

28 April 2021

Rob Stokes,
Minister for Planning and Public Places
Department of Planning, Industry and Environment
Design and Place SEPP

Dear Minister Stokes

The Glebe Society does not believe that the principle-based approach of the Design and Place SEPP will *ensure that design outcomes properly consider local character.*

Glebe has an extraordinary architectural and cultural history. It is located only a few kilometres from the Sydney CBD and is one of Australia's most intact inner-city suburbs.

Its topography, multi-layered development which includes early colonial marine villas (two designed by the major early colonial architect John Verge), entire streets of nineteenth century middle-class and working-class housing, the two great church estates (now owned by the NSW Government), the remarkable high street Glebe Point Rd which runs from Broadway to the harbour, its predominantly low scale, its proximity to Sydney University and its broad demographic, make it extremely precious to the people of NSW..

The survival of Glebe has been hard fought and has included warding off large-scale slum clearance, freeways and high rise. All these objectives were seen in their time as being based on good planning and the public interest.

As a result of community activism and visionary government engagement Glebe has been at the forefront of good urban planning.

The acquisition of the church estates and the restoration and upgrading of the nineteenth century houses by the Federal Government from 1975 and the masterly insertion of sensitive infill housing into those estates by the NSW Government in the 1980s marked new approaches to urban planning in Australia which in terms of its scale and boldness has international significance.

Glebe is a miraculous survival which contributes to the identity and liveability of Sydney much as Spitalfields does in London. Since the 1980s most of Glebe has been included in, and protected by, Heritage Conservation Areas.

The current DCP for Glebe's heritage conservation areas include principles about character, design and outcome, however there are many weaknesses in their application.

A primary one is that applicants self-assess by commissioning Heritage Impact Assessments. These documents often represent a biased, fragmentary and inadequate analysis skewed to support the applicant's proposal rather than an objective analysis of the proposal against the values of the heritage conservation areas.

The assessment of applications can also be inadequate for a number of reasons, including the quality of the advice provided by the consent authority and the lack of specialist skills in heritage on the panels.

Even more significantly is the problem is that values-based planning and the determination as to what the values mean when translated into developments has a degree of subjectivity. It is open to

interpretation. This is why it is essential that the values be translated into well considered empirical controls, including land use, building contributions, height, building envelope and landscape, in LEPs and DCPs.

These prescriptive controls are essential for the proper management of heritage conservation areas.

For this reason, the system should not change from a rules-based system to a principles- based system that is subjective and open to interpretation.

The review also needs to grapple with the inherent weaknesses and contradictions in the present arrangement whereby State Significant Development turns off the Heritage Act. This is totally inconsistent with the philosophical underpinnings of values-based planning. It potentially represents a particular threat to Glebe where the government is the largest landholder.

Rather than expanding the criteria for State Significant Development, as the draft proposes, it should be much more tightly constrained.

The Glebe Society does not support principles-based planning instead of rules-based planning and advocates the continuation of the existing prescriptive controls.

Yours sincerely



Ian Stephenson
Planning Convenor
The Glebe Society
04159 19874