



## **Submission on the draft Inner West Council Housing Strategy**

### **About us**

Save Dully is a residents' action group which was formed following the release of the draft Sydenham to Bankstown Urban Renewal Strategy in 2015. We are an incorporated association with an elected committee.

We have around 220 people on our subscriber list and 1,000 on our Facebook page. We are predominantly interested in urban planning matters in Dulwich Hill.

Thank you for the opportunity to comment on the draft Housing Strategy.

### **Comments on the strategy**

#### *Principles*

We have some concerns about the wording of the strategy's vision and principles.

Under the vision of *Respecting our History, Culture and Character*, there are two relevant principles, as listed below:

1. Ensure the cultural, historical and spiritual significance of landscapes, sites, waterways, customs and traditions that Aboriginal communities wish to conserve are protected and maintained when planning for housing development.
2. Accommodate housing growth through a range of sensitive infill compatible with heritage values and local character – enabling areas to evolve with respect.

The first principle could be interpreted as applying only to things that "Aboriginal communities wish to conserve". The second principle relates only to housing growth.

This raises the prospect that none of the principles of the draft strategy relate to preserving non-Aboriginal existing heritage and character, without this heritage and character being exposed to housing growth.

We think this is an unfortunate situation. There are likely to be many areas of the council where infill development is not appropriate, such as heritage conservation areas and items. The draft strategy should reflect this.

#### *Relationship to Sydenham to Bankstown strategy*

As the council would be aware, the Dulwich Hill community spent considerable energy fighting inappropriate planning proposals related to the Sydenham to Bankstown corridor, from 2015 to 2018. The council was largely an ally in our fight.

It is therefore now disappointing that, via this draft strategy, our corridor and suburb is once again being targeted for potentially inappropriate development levels, linked to a Metro line which the community did not request.

For instance, the draft strategy on page 85 refers to “significant uplift”, and on page 69 refers to “major urban redevelopment sites”, as happening in the Sydenham to Bankstown Corridor. We do not think this is appropriate language and undermines confidence that sensitive planning will happen in our corridor.

We therefore ask that the above language be removed and that the strategy instead commit only to locally-appropriate and sensitive planning in our corridor.

#### *Impacts on existing residential areas near railway station*

We are disappointed with the strategy’s implied suggestion that existing low-density residential areas within the suburb, and particularly near the railway station, will be targeted for redevelopment.

At the Dulwich Hill Village Fair in 2018, we surveyed 75 residents about developments they did and did not like, and their aspiration for the suburb. We also conducted a survey of our subscribers in April 2019. We received some 44 responses to this survey.

Across both these surveys, it was clear that there was a strong desire of Dulwich Hill residents to avoid rezonings which impact on the existing residential fabric of the suburb.

For instance, on the survey question as to whether people wanted to protect the “existing, low-density residential fabric of the suburb”, some 80 per cent strongly agreed, and 11 per cent agreed.

We think the reference to investigating development to the north of the railway station to Dulwich Grove and south to the Cooks River, as being code for investigating development in existing residential areas, particularly deep into the heart of the suburb.

This is particularly given some of these streets (such as Macarthur Parade and Blackwood Avenue) were not proposed for rezoning even in the 2015 or 2017 Sydenham to Bankstown Urban Renewal Strategy. We note that the council submissions to these strategies explicitly supported these areas remaining single dwelling areas.

While we appreciate the need to investigate rezonings in streets immediately adjacent to the railway line and station (ie: Bedford Crescent and north of Ewart St) we are likely to oppose rezonings outside these areas in residential areas.

As the council is aware, we have – with our members – articulated a potential broader urban planning vision for our suburb, called [Our Suburb, Our Future](#). We go into more detail on the need to protect existing residential areas in this report.

#### *Residential areas south of Arlington Grove light rail station*

In line with the comments above, we are also disappointed at the suggestion that a residential area south of Arlington Grove station be targeted for redevelopment.

The creation of this investigation area appears to be arbitrary and lacks an evidence base.

We think residents in this area, particularly those in Grove St, have suffered enormously from the unsympathetic new Arlington Grove development and to propose a further round of urban renewal in existing residential areas we think is unfair. It also be noted that a number of new developments have been approved but yet to be constructed in the area.

In addition, on face value, the block sizes in the proposed investigation area appear very small, which inhibits orderly redevelopment. We think the description of the area containing “older styles generally not of a cohesive character” is not a correct description of the historic quality of homes in the area.

#### *Waratah Mills reference*

Whilst acknowledging the relatively small amount of housing proposed for the Waratah Mills area, and the fact this will be a proposed future investigation from 2026, it should also be acknowledged that the part of the area around this station contains a sensitive environmental habitat, which is a haven for small birds, reptiles and insects.

In addition, the GreenWay-related bike boulevard in Weston St has the potential to be highly impacted by development. The area also contains large number of homes of architectural significance and historical value.

#### *Biodiversity mapping*

As you are no doubt aware, the Marrickville LEP and complementary development control plan (DCP) contains mapping and planning provisions relating to terrestrial biodiversity.

This mapping covers Dulwich Hill, along with other suburbs such as Lewisham, Petersham and Marrickville West.

We are concerned that the draft Housing Strategy has not considered, at all, this mapping or planning provisions, in making recommendations about housing growth in Dulwich Hill.

The relevant LEP planning clauses, relating to these maps, have the following objectives:

- Protect native fauna and flora
- Protect the ecological processes necessary for their continued existence, and
- Encourage the conservation and recovery of native fauna and flora and their habitats.

We don't see that it's possible for the above clauses to be implemented or respected through the wholesale rezoning of homes in our streets, which would lead to development of open space around private homes which currently support biodiversity.

Among other things, the planning controls in the LEP and DCP were put in place to help protect Dulwich Hill's colony of native long-nosed bandicoots. These bandicoots have been listed as an endangered species since 2008.

The former Marrickville Council's [guide to planning in the bandicoot zone](#), for instance, states that “disturbance to 25 per cent or more of a site may impact on existing or potential bandicoot habitat”.

This reflects a [major study in 2010](#) which found that bandicoots live in the underfloor areas of historic houses and in nearby natural foraging habitat, including in backyards.

We understand that a 2016 study by the University of Sydney found that, if a bandicoot colony still exists in the suburb, it would be most likely that bandicoots would be living under old homes and in backyards. To this end, we have been heartened to hear that – in the last month – there has been a sighting of a bandicoot in a private backyard at Weston St. This discovery would appear to support the theory of the university researchers.

Even if there is no bandicoot colony at present in the suburb, history has shown the colony has previously disappeared and then re-appeared.

As a result of the above council planning documents, residents completing minor developments are required to protect bandicoots. However, on the other hand, the council is now contemplating wholesale rezonings which would undo this work.

Given this, we would question that strategy's proposal to intensify development in existing, historic residential areas currently covered by this biodiversity mapping.

### *GreenWay*

We note that the strategy proposes increasing redevelopment along the Greenway corridor. For instance, it states (on page 36) that "the Greenway Corridor...provides an opportunity for redevelopment along the light rail corridor."

We question the assumption that the GreenWay corridor should be used as a trigger for development.

We think our comments on biodiversity outlined above provide support for us challenging this assumption. In addition, run-off and potential traffic impacts from higher-density development would appear to have the potential to cause damage to the GreenWay vision, rather than support it.

For instance, placing additional development in and around Waratah Mills could impact on the GreenWay biodiversity habitat which runs along either side of the light rail in Weston St and is an important small bird habitat.

Instead, we are also advocating for an alternate and lower density green corridor vision for private land alongside the GreenWay. More information is available about this in the *Our Suburb, Our Future* document.

### *New Canterbury Rd*

We note the reference in the Housing Strategy to the fact that feedback from Dulwich Hill has supported the development on the corner of Lewisham Rd and New Canterbury Rd.

As stated in our *Our Suburb, Our Future* document, we believe that there is some degree of comfort among the community to the possibility of further development along New Canterbury Rd, if this development is well-designed and sensitively integrates with any adjoining residential areas. The positive reaction to the development on the corner of Lewisham St and New Canterbury Rd is an illustration of this.

This type of development has the potential to improve some rundown areas along New Canterbury Rd, while at the same time deliver new housing and importantly refreshed retail and other facilities.

In other words, this development will return something back to the broader community, in the form of activation and new retail facilities, in a way that development in existing low-density areas will not.

Save Dully is interested in working with the council to further explore options in this corridor.

As the concept of further development in this corridor has not been widely articulated, there would need to be intensive community consultation in relation to this concept.

### *Hercules St site*

A rezoning and development proposal for the Hercules St industrial site has been given preliminary gateway certificate approval to be placed on public exhibition.

Save Dully has been on the record stating that this development proposal is excessive, particularly in light of the privacy and overshadowing impacts of Dulwich Hill public school and the Hercules St residential area. Please see *Our Suburb, Our Future* for our broader views on the appropriate planning on this site.

Nevertheless, we are keen to ensure that – if development is ultimately approved on the site – then the yield on the site counts towards any dwelling targets for Dulwich Hill, rather than being in addition to these targets.

### *Affordable housing*

The strategy tackles the difficult area of affordable housing. It spends a considerable number of pages examining the different planning options to deliver affordable housing.

We note that the strategy has a considerable focus on delivering new affordable housing, as part of the creation of new private development. In doing this, it references the Inner West Council's Affordable Housing Strategy.

In 2017, Save Dully lodged [a submission](#) in response to the strategy.

This submission noted that, in December 2016, the council administrator resolved (without community consultation) to pursue a target that 15% of apartments in major new developments be affordable.

The submission also noted that a background study which accompanied the strategy showed that, to achieve the 15% target in Dulwich Hill, the only financially viable form of development to capture value would be the rezoning of areas currently containing separate housing to allow 14 storey towers.

These types of developments are not compatible with historic areas such as Dulwich Hill.

In the same 2017 submission, we expressed concern that the council's policy and this adopted target was not subject to adequate community consultation.

As such, we are questioning the draft Housing Strategy's emphasis on this delivery of new affordable housing through private developments.

We are disappointed that the strategy does not suggest more stringent controls and assessment processes to reduce the impacts of the redevelopment or conversion of existing affordable housing. The *Our Suburb, Our Future* report outlines the example of a site at Osgood Avenue, Marrickville West, which was allowed to be converted away from affordable housing without sufficient scrutiny.

We do agree however with the concept of council land – such as carparks - being used to deliver affordable housing (page 86).

As the council owns the Seaview St carpark, it is in the box seat when it comes to mandating affordable housing levels. This is a preferred outcome, compared to forcing reluctant private landowners to deliver affordable housing, which can only ultimately lead to larger and bulkier buildings.

### *Seaview St carpark*

As outlined in our document *Our Suburb, Our Future* we believe that a conversation needs to commence with the Dulwich Hill community about the possibility of the Seaview St carpark being a significant renewal, place-making and housing opportunity (including to create new affordable housing).

We consider that focussing on development on this site can help to reduce the housing pressure on existing residential areas, while at the same time helping to activate our town centre and removing eyesore elements. At the same time, it should be noted that there is a strong community desire to retain carparking.

We are concerned that the strategy's investigation area precludes (for reasons that are not clear) the Seaview St carpark (it appears to be outside the boundary).

### *Industrial areas*

The Housing Strategy, in line with the Greater Sydney Commission's Eastern City District Plan, effectively prohibits any new development in industrial areas (including in the Carrington Rd precinct). The net effect of this policy is to increase redevelopment pressure on areas such as Dulwich Hill.

Our general view is that the prohibition on industrial land redevelopment is too 'black and white' and that the council should advocate for some redevelopment for mixed use and creative industries purposes on well-located industrial land.

We note that the strategy for instance suggests that affordable housing could be located in redeveloped industrial areas.

By doing this, there will be less pressure on existing residential areas.

### *Heritage*

We note that the Housing Strategy states that there will be heritage investigations "on some key locations" as part of a place-based study (page 130). We are confused as to what this means and believe this statement is unnecessarily vague.

For our broader view on heritage issues, please see the relevant chapter in *Our Suburb, Our Future*.

### *Open space*

The draft strategy is correct in identifying that a potential constraint on development is the comparative lack of open space at Dulwich Hill.

The council's 2018 Recreational Needs study found Dulwich Hill currently has 4.5m<sup>2</sup> of open space per person, compared with the benchmark provision of 13.3m<sup>2</sup> of open space per person across the LGA.

Of this open space, the Arlington Reserve is set aside for elite youth soccer, Jack Shanahan Reserve mainly used for youth-related activities and the Marrickville golf course is set aside for golf. This leaves little space (primarily the very busy Johnson Park) available for general recreation use.

It would seem unlikely that the creation of new open space along the GreenWay (at Jack Shanahan Reserve) will make a significant change to this figure.

The lack of open space makes us question whether Dulwich Hill should be considered a priority area for urban renewal, and whether the number of dwellings proposed is achievable.

### *Infrastructure analysis*

We would urge that a further infrastructure analysis takes place before rezonings.

In particular:

- Although Dulwich Hill is proposed as a priority area for urban renewal because of the Metro line, this Metro line will not be in place until at least 2024. Before this time, the Bankstown Line will be at reduced capacity as it suffers regular weekday and weekend shutdowns to build the new line. To this extend, the possibility of increased housing pressure in the pre-2024 period is concerning.
- As noted by the draft strategy, there is currently a problem with overcrowding on the light rail line. There is no indication that the additional light rail vehicles needed to help solve this overcrowding issue will be purchased. <sup>1</sup>
- The strategy notes there is a lack of data to understand local school capacity. This data should be obtained and planning for school growth in place concurrently with any planning for increased housing growth.

### *Medium rise housing*

We note that the strategy states that “low and medium rise” flat buildings will be constructed in the area in around Dulwich Hill train station (see page 128).

We cannot find this term specifically described or defined in the building typologies section, so it is difficult to know what this means. This should be clarified.

### *Housing typologies*

We note that the strategy says that “in and around centres and transport nodes, higher density development is considered more suitable in the form of residential flat buildings, shop top housing and mixed use developments, tapering down to low rise flats, manor houses, villas and townhouses and single dwellings”. (page 45)

We caution the council to avoid rezoning low-density areas to medium-density, as this is likely to impact on existing residential areas and trigger the complying development provisions of the Low Rise Medium Density Housing Code.

This code allows new projects to be approved by accredited certifiers without any public participation or council assessment process.

### *Carparking*

A number of the areas which could be affected by the proposed rezonings have homes on narrow-fronted lot sizes which do not have the capacity to have off-street parking.

The proposal to review and reduce on-site development carparking standards (page 89) is likely to simply exacerbate on-street parking problems for these homeowners, and therefore increase resentment and opposition to development.

Given this, we would make the following points in regard to carparking:

- We consider that the existing on-site parking standards under the Marrickville DCP deliver an appropriate balance
- The draft strategy should reaffirm what we understand to be existing policy that residents in new developments will not be eligible for resident parking permits
- The draft strategy should state that, where significant development has happened in an area, the council should some time after this development has happened review

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<sup>1</sup> See <https://www.smh.com.au/national/nsw/extra-trams-to-ease-crowding-on-sydney-s-inner-west-line-still-years-away-20190620-p51zix.html>

on-street parking impacts to investigate whether resident parking schemes should be introduced.

### *Mistakes*

There appears to be mistakes in the Waratah Mills and Arlington analysis.

The Arlington 'current character' analysis refers to Waratah Mills. In addition, the Waratah Mills analysis says the area has both 697 existing dwellings and a capacity for 697 additional dwellings which doesn't look right.

### **Conclusion**

We are disappointed by this draft strategy. We think it could be significantly improved by adopting the suggestions in this document.

We believe the concerns we have raised justify a reconsideration of the proposal to make Dulwich Hill a priority area for urban renewal, and the overall dwelling numbers.

In addition, we would be supportive of a more balanced approach to growth across the council, including through the use of shop-top housing.

We hope the above comments have been helpful and look forward to continuing to work with the council on planning for our suburb.