

Manager
Planning Assessment
City of Sydney
GPO Box 1591
Sydney NSW 2001

dasubmissions@cityofsydney.nsw.gov.au

Dear Manager

Re: DA: D/2023/21, 82 Wentworth Park Road GLEBE NSW 2037
Attention: Mathew Girvan

Number 82 Wentworth Park Road is a social housing complex which was specially designed by the NSW Housing Commission's Inner City Housing Team in 1984 to fit in with Glebe's Lyndhurst Heritage Conservation Area. It is classified as a NEUTRAL building in the 2012 City of Sydney Development Control Plan.

The Glebe Society objects to the proposed development on three grounds:

1. It is not the most effective way of increasing the supply of affordable housing in Glebe

The applicant's rationale for the proposed development is *to increase the supply of affordable housing in the local area* [Statement of Environmental Effects, FDR Planning on behalf of the NSW Land and Housing Corporation].

It involves demolishing a well-built building which is less than forty years old containing 17 apartments with a total of 27 bedrooms. It is to be replaced with a building which contains 43 apartments with 53 bedrooms. The estimated cost of the project is \$21,723,996. The net increase in accommodation is 26 bedrooms. The cost per additional bedroom is \$835,538. This is very expensive.

The existing site includes a large amount of open space (see fig 1 below). John Gregory the original design architect for 82 Wentworth Park Road has provided written advice to the Glebe Society that a more cost-effective way of increasing the supply of affordable housing would be to refurbish the existing building and provide sensitive additions on the site which could include a lift.

Mr Gregory's advice is set out below.

I. What would an approximate cost be for refurbishing the existing 27 apartments?

The costs can vary enormously (\$30k to \$200k if you believe the internet) but given the building is solid and well-built with services intact I think a reasonable allowance is \$70k per unit and \$100k each for the five terraced houses. This provides a new kitchen and fitments, new bathroom and fitments plus a complete freshen up of the living and bedrooms. Total would be (12 x 70k)+(5 x 100k) or \$1.34 million.

II. Is it feasible to build a new wing to the western boundary at the northern end of the site which could link to the staircase of the northern apartment wing and include a lift.

This is entirely practical. If we accept loss of car parking then we could attach a cluster of three one-bedroom units to the existing stair hall with a lift to produce another nine dwellings and connection to Bellevue Street. The cluster only needs to be three storeys high. It may be possible to achieve more than 9 extra units.

Mr Gregory also advised :

It is claimed that the existing building has reached the end of its intended life – this is clearly ridiculous given the context (a suburb full of 19th century housing). The existing building is full brick with cavity party walls for better sound attenuation and concrete floors and stairs - it is a robust building that can easily last the 140 years, most of its neighbours have

The statement that the existing building is expensive to maintain seems at odds with acceptance of higher running costs with the new building (2 lifts that will need regular maintenance, stormwater pumps that need to be inspected regularly, management of the bike room access etc). The existing building is mostly face brickwork with no maintenance, internal walls are rendered and largely protected from impact damage. There was no evidence provided to support the claim it is an expensive building to maintain.

The height of the proposed development remains a problem as the proposal is bulkier and higher than what exists – the visual and amenity impact on the residents in Bellevue Street is probably understated.

The current accommodation includes three-bedroom dwellings for families – how does removing this accommodation gel with the claim “help people and families in need by providing them with a safe place to call home”.

The provision of “studio apartments” is problematic as most of the social research shows these dwelling types to be the least favoured because of the lack of privacy when inviting a guest in. Housing’s 30 storey buildings at Waterloo are full of bed sit accommodation whereas 3 bedroom in the inner city is difficult to find and remains more flexible (think working from home, share houses and other societal changes). A copy of Mr Gregory’s advice is attached at Appendix A.

The Legislative Context

Object (d) of the Environmental Planning and Assessment Act, 1979 is *to promote the delivery and maintenance of affordable housing.*

By demolishing a well-built building instead of refurbishing it and opting for the expensive solution of a total rebuild with only a small amount of additional accommodation for a cost of nearly \$22 million the development does not promote the delivery and maintenance of affordable housing.

The applicant, the NSW Land and Housing Corporation was created, and is governed, by the Housing Act, 2001. The act includes as its first Object *to maximise the opportunities for all people in New South Wales to have access to secure, appropriate and affordable housing.*

In failing to explore the options for refurbishing the existing building and providing additional accommodation on the site, instead opting for the expensive and wasteful approach of total demolition and rebuild, the development does not accord with the Objects of the Land and Housing Corporation *to maximise opportunities for housing.*

The City of Sydney 2012 Local Environmental Plan also includes an objective to encourage the growth of affordable housing in the city. The expensive and wasteful development does not further the LEP Object to encourage the growth of affordable housing in the city.

The application states that the existing building is *at the end of its useful life* but no evidence has been provided in support of this. It also claimed that the building *is not fit for purpose*. This appears to be because it does not have a lift. Not all tenants require lifts and, in any case, lifts can be added by an extension to the existing building.

The proposal, because it is based on total demolition and rebuild, should be rejected because its excessive cost is contrary to Object (d) of the Environmental Planning and Assessment Act, Object (a) of the Housing Act, 2001 and Object (e) of the 2012 City of Sydney LEP.

It is particularly important at a time when waiting lists for public housing are at record levels that the provision of additional affordable housing be maximised by the prudent use of resources.



Figure 1 The existing complex occupies less than half the site, see above and below. Opportunities exist to refurbish the current building and provide additional accommodation on the site.



2. Heritage

A number of houses were demolished in the 1970s in this part of Glebe for the construction of the North Western distributor.

Some of the properties which had been resumed by the Department of Main Roads [DMR] were transferred to the NSW Housing Commission. The Commission's Inner City Housing team designed infill houses to rectify the damage to Glebe wrought by the DMR.

The existing building was designed in 1984. It is one of three public housing apartment blocks built next to and on the escarpment which forms the eastern boundary of the Lyndhurst Heritage Conservation Area.

The three apartment buildings, 82 Wentworth Park Road and 61-63 and 49-55 Bellevue Avenue were designed as an ensemble with pitched roofs to echo the steep roofs of Glebe's nineteenth century terraces and the pattern of roofs rising up the escarpment, refer to Figs 2, 3, 4, 5 and 6 below.



Figure 2 Three blocks of apartments, number 82 Wentworth Park Rd and 49-55 and 61-63 Bellevue Avenue were designed as an ensemble



Figure 3 The infill housing viewed from Wentworth Park Road. Numbers, 61-63 Bellevue Avenue centre, 82 Wentworth Park Road right, echo the pitched roofs and verandahs of Glebe's 19th century terraces, left



Figure 4 The topography of Glebe rises steeply from Wentworth Park. The pitched roof of 82 Wentworth Park Road was a well-considered design choice to respect the traditional character of Glebe's urban form and the terrace house typology. It was designed as part of an ensemble of three buildings which are highlighted in red.



Figure 5 Number 57 and 59 Bellevue Avenue is a mid-19th century house whose neighbouring houses had been demolished. The inner-city housing team restored its context. Anti clockwise from upper left (1) A 1943 aerial view shows the house and its 19th century neighbours, (2) Apartment buildings either side, part of the same ensemble as 82 Wentworth Park Rd, have restored the context (3) The street view

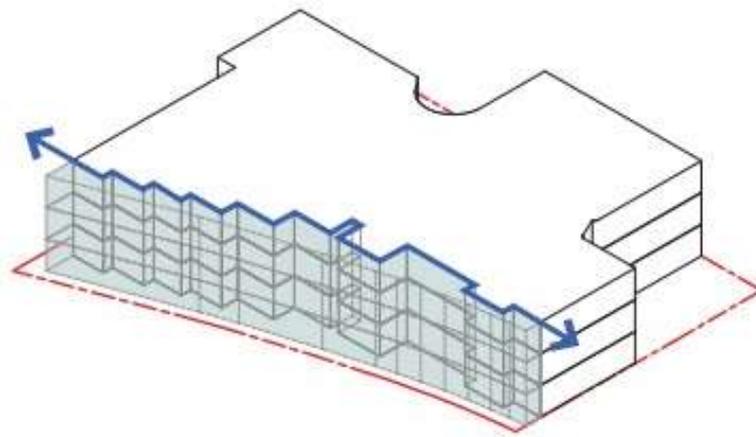
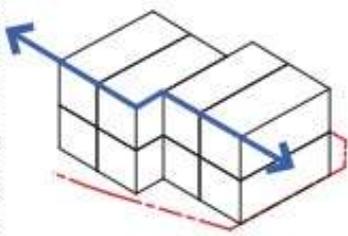


Figure 6 The articulation and broken forms of 82 Wentworth Park Road prevent it from looking monolithic unlike the proposed building – see Figure 7 below

The Inner-City Housing team’s understanding of the context and topography of the Lyndhurst Heritage Conservation Area was masterful. The design of the three apartment buildings rising up the steep hill set amongst nineteenth century terrace houses shows exceptional sensitivity and a deep respect for Glebe’s urban fabric.

The applicant’s Heritage Impact Statement and Urban Design Report both fail to identify that 82 Wentworth Park Road is one of an ensemble of three apartment buildings designed to reflect the pattern of roofs rising up the escarpment which forms Glebe’s eastern boundary. The reports neither recognise or analyse the significance of the topography of the escarpment of the eastern edge of Glebe and the contribution 82 Wentworth Park Road, and the related buildings at 49-55 and 61-63 Bellevue Avenue make to it.

The proposed building is obtrusive and incongruous and the arguments that it reflects Glebe’s terrace house typology are risible (see Figures 7, 8 and 9 below).



Existing terraces step and offset along curvature of boundary

Figure 7 The form and scale of the proposed building is not in accordance with the planning controls for the Lyndhurst Heritage Conservation Area which specifically mentions roof pitch. The above diagram is highly misleading. It removes the pitched roofs from the neighbouring terraces and implies that because the terraces are offset to the street and the new building is offset to the street as well, it is sympathetic to the Heritage Conservation Area.



Figure 8 The bulk, fenestration, baldness and flat roof of the proposed building will make it a detracting element in the HCA



Figure 9 The proposed building exceeds the height controls in the LEP and the height in storey controls in the DCP.

The Development Application does not comply with the 2012 Local Environment Plan and the 2012 Development Control Plan

The Local Environment Plan includes the object *to conserve the environmental heritage of the City of Sydney*. It lists the Lyndhurst Heritage Conservation Area, in which the site is located. It is a requirement of the DCP that *development within a heritage conservation area is to be consistent with policy guidelines contained in the Heritage Inventory Assessment Report for the individual conservation area*.

Table 1 The Heritage Inventory Assessment Report

Lyndhurst HCA Heritage Inventory Assessment Report management principles	Basis of non-compliance
<p><i>I. Retain Scale</i></p> <p><i>II. Retain pattern of forms</i></p> <p><i>III. Respect building line, scale, form and roof pitch of significant development in the vicinity</i></p> <p><i>IV. Protect the close and distant views which are important to the character of Glebe</i></p>	<p>The existing building was carefully designed to reflect the 19th century terraces in the vicinity, to be of an appropriate scale, to echo the pattern and forms of terraces and their roof pitch and to protect and enhance views to and from Glebe.</p> <p>The proposed building does none of these things, it does not comply</p>
<p>The Heritage inventory Assessment Report includes policies for reducing the impact of detracting sites including to <i>encourage appropriate replacement development on detracting sites</i></p>	<p>The existing building has been carefully designed to fit in with the significance of the heritage conservation area. The proposed building is obtrusive for the reasons set out above. The proposal seeks to replace a Neutral building with a Detracting one. This is contrary to both the Heritage Inventory Assessment report and the DCP.</p>

Table 2 The General Provisions of the DCP

Principle	Does not comply
<p><i>(1) The Demolition of neutral buildings will only be considered where it can be demonstrated that (b) the replacement building will not compromise the heritage significance of the heritage conservation area [DCP 3.9.8 1]</i></p>	<p>The proposed building will compromise the heritage significance of the heritage conservation area as shown in Figs 1 to 9 and Table 1 above.</p>
<p><i>New development in heritage conservation areas must be designed to respect neighbouring buildings and the character of the area, particularly roofscapes and window proportions [DCP 3.9.6]</i></p>	<p>The proposed building does not respect neighbouring buildings particularly roofscapes and window proportions. It is flat roofed, bulky and exceeds the allowable height.</p>
<p><i>Development within a heritage conservation area is to be compatible with the surrounding built form and urban pattern by responding sympathetically to the type, siting, form, height, bulk, roofscape, scale, materials and details of adjoining or nearby contributory buildings [DCP 3.9.6 (d)]</i></p>	<p>The proposed building does not respect the type, siting, form, height, bulk, roofscape, scale, materials and details of nearby contributory buildings</p>
<p><i>Development within a heritage conservation area is to be compatible with the surrounding built form and urban pattern by addressing the heritage</i></p>	<p>The proposal does not address the heritage conservation area statement of significance and</p>

<p>conservation area statement of significance and responding sympathetically to: (a) topography and landscape; (b) views to and from the site [DCP 3.9.6 1]</p>	<p>does not respond sympathetically to topography and landscape and views to and from the site</p>
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Table 3 SEPP 65 Design Quality Principles

<p>Principle 1: Context and Neighbourhood Character</p> <p>Good design responds and contributes to its context</p> <p><i>Context is the key natural and built features of an area, their relationship and the character they create when combined. It also includes social, economic, health and environmental conditions. Responding to context involves identifying the desirable elements of an area’s existing or future character. Well-designed buildings respond to and enhance the qualities and identity of the area including the adjacent sites, streetscape and neighbourhood.</i></p>	<p>As shown in Figs 1 to 8 and Table 1 above, the proposal involves demolishing a building which was designed to fit in with and enhance the heritage conservation area. The proposed building does not respond to and contribute to its context.</p> <p>Demolition of the present building is bad on social, economic and environmental grounds. Only 27 additional public housing bedrooms are being provided for an expenditure of \$21,723,996. Resources would be better used by refurbishing the existing building and developing additional housing on the site.</p> <p>Demolition involves removing very low-income tenants from their long-term homes. It is bad social policy.</p> <p>Demolition adds to greenhouse emissions through the loss of embedded energy. It contributes to global warming.</p> <p>The site is a former paint factory which was destroyed by fire in 1937. The report by Douglas Partners indicates a risk of contaminants being released as a result of demolition and excavation. This presents a potential health hazard.</p> <p>Does not comply</p>
<p>Principle 2: Built form and scale</p> <p>Good design achieves a scale, bulk and height appropriate to the existing or desired future character of the street and surrounding buildings. Good design also achieves an appropriate built form for a site and the building’s purpose in terms of building alignments, proportions, building type, articulation and the manipulation of building elements. Appropriate built form defines the public domain, contributes to the character of streetscapes and parks, including their views and vistas, and provides internal amenity and outlook.</p>	<p>The Heritage Inventory Assessment Report and DCP provide specific guidance as to how the built form and scale of an infill development in the Lyndhurst Heritage Conservation Area should be designed (see Table 1 and 2 above).</p> <p>The proposal does not comply. Its built form is inappropriate, it detracts from the public domain, particularly the important view of the eastern boundary of Glebe as well as views from Glebe.</p> <p>Does not comply</p>
<p>Principle 8: Housing Diversity and Social Interaction</p>	

<p>Good design achieves a mix of apartment sizes, providing housing choice for different demographics, living needs and household budgets. Well-designed apartment developments respond to social context by providing housing and facilities to suit the existing and future social mix. Good design involves practical and flexible features, including different types of communal spaces for a broad range of people, providing opportunities for social interaction amongst residents.</p>	<p>The proposal involves the demolition of five 3-bedroom apartments, which have a terrace house form and private open space and their replacement by studio, one- and two-bedroom apartments. It is unfriendly to families and poorly designed to suit the existing and future social mix.</p> <p>The objective of housing diversity and social interaction would be better met by refurbishing the present building and building some additional apartments on the site.</p> <p>Does not comply</p>
<p>Principle 9: Aesthetics</p> <p>Good design achieves a built form that has good proportions and a balanced composition of elements, reflecting the internal layout and structure. Good design uses a variety of materials, colours and textures. The visual appearance of well-designed apartment development responds to the existing or future local context, particularly desirable elements and repetitions of the streetscape.</p>	<p>The proposal responds poorly to the existing local context.</p> <p>Does not comply</p>

The section 4.6 height variation application

The LEP provides for a maximum building height of 12 metres. There is also a DCP control which allows a maximum of 3 storeys. The application does not comply with either as the proposed building is 13.1 metres high and comprises 4 storeys.

Section 4.6 of the LEP is intended *to achieve better outcomes for and from development by allowing flexibility in particular circumstances* [4.6 1 (b)]. The LEP sets out the tests by which this is assessed.

The applicant must demonstrate *that compliance with the development standard is unreasonable or unnecessary* [4.6 3(a)], *and that there are sufficient environmental planning grounds to justify contravening the development standard* [4.6 3 (b)]

The consent authority must be *satisfied that—*

- (i) *the applicant’s written request has adequately addressed the matters required to be demonstrated, and*
- (ii) *the proposed development will be in the public interest because it is consistent with the objectives of the particular standard and the objectives for development within the zone in which the development is proposed to be carried out*

Table 4 The application under section 4.6 of the LEP to vary the height control

Applicants claim for a section 4.6 variation	Response
<p>The proposal will not significantly impact views from properties on Bellevue Street, or public views from Wentworth Park</p>	<p>The building has a much bigger footprint than the existing building, extends further west and is taller and has a box like form which is alien to the character of the heritage conservation area. It is obtrusive and incongruous and will impact on views from Bellevue Street and Cardigan Street – see Figure 11 and 12 below.</p>

	<p>The interface with Wentworth Park is one of the defining views of Glebe – especially the pattern of pitched roofs rising up the escarpment. The proposed building is a large flat roofed box which is alien to its context. Making it taller than the LEP permits makes it more obtrusive. There is no justification for varying the LEP height control.</p>
<p>The proposal will not significantly impact views from properties on Bellevue Street, or public views from Wentworth Park</p>	<p>The proposal significantly impacts on views from Bellevue Street and Wentworth Park, see figs 11, 12, 13 and 14</p>
<p>The proposal represents an appropriate built form on the site and is compatible with surrounding built form character and does not impact the significance of the heritage conservation area</p>	<p>The DCP provides clear guidance for new development in a heritage conservation area including that <i>it respond sympathetically to topography and landscape, views to and from the site and the type, siting, form, height, bulk, roofscape, scale, materials and details of adjoining or nearby contributory buildings</i> [DCP General Provisions 3.9.6]. The recommended management of the Lyndhurst Heritage Conservation Area includes the principles <i>retain scale, retain pattern of forms, respect building line, scale, form and roof pitch and protect the close and distant views which are important to the character of Glebe</i></p> <p>The proposal meets none of these criteria. It is inappropriate and incompatible with the recommended management principles of the DCP and HCA and will be obtrusive.</p>
<p>Visual and streetscape impacts will be negligible as the building is designed to appear as 3-storeys from Wentworth Park Road, with the upper-level setback and rooftop landscaping</p>	<p>The building is a four-storey building and looks like a four-storey building (see Figs 12, 14 and 15).</p>
<p>The proposal accommodates new and increased affordable housing on the site - essential social infrastructure and is consistent with the objectives of the Housing SEPP and the City of Sydney's LSPS. The minor height variation facilitates an additional 11 affordable housing dwellings on the site within a wholly affordable housing development</p>	<p>The proposal will cost nearly \$22 million for a net gain of 26 bedrooms. As Section 1, pages 1 – 3 above, explains, additional housing for less cost can be provided by refurbishment of the existing building and erecting additional apartments on the site.</p> <p>The Housing SEPP requires <i>the consent authority to consider whether the design of the residential development is compatible with the desirable elements of the character of the local area.</i></p> <p>The development is not compatible with the desirable elements of the character of the local area.</p> <p>The City of Sydney's Local Strategic Planning Statement [LSPS] includes objective L2.9 (d) the</p>

	<p>goal of <i>ensuring new development in conservation areas conserves the heritage values of the place and is sympathetic to the built form, scale and fabric.</i></p> <p>This proposal is not sympathetic to the built form and scale of the heritage conservation area.</p> <p>Approving the section 4.6 application to increase the building's height above what is allowable in the LEP would exacerbate the inappropriateness of the scheme.</p>
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The Land and Environment Court has set out a five part test for consent authorities to consider when assessing an application to vary a standard to determine whether the objection to the development standards is well founded:

These are that:

1. *The objectives of the standard are achieved notwithstanding noncompliance with the standard.*

In this case the standard relates to a Heritage Conservation Area and is designed to retain the scale of the buildings in the HCA and the topography.

2. *The underlying objective or purpose of the standard is not relevant to the development and therefore compliance is unnecessary*

The underlying purpose of the standard is relevant to the HCA and compliance is necessary.

3. *The underlying object or purpose would be defeated or thwarted if compliance was required and therefore compliance is unreasonable*

The underlying purpose of the standard will be defeated or thwarted by noncompliance, therefore compliance is necessary.

4. *The development standard has been virtually abandoned or destroyed by the council's own actions in granting consents departing from the standard and hence compliance with the standard is unnecessary and unreasonable*

The standard has been maintained by Council, most notably in a development at 40-46 Wentworth Park Rd Glebe [D/2017/1752]

5. *The compliance with development standard is unreasonable or inappropriate due to existing use of land and current environmental character of the particular parcel of land. That is, the particular parcel of land should not have been included in the zone*

The environmental character of the land has not changed since the building was erected in 1986. The context in which the parcel of land is located has not changed significantly for over 40 years. The land is on the eastern boundary of the Lyndhurst Heritage Conservation area.

The proposed development is not in the public interest because it is inconsistent with the objectives of the height control and the objectives for development within the Lyndhurst Heritage Conservation Area. For the reasons outlined in Table 4, and above the Section 4.6 variation request should be rejected.



Figure 10 The existing view from Bellevue Avenue near Cardigan Street



Figure 11 The proposed building from Bellevue Avenue near Cardigan Street



Figure 12 The existing building echoes the steeply pitched roofs of the nineteenth century houses it adjoins and contributes to the rhythm of pitched roofs rising up the escarpment which characterises the eastern edge of the Lyndhurst Heritage Conservation Area

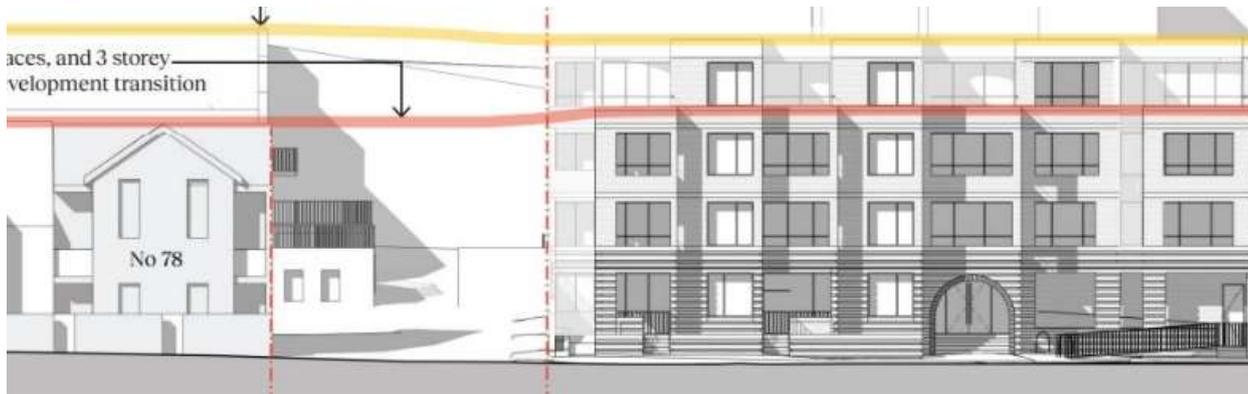


Figure 13 The proposed building will be incongruous. It does not comply with the requirement of the DCP that it be compatible with the surrounding built form and urban pattern of the Lyndhurst Heritage Conservation Area.

3. Contamination

The site was previously occupied by a factory manufacturing lead shot and a paint factory. Lead, asbestos and metal appears to exceed acceptable levels in certain sections of the site and there is also a data gap for the soil which the current buildings occupy. The proposal involves excavating a basement and demolishing the existing buildings. Given the contamination issues the site disturbances should be kept to a minimum

4. Conclusion

For the reasons outlined above the development application should be rejected because:

- I. Demolition of the existing well-built building and its replacement by a new building is not a cost-effective way of increasing the amount of affordable housing in Glebe. It involves spending an amount of \$21,723,996 for a net increase of 26 bedrooms.
- II. Alternative options were not explored. John Gregory, the architect of the existing building estimates that the cost of refurbishing the current building which provides 27 bedrooms would be in the order of \$1.34 million, leaving a balance of \$20.38 million which could be spent on providing additional affordable housing on this site and elsewhere.
- III. The proposal is not in accordance with the Objects of the Environmental Planning and Assessment Act and Housing Act, 2001 *to promote the delivery and maintenance of affordable housing* [EPA Object (d)] and *to maximise the opportunities for all people in New South Wales to have access to secure, appropriate and affordable housing* [Housing Act, 2001, Object (a)] because it is expensive and wasteful. Refurbishment of the existing building and providing additional affordable housing on the site would better *maximise the opportunities for all people in New South Wales to have access to secure and appropriate and affordable housing* and better *promote the delivery and maintenance of affordable housing*.
- IV. It is particularly important at a time when waiting lists for public housing are at record levels that the provision of additional affordable housing be maximised by the prudent use of resources.
- V. The proposal involves demolishing a building which is sympathetic to the Lyndhurst Heritage Conservation Area and replacing it with a detracting one which does not comply with the Heritage Inventory Assessment Report for the HCA or the heritage provisions of the DCP.
- VI. The proposal does not comply with the height control of the LEP.
- VII. The proposal involves excavating a basement on a site which has toxic waste.

Yours sincerely

Ian Stephenson
President

Appendix A

15 March 2023

Ian Stephenson
President
The Glebe Society

Dear Mr Stephenson

Re: Re: DA: D/2023/21, 82 Wentworth Park Road GLEBE NSW 2037

I was the original design architect for 82 Wentworth Park Road, Glebe. Thank you for your questions about the costs of refurbishing and extending the current building compared to demolishing it and rebuilding.

These are addressed below.

1. What would an approximate cost be for refurbishing the existing 27 apartments?

The costs can vary enormously (\$30k to \$200k if you believe the internet) but given the building is solid and well-built with services intact I think a reasonable allowance is \$70k per unit and \$100k each for the five terraced houses. This provides a new kitchen and fitments, new bathroom and fitments plus a complete freshen up of the living and bedrooms. Total would be $(12 \times 70k) + (5 \times 100k)$ or \$1.34 million.

2. Is it feasible to build a new wing to the western boundary at the northern end of the site which could link to the staircase of the northern apartment wing and include a lift.

This is entirely practical. If we accept the loss of car parking then we could attach a cluster of nine one-bedroom units to the existing stair hall and instal a lift to provide a connection for residents to Bellevue Street. The cluster only needs to be 3 storeys high. It may be possible to achieve more than 9 extra units.

3. Has the existing building reached the end of its design life?

No. Buildings, particularly residential buildings, are generally robust enough to have several fit outs of new kitchens, bathrooms, alterations and additions over their life. This building is solid with full masonry construction. The claim that the existing building has reached the end of its intended life is clearly ridiculous given the context (a suburb full of 19th century housing that has provided shelter for 140 years). The existing building is full brick with cavity party walls for better sound attenuation and concrete floors and stairs - it is a robust building that can easily last the 140 years most of its neighbours have

The statement that the existing building is expensive to maintain seems at odds with acceptance of higher running costs with the new building (2 lifts that will need regular maintenance, stormwater pumps that need to be inspected regularly, management of the bike room access etc). The existing building is mostly face brickwork with no maintenance, internal walls are rendered and largely

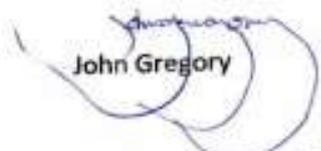
protected from impact damage. There was no evidence provided to support the claim it is an expensive building to maintain.

The height of the proposed development remains a problem as the proposal is bulkier and higher than what exists – the visual and amenity impact on the residents in Bellevue Street is probably understated – not sure the `concessions provided in the planning system for social housing were intended to subvert fundamental height and bulk constraints

The current accommodation includes three bedroom dwellings for families – how does removing this accommodation gel with the claim “help people and families in need by providing them with a safe place to call home”.

The provision of “studio apartments” is problematic as most of the social research shows these dwelling types to be the least favoured by occupants because of the lack of privacy when inviting a guest in. Housing’s 30 storey buildings at Waterloo are full of bed sit accommodation whereas 3 bedroom in the inner city is difficult to find and remains more flexible (think working from home, share houses and other societal changes).

Yours sincerely


John Gregory
15.3.2023