

# Submission by Save Dully to Local Strategic Planning Statement

## Executive summary

Save Dully has a number of concerns about the LSPS, and the Employment and Retail Lands Strategy and Study which have been exhibited alongside it.

In our view, aspects of the documents require revision.

The documents appeared to be based on the following principles:

- There should be a highly concentrated approach to housing growth, which is likely to result in Dulwich Hill and Marrickville being the only locations where housing growth will happen from 2019; and
- The redevelopment of existing historic residential areas should be a primary focus for this growth.

We do not agree with either of these principles.

We believe the LSPS exhibits an excessively rigid approach to housing growth management. In our view, there is a need to explore alternative housing growth locations and approaches.

Below are some comments on specific sections of the documents.

These comments build upon the [Our Suburb, Our Future](#) vision which was released by Save Dully in mid-2019, and [our submission to the council's draft Housing Strategy](#).

## Bandicoot protection zone and GreenWay

Save Dully is pleased to see that the existing Marrickville LEP bandicoot protection area has been mapped and published in the LSPS, when this was not the case in the exhibited Housing Strategy.

However, there is now a significant and unresolved conflict between the stated aim of the LSPS to protect and enhance biodiversity corridors, and the proposal in the draft Housing Strategy to concentrate growth around Dulwich Hill station.

We don't really see how it is possible to undertake both.

Our preference is for the preservation and expansion of the bandicoot protection area to take precedence over any housing growth, and for this area to be listed as a constraint to development.

As outlined in Our Suburb, Our Future, we would also like to see the LSPS reflect a broader 'green corridor' vision for the GreenWay. The vision could support the regeneration of the bandicoot colony, in part through retaining existing biodiversity and low density residential zoning protections in the Marrickville LEP.

There is also the opportunity, following community consultation, to put in place planning provisions which support other environmental enhancements, such as tree canopy preservation and growth, water sensitive urban design, active transport and healthy waterways.

The LSPS could also take a more explicit approach to supporting the control of feral animals in the GreenWay corridor, which are harming the bandicoot population.

### **North-South Metro line**

The LSPS includes a council-proposed idea for a new north-south Metro line, from Drummoyne, through Ashfield and down through Dulwich Hill and Marrickville. We would make the following comments about this idea:

- This line would appear to mainly service areas already with extensive public transport, rather than providing new public transport to under-serviced areas
- It would greatly intensify development pressure on Dulwich Hill
- This idea has not been generated by the local community
- The idea is inconsistent with the council's previous opposition to the concept of a privatised Sydenham to Bankstown Metro.

Given the above, Save Dully does not support the concept of a north-south Metro.

### **Hercules St industrial site**

We note that the Employment and Retail Lands Study suggests that the Hercules St industrial site should be retained for industrial uses, despite the fact a gateway certificate is in place endorsing its rezoning to residential uses. This recommendation would then be captured by the LSPS's recommendation to not support the rezoning of industrial land.

We think, in the case of the Dulwich Hill industrial site, this recommendation is presumptive.

Our previous submissions to the Housing Strategy and Our Suburb, Our Future vision addressed this site.

We are on the record saying that the current proposal for the site is excessive, and should be reduced in height and scale (particularly to reduce overshadowing and privacy impacts on Dulwich Hill public school).

However, as we said in Our Suburb, Our Future: "The site should be considered concurrently with the LEP, with any dwellings from the rezoning going towards the council's LEP housing target. By doing this, there is an argument that the suburb is making a housing contribution and therefore existing residential areas should be preserved from redevelopment."

Given this, a decision to retain the site for industrial is presumptive. The LSPS and the complementary Employment and Retail Lands Strategy should as a result be amended to allow the rezoning of industrial land, where a gateway certificate is in place.

### **Excessive focus on protecting and expanding employment and urban services land**

The LSPS and the complementary Employment and Retail Lands Strategy and Study have an excessive focus on protecting and where possible expanding employment and urban services land.

We acknowledge that the council, to a large extent here, is acting in line with the direction of the Eastern City District Plan. We also acknowledge that there needs to be some retention of these lands, to service Sydney's and the Inner West's ongoing non-residential needs.

Our concern here is that council officers have told us privately that this policy direction is placing more pressure on the council to rezone the historic residential fabric of suburbs such as Dulwich Hill.

However, there is the capacity within the State's planning system, for the council to seek to implement alternatives to the above policy direction, if it is well-justified.

To this extent, our submission to the Housing Strategy supported the concept of placing new affordable housing in some marginal industrial lands. We believe this is a well-justified and balanced policy outcome.

We also supported the concept, outlined in the Housing Strategy, of seeking to develop affordable housing in council carparks.

### **Impacts on existing residential areas**

We are concerned there are no explicit statements, that we can find in the LSPS, in relation to avoiding undertaking rezonings in existing residential areas.

In fact, in the case of Dulwich Hill, the council staff and their consultants have taken the opposite view, and argued in the draft Housing Strategy that the nature of Dulwich Hill's residential subdivisions is an opportunity for redevelopment.

Other councils have included explicit statements in the LSPS document to protect and celebrate existing low density residential areas. For instance:

- The draft [Canterbury-Bankstown LSPS](#) says the council will “avoid medium density housing types in suburban areas and maintain local character and landscape” and “Protect the low density character of our suburban neighbourhoods” (see page 75)
- The [Willoughby LSPS](#) includes an action to “generally protect the existing character of low-density suburbs in the LGA” and also says that “A key asset of the Willoughby LGA is its intact and green suburbs containing large family housing” (see page 31)

We would like to see similar statements in the Inner West LSPS.

It should also be noted that, our adjoining suburb of Hurlstone Park in the Canterbury Bankstown area, is proposed for very little change in that council's LSPS. This is despite the fact that Hurlstone Park has very similar housing stock to Dulwich Hill.

The lack of explicit statements or policy directions about protecting existing residential areas in the Inner West LSPS is surprising given that the LSPS includes a welcome KPI to seek increase resident satisfaction with “protection of low-rise residential areas”. If such a KPI is to be introduced, it should be supported by a policy action.

### **Excessively concentrated approach to growth**

The council has listed six proposed areas to be investigated for urban renewal from this year – these areas are near Dulwich Hill and Marrickville railway stations and four precincts along Parramatta Rd.

However, the council has added a condition to the LSPS that it won't examine new planning controls for the Parramatta Rd precincts until the NSW Government provides “mass transit on dedicated lanes”.

This means that Dulwich Hill and Marrickville are expected to be the only two areas across the LGA where the council is investigating new housing supply from 2019.

It appears remarkable that no other centres or areas are being considered, or seen as appropriate, for immediate new supply.

This appears to be a highly concentrated approach to delivering growth. We find it difficult to believe there are no other urban centres, such as those serviced by bus transport, where additional moderate growth could immediately be accommodated.

For instance, the draft Housing Strategy makes the assumption that no growth should immediately pursued on any centres along the main western line, including Ashfield, because this line is “currently approaching capacity” (see page 135 of the Housing Strategy). Such an approach however is superficial and doesn’t reflect the fact that a major centre such as Ashfield has excellent bus connections. The council’s narrow approach here is exacerbated by its desire to enforce non-residential commercial zones within the Ashfield CBD.

In addition, the council could examine using council carparks to deliver growth in a way which does not impact on existing residential areas, when these carparks are well-serviced by bus transport.

### **Design excellence**

There have been a number of recently-constructed apartment buildings in Dulwich Hill which have very poor architectural quality. We cover this issue in [Our Suburb, Our Future](#).

We are concerned that the language in the LSPS is not sufficiently clear that high architectural excellence should be a matter of course for all projects under existing planning controls, and not something which is only delivered when there are exceedences to controls.

We look forward to the council putting in place sufficient resources to maintain good design in the assessment process, and being clear about how to delivers good design outcomes, and for this language to find its way into the LSPS.

### **Affordable housing**

Although the LSPS says the council will seek to “maintain and increase” affordable housing, we think it could include stronger language in relation to protecting existing affordable housing. This reflects our [submission to the Housing Strategy](#) and [Our Suburb, Our Future](#).

In addition, we are concerned about the statement that only 30 per cent of new housing on “government land” will be affordable housing. The council is a government entity and its land could be used to deliver a far greater percentage of affordable housing.

As we stated in our submission: “We do agree however with the concept of council land – such as carparks - being used to deliver affordable housing. 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.”

### **Car parking**

The LSPS has a focus on seeking to reduce or eliminate off-street parking in new developments.

As outlined in our submission to the Housing Strategy, Dulwich Hill is characterised by a wide mix of housing types, including home on narrow frontages without off-street parking. These homes could be significantly impacted by the LSPS direction.

The LSPS policy in relation to off-street parking is therefore likely to 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; and
- The LSPS should reaffirm what we understand to be existing policy that residents in new developments will not be eligible for resident parking permits

In addition, the LSPS should state that, shortly after new council-planned development has happened in an area, the council should undertake a strategic review of on-street parking to investigate whether resident parking schemes should be introduced.

By doing this, the council is not waiting for residents to suffer the parking impacts of development, and then forcing them to lobby the council, and instead is proactively undertaking this work itself.

### **Local leadership**

In the local leadership section, the council should state that it will be seeking an exemption from the NSW Government's Low Rise Medium Density Housing Code.

### **Participation**

We believe the section of the LSPS in relation to participation could be strengthened.

Our Suburb, Our Future outlines instances of a lack of transparency in the planning process, particularly in relation to:

- The consideration of a developer-initiated rezoning proposal on the Hercules St site; and
- The way the Sydney Tools shopfront Land and Environment Court appeal was handled

As such, we think this section should refer to strengthening community participation in planning, including during the rezoning, development assessment and development review steps in the process.

### **Welcome aspects of the LSPS**

We should say that there are some welcome aspects of the LSPS:

- The fact that the LSPS references (twice) the suburb's existing bandicoot protection zone
- The 'agent of change' principle – this will help protect Dulwich Hill's emerging and interesting night-time economy from new and incompatible uses
- The commitment to review and consolidate planning controls for retail frontages in main streets and centres – this gives some hope that the council may seek to avoid a further Sydney Tools fiasco where small shop frontages were amalgamated into a single, ugly frontage, despite DCP controls to the contrary
- The fact the LSPS doesn't include references to the Sydenham to Bankstown corridor as being a major urban renewal area (unlike the Housing Strategy).
- Council's support for the retention of Canterbury Racecourse as a major regional park.