here - “The traffic generation of the loading dock would not be numerically inconsistent with that of prevailing other uses in the area.” Patently nonsense, 8 – 10 terrace houses are not going to generate 7-8 truck visits a day.

The loss of two on street parking spaces in an area where few residents have off street parking is not acceptable.

Reference to a re-activation of a disused hospital loading bay on Stephen St. is quite baffling – there is absolutely no evidence that such a loading bay existed.

Impact

As argued above the impact of this development on the garden and the heritage significance of the site will be devastating. Less obvious and barely touched upon by the developer is the impact it will have on the local residents, in particular those living at the southern end of Stephen St.

The impact of the construction phase with months of noise, vibration and dust of jack hammering and pile driving for the construction of 2 levels of basement, 12m deep, on their doorstep, and that will just be the beginning.

When completed there will be the impact of

- Loss of outlook - a view of trees will be replaced by a 20m wall of building. The developers argue that as “the site is not zoned as open space there cannot be a reasonable expectation to retain such an outlook into vegetated areas.” But as the site is a heritage garden they could, at least expect that some trees might remain, and considering there is a 9.5m height

limit in the area they could reasonably expect any new building to be within this limit. The fact that this building with its double basement is sited as close as 2.4m from the Stephen St boundary means that no adequate planting can be accommodated to lessen its visual impact.

- Overshadowing – significant reduction of available sunshine on winter afternoons.
- Lack of privacy with overlooking from rooms and balconies facing the street. With 17.4m between the RACF and #40 when the code minimum is 18m. This is played down in the EA – these rooms overlooking Stephen St will be “occupied by frail residents.” These frail residents will probably spend most of their time in their rooms and a lot of this looking out the window. Plus nurses, carers, visitors.
- The constant noise, fumes, odours, escaping vermin, etc. from the commercial kitchen, laundry and garbage store with attendant ventilation and AC equipment situated only metres away from their front entrance.
- Service truck traffic in a narrow cul-de-sac and network of streets too narrow to take it.

Utilities

An aspect barely considered is the impact of the extra volume of sewage on an antique and already groaning system. It is proposed that sewage from all proposed buildings on Cooper and Stephen Sts be directed to the existing system in Stephen St, i.e. 140 odd residents and 26 staff, plus a commercial laundry and kitchen, and their report just assumes that “...existing sewer mains will be sufficient for connection.” A little investigation would reveal that the sewer line in Stephen St is the source of strong sewage smells on a fairly regular basis – perhaps a sign that the system is already not coping.

Consultation

The so-called consultation process was a farce - ‘consultations’ were merely presentations of the intended development. Any expressed objections or criticisms were either ignored – or some dealt with by a little fiddling around the edges, but not enough to make any real difference.

The photo-montage images of views around and into the site were so obviously fudged they were insulting. Devices used were - covering buildings with non-existent trees - not using 50mm aperture (human eye) so that views are broadened, streets appear wider and buildings lower than they actually are - rendering of proposed buildings so that they appear to recede into the background - views taken from positions where development appears to have less impact eg. view down Glen St would have been more revealing taken from the other side of the street.

Views of the Brown St buildings are from either end of the site or from Glenview St, screened by trees, in the odd case real, but mostly fictitious or trees that are to be removed, not one from where the building could be seen in all its glory. This is a nine storey building – and yet if you believe the spin you will not see it from anywhere. In none of their images was the real impact of these buildings shown.

It would have served them better to have engaged with the community in an honest way – they have fooled no-one, just insulted.

They started with a lie - the fictitious cost estimate of \$100m which enabled them to bypass the council and local community – we were angry then, we are even angrier now as all hopes of the consultation process improving the outcome have well and truly faded.

In conclusion we object to;

- The loss of 61% of the site's trees and threat to others
- The destruction of a heritage site
- The height and bulk and depth of the proposed buildings
- The lack of setback to surrounding streets
- The disregard for the amenity of local residents
- The introduction of service traffic into local streets
- Lack of meaningful consultation
- The dishonesty

All for the addition of just 12 aged care beds

We confirm we have made no donations to any political party at any time at all.

Yours Faithfully

John and Virginia Richardson

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