

11 December 2020
Land and Housing Corporation
FranklynSt@facs.nsw.gov.au

Dear Sir/Madam

Re: Franklyn Street, Glebe, Redevelopment Proposal

Thank you for the opportunity to comment on the Franklyn Street, redevelopment proposal. The scheme which involves demolishing the existing low-rise buildings, destroying their gardens and constructing three monolithic structures topped by 14 storey towers is completely inappropriate and should not proceed.

This is a key site linking the low rise Victorian residential character of Glebe with the historic warehouses which define Ultimo. It is within the Mountain Street Heritage Conservation Area [HCA] and adjoins the St Phillips HCA. It is a large site, over 1.3 hectares in area, with 1/3 of a kilometre of street frontage on Franklyn, Glebe and Bay Streets. This gives it immense strategic importance in contributing to and defining the character of the area and contributing to the streetscapes. All the current street frontages address heritage conservation areas in which there are a number of individually listed heritage buildings.

In order to achieve an acceptable outcome the design of the development must be informed by the 2012 DCP Locality Statement and supporting principles for the Mountain Street HCA, in which it is located, and the adjoining St Phillips HCA. Regrettably, it is not.

The problem arises because the scheme has density, not good design, as its starting point. It has been treated as a given that there will be 425 dwellings, a 350% increase on the existing 108.

In order to accommodate this the current height limits will be increased from 15 metres to 42 metres, a factor of 280%, the Floor Space Ratio [FSR] will be increased to 2.5:1 and the open space at ground level will be reduced by nearly half. The existing gardens will be used for new roads which, in an exercise in Orwellian double speak, are called living streets.

As mentioned above the City of Sydney 2012 Development Control Plan [DCP] contains well considered principles for dealing with this important and unusual site. It is essential that LAHC use the 2012 DCP as the basis for managing the site.

The DCP includes Locality statements which *are place-specific and draw on the unique qualities of each neighbourhood and provide an important direction for the development controls and built form guidelines. The statements build on the existing structure, character of the neighbourhoods and important elements that contribute to the existing character. The statements are also supported by a number of principles that help reinforce and enhance the character of each locality.*

The Mountain Street Locality Statement (2.6.11) includes the objective that:

*The area will continue to provide a diverse and sustainable mix of uses in restored and adaptively reused early warehouse buildings **or in new buildings whose bulk and scale is appropriate to the large lots and existing urban form.***

The bulk and scale of the proposal is not appropriate to the existing urban form.

It also includes the principles that:

(b) Development is to respond to and complement heritage items and contributory buildings within heritage conservation areas, including streetscapes and lanes.

On Franklyn Street and Glebe Street the site faces heritage items and contributory buildings in the St Phillips HCA. While there is a tokenistic attempt at an appropriate scale at the corner of Franklyn and Glebe Streets the rest of the scheme does not respond to and complement the heritage items and contributory buildings because it is too tall and its form and mass is wrong

(c) Encourage simple forms where appropriate to recognise the predominant warehouse character.

The dominant character of Franklyn and Glebe Street is low rise residential (see (b) above). There are a number of historic warehouses in the vicinity of the site in Bay Street but the Bay Street elevation of the scheme is far too high and its form too contemporary and will overwhelm *the warehouse character* of this part of the precinct thereby taking away its predominance. The word predominate means present as the strongest or main element, if this scheme proceeds, because of its height and bulk it will be the predominate element thereby seriously damaging the character of the Mountain Street HCA.

The concept is not acceptable because it:

- Reduces the existing open space and destroys the gardens. The existing open space should be retained
- Demolishes a well-designed complex of social housing by the eminent architect Philip Cox working with John Richardson. It is profligate to demolish the Cox-Richardson complex. The units should be refurbished, ideally with advice from the original architects.
- In its scale and form uses the Mezzo development as its model when it should be following the 2012 DCP and relating to the warehouse forms of Ultimo which it adjoins on Bay Street and the Victorian low rise residential buildings of Glebe which it addresses on Glebe Street and Franklyn Street
- Involves the relocation of long-term residents, many of whom have lived in the complex for a many years
- Only increases the provision of social housing by 22 units
- Destroys the amenity of the residents of Greek Street, particularly through the loss of winter sun and overshadowing to North facing Greek Street apartments, particularly to lower-level units

The Relationship of the Scheme to Strategic Planning Frameworks

Housing for All, City of Sydney local housing strategy 2020

The strategy states that the provision of more housing must be done in a way which accords with the objectives of *A Metropolis of Three Cities* and the *Eastern City District Plan* including Priority E6 – creating and renewing great places and local centres and respecting the District's heritage.

Clause 1.2 (d) states that *developments must make a positive contribution to the built environment and result in an overall better urban design outcome on the site.*

As outlined above the scheme does not respect the District's heritage and does not make a positive contribution to the built environment and result in an overall better urban design outcome for the site.

The Housing for All strategy identifies the conflict between the Communities Plus program and the strategic planning objectives noting that *the resultant tripling of density is rarely consistent with creating good places.* The Franklyn Street scheme epitomises the problem.

Future Directions for Social Housing Policy

A 'place-making' approach to building communities

Place Plans are tailored plans developed with social housing communities to create a connected community

The scheme creates a disconnected community by:

- Using a design which does not respect its neighbourhood
- Destroying the gardens, and
- Removing social housing tenants from low-rise apartments and putting them in high rise apartments

A better social housing experience

Improving the liveability and amenity of social housing communities.

This project reduces the liveability and amenity of a social housing community by demolishing carefully planned low rise buildings set in gardens and replacing them with fourteen storey flats.

Removing long standing tenants from low rise units in a garden setting and putting them in high rise apartments does not provide a better social housing experience

A Metropolis of Three Cities, the Greater Sydney Region Plan, Eastern City District Plan

Planning Priority E6

Creating and renewing great places and local centres, and respecting the District's heritage

The project does not create a great place or respect the District's heritage

Conclusion

Good planning is not based on, and great cities are not created by, landowners determining what density they wish for with their developments and then obtaining rezoning to accommodate their desires.

Disregarding the 2012 City of Sydney DCP and strategic planning objectives about good urban design and heritage and relying on a rezoning to insert an overdevelopment into a heritage conservation zone is not good practice and contrary to the public interest. LAHC are one of the city's largest landholders. On occasion they, and their predecessor agencies, have led the way in good design and urban planning. They should emulate this standard at Franklyn Street by working within the existing controls and ideally refurbishing the existing buildings.

Yours sincerely

A handwritten signature in cursive script that reads "Janet Wahlquist". The signature is written in a dark ink and includes a small flourish at the end.

Janet Wahlquist
President