



7 December, 2020

To: Sydney City Council

From: The Glebe Society

Subject: An objection to the Planning Proposal 17-31 Cowper Street, the south site, and 2A-2D Wentworth Park Road, the north site, Glebe, Amendment to Sydney Local Environmental Plan 2012 October 2020 in particular the removal of 17-31 Cowper Street and 2A-D Wentworth Park Rd, Glebe from the St Phillips Heritage Conservation Area, the increase in the maximum building height from 9 metres to RL 36 And the increase in the floor space ratio on the north site from 1.25:1 to 4.3:1 and on the south site from 1.25:1 to 3.1:1.

The Society objects to the rezoning of 17-31 Cowper St and 2A-D Wentworth Park Rd, Glebe because it is unsuitable for the site, contrary to the public interest and does not comply with the provisions of:

- A Metropolis of Three Cities, the Greater Sydney Region Plan, Eastern City District Plan
- The City of Sydney, City Plan 2036 Local Strategic Planning Statements
- The City of Sydney Local Environmental Plan 2012,
- The NSW Environmental Planning and Assessment Act, 1979
- The City of Sydney 2012 Local Environment Plan

Executive Summary

The proposal is for a spot rezoning to remove two low rise buildings from the St Phillips Heritage Conservation Area, change the height control from 9 metres to RL 36 and the FRSRs on the north site from 1.25:1 to 4.3:1 and on the south site from 1.25:1 to 3.1:1, in order to allow the construction of two 8 storey buildings and 5 terrace houses.

The proposal is not justified because:

- I. It will have a serious impact on the heritage values of the St Phillips HCA
- II. If implemented, will further undermine the controls protecting the heritage values of the St Phillips HCA and adjoining conservation zones leading to further loss of heritage values
- III. It will lead to the demolition of two buildings included as being of heritage significance to the St Phillip's HCA and included on LAHC's sec 170 register
- IV. Is based on a flawed Heritage Impact Assessment, the serious shortcomings of which make the justification for the planning proposal invalid
- V. Contrary to the claims in the proposal the removal of the two buildings from the HCA and their replacement by two 8 storey buildings is not an acceptable heritage outcome
- VI. It reduces the liveability and amenity of social housing in Glebe
- VII. It does not explore other options for introducing additional accommodation into an HCA as recommended in *Housing for All, City of Sydney local housing strategy, June 2020*
- VIII. Is incorrect in its assertion that *there are no alternatives to achieve the intent of this planning proposal*
- IX. It compromises the cultural and landscape values of Glebe
- X. It does not provide, as claimed, *the sensitive introduction of mid-rise development into an established inner city environment*
- XI. It undermines the viability of the Glebe Point Road high street.

- XII. 2A-D Wentworth Park Rd and 17-31 Cowper Street are well built masonry structures, shaded by verandas and have a relatively small ratio of glass to wall mass. Their demolition and replacement wastes embedded energy and does not contribute to *reducing carbon emissions*
- XIII. It is contrary to the NSW Government's *Future Directions for Social Housing*
- XIV. It is contrary to *Housing for All, City of Sydney local housing strategy, June 2020*
- XV. Is contrary to *A Metropolis of Three Cities, the Greater Sydney Region Plan, Eastern City District Plan*

The basis of the objection is set out in more detail below.

1. SCALE and its Impact on St Phillip's Heritage Conservation Area and the related Glebe Heritage Conservation Areas

Background

Despite coming under pressure in 1920 to release 4 hectares for industrial development, and the 1951 County of Cumberland Planning scheme earmarking the area for an expressway and slum clearance, the Anglican Church retained the St Phillips Estate until 1974 thereby conserving it as a low rise residential area.

That year it was identified by the National Trust as containing *the largest continuous number of 1860s and 70s cottages and terraces forming a continuous townscape in Australia ... its ... scale and character have been little disturbed by modern intrusion*¹ and designated an urban conservation area, one of the first in Australia.

The Trust listing became the core of the Leichardt Municipal Council and its successor Sydney City Council St Phillips Heritage Conservation Area [HCA]. The survival of the St Phillips estate as a low rise largely Victorian suburb, its purchase by the Federal Government in 1974 who conserved and refurbished the houses and maintained its social demographic, and its transfer to the NSW Government Housing Commission in the 1980s who designed sensitive infill housing, make it a place of exceptional significance.

Sydney City Council's heritage listing notes that *St Phillips has aesthetic significance for its predominant Victorian character, supported by several other important historic layers and building types. The area is rare for its extraordinary degree of architectural intactness, and for the survival of early 1870s commercial and residential development so close to the city centre. The high level of integrity reflects the long history of church and government ownership.*

The LEP identifies that one of the most important elements of the St Phillips HCA is that its Victorian scale and pattern of development is intact and this is rare given its proximity to the city. The only non-confirming structures in terms of scale are the 1959 John Byrne Court at 34 Wentworth Street, Glebe (SP 111775) and the Glebe Telephone Exchange at 126 St Johns Rd, Glebe.

¹ A.C. Strahan and David Sheedy, 'The Glebe Conservation Area' in Leichardt Urban Conservation Report, National Trust of Australia (NSW), [Rev. ed.] 1979.

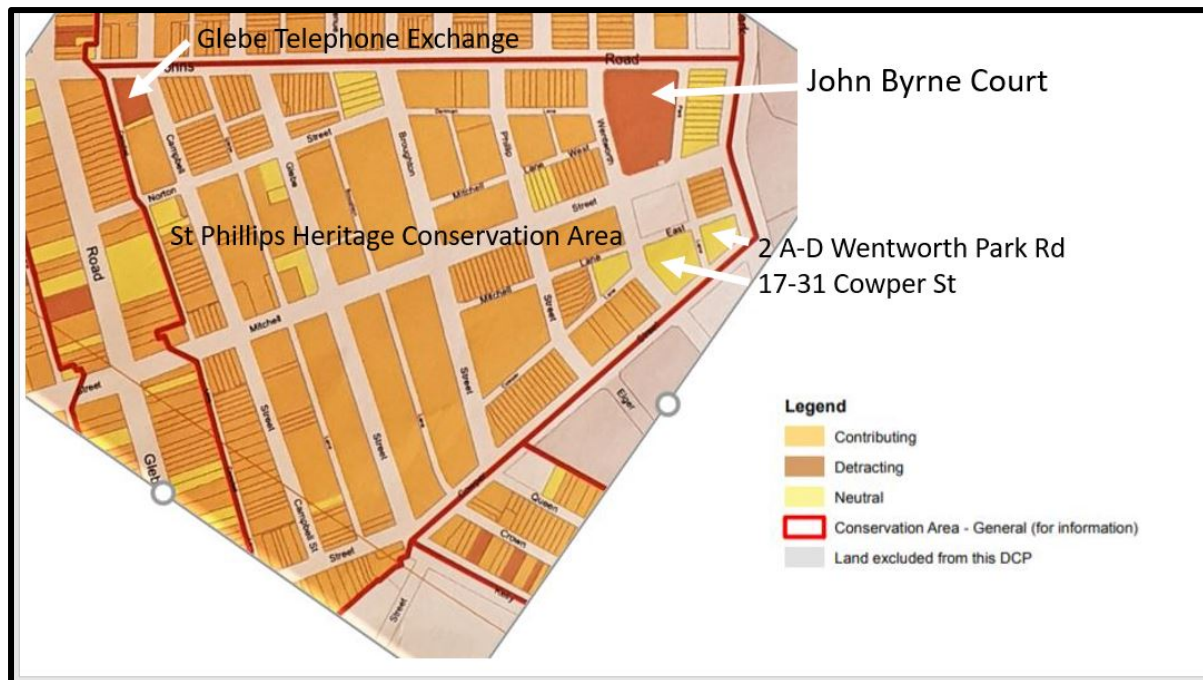


Figure 1 Building Contributions Map, St Phillips Heritage Conservation Area, Sydney Development Control Plan, 2012

The Building Contributions Map, fig 1 above, from the 2012 Sydney DCP, maps the scale of buildings in the St Phillip's Heritage Conservation Area. The two buildings identified as **Detracting** are greater than 9 metres in height. The items identified as **Contributing** date from before the Second World War and are less than 9 metres in height, while those marked **Neutral** date from after the Second World War and are less than 9 metres in height.

The **Neutral** buildings are primarily in-fill housing carried out in the 1980s as part of the Glebe rehabilitation project. They are classified as **Neutral** because they date from the 1980s and are low rise and reflect the Victorian subdivision pattern and the predominate terrace house form of the St Phillips estate. They are identified as having significance in their own right in the LEP and listed as heritage items in LAHC's sec 170 Register.

The Planning Proposal involves excluding the sites of the two **Neutral** buildings at 2A-D Wentworth Park Rd and 17-31 Cowper Street from the St Phillips Heritage Conservation Area and changing the permissible heights and FSR in order to allow the construction of two 8 storey buildings. Because of their height and its impact on the scale of the HCA the new buildings will be **Detracting** buildings as defined by the Buildings Contribution map in the DCP.

The Heritage Assessment accompanying the application seeks to justify the change in scale and form for the two sites from **Neutral** to **Detracting** by arguing that sites are not important to the HCA:

spatially, the site is located at the outer edges of the Conservation Area where the qualities and architectural values of the conservation area are not as evident or as obvious as it would be within the central core. – The site is located within a pocket of varied architectural styles and densities of development and that interpreting the existing buildings as cohesive with the values of the conservation area are less applicable.

The arguments contained in the Heritage Assessment that the existing buildings on the north and south sites are not important in terms of the character of the HCA are wrong.

Fig 2, left, shows how the subject sites adjoin 42 mid-Victorian terrace houses arranged in four groups.

Figs 3, 4 and 5, below, show how the infill buildings were designed to complement the scale and form of their historic neighbourhood.

The north site is a corner site and as such is particularly important in defining the edge of the HCA.

Fig 6, below, shows the impact of replacing the existing low-rise buildings with mid-rise buildings.



Figure 2 The historical and architectural context of the subject sites



Figure 3 2A-D Wentworth Park Rd (the north site) is on the left. It adjoins six mid-Victorian row houses, Premier Terrace



Figure 4 The Cowper St elevation of the south site , on the right, showing its relationship to the mid-Victorian single storey terraces which adjoin it to the south



Figure 5 The Mitchell Lane elevation of the south site showing its relationship to the mid-Victorian terraces facing Wentworth Street



Figure 6 The Mitchell Lane elevation of proposed scheme

Redrawing the boundaries of the HCA to exclude these sites is illogical, it is only an adjustment on paper. Physically it makes no sense, particularly in terms of its impact on streetscape and context, it does not lessen the impact changing the development on these blocks from **Neutral** (low rise) to **Detracting** (mid rise) will have on the HCA. The suggestion that the inclusion of five new three story terrace houses along Mitchell Lane will screen an eight storey building is both ludicrous and tokenistic.

Cowper Street is the logical boundary of the HCA. It has been the boundary for nearly 40 years. Tweaking the boundary to exclude the north site and the south site is spot rezoning based on the landowners, not the public interest. It is the planning equivalent of a gerrymander.

Even more seriously, by changing the number of **Detracting** buildings in this part of the HCA from one building (the 1959 John Byrne Court) to three buildings invites further mid-rise development of LAHC post 1974 sites close to the boundaries of conservation zones. This would completely compromise the Victorian pattern of development and scale of the HCAs.



Figure 7 The maps above show how the proposed excision of the north and south sites from the HCA (on the right hand map the white dotted lines represent the proposed boundary changes and the sites are marked in red) in order to replace Neutral scale buildings with Detracting ones is opportunistic and is not based on a logical boundary of the HCA. The sites marked in blue on the right hand map show how if this corrosive principle is accepted it could further compromise the HCAs by redrawing HCA boundaries to enable Neutral infill to be replaced with Detracting mid-rise development.

In seeking to justify the removal of the two sites from the HCA and the increased height limits and FSRs the planning proposal argues that the changes are acceptable because *they will deliver a built form which responds to the surrounding context including recent development to the east of the site.*

The developments to the east of the site lie outside the HCA. Using the recent high/mid rise developments outside the HCA as a basis for diminishing the controls over scale within the HCA is not soundly based. It is a methodology which has the potential to continue to undermine the HCA as **Neutral** buildings on the boundaries are replaced by **Detracting** ones whose existence then becomes a basis for replacing the **Neutral** buildings adjoining them with **Detracting** ones and so on. It is invasive and corrosive.

The Heritage Impact Assessment acknowledges that *the planning proposal is not consistent with the character statement for the St Phillips Conservation Area which describes residences of a one to two storey scale and that the proposed new development is higher in scale than the majority of the housing in the conservation area (p 59)*

2. The heritage significance of 2A-D Wentworth Park Rd and 17-31 Cowper

Section 1, above, establishes that replacing the current 2 storey infill on the north and south sites with two 8 storey mid-rise buildings is wrong, irrespective of the merit of the extant buildings, because of the impact it will have on the scale and setting in the HCA.

This section of the Society's objection examines the heritage significance of 17-31 Cowper Street. The application states that *the planning proposal is supported by a Heritage Impact Assessment which identifies the heritage significance of the existing buildings as little to moderate (p. 24).*

The assessment of the heritage significance of the subject sites, and 17-31 Cowper St in particular, which is contained in Attachment G, the Preliminary Heritage Impact Assessment by Extent Heritage

is totally inadequate. As such it does not provide a valid basis for the justification of the planning proposal.

Extant Heritage's assessment of 17-31 Cowper St relies on the statement in the applicant's, the NSW Land and Housing Corporation, Section 170 Register that the block has *marginal significance* (p. 23). The HIA includes little primary research about 17-3 Cowper Street and provides almost no contextual research to identify its place in the development of town planning ideas in Australia. It does not identify the architect or architectural influences which shaped it and relies on bald assertions such as the following: *although 17-31 Cowper St is a noted to be a [sic] representative example of the last major period of development in Glebe, there are more interesting examples of this style of infill housing in the vicinity such as 2-18 Mt Vernon Street and 42-58 Catherine St* (p23) (the report doesn't analyse or explain why these examples are more interesting or assess the infill work in the church estates as an ensemble).

On the basis of this inadequate research and flimsy analysis the report makes the unjustified assertion *that the building at 17-31 Cowper St is considered to have LITTLE heritage significance* (p23).

The LEP recognises that the buildings on the south site and the north site are of heritage significance to the St Phillips HCA because they are part of its *post 1974 public housing development and rehabilitation programs*.

In order to rectify this omission and allow the significance of the building to be properly understood and to facilitate a soundly based determination Ian Stephenson, former Director of Historic Places, ACT and CEO of the National Trust for South Australia has carried out some primary research for the Glebe Society whilst Dr Clive Lucas OBE, a distinguished conservation architect, and Dr James Broadbent AM, a leading architectural and landscape historian, conservationist, academic and author, have provided expert opinions on the heritage significance of 17-31 Cowper Street.

The Genesis of 17-31 Cowper Street

In 1985 ownership of the St Phillips and Bishopsthorpe estates was transferred from the Federal Government to the NSW Housing Commission. The infill was designed by the Commission's Inner City Housing Team headed by the architect John Gregory.

John Gregory in speaking about the work ²said it was successful for a number of reasons:

- Extensive social planning was carried out by Brian Astorio. This helped to understand the tenants needs and desires when it came to housing.
- It was ground-breaking in terms of design. There were few if any models in Australian practice for inserting new buildings into historic suburbs. The team looked at British models which worked on the principle that the design of new buildings in historic neighbourhoods should be circumspect. They decided that this approach did not produce good architecture. Instead, they elected to use scale, form and a carefully considered architectural vocabulary to create expressive buildings which related to the historic neighbourhood. John Gregory was influenced in this view by Russell Jack (1925-), principal of Allen Jack and Cottier and a teacher and later Professor at UNSW. Russell Jack taught that good design must have about it an element of delight. Another influence was Ted Mack, who was Assistant Chief Architect at the NSW Housing Commission in the early 1970s.
- As well as understanding the tenants needs the other fundamental consideration in inserting new development into Glebe lay in developing a deep understanding of the subdivision patterns. John Gregory said if the new work was to be successful, the designer had to

² John Gregory speaking with Ian Stephenson, August 2020

understand the rhythm of the subdivision. The *rhythm is what ties things together*, [using it to inform the new work] *is what will make it work*.

- Low density is good social planning, there are several studies which demonstrate that 5 storeys is the maximum height which allows people to feel a sense of connection to the street. Social housing tenants have diverse backgrounds, and some have special needs. Low rise development which does not necessitate the use of lifts gives tenants greater agency in determining who they mix with.

There are a number of things came together in the late 1980s to create this excellent infill in Glebe including:

- A willing client (the NSW Housing Commission)
- A skilful team of architects
- Good social planning which meant the tenants needs were understood
- A considered reading not just of the architectural vocabulary of the St Phillips Estate but how it all fitted together
- Being prepared to design buildings which were creative in their own right, which meant that the designs had a sense of joy and zest

The group worked as a team but there were lead architects for particular projects. The apartments at 17-31 Cowper Street were by David Tory whilst the four terrace houses at 2A-D Wentworth Park Road were designed by a young architect Steven Nihas.

The project added about 1,000 bedrooms, in various configurations of flats and houses, to Glebe in a way which complemented the historic suburb, rather than detracting from it. The maximum height was three storeys. It also respected the neighbourliness of Glebe by providing verandas where residents could engage with the street from their own territory.

Jillian Walliss in Creating Home in Urban Australia praises the Department's infill designs for the way they provide private open space, shared open space and relate to the urban fabric.³ What is striking about the work is that it was not a cookie cutter approach, a variety of forms were created using a common architectural vocabulary which was adjusted to take account of setting and topography. In addition the shared open space was beautifully detailed.

The work of the Inner City Housing team in Glebe, and at 17-31 Cowper Street in particular represents, an unusually sophisticated response to the aesthetic of place in the way it uses scale, texture, modelling, pattern, vicinity and variety to respond to the historic townscapes and is also well considered in terms of amenity and livability.

Clive Lucas, a conservation architect whose projects include Hyde Park Barracks, The Mint, Lyndhurst, Glebe, the former Treasury Buildings Macquarie Street, Swifts Darling Point and the Treaty House in Russell New Zealand, was commissioned by the Federal Government in the 1970s to advise on the conservation of the historic cottages in the Glebe estates. In relation to the south site he notes *17 to 31 Cowper Street ticks all the boxes, scale, character and materials . It is what all infill development in historic areas should exactly do. It is an exemplar.*⁴

James Broadbent, who has written and lectured widely on nineteenth century houses and gardens and conservation philosophy and practice, provided the following assessment of the 17-31 Cowper Street's heritage significance and the impact of the planning proposal on the HCA.

³ Jillian Walliss, Creating Home in Urban Australia, the role of space and form, 1996, University of Tasmania Department of Urban Design thesis.

⁴ Email Clive Lucas to Ian Stephenson 30 November 2020

There are three issues of concern in the planning proposal and associated development:

- 1. The impact of removing the two buildings from the conservation area, changing the height controls and the FSR*
- 2. The demolition of items of heritage significance*
- 3. The impact of the proposed development on the conservation area*

The proposed development does not address adequately the scale, materials, patterns, colours, forms and configurations of the immediate buildings in the area - either the original houses or the 1980s' infill housing. It addresses the buildings immediately without the area to the detriment of within the conservation area.

The proposed development erodes the conservation area whose logical boundary is, and should remain, Cowper street.

This is not only a matter of maintaining the well and logically defined boundaries of the conservation area but also of respecting the planning ideas under-pinning the Glebe urban renewal scheme itself which can now be appreciated as a sophisticated and important piece of urban planning and heritage conservation planning of the late 20th century. That planning itself is of significant heritage value and should be respected, maintained and not amended piecemeal.

Although the remaining 19th century houses are to be retained the infill housing of the 1980s' is of increasing heritage significance. That housing collectively, as well as individual houses, now warrant serious consideration as heritage items.

Just as the Glebe planning scheme as a whole is an important example of mid to late 20th century heritage conservation in urban areas, so the individual houses are fine and considered responses to the design and heritage significances of the 19th century houses. The respect and appreciation shown in the design of the infill houses to the scale, materials, colours, textures and forms of the old houses is masterful: sophisticated, romantic yet practical.

The 1980s houses have achieved heritage value themselves, and the whole - old houses and new - is an homogenous collection of items of heritage significance. In this area of the Glebe Estate the proposed development will destroy this homogeneity.

The planning proposal and the associated development are an undesirable erosion of the Glebe planning scheme. They show minimal respect, aesthetically, for its context of scale, materials, finishes, textures and colours, and minimal respect for the heritage significances of the original 19th century housing or the 20th century infill housing.

It should not be approved.

Using the NSW State Heritage significance criteria 17-31 Cowper St is significant because:

SHR Criteria a)
[Historical
significance]

It is an important part of the layering of the St Phillips Heritage Conservation area which contains:

- I. speculative working-class terrace development from c 1870s by Building Companies.
- II. inter-war church housing development.

SHR Criteria b) [Associative significance]	It is associated with the visionary politician Tom Uren who as minister for Urban and Regional Development in the Whitlam Government acquired the 19 hectare historic Glebe estate to be restored and refurbished as social housing and the work of the NSW Housing Commission Inner City Housing Team who designed contemporary buildings which complemented the historic character of the estate.
SHR Criteria c) [Aesthetic significance]	Of the respect and appreciation which its architect David Tory showed to the scale, materials, colours, textures and forms of the old houses in the estate while producing a new building which is masterful: sophisticated, romantic yet practical.
SHR Criteria d) [Social significance]	The area is held in high esteem by the local community. The 1980s social housing is important not only as an example of sympathetic infill but in the way it integrated its residents into an historic suburb. The design did not, as is more typical, create two classes of residents, those who lived in houses and those who lived in flats.
SHR Criteria e) [Research potential]	<p>Its role as an exemplar of a successful approach to town planning, social planning and design which added density to a heritage conservation area while respecting heritage, locality, identity and culture.</p> <p>Its ability to improve the way) both through planning policy and urban design) in which the density of historic suburbs in NSW is increased without compromising their heritage</p>
SHR Criteria f) [Rarity]	Its rarity as part of an intact neighbourhood, the St Phillip's Conservation Area which has a high level of integrity of the building stock, of the Victorian, Inter - war period and 1980 layers.
SHR Criteria g) [Representativeness]	It is representative. The item is part of an ensemble of infill housing where each complex was of bespoke design reflecting its setting, architectural context and topography but also part of the same school of design.

Using NSW SHR criteria the building at 17-31 Cowper Street is clearly of HIGH significance.

It has a high degree of original fabric. It demonstrates a key element of the significance of the St Phillip's HCA., it represents a landmark in ideas designing infill development in historic suburbs, it has social significance in being designed to meet the needs of social housing tenants and integrate them into an existing neighbourhood. It represents design excellence. Alterations are minor and do not detract from the significance. It fulfils the criteria for local or State listing.

Based on its heritage significance 17-31 Cowper Street should not be demolished.

The property at 2A-D Wentworth Park Rd is identified in Heritage Impact Assessment as having MODERATE significance and should also be retained.

Social significance

The Heritage Impact Statement notes that *the continued use of the original historic function of the site is a positive outcome of this planning proposal considering the importance of the social heritage significance of the site as social housing. It is important that this function is retained in any future development. (p. 43)*

The reasoning here is perverse. It essentially says the applicant could be intending to develop the site for private housing but isn't⁵, therefore the planning application to enable the current **Neutral** built form social housing to be replaced by **Detracting built form social housing** is positive.

The HIS misses the point that the social significance of the 1980s infill is much richer than its role as social housing. It provided new social housing in a traditional working class estate in a way which respected the scale and form of the area and its pattern of living by being low rise, intimate, providing verandas, public and private open space and giving each dwelling a relationship with the street and thereby helping to integrate the new residents into the community.

3. The Design of the new buildings

The buildings are too tall, this has been addressed in Section 1 above. The design alludes to the wool-stores of Ultimo and Pyrmont. This is an alien form in the church estates of Glebe. This is contrary to the City of Sydney 2012 DCP, St Phillips Locality Statement 2.6.9, the City of Sydney, City Plan 2036 Local Strategic Planning Statements which identify the importance of *historic Glebe* and maintaining its *character, heritage and built form*, and A Metropolis of Three Cities, the Greater Sydney Region Plan, Eastern City District Plan which includes as a planning priority *respecting heritage*.

The garage entry to the underground carpark of the south building in Wentworth Street is an obtrusive element in a 19th c. streetscape.

The Heritage Impact Assessment observes that the two eight story buildings *take some cues from the Victorian period such as arched portals*. It is naïve to assert that having a round headed windows makes the building compatible with the HCA. It does not, and cannot, fix the problem of form and scale.

4. Overshadowing of Heritage Items

Seven Victorian terraces in Cowper Street will be overshadowed by the new buildings. This is the result of proposing to erect mid-rise buildings within a Heritage Conservation Area. It further reinforces the specious arguments for removing the north site and the south site from the HCA.

5. Impact on Glebe Point Road High Street

Retail uses are proposed for the ground floor of the north site facing Wentworth Park Road. The creation of a commercial strip along Wentworth Park Rd will further fragment the retail precincts of Glebe and weaken the viability of the Glebe Point Road High Street which is less than 500 metres from the sites.

The Glebe Point Rd HCA notes *the street is important for its collection of Victorian row shops, for its wide variety of attached and detached housing, and for the number of public and ecclesiastical buildings designed by distinguished architects. The street retains a large number of original and later interwar shopfronts and several hotels which reflect the working class history of the suburb.*

⁵ In fact the south site will be private housing

The inclusion of retail and/or commercial uses in the development which will weaken the viability of the nearby Glebe Point Road High Street contravenes Planning Priority E6 of the Eastern City District Plan which is Creating and renewing great places and local centres, and respecting the District's heritage.

6. The Planning Proposal assessed against the provisions of key plans and strategies.

A. Housing for All, City of Sydney local housing strategy, June 2020

The Housing for All, City of Sydney housing strategy is a 20-year plan to guide the quantity, location and types of future housing in the City of Sydney.

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.*

The current planning proposal, whilst providing more housing, does not comply with these objectives because it does not respect the district's heritage, demolishes two significant buildings, compromises a place of great heritage significance by inserting two buildings of the wrong scale thereby creating threats of further intrusive development and does not result in an overall better urban design outcome.

The housing strategy gives quite specific guidance which is applicable to the St Phillip's estate:

the city has a rich supply of medium density, standalone, detached, semi-detached and terrace houses, mostly in heritage conservation and residential zoned areas. Each of these local areas has a distinct local character and a range of housing types that contribute towards the city's diversity. It is crucial that the local character and housing diversity in these areas is preserved as future housing growth will consist almost entirely of apartments in medium- to high-density development.

With most of the future housing growth in the city coming from apartments, the heritage conservation areas will play an increasingly important role in maintaining diversity of housing stock and providing homes for families and larger households. Heritage conservation areas also provide opportunities for secondary dwellings. Secondary dwellings are allowed under the current planning controls. With improved design and layout guidance, flexible housing solutions can be provided in a way that manages impacts on heritage, surrounding properties and the public domain.

The strategy recognises that better controls are needed to insert additional housing into heritage areas and that the

NSW Government as a large owner of heritage housing stock has a special role to play in this:

3.4 Investigate controls to ensure secondary dwellings are well designed and respect the character of heritage areas.

3.5 Work with the NSW Government to facilitate medium density housing [so that] density developments are designed and built to respect the established local character and amenity of future residents and the existing community.

It identifies the inherent weaknesses in the NSW Governments Communities Plus program which *aims to renew social housing at no cost to the government by targeting a split of 70 per cent private and 30 per cent social housing through redevelopment. Effectively, this requires that sites need to more than triple in density to maintain the same number of social housing dwellings.* This is one of the reasons why the planning proposal seeks to increase FSRs of the north from 1.25:1 to 4.3:1 and the south site from 1.25:1 to 3.1:1.

The strategy notes in regard to the LAHC holdings that *these sites often comprise large consolidated land holdings and are well-located for access to transport and jobs, allowing social housing tenants good access to employment and other opportunities. These sites tend to have a relatively high dwelling density compared to social housing sites elsewhere in Sydney and New South Wales. It is difficult to apply the Communities Plus program to these sites, as the resultant tripling of density is rarely consistent with creating good places.*

The St Phillips estate provides some rich messages to town planners and architects as to how density can be increased without destroying heritage, liveability, identity and community because of the exemplary work of the NSW Housing Commission Inner City Housing Team in the 1980s and 1990s in inserting a significant amount of housing into the Glebe estates with no building being higher than three stories. It is ironic that rather than following this model and identifying other opportunities within the Glebe estates for sensitive infill, LAHC's planning proposal involves the demolition of exemplary infill, doing spot rezoning by trimming the boundary of the HCA and erecting two 8 storey apartment buildings. It is an approach which is completely alien to the provisions of the Eastern City District Plan, The City of Sydney, City Plan 2036 Local Strategic Planning Statements and the housing strategy.

The housing strategy identifies the problem and seeks to address it when it states in *Section 5.5 Work with the NSW Government to adapt the Communities Plus model to include retention, adaption and improvement of existing social housing and supported housing stock* and sets as a goal at *Priority H6 Improving NSW Government controlled site outcomes.*

B. Future Directions for Social Housing Policy

The proposal does not accord with the following principles of the 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 infill which is proposed for demolition was 'place based' in its design. It fitted in with the form, scale and pattern of living of the St Phillips estate, a traditional working class community. The two eight story flat developments are alien to the spirit of the place. Far better results would be achieved by adopting the techniques of the Housing Commission of the 1980s who inserted the equivalent of 1,000 bedrooms into the church estates with no building being over three stories.

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 and replacing them with eight story flats.

A Negligible Increase in Social Housing

The project is demolishing 27 social housing bedrooms (4 x 3 bedroom terraces and 15 x 1 bedroom flats) and replacing them with the equivalent of 42 bedrooms in a mix of studios and 1 and 2 bedroom flats. All in the north building. The south building will contain 39 1, 2 and 3 bedroom dwellings.

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

(the Eastern City District's Plan criteria are written in red ink whilst the planning proposal's performance against those criteria are in black ink)

3 Liveability

Planning Priority E4

Fostering healthy, creative, culturally rich and socially connected communities

The planning proposal will lead to the demolition of well-designed low rise social housing which reflects the character of an historic neighbourhood and uses private open space, public open space, sensitive design and low rise to integrate its residents into the neighbourhood thereby *fostering healthy, creative, culturally rich and socially connected communities*, and replace it with two 8 storey apartment buildings thereby diminishing the cultural richness of the St Phillips estate and physically disconnecting its residents from their community.

Planning Priority E6

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

The St Phillips HCA was recognised as one of the most intact urban landscapes in Australia nearly fifty years ago. There has been nearly 40 years of public and private investment in its conservation and rehabilitation including its purchase by the Federal Government in 1974 and the construction of sensitive low rise infill housing by the NSW Housing Commission from the late 1980s. It is undoubtedly a *great place* as envisaged in the Eastern City District Plan, however the planning proposal will damage rather than renew the estate.

The Glebe Point Rd High Street is recognised in the Sydney City Council 2012 LEP as important. By providing retail uses on Wentworth Park Rd the planning proposal undermines the District's heritage by weakening the viability of Glebe Point Road.

The provision of retail on Wentworth Park Rd in close proximity to the housing is also contrary to Objective 7 of the ECD Plan which aims to encourage physically healthy communities in that it reduces the need to walk to the shops.

The ECD Plan states that heritage and history are important components of local identity and great places. The District's rich Aboriginal, cultural and natural heritage reinforces its sense of place and identity. A variety of local heritage items and heritage streetscapes also form part of the character of centres throughout the District. Identifying, conserving, interpreting and celebrating Greater Sydney's heritage values leads to a better understanding of history and respect for the experiences of diverse communities. Heritage identification, management and interpretation are required so that heritage places and stories can be experienced by current and future generations. Sympathetic built form controls and adaptive reuse of heritage are important way to manage the conservation of heritage significance.

The planning proposal undermines the existing *sympathetic built form controls* for the management of the St Phillips HCA. The ECD Plan states that *heritage, identification and management are required so that heritage places can be experienced by current and future generations* however the Heritage Impact Assessment which constitutes an important justification for the planning proposal is inadequate and fails to justify the removal of 2A-D Wentworth Park Rd and 17-31 Cowper Street from the HCA and increasing the height limits on the sites and the FSRs.

Objective 12 Great places that bring people together.

Greater Sydney's cities, centres and neighbourhoods each have a unique combination of local people, history, culture, arts, climate, built form and natural features creating places with distinctive identities and functions. Great places build on these characteristics to create a sense of place that reflects shared community values and culture. Through this, they attract residents, workers, visitors, enterprise and investment. Great places include all parts of the public realm such as open space, streets, centres and neighbourhoods, and the interface with the private realm which includes residential, commercial and industrial streetscapes. They exhibit design excellence and start with, and focus on, open space and a people-friendly public realm. They recognise and celebrate the local character of the place and its people.

The Eastern City District Plan seeks to nourish Sydney as a city of distinct places. Glebe with its diverse demography, rich history and location and topography is one of Sydney's most culturally rich and distinctive 'villages'. The planning proposal undermines the distinctive character of Glebe by introducing 8 storey buildings into a HCA and arguing that by making them resemble wool-stores, a built form typical of Ultimo not Glebe that they fit in with the character of Glebe.

5 Sustainability

Planning Priority E16.

Protecting and enhancing scenic and cultural landscapes

The planning proposal will diminish the cultural landscape of the St Phillip's HCA by introducing two 8 storey buildings which will compromise the almost intact low-rise scale of the HCA. By increasing the number of **Detracting** buildings (see Section 1 above) from one to three in the precinct, and two to four in the HCA as a whole, it weakens the ability to prevent further adjustments to the HCA to allow **Neutral** buildings (low rise) to be replaced by **Detracting** (mid-rise) ones.

The Wentworth Park Rd interface between Glebe and Wentworth Park has particular significance as a cultural landscape because the low-rise built form of Glebe enables the earlier form of Wentworth Park as Blackwattle Bay to be legible. This has particular significance in nurturing a layered city where indigenous landscapes are preserved, understood and appreciated.

Planning Priority E19. Reducing carbon emissions

2A-D Wentworth Park Rd and 17-31 Cowper Street are well built masonry structures, shaded by verandas and have a relatively small ratio of glass to wall mass. Their demolition and replacement wastes embedded energy and does not contribute to *reducing carbon emissions*

D. The City of Sydney, City Plan 2036 Local Strategic Planning Statements

(a) Introduction

The City Plan 2036 divides the city into localities. *The City's locality statements are place-specific and draw on the unique character of each area, including topography, landscape, street and park layout, setting, public buildings, heritage, streetscape, land uses and buildings. These statements are used to guide development. Each locality has its own strategic planning statement based on its history, character, and identity.*

The planning proposal is in the locality called **Glebe Point Road village**. The City Plan identifies special values for the **Glebe Point Road village** - *it is known for historic Glebe and the local shopping street of Glebe Point Road*. It indicates that important things the community like about this locality are **Character, heritage and built form**.

The locality statement refers to *historic Glebe*. The St Phillips estate, which is now the St Phillips HCA, which is the subject of the planning proposal, is one of two church estates dating from 1828. The estates

from which Glebe takes its name. It is recognised as being a place of exceptional heritage significance and is a core part of the spirit of *historic Glebe*. Redrawing the boundary of the HCA to allow the construction of two 8 storey buildings will compromise the special values of Glebe identified in LSP.

(b) City Plan 2036 Planning Priorities, Actions and Objectives for the Glebe Point Road Village

The planning priority Liveability (L2) is ***Creating great places***. The following processes are set as a means of achieving this:

- i. *To plan for accessible local centres and high streets to be the heart of local communities,*
- ii. *protect the character of our distinctive heritage neighbourhoods and iconic places,*
- iii. *and deliver design excellence and high amenity in the built environment.*

It identifies ***People-focused urban design, planning and placemaking*** as an important tool, recognises that *high-quality urban design, planning and place making can improve the amenity and safety of the city, encourage people to connect, meet, be active, have fun and build strong communities and sets the following objectives:*

- iv. *Local centres and activity streets are a focus for the community's social and cultural life and support health and wellbeing*
- v. *Indigenous and non-indigenous heritage is conserved and maintained*
- vi. *The character of unique neighbourhoods is protected and celebrated*
- vii. *The city exhibits design excellence*

Under **Key Moves** it sets the goal to ***Make great places***, explains the value *distinct identity and character* have in *adding to the success of local neighbourhoods* and sets some performance criteria to make great places:

- viii. *The City will continue to conserve its local heritage items and conservation areas as their historical origins and relationships to places contribute to the local character and strengthen each community's sense of place.*
- ix. *Great places and improved liveability will also be achieved by supporting centres and high streets for local services, retail and recreation.*

Planning priorities include:

- x. *Creating and renewing great places and local centres E6*
- xi. *Respecting the District's heritage E16*
- xii. *Protecting and enhancing cultural landscapes*

Objectives are that:

- xiii. *Local centres and activity streets are a focus for the community's social and cultural life and support health and wellbeing*
- xiv. *Indigenous and non-indigenous heritage is conserved and maintained*
- xv. *The character of unique neighbourhoods is protected and celebrated*
- xvi. *The city exhibits design excellence*

Actions include L2.9 (d) *ensuring development of heritage items, contributory buildings in conservation areas, and new development in conservation areas conserves the heritage values of the place and is sympathetic to the built form, scale and fabric*. It is noted that:

- xvii. *Buildings in the conservation areas are classified based on their contribution to the significance of the area. The loss of contributory buildings erodes the very fabric that makes conservation areas significant, and that*
- xviii. *the City's conservation areas provide housing at the highest population densities in Australia. The small lot sizes, variety of accommodation types and over two centuries of accumulated growth have produced successful urban environments that accommodate change and warrant protection.*

(c) The Planning Proposal assessed against the criteria of the City Plan 2036 for the Glebe Point Road Village as set out in D (b) above

Heritage

The criteria as listed at D (b) above require that:

- a District's heritage is respected;
- the character of unique neighbourhoods is celebrated;
- the character of distinctive heritage neighbourhoods is protected
- That local heritage items and conservation areas will be conserved as they contribute to local character and a community's sense of place
- that indigenous and non indigenous heritage is conserved and maintained, and
- that cultural landscapes are protected and enhanced.

The planning proposal is contrary to these principles, strategies and actions because it:

- Changes the boundary of the St Philips HCA so it no longer is the same as the boundary of the St historical Phillip's estate. These boundaries have been in place since 1828
- Will allow for the development of two 8 storey towers in the St Phillip's HCA thus compromising its intact scale
- Will lead to the demolition of two buildings, the north site and the south site which are identified as being of heritage significance in the 2012 LEP
- Will involve the demolition of 17-31 Cowper Street which is arguably a heritage item in its own right (see 2 above)
- By tripling the number of **Detracting** buildings in this precinct from one (the 1959 John Byrne Court) to three creates a precedent for further planning adjustments to allow the replacement of **Neutral** buildings with **Detracting** ones.
- By creating two 8 storey buildings on the Wentworth Park boundary of Glebe, and creating the prospect of more such buildings, diminished the cultural landscape, particularly the topography of Glebe and the legibility of the former Blackwattle Bay (now Wentworth Park).

Heritage and the High Street (Glebe Point Rd)

The criteria as listed at D (b) above require:

- *To plan for accessible local centres and high streets to be the heart of local communities,*

- *That local centres and activity streets are a focus for the community's social and cultural life and support health and wellbeing*
- *Creating and renewing great places and local centres E6*

The planning proposal does not support these principles, strategies and actions because it creates additional retail on Wentworth Park Rd thus weakening the role of Glebe Point Rd which is at the core of the identity of the ***Glebe Point Road village***.

Design

The criteria as listed at D (b) above require that:

- *The city exhibits design excellence*
- *Deliver design excellence and high amenity in the built environment.*

The planning proposal does not support these principles, strategies and actions because the design of two 8 storey towers in an intact low-rise Victorian neighbourhood is an alien element which will detract from the neighbouring buildings. It is based on the design of Edwardian wool-stores, a form typical of Ultimo but not Glebe, the claim that the inclusion of round portals means it will be sympathetic to the 42 Victorian terrace houses which adjoin it is patently false, it provides reduced amenity for social housing tenants than the present buildings which are low rise, have public and private open space and are physically integrated into the HCA.

Spot Rezoning

The planning proposal for 2A-D Wentworth Park Rd and 17-31 Cowper Street is a spot rezoning.

Planning proposals for additional development capacity through 'spot rezoning' must have strategic merit and site-specific merit. Council must apply a local merits test to guide it in the consideration of the application and consistent decision-making about planning proposals in the local area.

The local merits test involves the application of strategic principles of growth. The relevant strategic principles of growth are set out below in red, the assessment of the planning proposal against the strategic principle is in black.

Proposals must be consistent with the Greater Sydney Region Plan and Eastern City District Plan.

The proposal is not consistent with these plans as set out in section 6 (c) above.

Proposals must be consistent with the relevant liveability, productivity, infrastructure and sustainability priorities, objectives and actions in this local strategic planning statement.

The proposal is not consistent with liveability and sustainability priorities, objectives and actions of the local strategic planning statement as outlined above.

The proposal must create public benefit.

For the reasons outlined at sections 1-6 above the proposal does not create public benefit.

Proposals must make a positive contribution to the built environment and result in an overall better urban design outcome than existing planning controls

For the reasons outlined at sections 3-6 above the proposal does not result in an overall better urban design outcome than existing planning controls

Proposals must result in high amenity for occupants or users.

For the reasons outlined at sections 2, 6 (B) the proposal does not result in high amenity for its occupants and users, indeed the proposal will reduce the liveability and amenity of a social housing

community by demolishing carefully planned low rise buildings and replacing them with eight story flats.

The planning proposal should be rejected as it does not meet the merits test.

E. The City of Sydney Local Environmental Plan 2012

The St Phillips Locality statement provides clear direction for the management of the St Phillips estate. Including that it will *a predominant one to two storey building scale to respect the heritage character of the area. The intact townscape, including the building form, scale, architectural elements, and relationship to the street is to be retained and enhanced. New development that is introduced is to be sympathetic to its surrounds.*

Principles

(a) Development must achieve and satisfy the outcomes expressed in the character statement and supporting principles.

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

(c) The siting, massing and height of new development is to retain the visual prominence of the tree canopy.

(g) Encourage simple pitched roofs for dwellings to create an appropriate spatial relationship to the street.

The planning proposal and its concomitant development is contrary to the character statement which sets the objectives for development in the St Phillips estate and the associated principles.

F: The NSW Environmental Planning and Assessment Act, 1979

Objects of the EP&A Act, Section 1.3	Comments
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(a) to promote the social and economic welfare of the community and a better environment by the proper management, development, and conservation of the State's natural and other resources

Because of its ownership by the Church of England for 152 years, its acquisition by the Federal Government in 1974 who conserved and renovated the houses and its transfer to the NSW Housing Commission in the 1980s who increased the density by designing sensitive infill housing the St Phillips estate is of outstanding heritage significance as an intact Victorian era suburb in close proximity to the Sydney CBD. The planning proposal to remove the subject sites from the HCA and replace the low rise infill with two 8 storey towers does not represent proper management of the State's resources.

(c) (c) to promote the orderly and economic use and development of land,

The planning proposal is equivalent to a spot rezoning and undermines a 40 year investment in the historic and social character of Glebe by both the Commonwealth and NSW Governments and Glebe residents and does not promote the orderly use and development of land.

(f) (f) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),

The proposal does not promote the sustainable management of built and cultural heritage because it:

- involves the demolition of two well built buildings which were carefully designed to fit in with the historic and social character of the St Phillips HCA,
- compromises the integrity of the St Phillips HCA by inserting two 8 storey buildings into a heritage precinct which retains its low rise character,
- confuses and diminishes the physical character of the St Phillips HCA by introducing buildings whose design reflects early 20th c. wool-stores, a form characteristic of Pyrmont/Ultimo but alien to the St Phillips HCA,
- compromises the social significance of the St Phillips HCA by demolishing 1980s infill which reflects and sustains the traditional living patterns of the working class community and replaces them with mid-rise flats

(g) (g) to promote good design and amenity of the built environment,

The design of the mid-rise flats is not good design because it is out of scale with the HCA, is based on a building type not found in the HCA and causes overshadowing within the HCA

As outlined above the planning proposal cannot be justified as it is based on inadequate evidence and does not comply with the provisions of:

- A Metropolis of Three Cities, the Greater Sydney Region Plan, Eastern City District Plan
- The City of Sydney, City Plan 2036 Local Strategic Planning Statements
- The City of Sydney Local Environmental Plan 2012,
- The NSW Environmental Planning and Assessment Act, 1979
- The City of Sydney 2012 Local Environment Plan

Yours sincerely

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

Janet Wahlquist
President
Glebe Society