



# Save Dully submission on Inner West Council Fairer Future plan

## Executive summary

Save Dully has been in place since 2015 and was initially formed as a resident action group for the suburb of Dulwich Hill to comment on the Sydenham to Bankstown Urban Renewal Strategy. We have in the order of 280 email subscribers and a formal membership of more than 40 local residents. Our website is [www.savedully.com](http://www.savedully.com)

We welcome the opportunity to provide feedback on the Our Fairer Future plan.

In summary our feedback is that the plan has some positives, particularly compared to the NSW Government's [Transport Oriented Development](#) plan:

- Retention of most existing heritage areas
- Avoiding dividing blocks into different zoning levels, and by doing so protecting some residents from high-density development on adjoining sites.
- Delivering additional much-needed housing, while at the same time preserving a number of streets in the suburb for low-density development
- Revitalising New Canterbury Rd

However, the plan also has many unwelcome features.

One unwelcome feature is that suburbs in the south and south-west of the LGA (including Dulwich Hill) have had to bear such a significant and intense housing burden, while many other suburbs have not been allocated a single dwelling. This development intensity has led to poor planning outcomes in Dulwich Hill. These include:

- Very severe differences in development levels of up to 10-11 storeys between high and low development areas, a situation likely to be exacerbated by opaque and unclear incentive systems
- A likely further significant fall in Dulwich Hill's already inadequate supply of open space per person, and overshadowing impacts on the open space that is currently in place
- The likely development of areas which are currently contributing to Dulwich Hill's statutory biodiversity corridor, and an uncertain future for this corridor
- The removal of heritage areas and items
- The possible removal of public carparking which plays an important role supporting local shopkeepers, alongside undermining the potential for public good development on the Seaview St site.

These development outcomes are also accompanied by weak planning for affordable housing and infrastructure provision. This submission makes a series of recommendations for our suburb, of both a general and site-specific nature, to improve the plan.

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# Key submission themes

## Open space

There are significant concerns that the plan will further exacerbate Dulwich Hill's poor levels of open space per capita, creating ongoing liveability problems, and also have the potential to damage and undermine the limited open space that Dulwich Hill currently has through poorly-located high-rise development.

Inner West Council's 2018 Recreational Needs Study (page 55) found that Dulwich Hill had the 5th lowest open space level on a per person basis out of 21 Inner West areas. The study said Dulwich Hill had open space provision of 4.5 sq/m per person, less than the Inner West's average 13.3 sq/m of open space per person. The study also set this 13.3 sq/m amount as the Inner West's open space benchmark.

However, Dulwich Hill's open space issues are even worse than the figures would suggest. This is due to the fact that our very comparatively low level of open space is poorly allocated, or not easily accessible.

For instance, our riverside open space is primarily allocated to a small number of golfers, locking out many other community members. At the same, this open space is at risk of collapse and inundation due to poorly constructed and maintained engineered riverbank structures and sea level rise. Save Dully understands there are ongoing disputes about which jurisdiction and entity is accountable to fund and deliver these much needed riverbank stabilisation and naturalisation works. Meanwhile, the current metal retaining sheets are already failing and riverbank subsidence occurring due to underwashing. Save Dully is aware of at least one incident of a person sustaining injuries when they fell into a hole as ground collapsed under their feet as they walked along the riverbank.

Separately, our single sporting field is allocated to a high-performance soccer club which draws players from across the metropolitan area and is intensely used for this purpose.

Our three main parks (Johnson Park, Hoskin Park and Laxton Reserve) are located in close proximity to each other and not in easy walking distance to many other areas of Dulwich Hill.

While not officially open space, over the last 15 years, community members have also been locked out of previously accessible school open space areas (at Dulwich Hill Public and High Schools). This needs to be considered in the suburb's open space planning.

This plan proposes that Dulwich Hill is due to get an extra 4,245 dwellings. For these additional dwellings, the plans are proposing some 3,720 sq/m of new open space in Dulwich Hill, of which 2,000 sq/m will be a public plaza.

If an average of 2.2 per people per dwelling is used <sup>1</sup>, this represents just an additional 0.40 sq/m in open space per person - representing just 63cm by 63cm per person (the size of a typical carpet tile or cardboard box).

It is welcome that, since the 2018 study, the suburb has benefited from construction of the community-led GreenWay project. However, the level of open space coming to the suburb from the GreenWay has not been reported.

With the above in mind, the plan should outline whether Dulwich Hill, after this development, will meet the Inner West benchmark, or what Dulwich Hill's open space per capita will be. It currently does not do this.

It is concerning that one of our few pieces of large open space - Jack Shanahan Reserve - remains under threat by virtue of the fact it is subject to a State Infrastructure Zoning rather than Public Recreation zoning in this plan. This means it could be re-allocated to an infrastructure purpose at any time.

It is also concerning that the plan could reduce the amenity of our few existing open space areas, by placing buildings to the north of Johnson Park and Arlington Reserve, and therefore potentially overshadowing these areas. It would be preferable if the plan could contain open space overshadowing protections, similar to the statutory protections which have been in place at the City of Sydney Council since the early 1980s (when introduced for Hyde Park).

Further, and finally, the Social Infrastructure Needs Study, which is attached to the plan, identified that Dulwich Hill and Marrickville need 6-8 new sports fields and a new aquatic facility to accommodate further population growth. However, the study only proposes the highly uncertain path of working with schools to create new sports fields, and has no concrete plan for an aquatic facility.

## **OPEN SPACE RECOMMENDATIONS:**

- 1) That Council work to deliver greater open space improvements including by:
  - Acquiring more land
  - Working with NSW Education to allow access to school grounds and school buildings during non-school hours.
  - Increasing access to Arlington Oval for amateur and youth sports.
  - Working with Marrickville Golf Club to:
    - Enhance biodiversity values and canopy cover
    - Permit flexible use of golf course at certain times for other sports and activities
    - Formalising public access
    - Starting a community conversation about the course's long term use

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<sup>1</sup> This is in line with assumptions for NSW Government planning targets - see [www.planning.nsw.gov.au/policy-and-legislation/housing/housing-targets/inner-west-councils-housing-snapshot](http://www.planning.nsw.gov.au/policy-and-legislation/housing/housing-targets/inner-west-councils-housing-snapshot)

- Ensure the announced new federal government funding for the clubhouse delivers community space that can be used at low cost for community meetings and gatherings
- 2) That Jack Shanahan Reserve's zoning be changed to Public Recreation
- 3) That Council set controls strictly limiting overshadowing of open space areas, in a similar fashion to controls set by the City of Sydney Council for its key parks and open space areas, before allowing development to the north of open space areas.
- 4) That Council calls on the NSW Government to urgently resolve internal bureaucratic disputes about accountability to fund and deliver much needed riverbank stabilisation and naturalisation works.
- 5) That Council outline Dulwich Hill's current and proposed future per person open space allocation

## Biodiversity

Dulwich Hill benefits from an existing statutory biodiversity corridor, which covers both public and private land. This corridor is an important consideration when assessing development applications and helps implement the vision of a GreenWay which covers both land alongside the light rail line, and in the surrounding suburban area.

The consultant's Biodiversity Assessment disappointingly does not make any clear conclusion as to whether the proposed development is complementary to this corridor, instead making a single recommendation calling on development to minimise impacts on biodiversity. It is a deeply underwhelming document.

The assessment identified 31 threatened flora species, and 101 threatened fauna species, occurring within 5km of the Dulwich Hill and Marrickville housing investigation area.

The building of 8-14 storey development in streets such as Hercules Street, Keith St, Keith Lane, and parts of Blackwood Ave and Macarthur Parade will mean more stray light, noise and overshadowing of the GreenWay and other dwellings and schools.

This will affect the habitat of nocturnal animals and birds including the Grey-headed Flying Fox, Long-nosed Bandicoot; Large Bent-winged Bat and the Powerful Owl.

Additional pets will also affect the wildlife and plantings in our parks. The overshadowing mentioned above, in our commentary on open space, also has the potential to affect biodiversity in these open space areas.

Development in the biodiversity corridor will also inevitably result in the loss of private gardens which make an important contribution to local biodiversity habitats, including mature trees with hollows, understory for small birds and nooks and crannies for lizards and other small creatures.

Concerningly, the Council masterplan or reporting also does not commit to retain the statutory biodiversity corridor as part of a future zoning plan for the area.



### *Existing Dulwich Hill biodiversity corridor*

Action 3.1 in Inner West Council's [Local Strategic Planning Statement](#) commits to “maintain and increase the urban forest of the Inner West and enhance biodiversity corridors.”

The statement says this will be achieved through updating LEP and DCP controls to identify and protect habitat sites, enhance biodiversity corridors and ‘stepping stone’ links for priority flora and fauna species as biodiversity protection areas. The statement also refers to extending LEP provisions to protect terrestrial biodiversity by extending the Natural Resource - Biodiversity Map further north along the GreenWay Corridor and incorporating the foreshore areas of Rozelle, Birchgrove and Balmain East.

## BIODIVERSITY RECOMMENDATIONS:

That before the zoning plan is put in place, conduct a detailed assessment of impact on biodiversity, with plans to mitigate adverse impacts including by:

- Retaining and extending the statutory biodiversity corridor which is the spine of the Inner West Blue-Green Grid, a “place-based strategy that connects spaces within the wider public realm, through enhancing creek corridors, transport routes, suburban streets, footpaths and cycleways.”
- Creating wildlife corridors and areas of habitat for native flora and the five recorded threatened fauna species occurring within the study area, including: Grey-headed Flying-fox *Pteropus poliocephalus*; Long-nosed Bandicoot *Perameles nasuta*; Large Bent-winged Bat *Miniopterus orianae oceanensis*; Powerful Owl *Ninox strenua*; Southern Myotis
- Minimising shading caused by high buildings, especially on parks and the GreenWay
- Avoiding the loss of established gardens and mature habitats, and mature trees with hollows for nesting birds and possums

## Affordable housing

The plan proposes to introduce a clause that will require development for the purpose of residential flat buildings, independent living units or shop top housing to contribute to the provision of affordable housing, for very low to moderate income households.

The plan says the contribution rate has been informed by feasibility and market testing.

It is also intended that the affordable housing contribution will increase over time as per below, subject to the outcomes of future analysis.

- 2% on commencement of the proposed amendments;
- 3% after two years of commencement; and
- 5% after five years of commencement.

This ratio will deliver a minimum of 85 and maximum of 212 affordable homes in Dulwich Hill, based on a potential total yield of 4,254. This level of homes is unlikely to deliver the desired outcome of a diverse community, and therefore council is encouraged to take every opportunity to increase these ratios.

Unfortunately, the exhibition process has been inhibited by the fact the council has kept secret its feasibility analysis (as referred to in the report to council in December 2024). This makes it difficult to comment on whether this target can be lifted and deliver feasible development.

The strong suspicion is that the target could be higher, particularly given the neighbouring City of Sydney is progressing plans to deliver 20% of additional gross floor area, created by a



rezoning proposal, as affordable housing. This requirement will sit alongside the City's current requirement for all qualifying residential development to make a 3% contribution to affordable housing.<sup>2</sup>

What's missing, in addition, is an overall affordable housing plan.

This would include explicit evidence of how the plan will deliver more affordable housing with supporting rationale and analysis. This should include:

- Impact on median price of a home in the suburb
- Impact on the range of house types in the suburb (e.g. 1, 2., 3, 4 bedrooms, tenure types etc)
- Level of income needed to service the debt or rent for the range of homes in the suburb and how this relates to the local population/demand mix now and forecast.
- Net benefit in number of affordable homes in perpetuity
- Net benefit in number of social housing homes
- Net benefit in boarding house places.
- Personas or cameos illustrating the kinds of home that will be affordable and suitable for particular people eg a nurse working at RPA, a person on disability benefits, a boarding house resident, a single parent with two children, a creative industry and hospitality worker at a bar in Marrickville, etc

The plan would also articulate how the council would assess applications which seek to remove existing affordable housing, which remains a serious risk under this plan and has the benefit to undermine any gain for new affordable housing.

Given the low rates of new affordable housing required for new development sites (as mentioned above) it would seem very likely that the development of sites containing existing affordable housing is likely to result in a net loss of affordable housing at these sites.

In our analysis of the Seaview St carpark site below, we are also suggesting the acquisition of private properties to deliver improved affordable housing outcomes, particularly social housing. This could be replicated in other areas, particularly where social housing currently exists (such as in Bedford Crescent) and increased density is proposed.

## **AFFORDABLE HOUSING RECOMMENDATION**

Save Dully calls on the Inner West Council to:

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<sup>2</sup> Public Exhibition - Planning Proposal - Affordable Housing Contributions Review - Sydney Local Environmental Plan 2012, Sydney Local Environmental Plan (Green Square Town Centre) 2013, Sydney Local Environmental Plan (Green Square Town Centre - Stage 2) 2013 and Draft City of Sydney Affordable Housing Program 2024, report to City of Sydney Council's Equity and Housing Committee on 9 December 2024

- Prepare an overall affordable housing plan to accompany changes in planning controls, which guarantees a significant and net increase in affordable housing
- Take every opportunity to increase the rate of new affordable housing on rezoned development sites, with the City of Sydney's higher contribution rates being a potential guide in this instance.
- Reduce the destruction of existing affordable housing, in particular through stronger use of council's assessment powers and advocating for the return of contributions developers have to pay when they remove this housing, directly to the local area.
- Consider taking part in targeted property acquisitions, including at the Seaview St carpark

## Sustainability and climate resilience

In May 2019 Council reinforced its commitment to urgent climate action by declaring a climate emergency. Council's Local Strategic Planning Statement commits to "participate and seek to establish low-carbon, high-performing precincts with targets for increased energy efficiency, water and waste avoidance, reduction or re-use will need to be supported by planning controls." The Council's [Climate and Renewables Strategy](#) has a target that by 2036 community emissions are 75% less than in 2017 and solar PV capacity is 20 times greater than in 2017.

The Plan proposes additional 5% bonuses of the proposed base FSR for better than basic sustainability performance for water and energy use. We note this incentive does not apply to certain sites such as Key Sites where these sustainability requirements are to be met as a prerequisite to achieving the bonus FSR and height. Energy costs have risen dramatically in recent years, adding to the cost of housing. High standards for energy performance should apply to all new development in all upzoned areas, not just Key Sites and where developers choose to deliver them.

There is no analysis in the Plan of how all this development will impact the suburb's ongoing emissions, water and energy consumption, in comparison to the baseline nor how it affects Council's target of 75% emissions reduction by 2036 and 20 times more solar than in 2017. Also missing is the impact on embodied carbon that will occur as established buildings are demolished to make way for, most likely, concrete and steel constructions. There is no circular economy actions to salvage and reuse the high quality materials contained in the many of Federation homes slated for demolition.

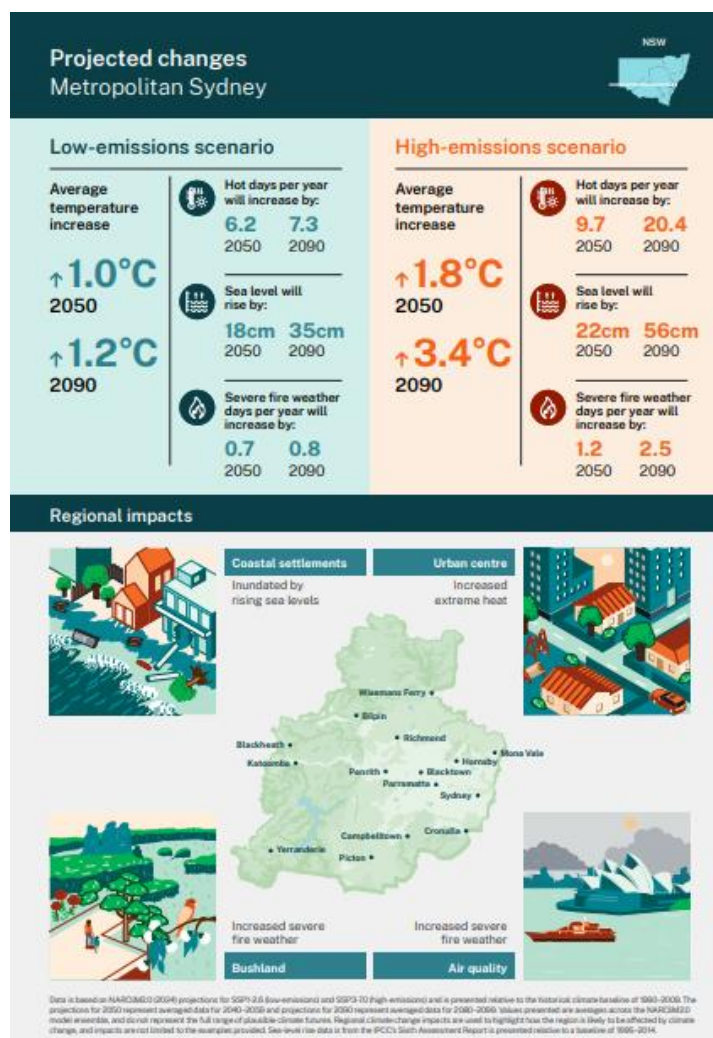
As noted in Council's Local Strategic Planning Statement, the Inner West is experiencing the impacts of climate change. [NSW Government's NARClIM 2.0 Climate Change Snapshot](#) (see graphic below) for Metropolitan Sydney projects an increase in the number of hot days per year for both low and high emissions scenarios. In the last five years our area has experienced extreme heat, flooding, storms and prolonged periods of extremely poor air quality due to the effects of bushfire smoke in the Black Summer Fires.

These extreme weather events affect our health, particularly the most vulnerable people in our community - babies and young children, people with chronic health conditions and the very old. Extreme weather events often result in power outages and damage to buildings and infrastructure. The most basic function of a home and neighbourhood is shelter from the climate. The NSW Urban Heat Vulnerability Index assesses the intersection between urban heat and social vulnerability. Dulwich Hill has areas of high urban heat vulnerability - many of which are proposed to be rezoned for high density.

The Fairer Future Plan will affect the climate resilience of our suburb for years to come. What's missing from the Plan is a robust assessment and design for climate resilience, urban heat island effect, water sensitive urban design and resilience of basic infrastructure such as power and water in the event of grid interruptions. This should include modelling how the Plan affects urban heat resilience, flooding, and effects such as wind tunnelling. Development needs to be designed for the climate we are going to experience.

Because the Plan lacks a Affordable Housing Plan, it is transparent about the effect plan will have on vulnerable A climate resilient plan should consider the needs of vulnerable people making they are well housed and can continue to live in Dulwich Hill just displaced to other parts Sydney, with cheaper housing - typically those West where it is hotter, and climate hazards such as bushfires and flooding.

Passive survivability in building and neighbourhood refers to the ability to maintain a habitable environment for occupants disruptions like power outages, water shortages, or extreme weather events relying on mechanical systems like heating, cooling, ventilation. This can be achieved by maximizing the building's thermal performance, using natural ventilation and shading, and incorporating thermal mass. At the neighborhood scale, this involves integrating



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these building-level strategies with community resilience planning, including resource sharing and localised energy systems, with rooftop solar and local battery storage.

## **SUSTAINABILITY AND CLIMATE RESILIENCE RECOMMENDATIONS**

Save Dully calls on the Inner West Council to:

- Publicly release modelling of Fair Future Plan's impact on greenhouse gas emissions, potable water use, energy consumption, solar generation and transport emissions. This should include both the construction (embodied energy/carbon) and the operational footprints.
- Make Dulwich Hill a Net Zero precinct. Apply the Plan's proposed better than BASIX standards to all upzoned land.
- Release modelling on how the Fairer Future Dulwich Hill's impacts climate resilience and passive survivability of the suburb, including the needs of vulnerable people, under the three NSW NARClIM scenarios. Demonstrate how the Fairer Future will ensure Dulwich Hill remains a safe and affordable place, and does not merely displace vulnerable and poor people to areas with harsher climate futures.
- Apply the [Cool Suburbs Tool](#) to review the most effective urban heat resilience measures and update the Plan to address these.
- Release detailed flood modelling and prepare a plan to address this with nature based solutions, building on the Marrickville Council's excellent [Tennyson Street Subcatchment Plan](#).
- Prepare and release a Circular Economy Plan to salvage and reuse - not just recycle materials demolition of existing homes and to minimise construction waste when building new ones.

## **Interface issues**

Council's natural desire to deliver financially feasible development controls, and the intensity of development in our suburb, has led to significant likely interface issues between high and low density areas.

Development of up to 10 storeys (34m) is proposed on the other side of roads from retained low-density areas. Streets which are particularly affected include:

- Hercules St (between Dulwich Grove station and the Loftus St carpark); and
- Riverside Crescent (between Ewart St and Wardell Rd).
- Marrickville Rd (particularly on the south side where high-rise buildings will overshadow and cause privacy impacts for homes in Canonbury Grove and Macarthur Parade)
- Loftus St, by the proposed high-rise development on the carpark site directly to the north of low density homes.
- Wilga Ave, where the southern side of the street is zoned for high-density while the north side is zoned for low-density.

This is in stark contrast to the NSW Government's Sydenham to Bankstown Urban Renewal strategies, which had the policy that an interface building height difference between higher and low density areas should be no more than four storeys.<sup>3</sup>

The proposal to taper development heights to increase from New Canterbury, and towards Hercules St, is inconsistent with the existing planning controls for the Hercules St industrial site which takes the opposite approach to reduce overshadowing and privacy impacts on Dulwich Hill Public School.



*Drawing of proposed building envelopes in Hercules St (before incentives) show potential interface issues (photo looking from Loftus St carpark towards Dulwich Grove light rail station)*

The proposed design podium setbacks seem to be token in nature, and don't appear to have resulted from place-based planning.

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<sup>3</sup> This was not just referring to setbacks or podiums, but absolute building height

Interface issues will be exacerbated through the opaque incentives for site amalgamation, public realm and sustainability proposed by Council, and for affordable housing by the NSW Government, which means the original 10-storey plan for Hercules St could in fact come closer to 15 or more storeys.

This interface problem will also be potentially worsened by council's incentives to amalgamate sites, potentially creating a long wall of development.

## **INTERFACE RECOMMENDATIONS**

- That Council reduces the very significant interface impacts in this plan, wherever possible, by aiming for a height difference of no greater than four storeys between areas of different density, including incentives.

### **Seaview St and Loftus car parks**

On 16 June, Save Dully invited Dulwich Hill retail businesses to attend a meeting at the Marrickville Pavilion to discuss the proposed development of the Dulwich Hill carparks at Seaview St and Loftus St.

Some 40 business representatives attended, along with two Inner West Councillors (Jo Carlisle and Victor Macri). There was significant concern expressed, by businesses, about the fact the exhibited plans committed to introducing planning controls to developing the carpark sites, but made no commitment to retaining existing retail parking. Businesses also complained about the lack of consultation.

These carparks were purchased, in the 1970s, by the former Marrickville Council for the express reason to support the Dulwich Hill retail centre, in the face of the development of new hardtop shopping centres (such as Roselands). They continue to play this important role.

In addition, the proposed adoption of these controls has the potential to inhibit the orderly redevelopment of the Seaview St site.

It's our view that Council or another government body should be investigating the acquisition of the existing vacant private dwellings in Seaview St, which we believe are owned by Coles. By doing this, the Council will be in a far stronger position to form an orderly development parcel - all owned by government - with far greater good public outcomes, including more social and affordable housing. By adopting these controls, Council will be making this acquisition step far less likely, as it will dramatically increase the value of the dwellings.

We are also concerned that planning for the Seaview St carpark site is happening separately for public domain planning at Dulwich Hill. A genuine place-based approach, underpinned by community consultation, is needed - a distinct to the current approach characterised by closed door council meetings and separate projects for private and public domain planning.

For both of the above reasons, we are recommending Council defer the introduction of controls on the Seaview St and Loftus St sites, to a clearer and more transparent investigation of community goals for these sites and a genuine place-based approach.

## **CAR PARK RECOMMENDATIONS**

- That Council defer the introduction of planning controls on the Seaview St and Loftus St carpark sites, to investigate potential land acquisitions to create public good development, including greater affordable housing and full retention of existing public parking
- That, if the above step does not happen, Council ensures that the same level of public parking spaces are retained in the development of both carpark sites, and that this is expressed in planning controls. This should include accessible parking.
- That Council introduces a genuine place-based approach to planning for the carpark sites, including the introduction of a place manager.

## **Private parking**

The proposed maximum on-site parking rates in Dulwich Hill, Ashfield and Marrickville are very low - just 0.4 parking spaces per two bedroom units and none for one-bedroom or studio units.

Our view is that, while the rationale for the low parking rates is understood, they are too intense and represent excessive on-the-spot change for the current conditions in our suburb, which generally support at least one parking spot for each two-bedroom unit and one spot between each two one-bedroom units.

The changes are likely to lead to intense competition for on-street parking and non permit holders chancing a fine. Week-end parking is also problematic, particularly for those residents living near parks and sporting fields.

It is not reasonable that existing residents should bear the load of lobbying council to introduce residential parking schemes to manage this competition, when the problem is of council's making. As such, we are recommending that council sets aside funding to proactively introduce these schemes as density levels increase.

The changes are also likely to lead to a clamour from new residents to overturn council's existing policy prohibiting new residents from being able to access resident parking schemes. As such, we are recommending that notations are placed on property Planning Certificates, making it clear the properties are not eligible for resident parking schemes, or another way of forewarning prospective owners is found. A council education campaign for tenants would also be supported.

## **PRIVATE PARKING RECOMMENDATION**

That Council:

- Tapers the introduction of the proposed maximum parking rates over time, or instead introduces the City of Sydney Council's controls, given the proposed rates represent excessive change and are likely to lead to adverse outcomes
- Commits to a proactive investigation into, and introduction of, resident parking schemes as density ramps up
- Forewarns private property owners and tenants that they are not eligible for resident parking schemes.

## Infrastructure

The infrastructure analysis to support this growth is thin.

It's proposed that there's a new community hub at the Seaview St carpark site, with:

- 1,500–1,900 sq/m of hireable community spaces with a mix of small and large halls.
- 1,000 sq.m of cultural spaces with fit-for-purpose performance, community participation, and production areas.
- 700–800 sq/m of affordable spaces for not-for-profit and community service providers.

It is also proposed that there is 2,000 sq/m new public plaza at the Seaview St car park development site.

There's a ten-page strategic transport plan with some helicopter-level aspirations about improving cycling, walking and public transport. There is also no analysis of the current capacity of school and health facilities to accommodate this growth, nor any analysis of traffic impacts on key intersections.

What's needed is a clear, comprehensive and exhibited infrastructure plan. The report to the Council meeting said an Inner West Infrastructure Delivery Plan will be reported to Council in late 2025, but it's disappointing to see the lack of detail at this time.

## INFRASTRUCTURE RECOMMENDATION

That any rezoning are accompanied by a full infrastructure plan, including for State and local infrastructure, including:

1. Metrics for current and proposed: open space per capita; canopy cover; cycleway connectivity and walkability
2. Demand forecasts by infrastructure types and delivery plans to service expected demand.
3. Investment needed and delivery /funding sources, including for the introduction of on-street resident parking schemes (as mentioned above).



## Heritage

The relevant consultant's report provides no justification to remove the southern side of Wilga Avenue as a heritage conservation area (HCA).

In fact, the report appears to argue the opposite, stating of the South Dulwich Hill HCA: "The built form is largely consistent, intact and of a good quality. The rhythm of roof forms, setback, fencing, front gardens, etc is harmonious and consistent **throughout**". As such, the removal of the southern side of Wilga Avenue is strongly opposed.

Save Dully also finds it disappointing that no new heritage items have been identified as part of this major development plan, and the council seems to have only sought out properties where heritage protection can be reduced (in the case of Gladstone Hall) or removed (in the case of 61 Garnet St and south Wilga St).

Therefore, in the site specific part of our report below, we are recommending protections for several buildings, including:

- Historic facades on New Canterbury Rd, including the Hands Building.
- A Federation home on the corner of The Parade and Terrace Rd
- Historic buildings and facades in the block of Denison, New Canterbury and Constitution Rd, including the Uniting Church.

### HERITAGE RECOMMENDATION

- That the council retains the existing HCA on the southern side of Wilga Avenue
- That Council takes the opportunity to identify new heritage items in upzoned areas.

## Overall dwelling numbers

Under the council plans, some 21,983 new homes are earmarked for Dulwich Hill, Ashfield, Croydon and Marrickville, and 8,975 in Leichhardt, Petersham, Lewisham, Marrickville, St Peters and Sydenham.

Many suburbs which are well serviced by bus, light rail, train or ferry services are either not receiving a single new dwelling, or only receiving a nominal number of dwellings. To this extent, this is not a LGA-wide plan.

Most development is concentrated in the south-west corner of the LGA, and in particular Ashfield Ward. Dulwich Hill has been allocated 4,245 homes. This is double the amount allocated to the suburb in the two Sydenham to Bankstown Urban Renewal Strategies (around 2,000) - these strategies were roundly rejected and opposed by the previous Marrickville Council, and Inner West Council. It is also well above the 571-631 dwellings proposed by Council in its 2022 plans.

We believe there is an opportunity to re-examine the distribution of dwellings, particularly given the report to the May meeting of the council stated that the council would be exceeding its NSW Government dwelling targets.

#### **DWELLING DISTRIBUTION RECOMMENDATION:**

- That the Council seek to reduce or eliminate some of the worst impacts of this plan on our suburb, as recommended in this submission - this may involve reducing dwelling numbers which is a feasible outcome given the council is exceeding its dwelling targets.
- That the Council produces a genuine whole of LGA plan - this plan is not that. By taking this path, for instance, the council will be able to produce a whole of LGA affordable housing plan, which cannot do currently because only select areas are proposed for upzoning.

#### **Process**

Save Dully notes that, while some aspects of the exhibition process were a positive, others were not.

The 'sliding' planning control map was very helpful to allow people to see how planning controls would change on, and around, their property.

Unfortunately, however, this positive was undermined by:

- Planning control maps, including the sliding map, not indicating maximum height controls, only minimum height controls (without sufficient clarification to the community that these were minimum height controls and could be vastly exceeded).
- Confusing and contradictory letters from the Mayor and Director of Planning on acquisition issues (causing distress to some landowners)
- A lack of information in other languages for community members who may have difficulty reading English.
- Residents in areas of change receiving generic letters, which did not specifically inform that their property - or a nearby property - had been rezoned.

#### **PROCESS RECOMMENDATION**

That Council extends the exhibition period and addresses the process issues raised in our submission.

#### **Site specific issues**

Save Dully has identified a range of site-specific issues. These are explained, and shown on the map, below.

## Facades on New Canterbury Rd

The need for development on New Canterbury Rd to consider historic facades (in line with heritage controls which currently exist in Marrickville Rd), particularly including the distinctive 1912 Hands Building on the corner of Beach Rd and New Canterbury Rd (see photo below).



*Hands Building*

## Home on the corner of The Parade and Terrace Rd

We would welcome the preservation of a grand Federation home on the corner of The Parade and Terrace Rd, which is currently proposed (under this plan) to be redeveloped.

The home is something of a local landmark, being on an elevated corner. The home appears to be well-preserved with an original slate roof and intact wraparound front balcony. In 2016, Save Dully named this as a [Dully icon](#).

The home has an interesting background in that there are many references to it being used as a private maternity hospital – known as Nurse Gee’s hospital – in the 1920s and 1930s. This illustrates the rich history of the Dulwich Hill area. By the 1950s, there are newspaper references to it being a private residence.



*Home on the corner of The Parade and Terrace Rd*

## Block bounded by Constitution Rd, Denison Rd and New Canterbury Rd

The rezoning of this block presents several challenges, due to its diverse lot sizes, existing affordable housing and heritage qualities.

We would ask for a reconsideration of controls in this area to consider:

- The potential for a block of relatively affordable units in the middle of this block to be isolated and left undeveloped, and overshadowed by new development to the north. A group of smaller terraces also fronting Denison Rd could also be isolated.
- The potential need to retain the high-quality terrace and other homes facing the Constitution Rd and Denison Rd frontages
- The preservation (as new heritage items) of the existing Uniting Church and its hall, which are threatened by a proposal to widen Constitution Rd and the rezoning itself
- The fact that redevelopment in this area is likely to lead to the removal of existing affordable housing fronting New Canterbury Rd.



*Historic homes on Constitution Rd near Denison Rd*



*Historic homes on Denison Rd*





*Dulwich Hill Uniting Church*

Windsor Rd, Union St and Constitution Rd between Windsor Rd and Williams Parade

Save Dully has received feedback from residents in the above streets, who are concerned they have - for the first time - been targeted for rezoning.

Union St contains small terraces, which may be difficult to assemble into a development site. It is located to the north of Arlington Oval, and therefore development in this area could overshadow the oval.

Windsor Rd is located to the north of Johnson Oval, and therefore again development could overshadow open space.

We urge council to undertake further consultation with residents in these streets before taking any action.



*Historically significant homes in Constitution Rd (west of LR)*

## Southern side of Marrickville Rd

Marrickville Rd, along with New Canterbury Rd, are Dulwich Hill's oldest roads.

While not heritage protected, this road contains many fine properties, particularly on the southern side from Macarthur Parade to Wardell Rd. At least two of these properties are also being used as existing affordable housing, which could be eliminated by these plans.

Development on the southern side also has the potential to overshadow properties to the south.

As such, we would ask for any investigation into whether the southern side of Marrickville Rd could be saved.

If a decision is made to continue with the rezoning in this area, proposed development in this area has the potential to extend the retail centre, to deliver new retail facilities to support new residents, by proposing shop top development rather than simply residential flat buildings.



*Marrickville Rd, southern side, looking from Macarthur Parade*



## EXAMPLES OF SITE SPECIFIC ISSUES



## Conclusion

In conclusion, we would say the plan does not deliver on our aspirations for the suburb, which includes:

- Fairness and equity
- Affordability
- Ecological Sustainability
- Social, cultural and economic diversity and vibrancy
- Character.

We want a credible plan for secure-tenure homes for people on benefits, with disabilities, in aged care and those who work in essential services - not just people with big pay packets and old money. We want this in perpetuity, not just till the next election.

We want healthy homes that are ALL climate-ready, and affordable to run - not only those where developers choose to build them in return for building higher than the published plans. We want homes to be comfortable during the heatwaves, bushfire smoke, droughts and floods we've already experienced and will become more frequent in the climate we're headed for. That means net zero, all-electric homes with built-in passive comfort and survivability during power outages, good air tightness and water resilience for times of flood and drought.

We want our kids to be able to walk or ride to the local schools, because they have places to accommodate them - not have to be driven halfway across the city to far away schools.

We want a plan that delivers commercial spaces that are affordable and welcoming to small and family businesses, continuing Dulwich Hill's vibrant village - not just cookie cutter chain stores and big box shopping malls with high rents.

We want a plan that continues our local tradition of community-led projects for sustainability action, like the GreenWay biodiversity corridor, bush regeneration and doing our bit to clean-up the Cooks River. The Council's tree canopy plans have aspirational targets but the reality is they won't be delivered for several centuries at the current rate of tree planting, removal and rezoning. The urban forest will be our frontline defence in the climate that lies ahead. We can't wait centuries to grow it.

We want high quality, flexible and connected and walkable open and community spaces for people to connect, exercise, play and hold functions and celebrations.

We also want connected cycle routes to get around the city safely and comfortably.