

20 February 2020

Manager
Planning Assessment
City of Sydney
Town Hall House
456 Kent Street
Sydney NSW 2000

by email to dasubmissions@cityofsydney.gov.nsw.au

Dear Sir/Madam

Development Application D/2019/1470
274-276 Glebe Point Road Glebe 2037
OBJECTION

The Glebe Society Incorporated (TGSi) boasts a current membership of 427 local residents living in various forms of accommodation. TGSi was established in 1969 and has a proud history of achievement on behalf of the local community on such issues as heritage, community and environment. We represent a diverse and tolerant community.

TGSi supports initiatives that stimulate the provision of Affordable Housing, but only on the basis that it complies with all regulatory requirements, that It meets the needs of the local community seeking Affordable Housing and that it contributes to the social fabric of the neighborhood.

On this occasion, TGSi has no option but to OBJECT to this Development Application as submitted. That is not to say we would not support a subsequent, but modified application.

The reasons for this objection are as follows:

- Change of use from Aged Care Facility to a Boarding House of greater density and intensity of occupancy
- A further increase in the FSR of a building which already exceeds the current FSR regulations for this location
- Additional infrastructure on the roof top of the building which will further emphasise the building's failure to meet the height restrictions for this location
- The current building does not make a contribution to the character of the local Heritage Conservation Area and the proposed enhancements to the facade of the building do not appear to change that assessment

- Lack of off street parking for service vehicles and residents that in turn will cause parking and traffic issues for local residents.

CHANGE OF USE

The Coronial inquest File No 0396/10, dated 2 May 2014, into the death of resident Leslie Armstrong, who fell from a second floor balcony in 2009, states that the building was originally constructed for use as Motel for American Servicemen, and converted to a residential aged care facility in 1974. That usage continued until 2010 when the building closed and has remained so ever since.

The Application Form contained within the Development Application describes the usage as "vacant".

The land is zoned R1 - General Residential pursuant to the City of Sydney Local Environmental Plan (LEP) 2012.

The objectives of the zoning are:

- To provide for the housing needs of the community.
- To provide for a variety of housing types and densities.
- To enable other land uses that provide facilities or services to meet the day to day needs of residents.
- To maintain the existing land use pattern of predominantly residential uses.

The Wesley Mission conducted a public meeting on 19 November 2019 during which it distributed a brochure that stated:

"...One of the goals of affordable rental housing is to enable people to stay within their communities as their life situation changes..."

"...The proposal for Wesley RJ Williams would see upgraded facilities for a diverse residential population. This may include single women aged 50 and over, a cohort which research shows is increasingly finding themselves in difficulty due to changes in life circumstances such as illness or loss of a partner.

Equally, people on medium to low incomes, like child care workers, administration staff, retail workers, hospital workers or those recovering from an illness or disability, as well as families in need of secure accommodation, could all make up the new Wesley RJ Williams neighborhood... "

This brochure makes no mention of a further cohort that is included in the Plan of Management submitted with the DA, that is, students.

The brochure is attached at the end of this objection.

TGSI does not accept that any of the above people - women over 50, child care workers,

administration staff, retail and hospital workers should be put in a situation where “home” is a 15-16m² room. It has the potential to cause social and mental health issues.

The Human Rights Commissioner, Kay Patterson, last year found that the number of older homeless women in Australia increased by over 30% between 2011 and 2016 to nearly 7000.

<https://www.humanrights.gov.au/our-work/age-discrimination/publications/older-womens-risk-homelessness-background-paper-2019>

The Plan of Management included in the Development Application (4.3.1 Targeted allocations) indicates that the developer will offer accommodation to people within the following demographic profiles:

- Individuals over 55 eligible for Affordable Housing
- Individuals studying in the area eligible for Affordable Housing
- Individuals working in the area eligible for Affordable Housing
- Families with support networks in the area

There is no commitment to accommodate any proportion of the total to any of the above groups, but the allocation of 64 small studios would suggest a large attraction will be students studying at local institutions.

The 2016 Census confirms that Glebe and Forest Lodge has a lower than average NSW percentage of the population over 50.

https://quickstats.censusdata.abs.gov.au/census_services/getproduct/census/2016/quickstat/SSC11641?opendocument

https://quickstats.censusdata.abs.gov.au/census_services/getproduct/census/2016/quickstat/SSC11546?opendocument

Given the lack of accommodation for people over 50, they are most likely forced to leave their community and resettle elsewhere.

It is considered that the developer of this site has disregarded both a commitment that it made to the local community, that is to enable people to stay within their communities, and its own recognition of the evidence that supports the critical housing needs of women over 50. TGSi believes the nature of the development and the services it proposes to offer are significantly skewed to tertiary students who are unlikely to be members of the local community

It is therefore considered that the Development Application does not meet the objectives of R1 – General Residential, particularly:

- To provide for the housing needs of the community

FLOOR SPACE RATIO (FSR)

The RJ Williams Lodge, with an approved usage as an aged care facility has an FSR of 1.9:1, notwithstanding that The City of Sydney LEP 2012 provides that the FSR for this location is 1:1.

The objectives of Clause 4.4 (1) of the LEP are as follows:

- (a) to provide sufficient floor space to meet anticipated development needs for the foreseeable future,*
- (b) to regulate the density of development, built form and land use intensity and to control the generation of vehicle and pedestrian traffic,*
- (c) to provide for an intensity of development that is commensurate with the capacity of existing and planned infrastructure,*
- (d) to ensure that new development reflects the desired character of the locality in which it is located and minimises adverse impacts on the amenity of that locality.*

Notwithstanding those objectives, the developer seeks to increase the FSR of the building to 2.3:1 by the infilling of space, thereby further increasing the density and intensity of the development, built form and land use.

The Section 4(6) application prepared by the developer in support of a further departure from the prescribed FSR completely overlooks the above objectives, particularly (b) in so far as to regulate the density of development, built form and land use and (d) in so far as the development is to reflect the character of the locality and minimizes adverse impacts on the amenity of that locality.

This facility was previously accredited to provide 72 places. The increase in studio/apartment room numbers to 101 and the further utilization of Level 3, particularly the additional 8 studios together with an urban farm(s) and a roof terrace severely impacts on the amenity of the locality.

As a number of the 101 rooms are proposed to accommodate more than one person, the occupancy of the building has the potential to be in excess of 112 people, an unwarranted increase to the point of overcrowding with inevitable social and mental health consequences.

The developer's defense of the application includes such matters as compliant set backs, privacy mitigation, landscaping to soften the built form and that the FSR is not readily perceived from the existing approved building, all of which are considered inconsistent with the above LEP objectives.

The fact that the building is vacant has no relationship to any justification for a further relaxation of the FSR.

BUILDING HEIGHT

The objectives of clause 4.3(1) of the City of Sydney LEP 2012 are as follows:

- (a) to ensure the height of development is appropriate to the condition of the site and its context,*
- (b) to ensure appropriate height transitions between new development and heritage items and buildings in heritage conservation areas or special character areas,*
- (c) to promote the sharing of views,*

The building already exceeds the maximum height of 9 meters as shown on the Height of Building Map within the LEP.

The current building fails to meet the objectives of (b) and (c) in that there is not an appropriate transition between this building and those in the local Heritage Conservation Area, and totally restricts the sharing of views due the existing bulk and scale of the building.

Whilst the developer claims not to be increasing the height of the building, the proposed installation of acoustic and screening fences and a pergola on the roof top are contributory to the height, scale and bulk of the building, and therefore fails to satisfy objective (b) in particular.

The increase in FSR, the increase in density and intensity of use with an increase in studio/apartment to 101, collectively fail to meet the development standards of the LEP.

HERITAGE CONSERVATION AREA

The property is located within the Glebe Point Road Heritage Conservation Area (HCA) No 29 as described in the City of Sydney LEP 2012. The property is classified as a non contributory item, viz the property detracts from the character and heritage significance of the HCA.

The property is located in that area identified as 2.6.5 Toxteth within the Section 2 Locality Statements of the Sydney Development Control Plan (DCP) 2012. The character statement includes the following:

"...This neighbourhood will continue to be a predominantly residential neighbourhood supported by the existing educational and cultural/religious institutions. The neighbourhood is characterised with a combination of consistent elements including building scale, front and side setbacks, wall and roof forms and mature planting in both the private and public domain which will be protected and enhanced..."

Principle (b) of the Locality Statement reads:

“Development is to respond to and complement heritage items and contributory buildings within heritage conservation areas, including streetscapes and lanes.”

The proposed enhancements to the external facades are minimal in the context of the bulk and scale of the building, and without further enhancement, the proposal will ensure that the building maintains its classification of a non contributory item, detracting from the character and heritage significance of the HCA.

The lack of significant enhancements will effectively ensure that the building remains inconsistent with the requirements of the character statement in terms of scale, front and side setbacks, and wall and roof forms.

Both the developer and the City of Sydney have the perfect opportunity to undertake and enforce significant design measures that will address the current imbalance between the detracting building and the character of this prized Heritage Conservation Area.

CAR PARKING

The State Environmental Planning Policy (Affordable Rental Housing) 2009 (ARHSEPP) provides for 0.5 car spaces per room (except where provided by a Social Housing Provider), notwithstanding that this standard cannot be used to refuse consent to a boarding house proposal. However a Council may consider a lower car parking rate if applicable.

It is understood that when the building was a motel it had about 100 off street car parking spaces in 2 basements. When it was converted to aged care accommodation, it had about 45 on-site parking places.

The Development Application proposes just six car parks (one for the manager, one for a private vehicle and four car share).

There are no car spaces for support workers, visiting tradesmen and health professionals, as well as household visitors

This is clearly inadequate for a building with potentially in excess of 112 occupants and a counselling practice. It is most likely that visitors will be forced to park in the surrounding streets, which all have time-limited parking, and where there are generally few car parking spaces available.

The expectation that all residents, bar the one who scores the single private parking space, will use public transport is unreasonable and doesn't take into consideration the shift work that many people in lower income occupations have to undertake.

If the developer is genuine in its intention to attract all four demographic profiles to live in the building, it will take a common sense and realistic approach to the transport needs of the residents.

That same common sense approach will recognise the relationship between the amenity of "home" for the residents, with the need to own a motor vehicle and park it in safe proximity of that home.

TGSI objects to the change of use to a boarding house for reasons previously detailed, and if that objection were successful, the developer's argument for a token 6 car spaces would not apply.

SUMMARY

The developer's promotional material identified the urgent need to address the provision of suitable housing for an alarming increase in women over 50 finding themselves in difficulty. TGSI agrees.

However the Development Application is silent on this issue. It does not contain strategies or targets that will ensure this group is given any priority in the tenancy allocations. The Development Application lacks detail or evidence of any strategies to ensure an equitable mix with a socially balanced integration of the targeted four groups.

The proliferation of 64 studios will no doubt attract students from other locations at the expense of locals seeking to stay within their community. TGSI is of the view that the developer is ignoring a heavy human and social responsibility and instead seeks to:

- Intensify the use of the building with greater densities of people
- Claim that an FSR of 2.3:1 is reasonable notwithstanding the legal FSR of 1:1 for this location
- Ignore the intentions of the LEP in relation to height transition to heritage items and buildings in Heritage Conservation Areas
- Show no interest in seeking to have the building classified as anything other than non contributory to the Heritage Conservation Area, when it has the perfect opportunity to do otherwise
- Swap car spaces for bedrooms.

...thereby replacing human considerations with "business model" priorities.

The Glebe Society OBJECTS to this DA as submitted, notwithstanding our desire to see genuine Affordable Housing proposals put forward for consideration.

Yours faithfully



Brian Fuller
President



Wesley RJ Williams refurbishment

The Wesley RJ Williams property presents a fantastic opportunity to provide affordable living in the inner west.

Located on Glebe Point Road, Glebe, Wesley RJ Williams was originally built as a motel in 1960. Wesley Mission purchased the property in 1974 and adapted it for use as an aged care facility for 70 residents.

The facility operated for 35 years until its closure in 2010. In 2019, thanks to the generosity of Wesley Mission supporters, we have been able to move ahead with revisiting plans for the site. Extensive scenario modelling, market research and rental demand studies indicate there is a clear opportunity to provide affordable rental housing in Glebe.

What is affordable housing?

Affordable rental housing is aimed at medium to low income households and priced so they can afford other living costs such as food, clothing and utilities. One of the goals of affordable rental housing is to enable people to stay within their communities as their life situation changes.



Who could live at Wesley RJ Williams?

The proposal for Wesley RJ Williams would see upgraded facilities for a diverse residential population. This may include single women aged 50 and over, a cohort which research shows is increasingly finding themselves in difficulty due to changes in life circumstances such as illness or loss of a partner.

Equally, people on medium to low incomes, like child care workers, administration staff, retail workers, hospital workers or those recovering from an illness or disability, as well as families in need of secure accommodation, could all make up the new Wesley RJ Williams neighbourhood.

Do all the good you can
because every life matters

What are the key changes?

In a practical, day-to-day sense, the main change will be that the building will once again 'come to life' with new vitality.

The proposed refurbishment will:

- transform the existing room layout for use as affordable housing under Division 3 of the Affordable Housing State Environmental Planning Policy (AHSEPP)
- deliver 74 self-contained apartments including a mix of studios, and four-bedroom configurations that can accommodate a group or family
- offers further flexibility with 14 interconnecting studios. A one bedroom unit is reserved for an on-site manager (in accordance with AHSEPP requirements)
- include a reconfigured basement area for shared car scheme parking, plus bicycle and motorcycle parking
- feature more than 500sqm for a range of potential communal uses including a rooftop terrace garden and a variety of multi-purpose rooms
- be refreshed with new balconies, screens, balustrades and cladding, and an upgraded entrance including an extended planter box to bring greenery to the front of the property.

There is no change proposed to the building height, footprint or existing setbacks.

What happens next?

The Development Application (DA) will soon be lodged with the City of Sydney Council for the next stage in the assessment process.

We expect there will be an exhibition period, during which time you will be able to view the DA and associated documents and provide a submission. These will be considered as part of the review process at the close of the exhibition period. We welcome your comments and views.

For further information or to register to stay in touch with us during this process, please contact us via email: rjwilliamsproject@wesleymission.org.au or call us on **1800 960 755** or visit wesleymission.org.au/wesley-rj-williams



Project timeline

We are here

