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42 Glenmore Road Paddington NSW

21 December 2018

Mr Gary James  
The General Manager  
Woollahra Municipal Council  
PO Box 61  
Double Bay  
NSW 1360

Attention: Catherine Colville

Dear Catherine,

**RE: SUBMISSION ON THE HERITAGE LISTING SHEET FOR THE FOUR IN HAND  
HOTEL, SUTHERLAND STREET PADDINGTON**

We appreciate the opportunity to make a submission on the heritage inventory sheet for the Four in Hand Hotel, Sutherland Street Paddington.

This submission has been prepared by Ruth Daniell. The owner of the building, supports heritage and particularly has regard for the buildings contribution to the history and the significance of the Paddington Conservation Area.

**Overarching concerns**

It is my professional opinion that the listing of the Four in Hand, prior to the completion of "The 'Paddington Hotels Group" study, is not well planned. The procedure in amending the Woollahra LEP 2014 has a strict legislative framework and not to be undertaken lightly. There was an urgency for listing when the hotel was recently listed for sale and the Councillors responded appropriately to the local residents' concerns.

However, the current ownership continues the hotel use and the building retains its historic use.

I question whether the current listing sheet for the hotel, without the benefit of the completed study, where there is possibility of a group listing and the comparative analysis, is a good basis for listing and an amendment to the LEP for an individual item,

My reasons are:

- A heritage inventory sheet should be factual
- A Statement of significance should be concise and set out the facts supporting the heritage significance.
- The listing sheet contains supposition in the statement that: "the 'Paddington Hotels Group' could have significance at 'State Level.'"
- The Four in Hand hotel is the first and only hotel studied and the study of the "Paddington Hotels Group".
- Individually the Four in Hand would not be of "State Significance"
- The level of significance, Local or State, should not be determined until the study is complete, when the group can be assessed using the accepted criteria and necessary comparative significance to determine this.
- Paragraph 4 in the 'Statement of Significance' the conclusion about the rarity or the comparative uncommonness should not be drawn until the "Paddington Hotels Group" study is complete.

### **The Approval Process**

The listing on the State Heritage Register requires a more complex, two tier, approval process for Development Applications. It takes longer, with additional fees.

The aim in Paddington is to maintain functioning hotels within the conservation area. Complicating the heritage management may have the effect of deterring hotel ownership leading to the further demise of hotels in the Paddington Conservation Area.

The approval process and applicant/council communication is more direct if the building is a local heritage item. Council encourages this.

We submit, other than finding to the contrary at the completion of the study, that the hotel is listed a local item or as part of a group and the requirements for a Heritage Impact Statement with a requirement for fabric analysis in the area where works take place is undertaken as part of Heritage Impact Statement.

### **Requirement for heritage management documents**

The listing sheet for the Four in Hand, still favours a Conservation Management Plan for any works to the hotel .

There are other "Management Documents" listed in the Guidelines on Conservation Management Plans and other Management Documents, which are:

- Conservation Management Plans (required for State Items)
- Conservation Management Strategies

- Heritage Impact Statements (required by the Woollahra LEP 2014); with assessment against and the applicable WDCP provisions:

The time and cost of the preparation of conservation management documents is exponential, from bottom to top of this list. Hotels are a type of building where significant change occurs due to licensing and legislation requirements there is substantial modification. During a site visit conducted with council staff and consultants, it was concurred that there was little heritage fabric remaining in the interior. However, with the current proposed listing sheet the onus is placed on the owner of the building to prove otherwise to the level of a Conservation Management Plan.

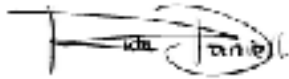
My submission is that the heritage inventory sheet should identify the significant building fabric.

### **History and Physical Development**

There is some confusion between the appearance of the hotel as originally constructed and the building retaining early and significant building fabric and the physical evidence evidenced by the building as exists today. The physical evidence should be reconciled with the history.

In conclusion, we would welcome to discuss any of these matters raised in this submission.

Yours Sincerely

A handwritten signature in black ink, appearing to read "T. J. Kane". The signature is written in a cursive style with a large, looped "K" and a trailing flourish.