



A submission prepared by the Walter Burley Griffin Society Inc (WBGS) on the Explanation of Intended Effect: Changes to create low and mid-rise housing (EIE), currently on public exhibition

The Walter Burley Griffin Society is a heritage advocacy and non-profit association of volunteers established in 1988 that commemorates and promotes a better understanding of the lives, ideals, vision and works of Walter Burley Griffin and Marion Mahony Griffin¹. The Griffins' environmental ideals and vision for urban development in harmony with nature, and for cohesive communities are as contemporary as ever. The Griffins' extensive and unique architecture, landscape architecture, urban design and urban planning in Canberra, Sydney, Leeton, Griffith and North Arm Cove, are widely recognised. When planning for metropolitan or regional urban areas, the Government should take a page from the Griffins' book.

We acknowledge that the NSW Government proposed changes to the NSW planning system are in response to the housing crisis in Sydney. We also understand that the planning reform is predicated on the NSW Productivity Commission's (the Commission's) series on how to make housing more affordable and to make the best use of Sydney's infrastructure (*'Building more homes where people want to live'*), (*'Building more homes where infrastructure costs less'*) and (*'What we gain by building more homes in the right places'*).

We believe it is well documented with plenty of evidence that it is hard to task the NSW planning system with delivering affordable housing supply in the market economy. It will make the task even more difficult with the proposed broad brush, indiscriminate up-zonings claiming that the private sector will deliver trickle down housing affordability.

There is no argument against the intention to build more homes in the right places, but the practical description and acceptable definition of the 'right place' have not been provided in any of the Department of Planning, Housing and Infrastructure's (DPHI) or the Commission's public material. The radius of 400m/800m/1200m from a transport or commercial node is far too simplistic for the complex urban morphology.

It is very concerning that the EIE does not mention what the impact would be of the proposed changes to the zoning, land use permissibility and primary development standards on our built, tangible urban heritage. Our heritage is not just our past, it is the essence of who we are. It is what gives Sydney its character, distinguishing it from any other city nationally and internationally and it is a significant tourism asset.

¹ Walter Burley Griffin Society web page: <https://www.griffinsociety.org/>

Heritage conservation areas have been created in previous decades with significant council resources, extensive independent and professional expertise and thorough community engagement. They are discreet parts of Sydney's urban development, and have been created for the broad community (not just those living in them) and importantly for future generations.

So it is of great concern to read the Productivity Commission paper (*What we gain by building more homes in the right places*) qualifying heritage conservation areas as '*preventing our cities from meeting the needs of their current and future residents*'.² Equally concerning is the statement in the DPHI's paper on Transport Oriented Development (TOD) program³ on new planning controls delivered through a new State Environmental Planning Policy (SEPP) that would apply in heritage conservation areas: '*...relevant heritage controls will apply to the extent they are not inconsistent with the new standards.*' (pg.11)

Urban renewal at this proposed scale needs to take into consideration the impact of any urban renewal adjacent to, or in the vicinity of, a heritage item. For example the Cameron House at 33 Marian Street, Killara designed by Walter Burley Griffin⁴ is near Killara Station.

Conclusion

We strongly object to the proposed planning reform.

The character of this reform, if adopted, will not create liveable and humane high residential density. The important architectural and urban heritage across Sydney Region must be preserved, including not only free-standing buildings but also key heritage conservation areas.

The advocacy for preserving heritage does not make us NIMBYs, many of our members live and raise their families in apartment buildings. The Commission has taken a simplistic, one sided and misleading approach, which would, if implemented, have far reaching and irreparably damaging consequences.

The Government must deliver a more strategic approach and protection for our heritage.

We appeal to you to follow the recommendation outlined in the third Productivity Commission's paper (pg.41, 3.3 *Balance heritage with renewal, diversity, and vibrancy*):

We need a state-wide strategic vision for heritage protection, as well as a mechanism for achieving it. The NSW Government's Heritage Strategy, under development at the time of writing, is an opportunity to define what is most significant and to explore options to ensure we meet both heritage and housing supply objectives.

Once the heritage strategy for NSW is completed, it then needs to inform the urban renewal policy to ensure that new housing will actually be located in "the right places". The cart should not be put before the horse.

Yours sincerely,



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² <https://www.productivity.nsw.gov.au/what-we-gain-by-building-more-homes-in-the-right-places>

³ <https://www.planning.nsw.gov.au/sites/default/files/2023-12/transport-oriented-development-program.pdf>

⁴ *Visionaries in Suburbia: Griffin houses in the Sydney landscape*, Edited by Anne Watson, 2015, pp 124 – 131).