



INNER WEST COUNCIL

OUR REF: 15/5639

9 November 2017

Brendan Nelson
Deputy Secretary
Growth, Design and Programs
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Mr Nelson

INNER WEST COUNCIL SUBMISSION ON THE REVISED DRAFT SYDENHAM TO BANKSTOWN URBAN RENEWAL CORRIDOR STRATEGY

I refer to your letter dated 15 August 2017 providing Inner West Council additional time to provide its detailed submission on the revised draft Sydenham to Bankstown Urban Renewal Corridor Strategy (revised draft Strategy). Please now find attached Council's detailed submission on the revised draft Strategy.

A draft detailed submission was reported to the 24 October 2017 Council Meeting (C1017 Item 21). The Council resolution from this Meeting has been incorporated into an introduction part of the submission and integrated throughout the body of the submission. A copy of the minutes of the Council resolution from this Meeting is also attached to the submission.

Should you have any queries about this submission, please direct these to Gill Dawson on 9367 9044.

Yours sincerely

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Submission from Inner West Council***Revised Draft Sydenham to Bankstown Urban Renewal Corridor Strategy*****November 2017****CONTENTS**

1.	INTRODUCTION.....	2
2.	SUMMARY.....	3
3.	STRATEGIC CONTEXT.....	9
4.	INFRASTRUCTURE AND FUNDING.....	17
5.	EMPLOYMENT LAND, BUSINESS AND ECONOMIC IMPACT.....	30
6.	TRANSPORT.....	32
7.	HERITAGE.....	37
8.	AFFORDABLE HOUSING.....	42
9.	ENVIRONMENT.....	47
10.	STRATEGY IMPLEMENTATION AND STAGING.....	48
11.	URBAN DESIGN.....	48
12.	PRECINCT REVIEWS.....	50

ATTACHMENTS

<u>Attachment 1:</u>	Summary of concerns raised by community
<u>Attachment 2:</u>	Submission from SSROC
<u>Attachment 3:</u>	Submission from Marrickville Golf and Community Club and Golf Course
<u>Attachment 4:</u>	Submission from Save Dully
<u>Attachment 5:</u>	Submission from Save Marrickville South
<u>Attachment 6:</u>	Submission from Sydenham to Bankstown Alliance
<u>Attachment 7:</u>	Submission from Marrickville Residents Action Group
<u>Attachment 8:</u>	Sydenham to Bankstown Linear Park Connections
<u>Attachment 9:</u>	Council Recommended Amendments plans
<u>Attachment 10:</u>	Minutes of Council Meeting on 24 October 2017

1. INTRODUCTION

The Inner West Council considered a report on the revised draft Sydenham to Bankstown Urban Renewal Corridor Strategy (revised draft Strategy) at its meeting on 24 October 2017.

The Council wishes to thank the Department of Planning and Environment (DPE) for the opportunity to respond to the revised draft Strategy.

In relation to the revised draft Strategy, the Council noted that there is considerable community anger about the potential effect of the implementation of the Strategy on Inner West communities.

The Council is concerned that the revised draft Strategy imposes unwanted and inappropriate major changes to density and scale, largely destroys the historic character and fabric of our low-scale suburbs and includes a lack of transition between high, medium and low density and existing single dwelling areas. In addition, its dwelling targets are simply too big to accommodate existing constraints in our suburbs, such as small lots; existing affordable and contributory housing; and valuable and diminishing employment land. Council is also concerned that this plan does not provide sufficient protection for our current amenity and built form heritage, as well as there being inadequate assessment of traffic and parking impacts.

The Council is also concerned that new housing construction is planned at a time when our community is also likely to be experiencing significant traffic and noise impacts, and reduced commuter rail transport capacity between 2019 and 2024, as a result of the proposed construction of the Metro line. Council lacks confidence that the planning for the necessary infrastructure to support the increased populations proposed has occurred. The plan does not provide for the community infrastructure needed, including open space; playing fields; schools; hospitals; and child-care centres. The Council also noted a lack of a clear affordable housing plan and the loss of lands for employment and our thriving arts community.

The Council is extremely concerned about the potential highly disruptive cumulative traffic, noise and other impacts from both private construction for new housing and the proposed construction of the new Metro line.

The Council does not support increased density or development within the Sydenham to Bankstown Urban Renewal Corridor that is inconsistent with the zoning provisions and/or development standards currently applying to the land under the provisions of Marrickville Local Environmental Plan 2011.

In light of the above, the Council resolved to call on the NSW Minister for Planning to abandon the Strategy and allow the Inner West Council to do the town planning along the corridor in consultation with our community.

Specifically, the Inner West Council requests that the NSW Minister for Planning:

- *abandons the Sydenham to Bankstown Strategy and allow the Inner West Council the opportunity to complete a revised LEP which considers all existing and proposed development, including beyond the Sydenham to Bankstown Corridor;*
- *provides the Inner West Council with additional funding to complete the LEP;*

- *commits to not impose Section 117 directions [to apply to the Inner West Local Government Area] until a new LEP is in place;*
- *restricts the ability of proponents of rezoning applications to rely on the Strategy in draft form and in particular the proposed rezoning of Carrington Road, Marrickville; and*
- *agrees to [amend State Environmental Planning Policy No. 70 – Affordable Housing (Revised Schemes)] (SEPP 70) [to list the Inner West as a local government area where there is a need for affordable housing and make relevant amendments to the Inner West Council’s three principle LEPs (Marrickville, Leichhardt and Ashfield) in order to permit a levying of Mandatory Affordable Housing Contributions] for affordable housing, in line with the Inner West Affordable Housing Policy.*

2. SUMMARY

Council acknowledges the challenge of providing the required housing and jobs to meet Sydney’s forecast growth and the strategic merit in focusing renewal around transport infrastructure and within urban centres. It is also noted that a number of amendments have been made from the initial draft Strategy which will have a positive local impact including the retention of high quality character areas.

Notwithstanding, Council continues to have issues and concerns with the revised draft Strategy. Those issues and concerns are detailed in this submission.

The key issues and concerns with the revised draft Strategy are as follows:

1. Lack of transparency about the forecast dwelling and employment numbers in the revised draft Strategy. With the removal of some areas and reduced heights from the initial draft Strategy, it is difficult to understand how a similar or significantly greater number of dwellings are now forecast in the revised draft Strategy, especially in the Marrickville Station Precinct, which has over 2,000 more dwellings.

Recommendation: That the Strategy make transparent the methodology used for the residential and employment forecast numbers.

2. Some areas being included for zoning uplift, especially in the Marrickville Station Precinct and in the Dulwich Hill Station Precinct, resulting in the loss of character and fabric. Concerns are raised as to the extent of redevelopment in certain areas and how redevelopment is to be managed and staged to ensure that redevelopment is carried out in an orderly manner. Some of the areas requested to be removed by Council have instead been reduced to low rise housing. The submission identifies areas where height continues to be a concern and areas recommended to be removed from any zoning uplift.

Recommendation: That in addition to the other amendments to the revised draft Strategy raised in this submission, the Revised Land Use Plans for the respective precincts be amended as detailed in Part 12 of this submission and the final Strategy include mechanisms to ensure that redevelopment is carried out in an orderly staged manner.

3. The removal or impact on key Marrickville employment and businesses lands, which have been identified to be in high demand through independent analyses.

Recommendation: That the revised draft Strategy be amended to retain all existing land in the precincts zoned IN1 General Industrial, IN2 Light Industrial and B7 Business Park under Marrickville Local Environmental Plan 2011.

4. Not providing a comprehensive fully funded whole-of-government plan for the required additional infrastructure and services. The anticipated increase in population will undoubtedly result in increased need for affordable rental housing, child care, schools, health care facilities, open space, recreation facilities, road upgrades, new or improved pedestrian and cycling connections and community facilities. No mechanism has been devised that will efficiently and transparently fund the delivery and/or upgrade of local, regional and state level infrastructure items. This is a significant shortfall of the revised draft Strategy and must be addressed prior to the final Strategy being released. Failing to address this issue will delay the delivery of housing and jobs across the Corridor.

Recommendation: That the final Strategy must include appropriate mechanisms that efficiently and transparently fund the delivery and/or upgrade of all necessary local, regional and state level infrastructure items. The final Strategy must also include the funding responsibilities and associated funding mechanisms to deliver that infrastructure, including staging; timing; cost; and trigger points for the delivery of that infrastructure.

5. The proposed Greenway South West is strongly supported. However, the revised draft Strategy has not adequately addressed the provision of local open space, only specifying that new parks would be left to Council to provide and that there is the potential for part of the Marrickville Golf Course to be repurposed for open space. Land for open space should be identified upfront and funding mechanisms identified. Section 94 will not be sufficient to provide the new open space areas required for the incoming community identified in the Strategy.

Recommendation: That the final Strategy must ensure that adequate, and appropriately located, open space and recreational facilities are provided to meet the needs of the existing population and the additional demand resulting from the increase in population density proposed. The Strategy must clearly identify the land required for open space purposes and include appropriate mechanisms that efficiently and transparently fund the acquisition and delivery of that open space, noting that given the high land values in the Inner West Council Area and the \$20k cap on Section 94 Contributions it would not be possible for Council to purchase land to support the open space requirements generated by the increased population density proposed; and that the Inner West Council does not support compulsory property resumptions for the provision of the additional infrastructure required.

6. Despite Council's previous request for affordable rental housing targets or provision of an inclusionary mechanism, the revised draft Strategy still has not provided any policy or regulatory options to address the issue of affordable rental housing. This critical issue must be addressed by the final Strategy. The Sydenham to Bankstown Corridor includes land which contains existing affordable rental housing. The redevelopment of those areas would result in the loss of existing affordable rental housing and the replacement of that housing with more expensive new housing. The final Strategy needs to include appropriate provisions/mechanisms to facilitate the effective delivery of new affordable rental housing and to facilitate the retention and mitigate the loss of existing affordable rental housing.

Recommendation: That the final Strategy must include an appropriate affordable rental housing target and appropriate provisions/mechanisms to facilitate the effective delivery of new affordable rental housing and to facilitate the retention and mitigate the loss of existing affordable rental housing in the Sydenham to Bankstown Urban Renewal Corridor.

7. Implementing the Strategy, including the carrying out of further detailed studies required, will require funding to be made available from the State Government. The

Strategy, as currently presented, requires a number of further detailed studies to be carried out, including traffic; heritage; urban design; flooding; and infrastructure planning. Those studies should be carried out and used to inform the final Strategy to ensure incoming growth and associated cumulative impacts can be appropriately managed by Council. Commitment to fund these required studies has yet to be made by the State Government.

Recommendation: That the State Government commit to the funding required to enable the implementation of the Strategy, including further detailed studies such as, traffic, heritage, urban design, flooding and infrastructure planning, which is to be carried out and used to inform the final Strategy.

8. The revised draft Strategy has not adequately considered urban design criteria such as orientation, topography, lot depths and configuration, width of streets, views relationships with open space and development parcels. Council's previous submission considered that detailed precinct wide master planning was integral to progress the Strategy, ensuring optimal planning outcomes, however this has not been undertaken. Council is concerned that some blocks and groups of blocks designated for medium-high and high rise housing will cause significant overshadowing, visual bulk, streetscape and view impacts on existing residences.

Recommendation: That the final Strategy must include detailed precinct wide master planning to ensure optimal planning outcomes with design quality outcomes that respond appropriately to the character of the area.

9. A comprehensive heritage study of all areas within the respective precincts should be undertaken before any changes are contemplated to existing land use zonings and/or density and scale controls. The comprehensive heritage study should inform consideration of appropriate land use controls to ensure that any new planning controls respect the existing built environment and any identified heritage significance.

Recommendation: That a comprehensive heritage study of **ALL** areas within the respective precincts be carried out, with the findings of that study being used to inform consideration of appropriate Land Use controls to ensure that any new planning controls respect the existing built environment and any identified heritage significance.

A summary of the issues and concerns raised by Council, as detailed in this submission, are as follows:

(NB The number reference in the heading to each issue is the reference number used in the body of the submission)

3. Strategic Context

The revised draft Strategy has a number of inconsistencies with relevant strategic planning documents including A Plan for Growing Sydney, the Draft Central District Plan and certain Section 117 Directions.

The Strategy should be amended to ensure consistency with those documents.

4. Infrastructure

The Strategy does not provide a comprehensive whole-of-government plan for the required additional infrastructure and services, including mechanism(s) that will

efficiently and transparently fund the delivery and/or upgrade of those local, regional or state level infrastructure items.

The Strategy must establish a regional approach for the funding and implementation of the required infrastructure and a State Government commitment be made to the funding of key infrastructure.

The Inner West Council does not support compulsory property resumptions for the provision of the additional infrastructure required.

The Strategy needs to address the infrastructure and funding issues raised in Section 4 of Council's submission including issues relating to:

- Active transport;
- Open space, recreational facilities and public domain infrastructure;
- Street, traffic, parking and stormwater infrastructure; and
- Social infrastructure

All the necessary additional infrastructure and services need to be itemised and incorporated, and appropriately detailed, into the respective Land Use Plan, Infrastructure Plan and Infrastructure Schedule for each precinct. Such documentation should include details of the infrastructure type, hierarchy of facilities (local, district or regional), priority works, indicative timeframe for delivery and funding mechanisms as well as an estimated cost of works (like the infrastructure schedule contained in The Parramatta Road Corridor Urban Transformation Strategy).

5. Employment Land and Economic Development

The Strategy's proposed rezoning of industrial land would have a significant negative impact on employment, availability of industrial floor space, supply chains, markets and synergies between businesses and Sydney's creative/cultural institutions.

The downside for the local economy would be the loss of a substantial amount of relatively affordable land, the greater percentage of which is currently occupied by creative industries. Those businesses will be lost when the properties they currently occupy are either demolished or rezoned for medium to high density residential or mixed use development.

The purported opportunity sites referred to in the AEC Employment Analysis have exceptional economic value as industrial lands. The Strategy should be amended to retain those sites for the reasons detailed in Section 4 of Council's submission.

6. Transport

The Strategy requires a more integrated transport approach as detailed in Section 5 of Council's submission.

In order to create a more sustainable future, it is essential that the increased residential densities (and employment opportunities) should not be solely designed to make the Metro more viable, they should offer genuine city shaping opportunities and start to guide a more sustainable city through more sustainable neighbourhoods.

For the reasons detailed in Council's submission, the Strategy should be based on an integrated approach to transport. The Strategy should be amended accordingly.

The Strategy should also be amended to address the specific transport comments for the respective precincts detailed in Section 5 of Council's submission.

7. Heritage

A comprehensive heritage study of the areas within the respective precincts should be undertaken to determine whether there are any sites or areas of environmental heritage significance to the area not currently identified as heritage items, heritage conservation areas or draft heritage items or heritage conservation areas. That study should be carried out before any changes are contemplated to existing land use zonings and/or density and scale controls to ensure that any new planning controls respect the existing built environment and any identified heritage significance.

The Strategy should be amended to incorporate the outcomes of that study and to address the other heritage issues raised in Section 7 of Council's submission.

8. Affordable Housing

The Strategy does not provide an affordable rental housing target or mechanisms to address the issue of the provision of affordable rental housing.

It is essential that the Strategy sets an appropriate affordable rental housing target and that the State Government make amendments to State Environmental Planning Policy No 70 – Affordable Housing (Revised Scheme) to identify that there is a need for affordable housing in the Sydenham to Bankstown Urban Renewal Corridor and that the State Government make relevant amendments to the environmental planning instruments applying to all local government areas in the Corridor to permit the levying of affordable housing contributions for residential development in the Corridor, to enable the creation of Affordable Rental Housing in perpetuity under the management of a Registered Community Housing Provider.

9. Environment

The Strategy should be amended to include a comprehensive sustainability framework with objectives, strategies and targets and measures.

10. Strategic Implementation and Staging

Implementing the Strategy will require funding to be made available from the State. Prior to any planning proposals being supported by Council detailed studies such as traffic, urban design and infrastructure planning must be prepared and finalised to ensure incoming growth and associated cumulative impacts can be appropriately managed by Council. Commitment to such funding has yet to be made by the State.

Concerns are also raised about the potential highly disruptive cumulative traffic, noise and other impacts from both private construction for new housing and the proposed construction of the new Metro line, along with the reduced commuter rail capacity, between 2019 and 2024. This issue needs to be thoroughly investigated and appropriately addressed before the Strategy is finalised.

11. Urban Design

The revised draft Strategy has not adequately considered urban design criteria such as orientation, topography, lot depths and configuration, width of streets, views, relationships with open space and development parcels. For example, as detailed in Section 11 of Council's submission, some of the land designated for medium-high rise and high rise housing in the Strategy do not support the height/density proposed in terms of solar access, visual bulk and streetscape considerations, based on the principles and guidelines applying to such development under SEPP 65 and the Apartment Design Guide (ADG).

The Strategy needs to be amended, as detailed in Section 11 of Council's submission, to ensure compliance with those principles and guidelines.

12. Precinct Specific Issues

The submission recommends a number of changes be made to the Land Use Plan, Infrastructure Plan and Schedule and other changes for each of the respective Precincts. Those amendments are detailed in Section 12 of Council's submission.

The recommended changes for each precinct are marked up in the Council Recommended Amendments plans.

Community Consultation:

Council has taken a proactive approach to assist the Inner West Council community understand the contents and implications of the revised draft Strategy and promoted the community making submissions to the DPE on the exhibition.

In this regard Council has:

- established Your Say Inner West project page, which was viewed by more than 1,000 people at the following link: <http://www.yoursayinnerwest.com.au/sydenham-to-bankstown-urban-renewal-corridor>;
- distributed a brochure to 16,500 nearby residences;
- distributed posters at key locations around the LGA;
- promoted the exhibition and public meeting in social and traditional media, and on Council's website and e-news - media release at the following link: <https://www.innerwest.nsw.gov.au/news-hot-topics/media/media-releases/sydenham-to-bankstown-urban-renewal-corridor-back-on-the-agenda>);
- held a public meeting on 10 August 2017 at Marrickville Town Hall, which was attended by 350 people;
- recorded the meeting and uploaded the video at Your Say Inner West.

The public meeting and submissions received from key groups including The Southern Sydney Regional Organisation of Councils (SSROC), Marrickville Golf and Community Club and Golf Course, Save Dully, Save Marrickville South, Sydenham to Bankstown Alliance and Marrickville Residents Action Group raised a number of concerns with the revised draft Strategy. The concerns raised are summarised in the attachment to this submission.

A copy of the submissions received from those key groups are also attached to this submission.

3. STRATEGIC CONTEXT

3.1 A Plan for Growing Sydney (2014)

A Plan for Growing Sydney includes principles on how to accommodate population growth and housing supply relevant to the Strategy. The revised draft Strategy may assist achievement of *Principle 1 - Increasing housing choice around all centres through urban renewal in established areas* and *Direction 2.1 - Accelerate housing supply across Sydney* as it will provide additional residential accommodation in close proximity to existing services and public transport.

The revised draft Strategy is however inconsistent with *Direction 1.9 - Support priority economic sectors* and related *Action 1.9.2 Support Key Industrial Precincts with Appropriate Planning Controls*. The action emphasises the importance of employment and urban services land to Greater Sydney's productivity.

The action requires that the questions in the Industrial Lands Strategic Assessment Checklist are assessed for proposed rezonings of industrial lands. That checklist has not been addressed in the *AEC Sydenham to Bankstown Corridor Employment Analysis* for the DPE, despite the significant tracts of industrial land that are earmarked for rezoning. *A Plan for Growing Sydney* clearly intends to protect industrial land in and around the airport from being lost to residential development, which the revised draft Strategy fails to do.

The revised draft Strategy for the Sydenham Station and Marrickville Station Precincts could result in a substantial loss of industrial land in those precincts. The AEC Employment Analysis accepts that there is significant demand for industrial space in those areas and that there is limited stock for sale or lease: "*the industrial areas of Sydenham and Marrickville are established and have wide market appeal. Recent development of strata industrial units has been met by high levels of market acceptance. Anecdotal evidence indicates rising price levels and a dearth of availability* (page iii)". According to the AEC employment profiles of the four opportunity sites in the Inner West Council LGA, the number of jobs potentially lost is up to 4,729 due to these rezonings. Many of those jobs are jobs of locals.

The Australian Research Council's August 2017 report *Made in Marrickville: Enterprise and cluster dynamics at the creative industries-manufacturing interface* found that the Carrington Road precinct alone contains 223 businesses, employs over 1,800 people and can be discerned as 15 functional clusters.

The Industrial Lands Strategic Assessment Checklist second question is *Does a site contribute to a significant industry cluster and is it near key economic infrastructure?* Surprisingly, the AEC study fails to identify the significant industry cluster of creative-manufacturing industries in Marrickville and Sydenham and the contribution they make to the national economy, and that they are close to key economic infrastructure at Port Botany, the Airport and the Central Business District. The revised draft Strategy could destroy those significant industry clusters.

The *Made in Marrickville* report found that Sydney's status as a global city relies on the Carrington Road precinct due to its complex networks that span the city, the nation and the globe. Cultural icons such as Sydney Opera House, Sydney Theatre Company, Sydney Gay and Lesbian Mardi Gras, Chinese New Year, and Vivid Festival all rely on supplier and servicing relationships with Carrington Road enterprises which include many companies that have been Oscars, BAFTAs and ARIA award winners. In this regard the revised draft Strategy's proposed rezoning of large tracts of industrial land that support creative-manufacturing industries in the Sydenham and Marrickville precincts, contradicts *A Plan for Growing Sydney* Direction 3.4 that aims to '*Promote Sydney's heritage, arts and culture*'.

The AEC Employment Analysis does not provide sufficient detail of the businesses and employment on the sites earmarked for rezoning as no land use survey has been undertaken. The desktop assessment is not sufficient evidence to justify rezoning industrial sites. It also does not adequately address the potential negative impacts of the Strategy's proposed alternative employment zones such as business/enterprise zones would have on existing businesses or other potential industrial tenants. The introduction of conventional business or office uses, would change the character of the Sydenham and Marrickville precincts, displace existing uses and change commercial property market perceptions of the areas. This would in turn lead to higher rents for light industrial uses and displace these uses from these critical industrial sites. This in turn would result in the closure of businesses that require proximity to supply chains and markets and that depend on those interconnections.

The proposed rezoning of industrial land as suggested in the revised draft Strategy will significantly reduce the industrial land supply in the subregion and the ability to meet future demand for industrial land activity and employment targets, failing to address this question in the industrial lands strategic assessment checklist.

The 2014 Employment Lands Development Program by the DPE reports that the Central subregion only had an overall vacancy rate of 3% across all its industrial precincts. This is barely sufficient to allow for turnover of tenants.

The AEC Employment Lands Study found that there will be a shortfall of industrial floor space in most Strategy Corridor precincts by 2041 and an overall unmet demand for approximately 247,900sqm (24.79 hectares) of industrial GFA. This shortfall is likely to be further exacerbated by the following Planning Proposals, which seek to rezone large areas of industrial land in the Sydenham Station and Marrickville Station Precincts:

Sydenham Station Precinct:

- Victoria Road Precinct (approximately 18 hectares, some of which is located in the Precinct); and
- Mary Street, St Peters, known as Precinct 75 (approximately 13,395sqm based on the proponent's Planning Proposal).

Marrickville Station Precinct:

- Carrington Road (approximately 7.8 hectares based on the proponent's Planning Proposal)

The cumulative loss of industrial land will result in a deficit of industrial land in the Inner West LGA, and largely eliminate the scope for existing industrial enterprises in the area to grow and adapt. Given that there is already a supply and demand gap for industrial land in the Inner West and a need to increase the stock of industrial floor space, the revised draft Strategy should be amended to ensure that those significant industry clusters and the existing businesses that provide urban services for the local population and other businesses are protected and retained to support a diverse local community and economy.

3.2 Towards Our Greater Sydney 2056

As part of the Greater Sydney Commission's review of *A Plan for Growing Sydney*, the document entitled *Towards Our Greater Sydney 2056* provides broad objectives in relation to the future operation of Greater Sydney being *A Productive Sydney*, *A Liveable Sydney* and *A Sustainable Sydney*. The revised draft Strategy is consistent with some of the broad aims of that document as it seeks to provide additional residential accommodation near an existing centre with good access to services and public transport. However, given the:

- intensity of some of the proposed development heights and lack of detailed urban design framework;
- loss of significant and highly strategic employment lands;
- lack of required studies and a comprehensive infrastructure plan and funding mechanisms to meet the needs of a significantly increased population;
- lack of any affordable rental housing policy, and appropriate mechanisms to facilitate the provision of such housing; and
- lack of sustainability targets, framework and guidelines for sustainable development,

it is considered the likely outcome, based on the revised draft Strategy, would not fully achieve these objectives for the Sydenham to Bankstown Corridor.

3.3 Draft Central District Plan

The draft Central District Plan (dCDP) aims to facilitate well-coordinated, integrated and effective planning for land use, transport and infrastructure over the next 20 years. The following assessment considers the revised draft Strategy, having regard to key relevant sections of the (dCDP):

Section 3.6 – Protect and manage employment and urban services land

Productivity Priority 5 of the dCDP requires a precautionary approach to the rezoning of industrial land for urban services or adding permitted uses. The dCDP notes that in 2015, the Central subregion had 1,490 hectares of zoned employment and urban services land, which represented 11% of Greater Sydney's total stock. Only 4% of this land was undeveloped.

The dCDP also confirms that even small parcels of employment and urban services land are important to the District's economy and that rezonings for non-industrial uses reduce potential long term growth and improvements in productivity, consequently that employment land stock needs to be protected.

The 2015 HillPDA Industrial Precinct Review for the DPE and Greater Sydney Commission's District Plans, provides a health check for all 135 industrial precincts in Greater Sydney. Each precinct was scored on job generation, function and output with an overall scale of 0 to 15. With a score of 13 the Marrickville industrial precinct is the second highest scoring precinct out of the 135 precincts, sitting just below the combined Port Botany/Banksmeadow precinct. Meeks Road also scored highly at 11. The most successful small precincts scored between 9 and 10.5 with the Tempe and Carrington Road industrial area scoring above average at 10.5.

The 2015 HillPDA Industrial Precinct Review referred to in the covering report to Council recognises the challenges of creating new employment lands in inner city areas and makes the following key points that support the retention of industrial floor space in the Marrickville Station and Sydenham Station Precincts:

- there is strong price driven demand for small industrial spaces (under 500sqm) in the Central Subregion (page 81);
- more creative types of uses (designers, food production and sale etc) are attracted to the Subregion (page 81);

- small local industries (furniture storage and renovation, printeries, food production and creative industries) flourish in these locations, given nearby local demographics (page 83);
- in terms of industrial trends, there is a growing and evolving demand for industrial areas within inner city and middle ring suburbs of Sydney to serve the needs of the growing local population (i.e. panel beaters and household trades) (pages 68-69);
- growing demand for more intensive backroom data storage and archives close to inner city offices (page 68); and
- growing demand for urban support services as a result of forecast rate of residential and business population growth (page 68).

Consequently the extent and nature of the draft revised Strategy's proposed rezoning of industrial land in the Sydenham Station and Marrickville Station Precincts is in direct conflict with Productivity Priority 5 of the District Plan.

Section 4.3 - Improving housing choice

The dCDP establishes a housing target for the Inner West Council to provide an additional 5,900 dwellings by 2021. The dCDP requires Council to undertake a number of actions in relation to housing supply, including the following:

- monitor and support the delivery of Inner West's five-year housing target of 5,900 dwellings;
- work with adjoining Councils to plan and delivery urban renewal in the Sydenham to Bankstown Corridor; and
- investigate local opportunities to address demand and diversity in and around local centres and infill areas with a particular focus on transport corridors and other areas of high accessibility.

Council is monitoring the delivery of the housing in the Inner West LGA and is on track to reach the five year housing target set for the LGA.

Section 4.4.4 - Deliver Affordable Rental Housing

The dCDP requires the relevant planning authority to include an Affordable Rental Housing Target as a form of inclusionary zoning and sets a target of 5% to 10% of new floor space at the rezoning stage. As discussed in the body of the report the revised draft Strategy does not provide an affordable rental housing target or mechanisms to address the issue of the provision of affordable rental housing.

Section 4.6 - Create Great Places

The dCDP encourages design led planning that produces good quality integrated urban design as key elements of a people centred, sustainable, liveable environment. The dCDP requires growth to be managed to create healthy, well designed, safe and inclusive places that encourage economic and social activity, vibrancy and community spirit. Again the intensity of development proposed, impact on heritage and character of the affected suburbs; loss of employment land, inadequacy of infrastructure planning and other deficiencies identified in this submission are such that it is considered the revised draft Strategy would not create great places, instead it will worsen what currently makes Sydenham, Marrickville and Dulwich Hill great.

Section 4.7 - Foster cohesive communities in the Central District

Section 4.7.2 of the dCDP stresses the importance of arts and culture for connected communities and vibrant public places and states that; “*Arts and cultural policy, investment and actions should be well integrated into urban development. This can be achieved through planning proposals for urban renewal areas and priority precincts...*” As a high density precinct with 15 significant creative industries clusters the Marrickville Road precinct and in particular Carrington Road area with over 8 hectares of industrial land is an important element of the overall cultural ecology of the Inner West and Greater Sydney that needs to be nurtured. The Commission also describes the importance of night-time economies and live music, which is also a specialisation of the Marrickville Station and Sydenham Station Precincts.

The revised draft Strategy states its vision for the Sydenham precinct as “*a creative and dynamic centre that increases and diversifies employment opportunities with new and exciting businesses and industries, cafes, bars, restaurants and venues for live music.*” The existing IN1 General Industrial zoning provisions under MLEP 2011 allow live music venues. The introduction of substantial new residential population in areas currently zoned industrial is likely to conflict with creative industries in existing industrial zones and undermine this vision.

3.4 Marrickville Urban Strategy (2007), Marrickville Local Environmental Plan 2011 and Marrickville Section 94/94A Contributions Plan 2014

The Marrickville Urban Strategy (MUS) was adopted by Council in 2007. It establishes a vision and co-ordinated directions addressing a range of planning, community, and environmental issues, to guide short, medium and long term strategic planning policies for the former Marrickville LGA. The MUS was developed in response to employment and housing targets established through the draft South Subregional Strategy (dSSS) and its overriding strategy, Sydney Metropolitan Strategy City of Cities, A Plan for Sydney’s Future (December 2005).

The MUS supports the aim of locating additional residential development in and around existing centres with good access to public transport and services. The MUS adopted six urban renewal approaches to inform policy options for future residential development within the LGA. These are:

1. Focus on residential density in and around centres;
2. Focus on commercial zoned land in centres;
3. Rezone select industrial sites;
4. Develop new centres;
5. Rezone select special use sites; and
6. Increase density in infill areas.

Marrickville Local Environmental Plan 2011 (MLEP 2011) incorporated those urban renewal approaches, creating many new areas for increased residential densities in order to meet the 25 year housing target of 4,150 additional dwellings. Since the commencement of the MLEP 2011 a higher than anticipated growth has occurred, which has meant the former Marrickville LGA was easily on track to meet those required housing targets. MLEP 2011 was based on a manageable growth, established collectively with support of the Marrickville LGA community and supported by Marrickville Section 94/94A Contributions Plan 2014.

Whilst the Rate cap and S94 cap makes it difficult to maintain existing infrastructure and provide the required infrastructure for new residents already for sustainable growth, the revised draft Strategy, with significantly increased dwelling projections, will further place pressure on local, regional and state infrastructure, making growth increasingly unsustainable, without a comprehensive State government supported infrastructure plan.

3.5 Inner West Council Interim Statement of Vision and Priorities

Council's adopted Interim Statement of Vision and Priorities currently guides Council until a single Community Strategic Plan is developed for the Inner West. The Interim Statement, which was adopted by Council at its meeting on 28 March 2017, contains the following eight high level priorities:

- Planning and development;
- Transport;
- Social vitality, creativity and quality of life;
- Sustainability and the environment;
- One Council;
- Local industry and business;
- Advocacy; and
- Local democracy.

The revised draft Strategy does not fully achieve those priorities as discussed throughout this submission.

3.6 Section 117 Directions

The following Section 117 Directions are relevant to the revised draft Strategy:

Direction 1.1 - Business and Industrial Zones

The relevant objective of Direction 1.1 is (1) (b) to protect employment land in business and industrial zones, and applies because (3) future planning proposals consistent with the Strategy will affect land within an existing or proposed business or industrial zone. The relevant provisions are that the planning proposal (4) (a) must give effect to the objectives of this direction, (b) retain the areas and locations of existing business and industrial zones, and (d) not reduce the total potential floor space area for industrial uses in industrial zones.

However under (5) a planning proposal may be inconsistent with the terms of this direction only if the relevant planning authority can satisfy the Director-General of the DPE (or an officer of the Department nominated by the Director-General) that the provisions of the planning proposal that are inconsistent are: (c) in accordance with the relevant Regional Strategy, Regional Plan or Sub-Regional Strategy prepared by the DPE which gives consideration to the objective of this direction.

The revised draft Strategy's proposed rezoning of substantial tracts of industrial zoned land and certain business zoned land is inconsistent with Direction 1.1 because it contradicts Productivity Priority 5 of the Draft Central District Plan to protect and support employment and urban services land.

Under *The Revised Land Use Plans* for the Marrickville Station and Sydenham Station Precincts in the revised draft Strategy, some land that is currently zoned B7 Business Park, IN1 General Industrial or IN2 Light Industrial under MLEP 2011 is proposed for either "Medium rise housing" or "Medium-high rise housing" which, if implemented, would result in the loss of that land for employment purposes.

The draft Central District Plan states that "despite high demand for employment and urban services land in the Central District, there has been significant market speculation and pressure to rezone them to retail and residential uses." (page 68).

The Plan notes that since 2011 a total of 45 hectares of employment and urban services land in the District has been rezoned for other uses (page 68). There are currently a number of current planning proposals relating to employment and urban services land within the Inner West LGA, which if approved, would further increase the loss of employment and urban services land in the District.

The Plan notes that research carried out by the Greater Sydney Commission on employment and urban services land has “*reaffirmed their value, underpinned by the economic contributions they make and the strong demand for this comparatively rare resource.*” (page 68)

The Strategy should be amended to ensure that it does not result in further reductions to this valuable, important and “*comparatively rare resource*”.

Direction 2.3 - Heritage Conservation

The objective of this direction is to conserve items, areas, objects and places of environmental heritage significance and indigenous heritage significance.

A comprehensive heritage study of the areas within the respective precincts should be undertaken to determine whether there are any sites or areas of environmental heritage significance to the area not currently identified as heritage items, heritage conservation areas or draft heritage items or heritage conservation areas. That study should be carried out before any changes are contemplated to existing land use zonings and/or density and scale controls to ensure that any new planning controls respect the existing built environment and any identified heritage significance.

Direction 3.1 - Residential Zones

The objectives of this Direction are to encourage a variety of housing types, make efficient use of infrastructure, and minimise the impact of residential development on the environmental and resource lands.

The Direction requires planning proposals to encourage housing that will broaden the choice of building types and locations available in the housing market; make more efficient use of existing infrastructure and services; reduce the consumption of land on the urban fringe; and be of good design.

Future planning proposals consistent with the Strategy will be consistent with this direction as it provides increased densities near an existing centre with good access to public transport (transit oriented development) and would therefore reduce demand for land on the urban fringe. However, as discussed elsewhere other infrastructure is required to support such significant residential density to provide this new housing. There is also concern that significant redevelopment of some of the older apartments would remove more affordable housing stock, reducing choice. Accordingly, some blocks containing older apartment buildings are recommended to be reduced in development height to limit likelihood of being redeveloped in the short to medium term.

Direction 3.4 - Integrating Land Use and Transport

As highlighted elsewhere, future planning proposals consistent with this Strategy will increase densities in a highly accessible location.

Direction 3.5 - Development Near Licensed Aerodromes

The objectives of this Direction are to ensure the safe and effective operation of aerodromes; ensure that aerodrome operations are not jeopardised by hazards or obstructions; and that residential development near aerodromes are safe for human occupation.

Future planning proposals consistent with the Strategy will increase height and density of building development standards. The revised draft Strategy proposes increasing to 6 storey main street shop top housing in Sydenham (in Gleeson Avenue and Unwins Bridge Road), which are located in areas heavily affected by aircraft noise (30-35 ANEF), contrary to the 117 direction, which directs that planning proposals must not rezone land for residential purposes or to increase residential density where the ANEF exceeds 25.

The revised draft Strategy also proposes to rezone land in Gerald Street from IN2 Light Industrial, IN1 General Industrial and B5 Business Development for Medium-high rise housing, and increase height/density for certain land in Marrickville Road, which is located in the 25-30 ANEF bands, also contrary to the 117 direction.

Whilst the previous draft Sydenham Precinct Land Use and Infrastructure Analysis identifies that "*The precinct is in an area with a level of aircraft noise above 25 ANEF that significantly restricts the development of new residential development opportunities.*", it does not justify or give consideration to the objectives of this 117 direction, as required under the Direction. Accordingly, those properties are not supported for new or increased residential from what is currently permitted under MLEP 2011 for such land.

Under the Direction there is a requirement to take into consideration the Obstacle Limitation Surface (OLS) as defined by that Department of the Commonwealth. It is noted that some of the Urban Design Peer Review Recommendations in the revised draft Strategy include building heights expressed in storeys that would penetrate the OLS (e.g. Carrington Road).

Direction 4.1 - Acid Sulfate Soils

The objective of this Direction is to avoid significant adverse environmental impacts from the use of land that has a probability of containing acid sulfate soils.

The revised draft Strategy relates to land that is identified as acid sulfate soil on the Acid Sulfate Soils Maps under MLEP 2011. Most of the land in the Sydenham to Bankstown Urban Renewal Corridor is located on land containing acid sulfate soils. In the case of the Sydenham Station and Marrickville Station Precincts much of that land is specified as Class 2 acid sulfate land.

As the Strategy would result in an intensification of land uses on certain land identified as having a probability of containing acid sulfate soils, under the Direction an acid sulfate soils study assessing the appropriateness of the change of land use given the presence of acid sulfate soils would need to be carried out.

Direction 4.3 - Flood Prone Land

The objectives of this Direction are to ensure that development of flood prone land is consistent with the NSW Government's Flood Prone Land Policy and the principles of the Floodplain Development Manual 2005, and to ensure that the provisions of an LEP on flood prone land is commensurate with flood hazard and includes consideration of the potential flood impacts both on and off the subject land.

The Strategy relates to land in the former Marrickville LGA that is identified as flood liable land under the planning controls applying to the land.

Under Part 6 of the Direction a planning proposal must not contain provisions that apply to the flood planning areas which inter alia:

- “(c) permit a significant increase in the development of that land,
- (d) are likely to result in a substantially increased requirement for government spending on flood mitigation measures, infrastructure or services”

The draft revised Strategy would permit a significant increase in the development on certain land within the respective precincts.

Council's floodplain management process has identified flood affected areas and the information from these studies should be used as a basis of any further local studies or risk assessments that may be required in the flood planning process.

Any further flood studies required should be funded by the DPE and this work should be undertaken in close consultation with Councils.

The implementation of the Strategy will require additional infrastructure to accommodate the growing population and a sustainable funding source to deliver this. It is important to clearly know how that infrastructure will be provided and how it will be funded.

Direction 7.1 - Implementation of A Plan for Growing Sydney

The objective of this direction is to give legal effect to the planning principles; directions; and priorities for subregions, strategic centres and transport gateways contained in *A Plan for Growing Sydney*.

(Refer to discussion in *Part 2.1 A Plan for Growing Sydney (2014)* of this submission)

4. INFRASTRUCTURE AND FUNDING

The revised draft Strategy does not provide a comprehensive whole-of-government plan for the required additional infrastructure and services. The anticipated increase in population will undoubtedly result in increased need for open space, recreation facilities, community facilities, child care, schools, out-of-school care, health care facilities, affordable housing, road upgrades and new or improved pedestrian and cycling connections.

The revised draft Strategy includes Infrastructure Plans and Infrastructure Schedules that itemise proposed infrastructure projects for each of the three Precincts. However, only some of the infrastructure recommendations in the various background reports and studies have translated into the respective Land Use Plans and Infrastructure Plans, some amendments to these are required and a large number of additional infrastructure projects are required. Also the level of detail in these maps and schedules are insufficient. An example of a more detailed and comprehensive implementation tool that the DPE could have used as a model, is the infrastructure schedule used in The Parramatta Road Corridor Urban Transformation Strategy. That document provided infrastructure type, hierarchy of facilities (local, district or regional), priority works, indicative timeframe for delivery and funding mechanisms as well as an estimated cost of works.

No mechanism(s) has been devised that will efficiently and transparently fund the delivery and/or upgrade of local or regional level infrastructure items. This is a significant oversight of the revised draft Strategy and must be addressed prior to the final Strategy being released.

Failing to address this issue will delay the delivery of housing and jobs across the Corridor. A Special Infrastructure Contribution Plan (SIC) to identify the regional infrastructure improvements is not as yet released. This task is listed as one of the key actions that will drive the implementation of the Strategy in the individual documents for Dulwich Hill, Marrickville and Sydenham Station Precincts. However, currently none of the items listed in the Infrastructure Schedules in Sydenham, Marrickville and Dulwich Hill Station Precincts is to be delivered as part of the SIC. The recommended mechanism for delivery of some of the required infrastructure as 'works in kind' by developers is an unquantified ad-hoc tool, which does not provide certainty to the community. All other works apart from public transport and major road works shown in the Infrastructure Schedule are to be funded from S94, which is inadequate to deliver the infrastructure required.

Given the scale of redevelopment proposed for the Sydenham to Bankstown Urban Renewal Corridor, which goes far beyond what Council is able to reasonably absorb and service for a rapidly increasing population, the DPE must establish a regional approach for the funding and implementation of all the required infrastructure (i.e. state, regional and local) and identify the funding source for each infrastructure item. Also, that the State Government must commit to funding the key infrastructure that Council will not be able to fund, such as acquisitions for new local open space, that due to past caps on S94 contributions (combined with caps on Rates) will not be able to cover such major infrastructure expenses, unless a major increase from the cap is allowed. Also Council considers that acquisitions should be implemented by the State Government, given this is required largely due to the rapid population growth that will be initiated by the Strategy. If a SIC is introduced for the Corridor, concern is raised that the funding for state and regional infrastructure will be locked in first and Council will be limited in its ability to increase S94 contributions to adequately cover all the remaining local infrastructure required through the IPART process. It should also be noted that some of the infrastructure projects identified to be funded fully or partly by Council in the revised draft Strategy are regional infrastructure. A clear example of this is the GreenWay South West project, which can create a shared pedestrian / cycle corridor and with the embellishment of existing open space; acquisition of land and construction of new open spaces where there are gaps along this link; and enhancement of feeder paths, can collectively create a part of the Sydney Green Grid as regional infrastructure.

In terms of acquisition of land to provide the required new open space additional infrastructure, it is stressed that the Inner West Council does not support compulsory property resumptions.

4.1 Active Transport

The proposed GreenWay South West is strongly supported. If designed to a high standard, this regional active transport corridor provides great potential to create connections to and between existing open spaces, centres, transport nodes, employment and other activity hubs along the route. The GreenWay South West can also provide a recreational facility in itself for walking and cycling, with walking in particular having been identified as the most frequent type of recreational activity in the Marrickville Recreation Needs Study 2011. Also it can provide a trunk route that gives access to a multitude of branch routes off this (including regional Cooks River and Cooks River to Iron Cove GreenWay routes), providing links to other open space and activation hubs and as a broader active transport network.

While the GreenWay South West is potentially a great initiative, the wording of the revised draft Strategy lacks certainty and commitment that this initiative will be implemented, stating '*DPE is preparing a concept landscape masterplan for a shared pedestrian and cycle link and linear park should surplus rail land become available*' in the Actions and providing a '*Potential new shared bicycle and pedestrian path along the existing rail corridor between Bankstown and Sydenham stations*'. Neither does the revised draft Strategy make clear how

implementation will be funded, with the responsibility shown as both DPE and Council, with the previous draft Strategy indicating it would be funded through S94 and the State Government not yet having established a SIC. The suggestion of it being funded with S94 funds from different Councils would make it unattainable and likely to be delivered in short disconnected lengths. From Council's experience with the Cooks River to Iron Cove GreenWay, the engineering for such a facility adjacent to a rail corridor may be cost prohibitive and gaining access to rail land problematic. To succeed it would need to be funded and delivered by the NSW Government as a single project with timely delivery, in conjunction with the Sydney Metro.

To maximise the effectiveness of the GreenWay South West, achieving it's functionality potential, depends on creating a continuous high standard corridor design that maximises connectivity, accessibility; safety; comfort; attractiveness; activation at appropriate place; biodiversity and water sensitivity.

To achieve these objectives the proposed GreenWay South West concept master plan is to include the following elements in the scope:

- minimum 3.5 metre to 4 metre wide shared use path and associated cycle and pedestrian facilities (e.g. bike racks, signs, bubblers, shaded seats/rest areas, lighting);
- safe crossing of street barriers to movement, wherever feasible through the use of bridges and tunnels to create a regional standard of safe unimpeded access, (especially where crossing of busy roads are required) or secondly provision of high-standard crossing facilities;
- water sensitive urban design, wherever feasible;
- public art and consistent, high quality street furniture and public domain treatments (e.g. best practice lighting, signage, fencing);
- use of indigenous species for tree planting and landscaping along the corridor and in adjacent areas;
- establishment of compensatory bush care sites along the Sydenham to Bankstown corridor in situations where existing patches of vegetation need to be cleared to make way for construction of Sydney Metro and GreenWay South West;
- effective integration with existing open space and recreational areas (e.g. ovals, parks, children's play areas in close proximity to the GreenWay South West corridor);
- incorporation of activation elements wherever possible, particularly in new development sites/precincts adjacent to the Sydenham to Bankstown Corridor. This can include fitness stations, cafes, community gardens, meeting places, heritage interpretation and special interest hubs/facilities/pop ups (e.g. environmental art, skate boarding facilities, outdoor learning spaces for school and university students etc); and
- effective integration with existing town centres along the GreenWay South West corridor.

To achieve a complete active transport network integrated with the GreenWay South West, the State Government needs to fund the provision of pedestrian and cycle feeder branches that links to / from and across the main east/west GreenWay South West "spine", that provide links to open spaces (particularly district and regional parks) as well as to centres, transport nodes, employment and other activity hubs as identified by Council.

4.2 Open Space, Recreation Facilities and Public Domain Infrastructure

While the proposed GreenWay South West is strongly supported, it is not considered the section running through the Inner West LGA would form a 'linear park' as described in the Vision and Actions of the revised draft Strategy, given it's limited width creating limited scope to be considered parkland. However, it does have the potential to be a linear form of greened open space, connecting a series of parks and other open space activity nodes.

The background draft *Bankstown to Sydenham Corridor Strategy: Open Space and Recreation Strategy* (draft Open Space and Recreation Strategy) supporting the revised draft Strategy is not based on a broad recreational needs study, only physical open space and public domain analysis. Notwithstanding this, the draft Open Space and Recreation Strategy proposes locations for open space upgrades; opportunities for shared school access; new open spaces where there are local open space gaps; and streetscape and laneway upgrades to provide pedestrian links. However, not all these have been committed to in the revised draft Strategy. Predominantly, the Infrastructure Plans and Schedules specifies that these open space initiatives would be left to Council to provide or negotiate as part of development or the other bodies (Dulwich Hill Primary School and Marrickville Golf Course), which is uncertain. Required upgrading of existing parks; land required for acquisition and construction of new open space; and other public domain improvements required, must be clearly identified upfront, itemised in a detailed infrastructure schedule, be accurately costed and be committed to by State Government funding mechanisms to enable its delivery. Section 94 will be insufficient to provide the new open space areas required for the incoming community identified in the Strategy.

The Strategy recommends provision of community access (outside school hours) to facilities at Dulwich Hill Primary School to address lack of public open space. The school has one hard stand area and one heavily-worn grass area, both only approximately 1000sqm in area, that will be inadequate to provide for the recreational needs of an additional 5,000-6,000 residents.

The type and size of the new open space delivered by conversion of the Carrington Road industrial precinct is not defined and are open to interpretation. The revised draft Strategy should clearly state that any new public open space created by the urban renewal on large sites should be provided in addition to the area of communal open space, i.e. more than 25% of the site as per standards in the Apartment Design Guide.

To ensure adequate open space and recreation facilities are provided to meet the needs of the existing and new populations the following is recommended:

- Base the proposed open space and recreation facilities on a comprehensive recreation needs assessment;
- Ensure recommendations for the GreenWay South West and other open space, public domain and urban design recommendations made in reports supporting the revised draft Strategy are included in the Infrastructure Plan;
- Ensure pedestrian and bicycle connections to existing significant open space are upgraded to meet demands from increased population – e.g. to Cooks River Parklands, Enmore Park, Tempe Reserve, Sydenham Green;
- Land acquisitions for additional recreation areas should be based on need – i.e. the greatest need in Marrickville is to upgrade facilities in larger district and regional parks. If it is not possible to provide significantly sized land acquisitions within the town centres to create large open space areas, then improvements to the connections to these district and regional facilities should be the priority;

- In general, funding for park improvements is better to be allocated to upgrading regional facilities – e.g. Tempe Reserve, Cooks River Parklands etc;
- Provide improvements that make these connecting streets ‘people places’ that allow for informational recreation / interaction with separated bicycle connections, shade trees, safe and quality pedestrian pavements and street furniture (including seating, bicycle racks, drink fountains, rubbish bins and integrated public art);
- Increase setbacks for development sites adjoining pedestrian /cycle connections to enhance the public domain;
- Provide separation from busy thoroughfares and traffic corridors with multifunctional green infrastructure, including rain gardens, to increase the pedestrian perception of separation and safety from traffic;
- Review opportunities for shared use of school grounds and church grounds for recreation within the area; and
- Support the implementation of the Inner West Council (Public Domain Planning) draft master plans for both Dulwich Hill Station Precinct and Sydenham Station - Marrickville Road East.

Specific comments on open space initiatives are as follows:

- Council is supportive of the provision of an additional open space to serve the significant block of medium and medium-high density housing adjacent to Hercules Street. There is inconsistency of where this open space should be provided between the revised draft Strategy Land Use Plan, Infrastructure Plan, Fine Grain Public Domain Study for Dulwich Hill prepared by Panovscott; and the draft Open Space and Recreation Strategy. Council considers the best location for open space would be at the north end of this development area adjacent to the bridge over the light rail corridor, where the land has less slope, to provide an entry into the Cooks River to Iron Cove GreenWay open space corridor, as well as to provide local open space to serve this development as well as other development further to the north. This space needs to be of sufficient scale and useability to provide recreation opportunities and effective relief from the built environment and enhance the connection between the open space at Jack Shanahan reserve and the parklands to the north near Arlington. To create this space would require acquisition and open space construction commitment in the Infrastructure Plan and Schedule. There is a good evidence base for this acquisition in the Marrickville Recreation Needs Research 2012, which identifies Dulwich Hill as an area with a very low supply of open space per capita to the north of Jack Shanahan reserve.
- The Dulwich Hill Land Use Plan and Infrastructure Plan and Schedule is to make clear that dedication or easement is required as part of redevelopment for higher density housing for a 10 metre strip of land adjoining the light rail / Cooks River to Iron Cove GreenWay corridor for open space and pedestrian / cycle public access.
- As proposed in the draft Open Space and Recreation Strategy to reinforce the regional GreenWay South West corridor linking a series of open spaces, additional open space is required along the corridor where there are currently gaps along the corridor, as well as serving local open space needs for the surrounding community, ideally in the following desirable locations:
 - expansion of the Tom Kenny Reserve in Bayley Street, Dulwich Hill, to a size that can function as a park and a destination for people travelling along the GreenWay South West, to create a local park of minimum 3,000sqm with a direct visual and physical and connection to the GreenWay South West corridor that passes adjacent.
 - the area designated for potential urban plaza associated with an eastern entrance to the Marrickville Metro Station is also an area identified as a gap in local open space (also proposed in the Marrickville Fine Grain and Open Space

Study prepared by TyrrelStudio), to create a local park of minimum 3,000sqm. Open space at this location will also provide more open and direct physical and visual link from Leofrene Street to Myrtle Street and direct access to a park space and green outlook from apartments for this intense high density area.

As they are tied to the provision of the GreenWay South West as regional open space corridor, these two open space areas should also be classed as regional infrastructure and be funded through the Special Infrastructure Contribution being developed for the Sydenham to Bankstown Corridor.

4.3 Street, Traffic, Parking and Stormwater Infrastructure

In order to identify the required street, traffic, parking and stormwater infrastructure needs for a future population increase, further detailed studies will need to be undertaken so that an Infrastructure Plan can be developed. The studies will need to identify the requirements, costings and priority of implementation. These studies should be funded by the DPE and this work should be undertaken in close consultation with Council and other stakeholders. This study process is seen as a key requirement to ensure infrastructure needs are considered. The studies should also identify the funding source, which needs to be sustainable, not just for the implementation but also for the ongoing maintenance and renewal that will be required. The mechanism to provide this funding needs to be achievable so that the complete infrastructure list that is developed will be delivered in line with the priority needs.

With the development of the Sydenham to Bankstown Urban Renewal Corridor, opportunities to improve flooding issues along the corridor should be prioritised and implemented to reduce flooding impacts and the risks that come with flooding. Council's floodplain management process has identified flood affected areas and the information from these studies should be used as a basis of any further local studies or risk assessments that may be required in the flood planning process. Any further flood studies required should be funded by the DPE and this work should be undertaken in close consultation with Council.

4.4 Social Infrastructure

4.4.1 Background

The Sydenham to Bankstown Social Infrastructure Study (SIS) prepared by ARUP on behalf of the DPE, Revised August 2017, presents a *high level assessment of social infrastructure that is provided by local government... and state government...* The study excludes social infrastructure provided by the non-government and private sectors (e.g. childcare, educational facilities and places of worship). Community Services and Culture has a number of concerns regarding methodology, assumptions, stakeholder consultation and the adequacy of research and analysis upon which social infrastructure needs have been projected.

4.4.2 Methodology (SIS section 1.2)

The benchmarking approach utilised by the SIS is not well suited to urban infill developments on this scale. A detailed needs-based assessment informed by a future population profile and analysis of current demand and supply is required to assess future social infrastructure needs (as acknowledged in the SIS, page 19). Assessment of capacity of existing facilities to meet community demand will assist in future infrastructure planning.

Cumulative demand impacting on social infrastructure within the Corridor, originating from regional developments such as Bays Precinct, Green Square and Parramatta Road, has not been assessed.

Issues concerning the potential to expand existing infrastructure and/or develop new facilities in an increasingly densified footprint needs to be further examined.

The SIS acknowledges that further studies need to be undertaken, including the analysis of leading practice in urban renewal; evaluation of capacity of existing social infrastructure; and development of a future social profile. There should also be an analysis of any negative impacts of the draft Strategy on the existing population, including the identification of strategies to ameliorate such impacts. The studies recommended by SIS together with the assessment of cumulative impacts should be completed prior to approval of the final Strategy.

The desktop audit of existing and planned infrastructure is incomplete. Notwithstanding that the Study includes a list of references in section 19 from former Marrickville Council (including Section 94 Plan; Facilities Needs Research; Youth Strategy; and Community Strategic Plan 2023), the Study does not include any analysis of these documents in the "Local Policy Framework" (Section 4.2). Despite this section including several pages regarding social infrastructure needs from Canterbury and Bankstown Councils, there is no reference to or analysis of the needs of the former Marrickville Council or Inner West Council. The Study needs to analyse the various reports from the former Marrickville Council listed in the References so that social infrastructure needs encompass the needs that have already been identified. This analysis should also reference the recently adopted Inner West Council Inclusion Access Plan 2017-21.

<https://www.innerwest.nsw.gov.au/ArticleDocuments/233/Inclusion-Action-Plan-2017-2021.pdf.aspx>

together with other relevant reports from the former Marrickville Council, such as Let's Talk Marrickville South which addresses the needs of lower socio-economic families in the area.

The population projections (Refer Section 3) do not attempt to stratify population by age/ stage of life sections, necessary for prediction of childcare, education, health, open space, and recreational facilities.

Given the role played by both community providers and the private sector in providing social infrastructure, particularly in areas such as child care; education; arts and culture; and recreation, the assessment of infrastructure provided by the non-government and private sectors will assist with needs assessment and infrastructure planning. For example, despite the number of creative industries operating in the area there are no arts and cultural facilities listed under existing social infrastructure. Consequently, this important part of the Inner West's cultural infrastructure is not recognised or adequately addressed.

4.4.3 Stakeholder Consultation (SIS Section 1.4)

Notwithstanding commentary drawn from the Sydney Local Health District Plan 2012-2017 our understanding is that Sydney Local Health District has not been consulted at district level by the DPE on the revised draft Strategy. Council considers this as a significant omission, particularly in relation to community-based health services and consultative services required to support growing populations in the proposed "vertical village" environment.

4.4.4 Benchmark Standards (SIS Section 5.3)

Table 2 (pages 19-20) lists the benchmarks applied in the Study and are based on the NSW Growth Centres Commission and the DPE for the provision of social infrastructure. The benchmark for the provision of long day care centres, occasional care centres, outside school hours care, pre-schools etc would have greater merit if the size/capacity of the facility specified was known (e.g. the benchmark standard for long day care centres on page 20 states 1:320 children aged 0-5 years). Assessment of long day care needs should incorporate analysis of capacity of existing centres as well as projections of future demand based on future population profile of new residents.

The SIS notes the inadequacy of benchmarks to predict school needs (Section 5.3, p19) – the same principle applies to all other social infrastructure.

The current provision of cultural infrastructure is not benchmarked in any of the Sydenham to Bankstown precincts, with readings at “0”. This omits both the current provision of local government cultural infrastructure, and as previously indicated, the significant proportion of local and Greater Sydney cultural infrastructure provided by NGO and private sector organisations. If rezoning changes in this area are to proceed, with affordable industrial lands replaced by residential developments, the responsibility to provide cultural and creative infrastructure for the area/ Greater Sydney will fall back on local and state government.

Council supports SSROC’s call for the development of joint NSW government/local government liveability indices for urban infill projects, developed a theme of *“Improving liveability alongside growth and intensification”*.

4.4.5 Social Infrastructure Assessment (Sections 7, 8 and 9)

The following comments are provided on the various social Infrastructure, including comments on the SIS assessment.

4.4.5.1 Child care

Demand outstrips supply at all of Council’s education and child care facilities, including early learning centres; family day care; before and after school care; and Council’s pre-school. Likewise private centres and community based providers all have waiting lists. This highlights the need for research into existing infrastructure capacity referred to earlier.

4.4.5.2 Education

Council notes that as Ferncourt Public School is the only public primary school in the Marrickville precinct, there will need to be careful consideration of the capacity of this school to meet current let alone future needs. The SIS notes that the Education Department is currently undertaking work to identify the capability of schools in the Corridor to meet community needs. Council would appreciate being provided with the resulting report to assist with Council’s strategic planning processes when it becomes available.

4.4.5.3 Libraries

The State Library of NSW People Places A Guide for Public Library Buildings in New South Wales (3rd Edition) provides the basis for the following comments regarding the planning for libraries in Marrickville, Sydenham and Dulwich Hill. It is noted that it appears the State Library of NSW formulas / recommendations have not been used in the document so items such as distance between and transport availability, non-resident members and existing and future plans for libraries in adjoining areas have not been considered.

When calculating the number and size of libraries, the State Library recommends that the non-resident workforce should be included in any of the calculations. This has not been done.

The report does not consider the existing square metres of the libraries. Currently the Sydenham and Dulwich Hill libraries are under the recommended sizes based on the current population – let alone future population. The recommendations should consider existing size / square metres and the existing facilities offered within the current libraries, that is meeting rooms, quiet study etc.

The proposal also suggests the expansion and / or upgrade of the Dulwich Hill library. This is a newly built library. The nature of the site means that expansion is virtually impossible as it is located on the ground floor of high density housing.

The authors may be under the impression that the existing Marrickville library will remain when the new library opens, that is, it is stating that there are currently 2 facilities (there is only 1) and that 2.5 will be required. The wording states that the new Library / Community hub is going to be a community centre and that the existing library should be upgraded.

Clarity regarding the definition of what comprises a community centre would be helpful. The Community Hub, is not really a community hub. It is basically one medium sized meeting room, with three meeting rooms upstairs that will be used for library programs.

4.4.5.4 Cultural Infrastructure (including arts/cultural centres)

Cultural infrastructure is a key priority for the Inner West community (Inner West Community Vision Statement 2016; Marrickville Council Community Strategy 2023, KRA 2; Cultural Action Plan 2016 – 2020, CE2). The area has the highest concentration for people working in the creative and cultural industries (9.4%, 2011 Census), with particular specialisations in the visual arts and music. The cultural sector (including a large proportion of private and NGO cultural practitioners) provide a range of engagement, employment and public activation opportunities in the area. They primarily utilise affordable rental spaces to carry out their activities, largely in industrial areas. Council is concerned about the potential loss of these creative industries in the Sydenham and Marrickville Precincts under the Draft Strategy.

Projections for infrastructure provision (page 5) should take into consideration re-zonings in the area. If industrial areas that house significant cultural infrastructure are rezoned to residential, cultural infrastructure needs will be greatly impacted. Losing local industrial lands changes workforce proximity for cultural workers and access to cultural spaces for the local community. This loss includes spaces for cultural producers, live music venues and a range of arts practitioners. The report titled *Made in Marrickville: Enterprise and cluster dynamics at the creative industries-manufacturing interface* (Gibson et al, 2017, page 24) identifies there are 59 local creative and cultural organisations in the Carrington Road precinct alone.

Acknowledging the high importance of cultural infrastructure, and the value of the sector to the local community and Greater Sydney (Greater Sydney Commission's Central District Plan, 4.7.2), Council seeks to support the continuing provision of this infrastructure through planning mechanisms and community plans. These mechanisms and plans include:

- Striving to acknowledge the value of industrial lands to cultural organisations and creative industries and seeking to protect these.

- Providing a range of cultural and planning information, resources and support for cultural organisations and spaces (*Cultural Action Plan 2016 – 2020, CE2*)
- Access to Council's Arts and Culture Grants (\$150,000 to be distributed in 2017) and programs, including the Open Studio Trail program (100 participating art spaces in 2017).

Proposed zoning changes in the Marrickville precinct (particularly the Carrington Road) area will see a significant loss to the Inner West's already diminished industrial-cultural areas, with knock on effects on the Sydenham precinct and more broadly into Greater Sydney. The Made in Marrickville report argues that the cultural infrastructure provided by industrial lands in Carrington Road are critical for Sydney to remain a competitive and liveable global city (Made in Marrickville, p. 9). If rezoning changes that result in a loss of industrial lands and cultural spaces in this area are to proceed, the responsibility to provide cultural and creative infrastructure for the Corridor's (and Greater Sydney's) cultural sector will fall back on local and state government.

There is no clear plan to find new spaces for displaced cultural organisations and creative practitioners resulting from rezoning changes as part of the Sydenham to Bankstown Urban Renewal Corridor. The Made in Marrickville report argues that the area's creative cluster is unique within Sydney and is "strongly place-embedded and proximity dependent" (p. 9) with a significant amount of cluster linkages, local cross-pollination and links to major Sydney CBD arts and cultural organisations and events. For this reason, cultural spaces cannot simply be moved further afield or broken apart.

The NSW Government's vision for Sydenham as part of the Urban Renewal Corridor is "a creative and dynamic centre that increases and diversifies employment opportunities with new and exciting businesses and industries, cafes, bars, restaurants and venues for live music." Council's Sydenham Station Creative Hub rezoning proposal aims to support some of these arts and cultural activities, particularly live music. However, proposed rezoning in nearby Carrington Rd area will greatly squeeze the availability of suitable cultural spaces in the Sydenham area, thereby diminishing the viability of live music venues and late night cultural activity. The local or state government provision of cultural infrastructure would then be required to make this vision a reality.

The SIS identifies the need for "**performing arts/cultural centres**" in the Sydenham, Marrickville and Dulwich Hill precincts. Such facilities will be crucial to these precincts, especially given the previously described impact on artists from any potential loss of industrial land. There is a need for analysis of the unique characteristics of these precincts and the type of arts/cultural facilities that may be suitable. For example, the Sydenham area may be suited to providing for live music venues/performance spaces that requires long operational hours, scale and areas where noise will not disturb residents. East Marrickville may be able to best accommodate cultural spaces for artist practitioners and creative producers in large, multi-use shared spaces. Dulwich Hill may be able provide an incubation hub for lower impact visual arts such as studios and residencies.

4.4.5.5 Halls, community centres and youth centres

The SIS considers the need for various sized community centres, meeting halls and youth centres. Council's halls and meeting rooms are intensively used at present and the high level of demand means that some bookings cannot be accommodated. The demand in new apartment developments for limited community spaces means that these spaces already struggle to meet the demand for playgroups and small social/family functions.

Council supports the provision of additional venues, and also suggests that further work is required to assess the potential to enhance and/or expand existing infrastructure and make

all facilities accessible (examples include Marrickville Town Hall; St Peters Town Hall; Herb Greedy Hall and Seaview Street Hall). The potential to complement existing recreational facilities such as the Jack Shanahan Skate Park should also be explored.

The potential for facilities to be multi-purpose and multi-generational should be considered to optimise use, promote social inclusion and enable inter-generational programs. Locations should be well located in terms of accessibility, public safety and active transport linkages to residential areas.

There are a number of community organisations in this corridor that provide essential services to vulnerable and disadvantaged residents (e.g. Marrickville Legal Service). A number of these groups are located along railway corridors where accommodation is more affordable, and may therefore be at risk of being displaced. For example, any impact on the community transport service in Carrington Road (which meets the needs of frail aged people and people with disabilities) needs to be assessed. If this valuable service is impacted, alternative locations and facilities to accommodate this service and its fleet of vehicles must be identified as part of the other work already recommended.

4.4.5.6 Health

The importance of quality, accessible social infrastructure and open space, in terms of health and well-being, for people and families living in apartments should be considered. Infill developments and associated increased density will necessitate accessible meeting places and open space to promote social inclusion and encourage connections between existing and new residents. Note earlier comment regarding the need for the Sydney Local Health District to be consulted at district level by regarding the revised draft Strategy and the assessment of health infrastructure needs.

4.4.5.7 Aged Care

The SIS does not address planning for an ageing population in terms of Commonwealth Government guidelines for aged care beds per head of population. This infrastructure requires significant advanced planning and needs to be considered.

4.4.6 Social Infrastructure Requirements for Precincts identified in revised draft Strategy

While the SIS identified a significant number of infrastructure requirements in each of the precincts, the revised draft Strategy only identified two infrastructure projects, including one in Marrickville and one in Dulwich Hill (no infrastructure requirements are noted for Sydenham):

- the new Marrickville library, already in construction; and
- the provision of community access outside school hours at Dulwich Hill Public School, which the Strategy justifies as follows: "There is an opportunity to make use of these public open spaces to minimise the amount of new open space that has to be provided" (Dulwich Hill Station Precinct, page 34).

As the Marrickville library is already under construction and the Dulwich Hill Public School already exists, the revised draft Strategy identifies no new infrastructure requirements to accommodate the increased population and density anticipated in the Corridor by 2036. The discrepancy between the Study's findings and those of the revised draft Strategy is substantial. For example, variance in the requirements for performing arts/cultural facilities and halls and centres is as follows:

		Additional arts/cultural centre required based on SIS	Additional arts/cultural centre identified based on Draft Strategy
Sydenham Precinct	Station	0.3	0
Marrickville Precinct	Station	0.8	0
Dulwich Hill Precinct	Hill Station	0.3	0
Total for the 3 Precincts		1.4	0

		Additional halls/centres required based on SIS	Additional halls/centres identified based on Draft Strategy
Sydenham Precinct	Station	3.1	0
Marrickville Precinct	Station	6.6	0
Dulwich Hill Precinct	Hill Station	3.8	0
Total for the 3 Precincts		13.5	0

With regard to the revised draft Strategy's proposal to address needs in Dulwich Hill by accessing Dulwich Hill Public School outside school hours, the following should be noted:

- any use of schools outside school hours cannot be guaranteed, and would be subject to negotiations with the school and the development of a Heads of Agreement in the first instance, followed by a Formal Joint Use Project Agreement.
- Council's Park Planner advises that the facilities and open space at Dulwich Hill Public will do little to address the area's needs in terms of sporting field infrastructure and open space, with one hard stand basketball court area being the only area for potential community use. Furthermore, there is limited opportunity for enhanced greenspace on this site or improved amenity through greening.

4.4.7 General Comments

The SIS refers to the need for "*innovative and compact built form solutions such as vertical mixed use and flexible indoor and outdoor spaces*" (p21). Investigation into innovative approaches to the provision of social infrastructure both within Australia and abroad may assist with addressing some of the social infrastructure planning challenges referenced in the SIS and are supported.

While the SIS addresses the need for community centres, it does not explicitly reference recreational facilities as part of the social infrastructure needs of the precincts. Indoor recreational facilities and outdoor facilities such as playgrounds could also be considered as part of the social infrastructure needs of the precincts, unless they are addressed elsewhere in the Sydenham to Bankstown Corridor Project.

An important part of existing social infrastructure serving local families is the Magic Yellow Bus that visits local parks providing support to parents with young children. This service enables workers to link vulnerable parents to social support services. This less traditional

approach to providing social infrastructure does not appear to be captured in the SIS. Similar models could be considered to meet future needs of families moving into the corridor.

The identification of future social infrastructure requirements needs to reflect the leading practice approach of walkable and/or cycleable neighbourhoods. The number and location of community resources should reflect the principles contained in the Healthy Urban Development Checklist (NSW Health, 2009). Item PA1.3 of the Checklist (NSW Health, 2009 p57) refers to a comfortable walking distance of 400-500 metres (or approximately 5 minutes of walking) between housing and frequent destinations such as shops, parks, schools etc.

The literature reviewed in the Checklist indicates that walkable communities that allow for informal and casual encounters as people walk to local destinations contribute to social connectedness (NSW Health, 2009, p119-120) as well as physical fitness. Any further analysis of the social infrastructure needs of the Corridor should consider and plan for walkability as a core objective in determining the location and number of social infrastructure assets.

Social infrastructure associated with urban development projects often lags behind resident occupation, in part due to the nature of the developer contribution system being tied to final occupation of all lots. The Healthy Urban Development Checklist document notes that in Greater Western Sydney this delay in social infrastructure development has resulted in “significant inequities in access to services” (NSW Health, p 112). The planning and development of social infrastructure in the Corridor needs to occur much earlier in the process, with funding strategies in place to ensure this occurs from when residents first settle (NSW Health, Checklist item S13.1, p.116).

The responsibility for funding the infrastructure needs of the Corridor has not been adequately addressed. While the revised draft Strategy states that DPE will provide funding to Councils through the Precinct Support Scheme to improve amenity and infrastructure within the corridor, this funding prioritises projects such as stormwater, recreation, parks and public domain improvements.

As well as requiring clarification regarding how the proposed new social infrastructure will be funded, there needs to be recognition of the ongoing operational costs associated with management of new facilities. Costs of staffing, maintaining and operating facilities will be significant and need to be factored in when the costs of future social infrastructure provision are considered. Where possible expansion and improvement of existing infrastructure should be considered as part of the response to infrastructure needs.

4.4.8 Further Work Recommended

The following detailed planning and research recommended by the SIS, in order to ensure social infrastructure planning reflects future population growth, is supported by Council, with Council recommended amendments noted:

- *Ongoing engagement with delivery agencies, local authorities and other stakeholders to inform more detailed social infrastructure planning.*
- *Undertake a comprehensive evaluation of the capacity of the existing social infrastructure – This should be undertaken and reviewed by stakeholders before being finalised. This should include community organisations that support disadvantaged communities.*
- *Inner West and Canterbury-Blacktown Councils to work with the sub-regional planning team of Department to coordinate social planning, funding and delivery of social infrastructure across the corridor.*

- *Review the Department of Education and Communities' Schools Assets Strategic Plan and School Cluster Asset Plans, when available, to confirm education infrastructure needs – A population breakdown of age and stage of life data for predicted incoming populations is required.*
- *Prepare a comprehensive future social profile to understand the potential particular needs of the new residents, workers and visitors within the corridor based on indicative age profile and other key demographic indicators relating to household size and composition, household incomes, labour force participation rates, education levels, rates of car ownership and dwelling mix.*
- *Identify the privately operated community facilities operating within and servicing the corridor and their level of contribution to addressing existing and future needs.*
- *Research into emerging leading practice in providing and delivering social infrastructure in urban infill environments.*
- *Continued tracking of population and worker growth, demographics, community needs and infrastructure capacity and provision to ensure timely implementation and needs of the existing and emerging community are realised.*
- *Engagement with emergency services providers to align their infrastructure planning with expected growth and explore ways to share infrastructure between emergency services agencies, for example, streamlining asset management, training services and facilities, back end administration resources and even shared stations.*
- *Locating new community facilities to reinforce the hierarchy of centres along the corridor.*

4.4.9 Conclusion

The Social Infrastructure Study has a number of significant methodological limitations. Without the further research recommended by both the Study itself and Council, the planning for social infrastructure in the Corridor will be flawed and community needs will not be adequately met. Furthermore, it is of concern that the revised draft Strategy does not reflect the Social Infrastructure Study in terms of the social infrastructure required by 2036. The failure of the NSW Government to commit to the development of any new social infrastructure in the Strategy will compromise the ability of the Corridor to provide an environment for healthy, creative and inclusive communities.

5. EMPLOYMENT LAND, BUSINESS AND ECONOMIC IMPACT

This section supplements the Council's core strategic economic and employment concerns set out in Section 3 above.

It is accepted that development in the corridor will create a significant number of temporary jobs in the construction industry and the fixture and fittings retail sector. The increased population will also fuel demand for goods and services in the retail, health, leisure, entertainment and other local consumer based enterprises.

Unfortunately the proposed loss of industrial floor space would mean that many existing businesses would find it impractical to relocate to western Sydney and will cease trading or leave the region altogether. This would result in significant losses of industrial jobs, unique award winning businesses, specialist experience, world class creative enterprises and talent that cannot be offset by short term jobs in construction or longer term low value retail and leisure employment.

The Strategy's proposed rezoning of industrial land would therefore have a significant negative impact on employment, availability of industrial floor space, supply chains, markets and synergies between businesses and Sydney's creative/cultural institutions.

The downside for the local economy would be the loss of a substantial amount of relatively affordable land, the greater percentage of which is currently occupied by creative industries. These businesses will be lost when the properties they currently occupy are either demolished or rezoned for medium to high density residential or mixed use development. It is envisaged that any preserved commercial and/or industrial property will attract even higher rental premiums than those already being paid in this rare industrial area close to the City of Sydney, Sydney Airport and Port Botany.

The concept of building over the railway storage/shunting area in the future would require a massive injection of resources which would in turn demand a high return on investment, traditionally in the form of sales or rentals. Unless subsidised to have affordable rental levels, this would make it difficult for take up of such new premises by creative industries that depend on having affordable space.

The collective impact of this urban renewal corridor, WestConnex, and the Parramatta Road revitalisation will accelerate the gentrification process, which has already severely eroded the once rich cultural diversity of the Inner West. This trend is clearly seen in the Census and the Inner West Council's Community Profile statistics.

Disappointingly the revised draft Strategy has largely ignored or glossed over the opportunity costs of the proposed re-zonings in an obvious drive to achieve predetermined outcomes. It is contended that some of those outcomes are not based on sound land use planning principles.

The purported opportunity sites referred to in the AEC Employment Analysis have exceptional economic value as industrial lands and should largely be retained as such. Council has empirical evidence drawn from extensive economic development collaboration with local business owners. This includes facilitating access to state and federal assistance such as Enterprise Connect and the establishment of the Marrickville Manufacturers Association Inc. which owns and promotes the use of "Made in Marrickville" as a premium brand for locally manufactured goods.

This evidence is supported by the Australian Research Council August 2017 *Made in Marrickville: Enterprise and cluster dynamics at the creative industries-manufacturing interface Carrington Road precinct* paper. This seminal report is based on international best practice. It highlights the need to rethink urban development and land use change that have adverse impacts on industrial land, especially where it is the physical link between cultural production and manufacturing. Additional evidence supporting the findings in this paper can be found in a number of direction papers prepared by the CSIRO.

The above report, points out that under current IN1 General Industrial and IN2 Light Industrial zonings the industrial lands identified as opportunity sites "*bring investment, jobs, vitality and liveability to Sydney, underpin its global city functions, and generate locally made goods and services that are distinctive to this city.*"

Although already referenced in this report it is worth re-stating that the Carrington Road site alone contains 223 businesses, employs over 1,800 people and can be discerned as 15 functional clusters.

The opportunity cost also includes loss of the fine grain that makes the Inner West a vibrant and culturally diverse place that attracts highly talented people from across the globe. The

four 'Ts', as espoused by Richard Florida in Rise of the Creative Class, which define truly creative locales, transport, talent, technology and tolerance are also the defining characteristic of all four of the Strategy's opportunity sites.

Without these industrial lands the Inner West will become a collection of characterless, low value dormitory precincts. There is no evidence of any need for further retail space and there is a current glut of shop vacancies in various parts of the Inner West LGA, other sections of the Corridor and adjacent suburbs.

Empirical evidence and global trending overwhelmingly support the retention of the industrial land zoning of the opportunity sites as their highest and best use. Removal or dilution of that zoning will have significant detrimental impacts well beyond the borders of the Inner West LGA.

6. TRANSPORT

6.1 Integrated Transport

This project creates a unique one-off opportunity to start reshaping our city and set the scene for future, precinct-based, redevelopment. In many ways the revised draft Strategy appears to focus on providing residential densities in Transit Orientated Developments (TODs) that will assist in providing a viable population to support the new metro line.

However, the Sydney Metro project (like much of Sydney's transport network) is still a very CBD-centric system re-enforcing the existing *hub and spoke* network; with the City and Parramatta as the 2 core hubs. In order to better cater for the long-term needs of the Sydney Region it is essential that increased north-south connections collectively be provided.

Consequently, it is suggested that both TOD and Development Orientated Transit (DOT) principles, providing new transport networks to connect existing land use hubs, should be employed to ensure that the Sydney Metro is not the only transport initiative proposed to cater for the increased population (resident, visitor and worker). And in catering for these three user groups a variety of transport modes must be readily available throughout the week during both day and night-time hours.

6.1.1 Regional Transport Network

At this stage the revised draft Strategy only addresses north-south connectivity through an enhanced bus service between Bankstown and Parramatta, and the corridor's proximity to the Inner West Light Rail Service.

Opportunities should be explored to provide links between the Sydney Metro (and associated precincts) and the T1, T2 and T3 heavy rail lines. This could be provided through enhanced bus services and/or opportunities for new transport technology, as well as enhanced active transport links.

While the revised draft Strategy discusses completion of the existing Cooks River to Iron Cove GreenWay and creation of a new GreenWay South West, it is also essential that a trellis of feeder paths be developed to link both elements of the GreenWay to adjacent suburbs. In particular, improved connectivity between the GreenWay South West as a linear park and existing open spaces is essential. While the idea of the GreenWay South West as a linear park is welcome, it is not a solution to the issue of insufficient open space in the local area and thus its role in the wider open space network and how it connects to other spaces is imperative. The requirement for this needs to be worded more strongly in the final Strategy than *IWC should consider...* etc. Council has undertaken work on these critical links feeding

to and from the GreenWay South West and how this must be integrated into GreenWay South West plans as they develop, which has been shared with DPE and Government Architects Office recently. A copy of that plan titled “Sydenham to Bankstown Linear Park Connections” is reproduced below and attached:



6.1.2 Modelling

Prior to the project proceeding it is essential that a detailed analysis of existing and likely future traffic movements be determined. The most appropriate mechanism to develop this evidence base would be to create a traffic movement model for the street network of the corridor and each Precinct.

This modelling should include both:

- Mesoscopic analysis – examining impacts along the whole corridor and how those impacts affect adjacent areas; and
- Microscopic analysis – examining impacts within and immediately adjacent to each precinct.

The model(s) should permit a series of development and traffic management scenarios to be tested; providing stakeholders with opportunities to examine the likely implications of various combinations of land use/floor space with traffic management measures (including rates of parking provision). This would ultimately assist in ensuring acceptable levels of traffic flow, rates of parking provision and the creation of environmentally and aesthetically suitable precincts.

It should include agreed mode share targets and assist in designing a road hierarchy and transport management scenario which will facilitate an agreed *desired future* for the corridor and each precinct, rather than being designed to accommodate a variation of the status quo.

6.1.3 Creating a Sustainable Future

Ultimately, it is considered essential that the increased residential densities (and employment opportunities) should not be solely designed to make the metro more viable, they should offer genuine city shaping opportunities and start to guide a more sustainable city through more sustainable neighbourhoods. This could be achieved through the:

- creation of 10 minute walkable neighbourhoods, with either car-free or limited traffic internal environments created within the precincts (possibly shared zones or pedestrian priority areas);
- provision of precinct-wide 30km/h speed limits, in recognition of the likely increased pedestrian activity;
- inclusion of mode share targets, which aim at reducing private car dependency;
- provision of on-site car parking controls, which reflect the high level of public transport accessibility by permitting zero rates of provision and cap maximum rates of on-site car parking provision in a manner which supports prescribed mode share targets;
- limiting of the amount of car parking to be provided (see above) should be disassociated (not on the same title as the dwelling or workplace) and disengaged car parking (car parking for each precinct should be contained within several suitably positioned facilities rather than under or adjacent to each building) in buildings designed for adaptive re-use (as car parking becomes less important to the precinct's viability). In addition to rationalising the location of car parking spaces and their acquisition, this arrangement will reduce the number of kerb-crossings/driveways and correspondingly reduce pedestrian/vehicle conflict within the precincts;
- provision of opportunities for both internal and external car share facilities, as well as suitably located pick-up/set-down areas;
- provision of a mix of internal (within developments) and external (kerbside or in parking areas) electric vehicle charging points/stations; and
- provision of a prescribed proportion of soft stand areas and WSUD to assist in reducing heat island impacts in the precincts.

6.2 Specific Transport Comments in Sydenham Precinct

- With regard to the fine grain elements around Sydenham Station, consisting of:
 - removing the one-way pair and introducing safer, more attractive and pedestrian friendly roads;
 - improving pedestrian connectivity between the station and Marrickville Town Centre including creating raised threshold entries to side streets off Marrickville and Sydenham Roads;
 - improving cycle connectivity between the station and Marrickville Metro, Frazer Park/Carrington Road and Sydenham Green;
 - increasing pedestrian safety on all approaches to the station and improving circulation around the new entry in particular; and
 - ensuring accessible interchange between rail and other modes at the station,there is a great deal of consistency with Council's planning, which is supported.
- The Marrickville Dive Site is now proposed to be used permanently by Sydney Metro as a stabling facility (bounded by Sydney Steel Road, Edinburgh Road, the railway line the Sydenham Pit). Accordingly the planning for this area needs to be amended to reflect these changes. Council's submission on the modification of the Sydney Metro Stage 1- Chatswood to Sydenham, proposed that use of this site above the train

storage facility be developed for a creative industry hub (with affordable rental levels). This was proposed given the site saw the loss of a large amount of light industrial and creative industry businesses when demolished for the purposes of the dive site, in addition to the nearby areas being under threat, notably Victoria Road, Carrington Road and Myrtle Street. Further, aircraft noise and OLS restrictions limit the future use of the site significantly in terms of potential use.

- In this submission Council also included that the new Sydney Metro Sydenham Station concourse be designed to increase permeability of site and connectivity across tracks, which should be reflected in the revised draft Strategy.
- Council supports the proposal for improved pedestrian movement on Railway Parade and Sydenham/Marrickville Roads, as well as between Sydenham Station and Marrickville Metro Shopping Centre.
- A shared pedestrian / cycle path solution for connecting Sydenham, Tempe and Marrickville Stations has been presented to DPE and Sydney Metro, which could form part of the GreenWay South West route. This would provide connectivity between Sydenham Station with the Carrington Road precinct via Frazer Park, combined with the opportunity to unlock new open space in the Sydney Water and railway reserve areas adjoining Myrtle Street / Carrington Road and improve connectivity. The Council Recommended Amendments plan of the Sydenham and Marrickville Precincts shows this recommended route.
- Infrastructure projects T2, R1, P6 and O3 all need to be developed in tandem, fully integrated to ensure best pedestrian and cycle enhancement outcomes.
- P3 to be delivered by Sydney Metro as perimeter works to the Dive Site needs to be clearly documented as involving full street transformation works, rather than just a footpath upgrade.
- Include a P7 relating to project works to Bedwin Bridge and the Edinburgh Road/Edgware Road intersection plus surrounds, to ensure improvements to pedestrian and cycle networks do not terminate at Bedwin Road but are integrated into the surrounding network and provide connection to wider destinations such as Sydney Park and King Street.
- O2 should be delivered by Sydney Metro in tandem with the works planned so that this can open at the time of railway opening (or prior).
- More work is needed on the bus routes and stop locations around the station than is set out at present. Achieving an accessible interchange is crucial, which we believe is possible via two way bus routings outside of the new accessible station entry and with new pedestrian crossings incorporated at this location.
- The Infrastructure projects needs to identify how space can be provided to allow for a two-way separated cycleway across Gleeson Bridge.

6.3 Specific Transport Comments in Marrickville Precinct

- Council strongly agrees with the need for a new Marrickville Metro Station entry at Victoria Road (T3). This is essential to provide connectivity to the station for all of the potential new development in the Carrington Road/Myrtle Street precinct and ensure that as high a proportion as possible of new residents use sustainable means of travel. It must be noted that the Sydney Metro EIS (currently on exhibition) does not include an additional entrance at this location. It is essential that this be reintroduced and Council strongly encourages DPE condition its inclusion, which will be included in our submission on the EIS. It is believed that Sydney Metro removed this entrance, which was previously proposed, because of its proposed size and inability to fit at that end of the station. However, a smaller secondary entrance would be more fitting in this location, while still being able to provide essential access to the platforms.

- The report acknowledges previously raised community concerns regarding vehicle movement and traffic congestion, however this cannot simply be deferred until the planning proposal stage and must be raised in principle now. An approach must be included for addressing these matters and a strategy set out for how these crucial issues could be tackled. The time for robust conversations around car-free/car-capped/disassociated parking (as raised above) is now, not later.
- A new significant station plaza at Station Street (O3) is welcome, however the Sydney Metro EIS currently shows only a slightly widened Station Street, which implies acquisition of approximately a third of the Station Street block, rather than the whole block as indicated in the revised draft Strategy. Council would support acquisition of the whole block and creation of a significant plaza at this location, having a high standard of design and incorporating adequate activating facilities, and that this must be done (including the necessary acquisitions) by Sydney Metro.
- The fine grain study acknowledges the importance of Carrington Road not competing with the established Illawarra Road shopping strip. Further to this it is important that any future development in the Carrington Road precinct does not become a new regional attractor in itself, given the traffic/parking chaos that can result.
- Intersections at Marrickville Road/Petersham Road and Warburton Street/Illawarra Road need upgrades for pedestrian movement enhancement.
- McNeilly Park improvements (O4) should be undertaken by Sydney Metro when they use the park for stormwater upgrades.
- Additional bus routes are welcome to support additional residential growth but further consideration is required as to how best to connect to desired destinations rather than creating circuitous, unattractive, bus routes.
- The GreenWay South West route, is supported to run through the rail / Sydney Water reserve located behind Myrtle Street adjacent to the railway line from the level railway crossing provided safe crossing of Victoria Road is provided, most likely requiring a pedestrian bridge, justified give the road traffic and dangerous curved road configuration to enable safe and high amenity connection as a regional GreenWay.
- While Council's position is not to support the rezoning of the employment land around Meeks Road and Gerald Street, if this does remain in the final Strategy, the additional provision of a pedestrian link, from Victoria Road on the northern side of the railway line to Marrickville Road is also supported, as it will also allow links further to the north, noting that it will only occur incrementally if and when industrial properties are redeveloped in Gerald Street.
- The proposal for the stormwater channel running parallel to Carrington Road to be used as a new pedestrian connection and open space will have poor amenity, and would be not supported unless significant widening was to occur, by the dedication or easements being provided as part of redevelopment of adjoining industrial properties, which again Council's position is not to support for rezoning.

6.4 Specific Transport Comments in Dulwich Hill Precinct

- It is not clear how the connection between the Cooks River to Iron Cove GreenWay and GreenWay South West will occur. While design ideas for this connection are recommended in the Fine Grain Public Domain Study, using the disused fork of the former goods line as an active transport link, upgrading the link under the railway to Ewart Street and linking to the GreenWay South West (having a new pedestrian bridge over Terrace Road), these are not included as infrastructure projects in the map and table of the revised draft Strategy. This important connection needs to be made clear and allowance for this enabled in future development, particularly by Sydney Metro.

- Any ideas for open space / urban plaza adjacent to the new Sydney Metro Dulwich Hill Station entrance (O2) needs to be incorporated into Sydney Metro plans and delivered by Sydney Metro as part of the redevelopment of station. It is good that the revised draft Strategy recognises the need to incorporate the relevant section of the GreenWay South West into this open space / urban plaza. It also needs to consider how new infrastructure around the station integrates with the established trees along Ewart Street to the west of the car park.
- Infrastructure project T3 for bus network improvements serving Dulwich Hill are welcome as Dulwich Hill Station is currently served by only a single route. The introduction of Metro services and improved integration with light rail will likely require investigation into additional bus routes to/from the station.
- Improved connections between new developments around Dulwich Grove Light Rail stop and existing Dulwich Hill town centre should also be included to be delivered as works in kind by developers.

7. HERITAGE

The last comprehensive heritage study in the Marrickville LGA commenced in 2008. There has not been a comprehensive study in almost 10 years. Gentrification has been enormous in that time. The more recent Southern Areas Heritage Study was not comprehensive; a small list of items and Heritage Conservation Areas (HCAs) were identified for assessment on the combined basis of their potential significance and the estimated threat of development at that time. There will be many properties which are now considered under threat, which were not previously. Additionally, community views as to what is significant have evolved. Relying only on the existing LEP listings would be an oversight of the revised draft Strategy and even existing heritage items have not been identified on the Land Use Plans. Additionally there are some draft heritage items which are currently with the DPE as MLEP 2011 (Amendment No. 10) awaiting gazettal. Mapping of the existing, draft and potential heritage items is essential to evaluate development potential. Accordingly, before proposing any changes to scale and density, all areas affected by the Strategy, must be reviewed against the Office of Environment and Heritage criteria for heritage listing – *Assessing Heritage Significance*, published by the NSW Heritage Office, 2001. The ramifications of not doing so will be potential loss of heritage significance. A comprehensive Heritage Assessment must be done before the finalisation of the Strategy.

The comments in this report highlight the need to identify sites of potential significance in addition to the existing and draft items, and to subsequently provide the appropriate site specific/responsive zonings/height limits. In the same way that existing and potential HCAs are indicated on the Land Use Plan, existing listed heritage items, draft heritage items and potential heritage items to be investigated that are supported in the final Strategy should be designated on the Land Use Plan, so as to inform consideration of appropriate land use controls at the planning proposal stage for these sites and the surrounding setting.

7.1 Dulwich Hill Station Precinct

7.1.1 Positive Revisions

The following revisions to the revised draft Strategy are positive for heritage:

- The extension of areas nominated as Single Dwelling Housing;
- The nomination of the precinct north of Ewart Street as an HCA;
- The inclusion of 231-245 Wardell Road in the South Dulwich Hill HCA; and
- The down grading of the south Wardell Road area and The Parade south of Allison Park as Low Rise Housing.

7.1.2 Development Supported

- five to six storey heights around Dulwich Grove light rail station;
- appropriate scaled development south of Keith Street; and
- all areas now nominated as single dwelling zones.

7.1.3 Limitations of Heritage Assessment

The NBRIS study was too limited in its scope; only evaluating for block based potential HCAs, not smaller HCAs or potential heritage items. A comprehensive heritage assessment of every property effected, by the changes proposed in the strategy, needs to be undertaken by the DPE. Additionally the lack of coordinated fine grained urban planning with heritage has meant that opportunities to retain clusters of heritage buildings as small HCAs and items, has been overlooked. The approach is oversimplified.

7.1.4 Limitations of Urban Design

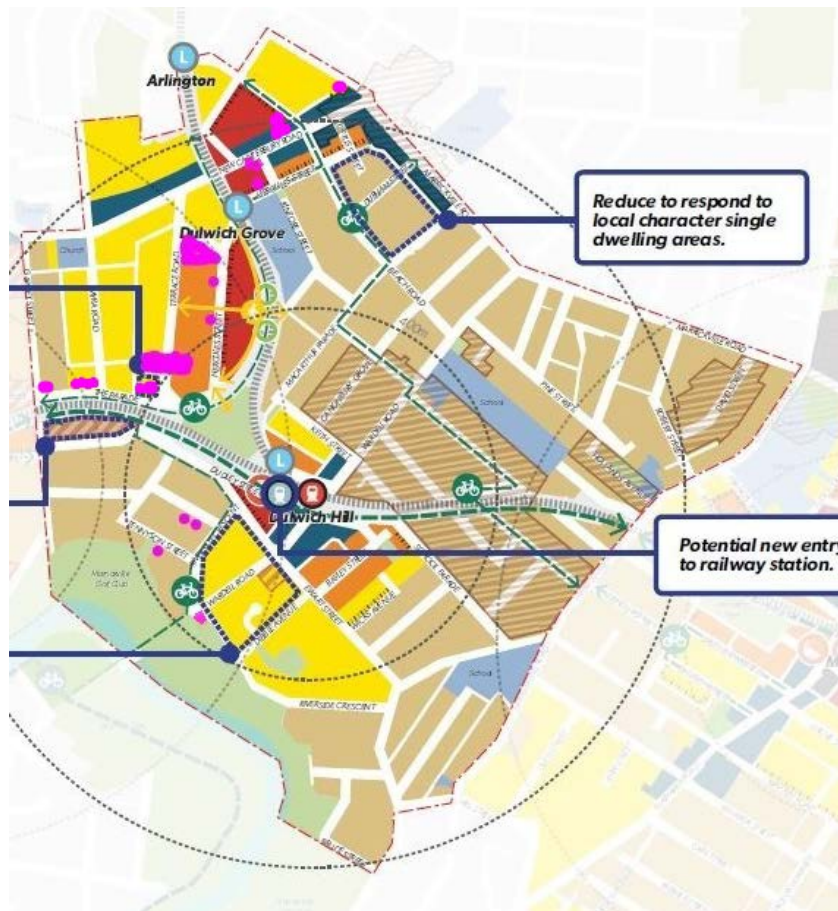
More detailed master planning has been provided in the form of Panovscott's opportunities and design solutions for select sites, public spaces and connections, however within the blocks between Hercules Street and Terrace Road a detailed, fine grain level of planning is not evident in the Masterplan by JBA.

The JBA Masterplan is a generic massing diagram which only establishes the maximum development allowable within the constraints of the ADG and the topography. It does not demonstrate that significant heritage values have been considered, nor that quality, place based urban design will result. For example the whole block has been discounted as an HCA, and potential heritage items and smaller HCAs within it have not been assessed. The inclusion of individual and small clusters of heritage buildings within an up scaled urban renewal project is proven to add value through diversity and richness in local character and building type.

7.1.5 Potential Heritage Items to be Investigated

Preliminary investigation of the Precinct by Council's Heritage and Urban Design Advisor has identified the following properties that warrant further investigation for potential heritage listing, also mapped below in pink colour should be evaluated (disregarding the Greek Church at 28 Hercules Street and the Interwar shoptops at 466-470 New Canterbury Road as these have already been investigated by Council as part of the Planning Proposal for this block and found not to warrant heritage listing):

- 59-65 Terrace Road – Potential HCA with Allison Park opposite – an intact group of 4 Federation timber and stone cottages
- 1-3 Consett Street, 42 Hercules Street and 11-17 Terrace Road – potential HCA – substantially intact group of representative Victorian, Federation and Interwar houses
- 50 and 62 Hercules Street – potential heritage Items – intact, representative Federation timber cottages
- 2 The Parade – potential heritage Item – intact Federation corner house and former Maternity Hospital
- 151 Constitution Road – potential heritage item – Inter-war Uniting Church with significant social history
- 521 New Canterbury Road – potential heritage item - Inter-war apartments
- 39 Dulwich Street Dulwich Hill – potential heritage item – Inter-war flats



Map of potential heritage items and HCAs in the Dulwich Hill Station Precinct requiring further assessment (coloured pink)

7.2 Marrickville Station Precinct

7.2.1 Fine Grained Urban Planning

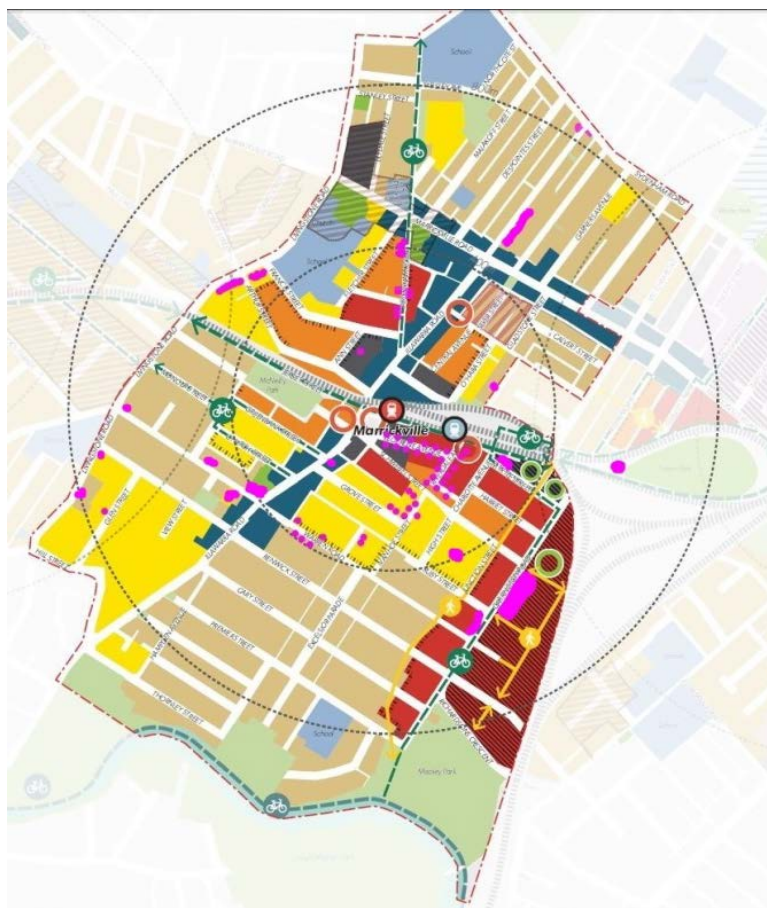
The proposed opportunities identified by TYRELLSTUDIO have suitably evaluated effects on existing heritage sites, however the page describing opportunities at Fraser Park and surrounding rail lands, which have been rightly identified for improved community access and utilisation, has the wrong text on it and therefore cannot be understood. The proposed opportunity envisaged at Leofrene and Riverdale Avenues needs a full analysis of the heritage value of the subdivision – see comments below:

7.2.2 Potential HCAs requiring assessment:

Preliminary investigation of the Precinct by Council’s Heritage and Urban Design Advisor has identified the following properties that warrant further investigation for potential heritage listing (also mapped below in pink colour), or require corrections:

- Carrington Road Industrial Precinct – potential HCA – industrial heritage, social heritage and geographic heritage – investigation and determination of the significance of ongoing industrial activity in the Carrington Road Precinct;
- Both sides of Leofrene and Riverdale Avenues – potential HCA – subdivision of substantially intact, representative Inter-War Californian Bungalows;
- Ivanhoe and Grove Streets – potential HCA - a high proportion of Victorian and Federation houses: e.g. 6 and 6A Ivanhoe Street, former stone stable at 25 Grove Street and terrace at 21 Grove Street;

- 206-218 Livingstone Road – potential HCA – substantially intact block of Federation semis and a house;
- 61, 62, 64, 66 and 71 Warren Road – potential heritage item – representative middle class Victorian housing on the ridge;
- 7 Glen Street – potential heritage item – Victorian /Federation cusp two storey semi;
- 220- 234 Livingstone Road – potential heritage item – two storey Victorian corner store and terrace row;
- 322 Livingstone Road – potential heritage item – Victorian Filigree house;
- 4 Ann Street Marrickville – potential heritage item – locally rare sandstone house on rock, intact Late Victorian/Federation with front fence;
- 108-106 Petersham Road – potential heritage item – Victorian Italianate double fronted houses;
- 85, 87 and 89 Petersham Road – potential heritage item – Victorian Rustic Gothic and Federation cusp Houses;
- 111-117 Petersham Road – potential heritage item – two storey Victorian terrace row;
- 119-125 Petersham Road – potential heritage item – single storey terrace row with corner shop;
- 11 Cavey Street Marrickville – potential heritage item – timber cottage with ‘stone’ weatherboards; and
- 202 and 204 Livingstone Road is not part of the school zone.



Map of potential heritage items and HCAs in the Marrickville Station Precinct requiring further assessment (coloured pink)

7.3 Sydenham Station Precinct

7.3.1 Fine Grained Urban Planning

The fine grain study by Andrew Burns Architects is generally supported and will have positive impacts on heritage items like the Sydenham Detention Basin. The only queries regarding heritage are set out below:

7.3.2 Potential Heritage Items

Sydenham's older housing stock is largely protected from new development by the aircraft noise restrictions to residential development, however Meeks Road is in an area earmarked for medium rise development and needs to be assessed.

Preliminary investigation of the Precinct by Council's Heritage and Urban Design Advisor has identified the following properties that warrant further investigation for potential heritage listing (also mapped below in pink colour), or require corrections:

- 64 Meeks Road – potential heritage item – Two storey Queen Anne style grand terrace, which is rare in Sydenham; and
- 80-110 Unwins Bridge Road Sydenham – is not the subject of the Precinct 75 planning proposal. It is mistakenly captured as such on the map. It is a substantially intact row of Federation semis and houses and therefore should be retained as a single dwelling area.



Map of potential heritage items in the Sydenham Precinct requiring further assessment (coloured pink)

8. AFFORDABLE HOUSING

The revised draft Strategy states (in part):

The Department acknowledges that housing affordability is an issues (sic) for Sydneysiders. It is becoming increasingly difficult for many to own a home or live where they would like to (for example near family and friends or work). The strategy increases housing supply, which is how this Government plans to address housing affordability.

In relation to this issue and the question *How has the Strategy been revised?* the following comment was provided:

Noted. The State Government is currently investigating a range of policy options to address the issue of affordable housing provision.

It is extremely disappointing that policy options to address the issue of the provision of affordable rental housing have not been incorporated into the revised draft Strategy. The issue of the provision of affordable rental housing is not a new issue. It was an issue identified when the initial draft Sydenham to Bankstown Urban Renewal Corridor Strategy was released in 2015. Since that time the affordable housing crisis in Sydney has further escalated.

Policy options to address the issue of the provision of affordable rental housing need to be incorporated into a further revised draft Strategy with those options being placed on exhibition for community consultation.

8.1 Market Failure and Affordable Housing

The claim that *Government plans to address housing affordability* by increasing *housing supply* does not address the issue of *affordable housing*.

Whilst there has been a significant increase in *housing supply* in the Inner West Council area in recent years it is clear that the market is not providing affordable rental housing for the vast majority of very low, low and moderate income households who need it in the Inner West Council area, and is not replacing existing stock of housing that is affordable to those groups as it is lost through gentrification and redevelopment.

Research shows that increasing supply, without intervention in the market, will not achieve housing diversity, choice or affordable supply. It is widely accepted that a complex range of demand and supply drivers must be addressed to achieve housing affordability and that, if change is adopted, the effects will be long term.

Council's research strongly indicates that virtually no new housing constructed in the future will be affordable to any very low or low income households, or to moderate income families, without strong intervention through the planning system including a policy to share land value uplift, particularly in larger brownfield and redevelopment sites as well as major State urban renewal projects.

8.2 State Government Commitment to the Provision of Affordable Housing in Government-led Urban Renewal Projects and on Government-owned Sites

Action 2.3.3 Deliver more opportunities for Affordable Housing of The Plan for Growing Sydney states (in part) that:

The Government will:

- *provide affordable housing in Government-led urban renewal projects and on Government-owned sites to meet the shortfall in affordable housing...*

The Sydenham to Bankstown Urban Renewal Corridor Strategy is a Government-led urban renewal project. The Strategy clearly needs to include appropriate provisions to facilitate the provision of affordable rental housing *to meet the shortfall in affordable housing*. It is regrettable that those provisions were not incorporated in the initial draft Strategy as developers are already buying up existing land parcels within the corridor.

The draft Central District Plan acknowledges that *housing supply and diversity are only part of the solution, and an Affordable Rental Housing Target complements these approaches to the affordable housing challenge*.

The Draft Central District Plan proposes an Affordable Rental Housing Target that builds on Action 2.3.3 of A Plan for Growing Sydney. The Draft Central District Plan sets a target of 5% to 10% (page 103).

8.3 The Need for Land Value Sharing

An Affordable Rental Housing Target should have been set in the initial draft Strategy for the Sydenham to Bankstown Urban Renewal Corridor from the outset so that it would be very clear to developers how much they need to factor into site acquisitions. The inclusion of an affordable rental housing target in the initial draft Strategy would have also helped as a means of containing land speculation and prices in the urban renewal corridor.

It is contended that the only way to achieve affordable rental housing that will help to address the immediate housing and homelessness crisis is to mandate a component of all residential development within the Sydenham to Bankstown Urban Renewal Corridor as affordable housing.

Strong intervention through the planning system in the form of mechanisms to capture an equitable share of land value uplift are required. Those mechanisms should be included in the final Strategy.

The Inner West Council is alarmed there are no affordable rental housing targets, or reference to the mechanisms that are needed (value uplift capture, mandatory contributions on all residential development) in the revised draft Strategy. Council recommends that affordable rental housing be funded in part by land value capture created by the Strategy rather than the value being directed to a few fortunate landowners as a result of planning decisions.

The Inner West LGA faces some of the most serious housing affordability challenges in Australia. Research commissioned by Council reveals a large, disproportionate and growing number of local residents in housing stress. That research shows that the market is not providing affordable rental housing for the vast majority of very low, low and moderate income households in the LGA. Nor is the market replacing existing housing stock lost through gentrification and redevelopment that is affordable to these groups.

Council's Affordable Housing Policy (adopted 28th March 2017) aims to increase the provision of affordable rental housing in the LGA by stronger intervention through the planning system in the form of mechanisms to capture an equitable share of land value uplift, together with mandatory contributions or inclusionary zoning in larger development sites within the LGA and in major State redevelopment projects. It is argued that such mechanisms offer Council the best means of increasing housing affordability for very low to moderate income households and retaining social diversity within the Inner West community.

8.4 Affordable Rental Housing Target and SEPP 70

Based upon extensive feasibility modelling, Council's Affordable Housing Policy provides for a 15% Affordable Housing Contribution within new release areas, brownfield and infill sites, and major private and public redevelopments, including on State Government land and in State urban renewal projects, including the Sydenham to Bankstown Urban Renewal Corridor that are within the Inner West Council area. This affordable housing contribution applies to such land that is subject to rezoning or amendment to planning controls that provide for increased density.

Further, the Affordable Housing Policy applies to proposed developments comprised of 20 or more dwellings or that have a Gross Floor Area of 1,700 sqm or greater across the LGA.

Modelling and research indicates that the most likely areas that will experience redevelopment will be older industrial areas and areas of lower quality commercial development, and that developments will be generally be able to sustain a 15% levy without adversely affecting redevelopment.

However, economic modelling also shows that some types of redevelopment may be adversely affected by a 15% levy, for example, mid-rise development on smaller lots. Therefore, a threshold of 20 units, or 1,700 sqm of Gross Floor Area has been selected as a development that is of sufficient scale to generally avoid such development disincentives.

Council's Affordable Housing Policy also calls for a 30% affordable housing levy to be applied to State Government owned land.

Affordable rental housing targets are currently subject to the outcomes of Voluntary Planning Agreements (VPAs). It is Council's view, however, that inclusion in SEPP 70 – Affordable Housing (Revised Schemes) will substantially improve Council's capacity to increase the supply of affordable rental housing in LGA.

In accordance with key directions in the Greater Sydney Commission's Draft Central District Plan, Council is seeking amendments to SEPP 70 and will make relevant amendments to its three principle LEPs (Marrickville, Leichhardt and Ashfield) in order to permit a levying of Mandatory Affordable Housing Contributions to create Affordable Rental Housing in perpetuity under the management of a Registered Community Housing Provider.

8.5 Open Letter to State Government

Similar mechanisms to boost the supply of affordable housing were recommended in an Open Letter to Premier Mike Baird and Planning Minister Rob Stokes in September 2016 by some of the State's leading planning experts, housing and homeless peaks and property sector representatives.

This letter was signed by Committee for Sydney CEO Tim Williams, Homelessness NSW CEO Katherine McKernan, NSW Federation of Housing Associations CEO Wendy Hayhurst, Professor Bill Randolph, Director of the City Futures Research Centre (UNSW), and

Professor Peter Phibbs, (Faculty of Architecture, Design and Planning - University of Sydney).

The Open Letter urged the NSW Government to think beyond the strategy of unlocking new land for housing and introduce measures to help people locked out of the market. These measures included:

- inclusionary zoning and setting affordable rental housing targets for privately owned development sites;
- setting ambitious targets for affordable rental housing on all Government owned development sites;
- Government incentives to trigger private and not-for-profit investment into affordable rental housing; and
- support for an Affordable Housing Financial Intermediary that would enable community housing providers to access well-priced, long-term funds from institutional investors bringing down their costs and stretching the benefit of a fixed amount of Government financial support.

8.6 Joint Communiqué on Affordable Housing

Measures similar to those in the Open Letter above were recently included in a Joint Communiqué arising from an Affordable Housing Forum held at University of Technology Sydney on 24 July 2017. Organised by Southern Sydney Regional Organisation of Council (SSROC), Planning Institute of Australia (PIA) and Community Housing Providers, the forum was attended by nearly 200 representatives from the Government, development industry, community housing and non-Governmental sectors, together with research, housing and urban development experts.

The Joint Communiqué, released on 23rd August 2017, noted that as of 2017, 373,000 households in NSW cannot get into housing at market rates or are under rental stress. More than 5,000 social and affordable dwellings per year are required in Sydney, while only 10,000 are being planned for the next 20 years.

To address the chronic lack of affordable housing, the Communiqué calls on the State Government to recognise affordable housing as essential infrastructure for a sustainable, inclusive and productive city. Measures recommended to help boost the supply of affordable housing included the following:

- recognise Sydenham-Bankstown Corridor as a priority target for affordable rental housing in the Central and South Districts that should be subject to Growth Infrastructure Compact agreement;
- expand SEPP 70 to enable more councils to embed inclusionary zoning schemes within local planning frameworks, particularly in growth areas or areas undergoing renewal; and
- enable councils to include a mandatory requirement for affordable rental housing in their LEPs where there is land value uplift to support its application, including in Government land.

8.7 National and International Inclusionary Zoning Schemes

Inclusionary zoning schemes designed to increase the supply of affordable rental housing are not new to Australia. For example South Australia has introduced such schemes with a contribution rate of 15%.

For example, The Housing Plan for South Australia, introduced in 2005, mandates that 15 per cent of new dwellings in all significant development projects be affordable, including at least 5 per cent for high-needs groups. In the initial phase of the scheme, the affordable housing requirement was applied to Government land releases on the urban fringe only. However, the policy is now being applied to urban renewal sites. As of 30 June 2014, the South Australia Inclusionary Zoning scheme had delivered 1,489 affordable homes, with a further 3,300 are committed in coming years.

Inclusionary zoning schemes designed to address a chronic undersupply of affordable housing have also been implemented internationally. For example, Prof Bill Randolph from City Futures at UNSW has referred to London in this regard:

Faced with a similar investor fuelled 'dash to density' across that city, and spurred on by a growing community backlash against the practices of developers to effectively get out of providing the affordable housing required under the London Plan, the new London Mayor, Sadiq Khan, has drawn up an Affordable Homes Program. This proposes that all new developments need to show how they achieve 35% *genuinely affordable* homes without subsidy – i.e. derived entirely through a value sharing arrangement. If they do, they get a speedy decision. If not, then a team of valuation experts will tease over the developers' feasibility assessments to see if they really can't afford to provide the required amount of affordable homes. The chances are if they can't, the proposal will be rejected.

Prof Randolph emphasises that the approach adopted in London goes to the crux of the value sharing argument. He argues that the debate *should be about the price developers pay for the land they want to build on and how much of the resulting uplift is deemed 'reasonable' profit, not about demanding more density*. Accordingly, value sharing should be seen as an important funding mechanism available to Governments to help pay for this much needed infrastructure.

8.8 Inclusive Renewal and the Benefits of a Non-Profit Renewal Corporation

Apart from introducing *inclusive renewal* processes entailing genuine engagement with local communities and stakeholders, Prof Randolph argues that the Sydenham to Bankstown Urban Renewal Corridor offers a *real opportunity to establish an arms-length non-profit Renewal Corporation or agency to work with local councils (with land holdings), local land owners and businesses, communities (particularly those in older strata properties), the development sector and community housing providers in consortia or joint ventures to re-plan and renew these town centres*.

8.9 Summary

In summary, key findings of the research underpinning Council's Affordable Housing Policy, include the following:

The Inner West Council LGA has experienced some of the most rapid real increases in housing prices (rental and purchase) over the past decade, with accelerating trends in recent years. Even the lowest priced strata dwellings are no longer affordable to very low and low income households, and are generally affordable only to the upper end of the moderate income band.

This is leading to serious impacts on the social and economic fabric of the local community including:

- (a) a large, disproportionate and growing number of local people are in housing stress, and sacrificing basic necessities to pay for their housing costs;
- (b) considerable displacement of historical populations through ongoing gentrification and non-replacement of affordable and lower cost housing;
- (c) very high current and projected levels of unmet need for affordable housing including for key workers and more vulnerable groups such as aged pensioners and people with a disability.

As indicated previously, Council's economic modelling strongly indicates that virtually no new housing constructed in the future will be affordable to any very low or low income households, or to moderate income families, without strong intervention through the planning system to capture a reasonable share of land value uplift to fund affordable rental housing in perpetuity, and the direct creation of affordable rental housing on public land.

Capturing a share of land value uplift before rezoning occurs is reasonable and feasible. This is not a tax. Rather, it is a mechanism for capturing a reasonable share of the unearned increment in land value uplift created through the planning actions of government.

It is Council's view that major State Government-led urban renewal projects such as the Sydenham to Bankstown Urban Renewal Corridor Strategy offer a rare opportunity to generate affordable rental housing on a reasonably large scale through inclusionary zoning measures.

These projects should meet community standards and expectations with respect to height and density. They should also incorporate a quantified component of affordable rental housing designed to successfully address the State's substantial need for affordable rental housing.

9. ENVIRONMENT

Significant concern is raised with the lack of background study, objectives, targets and measures in relation to sustainable development in the revised draft Strategy. The revised draft Strategy is not consistent with the approach taken by Urban Growth for the nearby Parramatta Road Urban Transformation Program, producing the Parramatta Road Corridor Urban Transformation Strategy in November 2016 (PRCUTS). PRCUTS consisted of a number of strategies, plans, and supporting technical documents, including a Sustainability Report describing the sustainability interventions to be applied to target World Class Urban Renewal. Although Council considered the scope too narrow to bring about world class urban renewal, the PRCUTS does at least set a framework to measure sustainability performance against four key measures:

1. Transport use (vehicle kilometres travelled per person per day);
2. Water consumption (ML per person per year);
3. Greenhouse gas emissions (tonnes per person per year); and
4. Household living affordability (\$ per household per year)

The PRCUTS also put forward three *key interventions for World Class Renewal*:

1. High Performance Buildings;
2. Reduced and Decoupled Strategic Parking; and
3. Urban Resilience and Infrastructure Delivery.

The final Strategy should develop a comprehensive sustainability framework with objectives, strategies and targets and measures. Building on the approach taken by the PRCUTS, the sustainability framework could incorporate:

- Transport;
- Water consumption;
- Greenhouse gas emissions;
- Household living affordability;
- Precinct green cover targets;
- Renewable Energy targets;
- Stormwater pollutant load reduction targets;
- Construction Materials & Recycling;
- Urban Ecology; and
- Zero waste to landfill.

10. STRATEGY IMPLEMENTATION AND STAGING

Implementing the Strategy, including the carrying out of further detailed studies required, will require funding to be made available from the State Government. The Strategy, as currently presented, requires a number of further detailed studies to be carried out, including traffic; heritage; urban design; flooding; and infrastructure planning. Those studies should be carried out and used to inform the final Strategy to ensure incoming growth and associated cumulative impacts can be appropriately managed by Council. Commitment to fund these required studies has yet to be made by the State Government.

Concerns are raised about the potential highly disruptive cumulative traffic, noise and other impacts from both private construction for new housing and the proposed construction of the new Metro line, along with the reduced commuter rail capacity, between 2019 and 2024. This issue needs to be thoroughly investigated and appropriately addressed before the strategy is finalised.

11. URBAN DESIGN

The revised draft Strategy has not adequately considered urban design criteria such as orientation, topography, lot depths and configuration, width of streets, views, relationships with open space and development parcels. Council's previous submission on the initial draft Strategy considered that detailed precinct wide master planning was integral to progress the Strategy, ensuring optimal planning outcomes, however this has not been undertaken. The urban design investigations and reviews that have been undertaken have only considered the areas at a high level, without appreciating what is realistic to be developed on each block.

Urban design analysis of critical blocks designated for medium-high rise and high rise housing by Council, applying SEPP 65 and the Apartment Design Guide (ADG) principles and guidelines, reveals that some of these blocks do not support the height/density proposed in terms of solar access, visual bulk and streetscape considerations. It is also evaluated that given the small width and depths of many blocks; fragmented property ownership; narrow streets; and major shadowing implications, that 12 storey height / building typology is not appropriate in this context for infill development. 12 storey built form typologies would only be appropriate on large sites in isolated positions, which is a very rare condition in the Inner West LGA's traditional historic urban morphology. In order to create a cohesive integration of new development into the existing built environment; appropriate transitions; create varied streetscapes; avoid streets being 'walled in'; and allow view

outlooks, it is necessary to incorporate nuancing of some of the areas designated for 8 storey development height (especially in the area south-east of Marrickville Station).

Council can see no reason why the Marrickville Precinct should incorporate a variation in the height allowed in the low rise housing development areas, where located within 500m of Marrickville Station (which represents all the low rise areas). The removal of a 3 storey typology does not provide the required variation of building form needed to be applied to certain areas to achieve sensitive infill and transition adjacent to single dwelling housing. There is a significant development impact difference between 3 and 4 storey development when infilling adjacent to single dwelling housing. Keeping the scale low is critical as these areas are more likely to develop sporadically over a longer time frame, based on the development uptake that has occurred in areas with similar planning controls, necessitating a sensitive low scale infill approach in between remaining single dwelling housing.

In view of the above, certain blocks or parts of blocks are recommended for lower height or variations in heights, which is discussed in the Precinct Review sections below and marked up in detail on the Council Recommended Amendments plan.

While there has been further public domain investigations in the three precincts, only some of these design ideas have been translated into the Land Use Plans and Infrastructure Plans. Accordingly, Council has marked up on the Council Recommended Amendments plan what additional public domain initiatives should be shown as appropriate on the Land Use Plans, Infrastructure Plans and itemised in the Infrastructure Table.

The public domain matters shown consist of:

- open space corridor dedication of land;
- government land where there are opportunities for open space;
- desirable locations for non-compulsory acquisitions for new local open space;
- amendment to the GreenWay South West route alignment;
- designation of the full Carrington Road Precinct;
- pedestrian connections; and
- addition of Sydenham Enterprise Area.

The most sustainable; safe; vibrant; and overall liveable precincts contain a mix of land use; a diversity of activity; and mix of operation in the day and night. This provides opportunities for people to live and work in the district; supports a walkable city; creates vibrant places as people activate the street; and facilitates a highly interactive community network. This is true of the Sydenham and Marrickville Precincts which are gifted to have significant employment lands, which are a critical part of the functioning and character of these Precincts, with the nature of this broadening as the type of employment and businesses continue to evolve in the Precincts and broader district. This is further enriched by the history of the Precinct; fine grain of the street and subdivision patterns and highly diverse building stock (which supports diversity of activity) that has developed slowly over a long time. Urban renewal, especially rapid extensive renewal that results in the loss of employment land and diversity and a move towards residential homogeneity will be deleterious to retaining and continuing to enhance Sydenham and Marrickville as great mixed use places.

12. PRECINCT REVIEWS

12.1 Sydenham Station Precinct

Meeks Road and Gerald Street Employment Land

As addressed in the Strategic Context and Employment Land, Business and Economic Impact sections the B7 Business Park, IN2 Light Industrial and IN1 General Industrial zoned land in Meeks and Gerald Street proposed for medium and medium-high rise housing is considered strategic employment land and is not supported and is recommended to be retained as currently zoned. If the final Strategy continues to designate this area for residential redevelopment, a new designation colour and legend key is to be shown on the Land Use Plan and a new land use type is required to be included in the Built Form Typology, requiring a mixed employment and residential land use.

Marrickville Road

As a consequence of the above, the proposed main street shop top housing area identified in Marrickville Road, from Meeks Road to Gerald Street / Sydney Street, is not supported to be increased in height / density to 6 storeys, as noted in the built form typology, as it would increase the residential conflict with retained industrial land. Accordingly, this area is recommended to be reduced to 4 storeys.

Mary Street and Unwins Bridge Road Business Enterprise Area

Also as discussed in the Strategic Context and Employment Land, Business and Economic Impact section, 60-62 Mary Street, Sydenham and 9-15 Unwins Bridge Road, Sydenham the existing zoning already supports office and business premises for creative industries in the IN2 Light Industrial zone and the loss of further industrial land, even to a business zone is not supported. In view of the circumstances, the subject land should be retained as currently zoned and the Strategy amended accordingly.

Commercial Premises Adjacent to Sydenham Station Metro Entrance

Consistent with the Sydenham Fine Grain Public Domain Study, the “new corner building” at 1-11 Sydenham Road, Marrickville has now been acquired by Sydney Metro and will likely be completely demolished during construction. Reuse of the site is to be determined but the strip fronting the new public plaza outside of the station entry should be a suitable land use enabling commercial premises and potentially forming part of the new plaza. The same applies to current residential land fronting Burrows avenue opposite the new eastern metro entrance (136 George Street, Sydenham and 11 Swain Street, Sydenham), having a land use allowing low scale commercial premises, supporting the existing three shopfronts and allowing potential additional infill shopfronts. Given the location directly under the flight path, these areas not appropriate for any form of new residential. Accordingly, it is recommended to designate these areas to allow commercial premises (but with no residential) requiring a new designation colour and legend key to be shown on the Land Use Plan and a new land use type being included in the Built Form Typology.

Main street shop top housing in Gleeson Avenue and Unwins Bridge Road

The main street shop top housing areas identified in this area, is also highly affected by aircraft noise and should not be increased in height / density to the proposed 6 storeys as noted in the built form typology. Accordingly, this area is recommended to be reduced to 3 storeys.

Expansion of Sydenham Enterprise Area adjacent to the Sydenham Pit

Given the location of 32 Shirlow Street, Marrickville and 39-45 Garden Street, Marrickville adjacent to the Sydenham Pit, with public domain opportunities (as identified in the Sydenham Fine Grain Public Domain Study); the route of the GreenWay South West; and potential for industrial activation around the Sydenham Pit area, it is recommended that these properties be included in the Sydenham Enterprise Area.

Mapping Error

The properties 80-110 Unwins Bridge Road, Sydenham are not the subject of the Precinct 75 planning proposal. It is mistakenly captured as such on the Land Use Plan. The Land Use Plan for the precinct needs to be amended with the subject properties designated as “Single dwelling areas”.

GreenWay South West Route

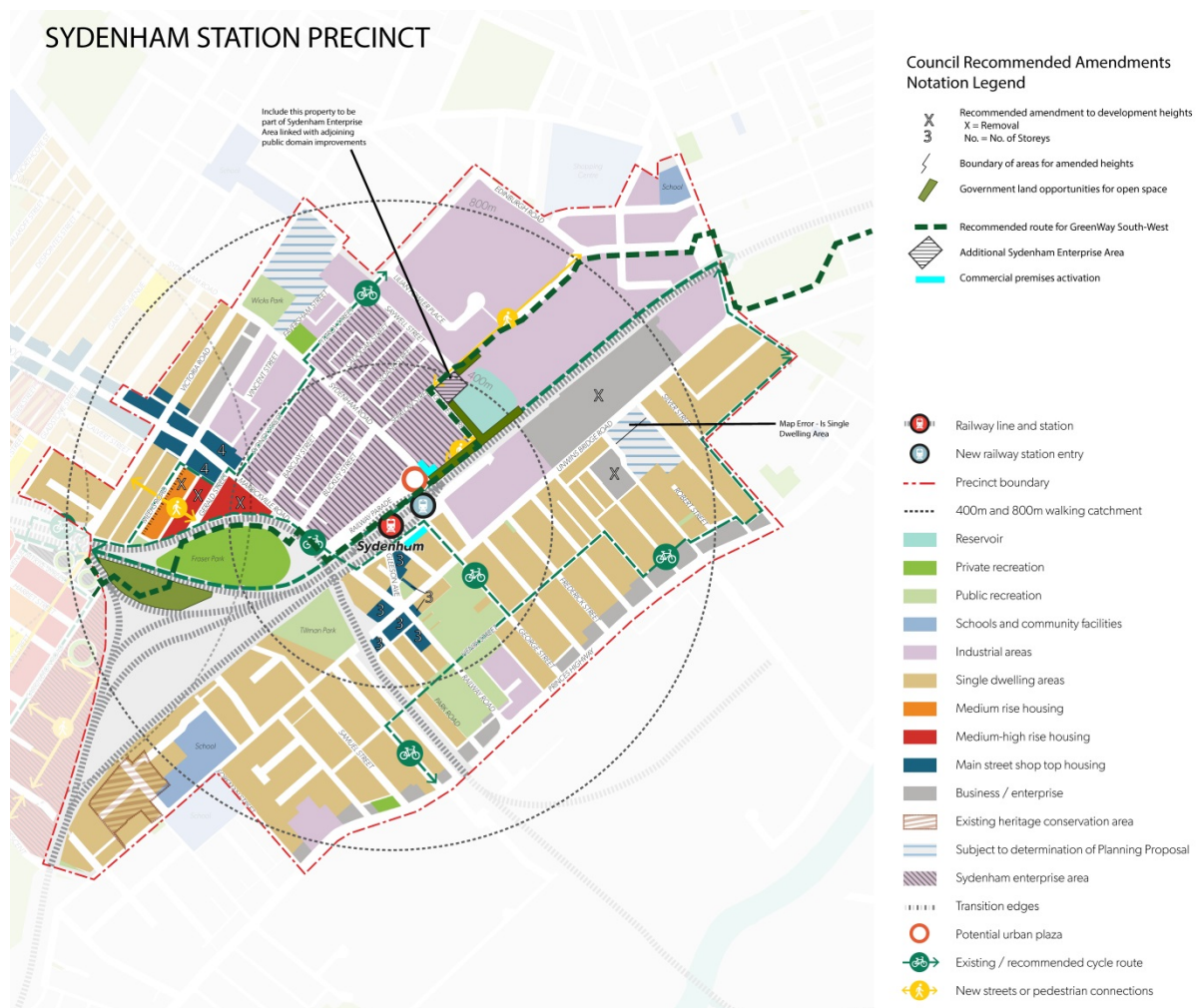
Amendment to the GreenWay South West route is recommended to reflect other proposed infrastructure projects and Council’s investigations for the most desirable and cost effective route.

Open Space Amendments

It is recommended the Land Use Plan and Infrastructure Plan indicate Government land where there are opportunities for renewal as open space (between the railway lines south of Fraser Park and around the edge of the Sydenham Pit and link to Sydenham Station).

Council Recommendation Amendments plan for the Sydenham Station Precinct

Council’s Recommendation Amendments plan is shown below and attached, relating to recommended amendments to the Land Use Plan, Infrastructure Plan and other relevant sections of the Sydenham Station Precinct Plan:



12.2 Marrickville Station Precinct

As address in the Urban Design Section of this submission all the Low rise housing areas should be limited to a maximum of 3 storeys.

Petersham Road

Due to the narrowness of Petersham Road and orientation of blocks the proposed medium-high rise housing (8 storey) areas on the eastern side of Petersham Road, Marrickville (the properties 98-126 Petersham Road) will cause excessive shadow impacts on existing and future housing and a dominant closed in streetscape scale. In view of the circumstances, it is recommended that the Land Use Plan for the precinct be amended to designate those properties as “Medium rise housing” (5 storeys).

Ann Street/Arthur Street/Francis Street

Due to the fragmented, odd shape, orientation and topography of properties, the proposed high density housing (12 storey) area for the properties on the eastern side of Ann Street, Marrickville, properties on the northern side of Arthur Street and properties on the southern side of Francis Street (2-10 Ann Street, 1-7 Arthur Street and 2-6A Francis Street) will cause severe shadowing of adjoining existing and future housing and could not be developed as proposed. In view of the circumstances, it is recommended that the Land Use Plan for the precinct be amended to designate those properties as “Medium rise housing” (5 storeys).

Byrnes Street and south western end of O’Hara Street

Due to the location to the north of the existing “Revolution” mixed use development at 359 Illawarra Road, Marrickville on the former Marrickville RSL site and the narrowness of the blocks, the proposed high density housing (12 storey) area in Byrnes Street/O’Hara Street for the properties 1-15 Byrnes Street and 31-41 O’Hara Street, Marrickville, will cause excessive shadowing of existing apartments and dominant closed in streetscape scale. In view of the circumstances, it is recommended that the Land Use Plan for the precinct be amended to designate those properties as “Medium rise housing” (5 storeys).

O’Hara Street

The proposed low rise housing on the south-eastern side of O’Hara Street for the properties 2-36 O’Hara Street, Marrickville is a new area designated for higher density residential redevelopment, presumably intended to create a transition between the medium rise housing (5 storey) area and the single dwelling area to the south-east. However, while only low rise housing, given the orientation and topography it will still cause major shadowing and visual bulk impacts on the adjoining single dwelling area. It is considered it is better to create the transition from 5 storey apartments (recommended in the previous section “Byrnes Street and south western end of O’Hara Street”) to single dwelling housing across O’Hara Street, which would create acceptable outcomes. In view of the circumstances, it is recommended that the Land Use Plan for the precinct be amended to designate the properties 2-36 O’Hara Street as “Single dwelling areas”.

Area south of Marrickville Station

As discussed in the Urban Design Section of this submission it is not considered a 12 storey scale built form is an appropriate typology that can fit contextually into traditional Marrickville Road main street streetscape. However, with the proposed creation of a significant new plaza adjacent to Station Street, creating an enlarged street and square open space, there is the opportunity to be surrounded by 8 storey form, to create a comfortable relationship and balance between space and surrounding built form.

Leofrene Avenue, Riverdale Avenue and Charlotte Avenue

It is acknowledged that this area has strategic merit for redevelopment given its location adjacent to the station, good orientation of the street and large and regular shaped

properties. However, the proposed 12 storey form is not supported as discussed in the Urban Design section. It is considered appropriate to propose a mix of medium-high rise (8 storeys) and medium rise (5 storeys) built form, to break up the streetscape scale, ensure there is good solar access and enable views from existing apartments in Schwebel Street over 5 storey forms. This would be further enhanced by the provision of park open space in combination with the urban plaza at the northern end of Riverdale and Charlotte Avenues, providing a green outlook for existing and new apartments. To enhance the pedestrian/cycle public path located south of the railway line that will provide important connection to/from higher density to the south-east, it is recommended properties adjacent to this path be required to dedicate land for path widening.

Schwebel Street (southern side)

The area already contains significant residential density and as older apartments would be likely to be redeveloped if designated with a “medium-high rise” height. While it appears an 8 storey scale form is workable in terms of shadowing of existing single dwellings to the south, which remain and are likely to continue to remain despite being zoned for low rise apartment housing for the past 45 years, this significant increase in scale will cause significant visual bulk impacts. The scale up on the bluff will be dominant in broader views. Also the redevelopment of these apartments in the short to medium term is questioned in terms of loss of more affordable apartment housing and replacement with more expensive new housing and the sustainability implications with the loss of the embodied energy and waste implications of the redevelopment of a substantial group of apartments. It is recommended for this area to be reduced to 5 storeys, which will be unlikely to be redeveloped in the short to medium term, but allow turn over in the long term, when these buildings come to the end of their useful life.

Carrington Road and northern side of Myrtle Street

As addressed in the Strategic Context and Employment Land, Business and Economic Impact sections the IN2 Light Industrial and IN1 General Industrial zoned land in Carrington Road and Myrtle Street proposed for medium-high and high rise housing is considered strategic employment land and is not supported. As shown in the initial draft Strategy all this employment land is to be shown as the Carrington Road Precinct, consistent with Council’s MDCP 2011. Also the land on the eastern side of Carrington Road is required to be marked as Subject to determination of Planning Proposal, consistent with how the other land the subject of planning proposals, is identified on the Land Use Plans, to avoid pre-empting the land use outcome for that land.

If the DPE was to continue with the designation of the IN2 Light Industrial zoned land on the western side of Carrington Road and northern side of Myrtle Street for residential redevelopment, then:

- a new designation colour and legend key is to be shown on the Land Use Plan and a new land use type is required to be included in the Built Form Typology, requiring a mixed employment and residential land use;
- there is no basis for the block north of Myrtle Street to be 12 storeys, which will cause excessive shadowing impacts on existing single dwelling housing and on future housing, dominance over the heritage item and excessive scale in the streetscape, and is recommended to be reduced to medium-high rise housing (8 storeys), identify the heritage item and show a required transition edge between new development and the heritage item;
- the blocks on Carrington Road, located between Premier Street and Schwebel Street, are required to be lowered to 5 storeys for the part of the blocks fronting Carrington Road and 3 storeys at the rear where the land adjoins “Single dwelling areas”;

- a new legend key be created for only pedestrian connections and be amended for the link following the canal west of Carrington Road to only relate to a pedestrian connection (i.e. not “new streets”); and
- properties adjoining the canal or the GreenWay South West route adjacent to the railway to provide a strip of land as a dedication or easement to provide the space to enable the effective operation of the proposed pedestrian connections and linear open space and where adjoining single dwelling housing enable the establishment of large tree canopy to provide an appropriate transition and buffer.

GreenWay South West Route

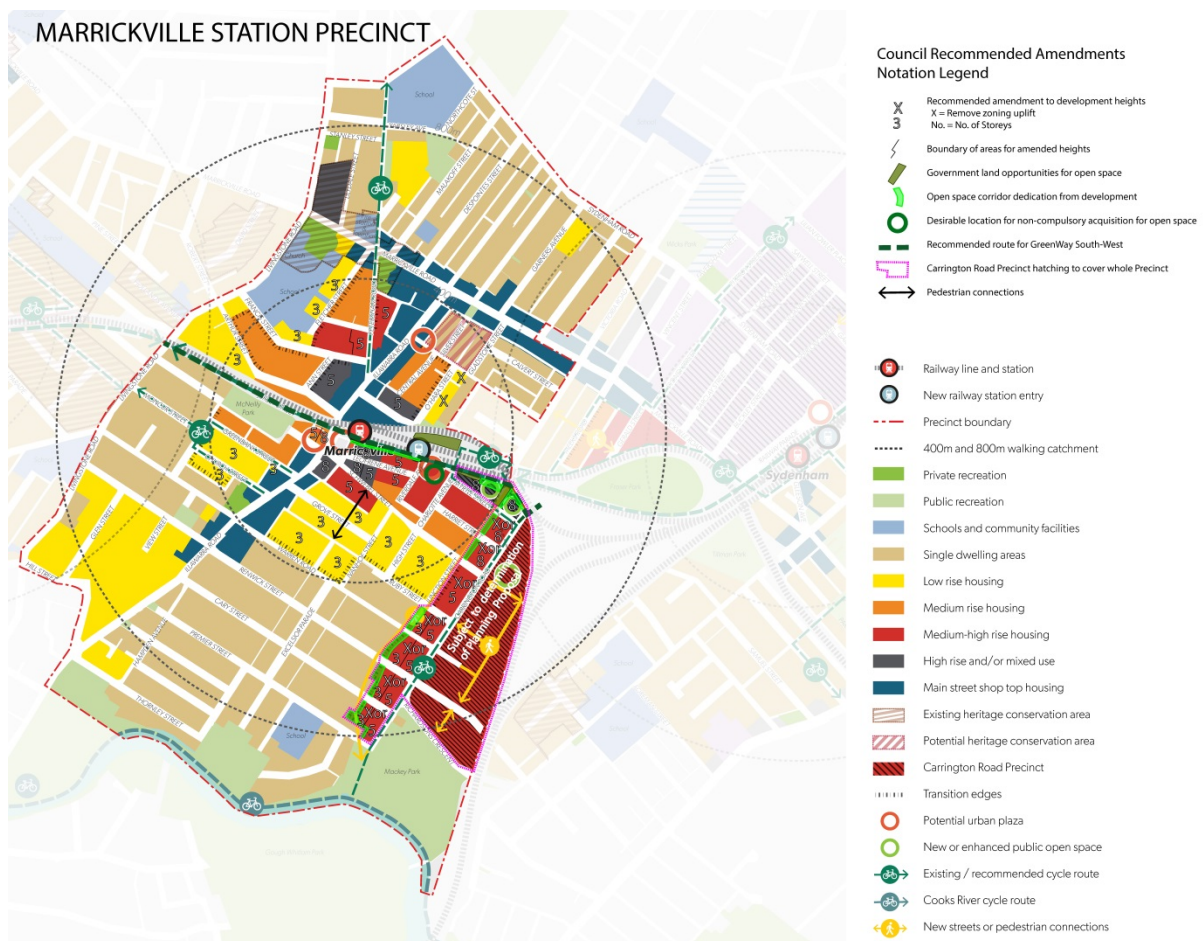
Amendment to the GreenWay South West route is recommended to reflect other proposed infrastructure projects and Council’s investigations for the most desirable and cost effective route.

Open Space Amendments

It is also recommended the Land Use Plan and Infrastructure Plan indicate Government land where there are opportunities for renewal as open space (between the railway lines off Victoria Road; south of the railway line north of Myrtle Street and the north-south canal area west of Carrington Road up to Myrtle Street).

Council Recommendation Amendments plan for the Marrickville Station Precinct

Council’s Recommendation Amendments plan is shown below and attached, relating to recommended amendments to the Land Use Plan, Infrastructure Plan and other relevant sections of the Marrickville Station Precinct Plan:



12.3 Dulwich Hill Station Precinct

Block bounded by New Canterbury Road, Kintore Street, Hercules Street and the light rail corridor

The subject block is currently the subject of a Planning Proposal, which is under review by the DPE. The block should be marked as "Subject to determination of Planning Proposal", consistent with how the other properties are identified on the Land Use Plans, to avoid pre-empting the land use outcome for this property. If a building height is to be designated, in line with the Council resolution of 24 October 2017, the building height should not be increased above that recommended in the former Marrickville Council's previous 2015 submission on the initial draft Strategy 2015, which was for a maximum of 5-6 storeys, with the objective partly to protect Dulwich Hill Public School from overshadowing and privacy impacts. Accordingly, the height of this block is recommended to be designated as medium rise housing (maximum 5 storeys).

Area North of New Canterbury Road and Light Rail corridor

The area south-east of Denison Road, between Dulwich Street and Constitution Road, was not originally identified in the initial draft Strategy. This area combined with the area south-east of Denison Road, south of Constitution Road, contains high quality groups of single dwelling housing. As identified in the Heritage section the uniting church at 151 Constitution Road is a potential heritage item. Accordingly, it is recommended these areas be removed and remain as single dwelling areas. The remaining area of the block bounded by New Canterbury Road, Constitution Road and Denison Street contains a complicated mix of lots and existing residential flat buildings, making it very problematic to develop to the proposed medium-high rise housing (8 storey) scale in terms of shadow and visual bulk impacts. Also the redevelopment of these apartments in the short to medium term is questioned in terms of loss of more affordable apartment housing to be replaced with more expensive new housing and the sustainability implications with the loss of the embodied energy and waste implications of the redevelopment of a substantial group of apartments, some of which front onto New Canterbury Road, with 521 New Canterbury Road being a potential heritage item. Accordingly, it is considered only the existing areas zoned Neighbourhood Centre in MLEP 2011 be designated for main street shop top housing and the remaining properties be designated for medium rise housing (5 storeys).

The triangular block to the north-east of the light rail corridor on the corner of New Canterbury Road and Denison Street

This area designated for medium-high rise housing (8 storeys) would be too dominant given major exposure from views along New Canterbury Road, would be inconsistent with the prevailing 5 storey street fronting form along this part of New Canterbury Road and would be difficult to integrate an 8 storey element, given the block shape. Accordingly, it is recommended this block be reduced to 5 storeys, which is best as main street shop top housing, fronting New Canterbury, given proximity to the Dulwich Grove Light Rail Stop entrance.

Area to the north of New Canterbury Road, between the light rail corridor and Union Street:

Redevelopment for increased residential density is supported for this strip, which provides the opportunity for dual frontage apartments that limits openings to the noisy New Canterbury Road and opens living areas and balconies to the favourable northern aspect. However, the extension of commercial use is not supported past the light rail corridor, which is the natural end for any commercial activity, to contain the Dulwich Hill town centre. Accordingly, it is recommended this strip be changed to medium rise housing (5 storeys).

Hercules Street, Terrace Road, Consett Street and The Parade

The block bounded by Hercules Street, Terrace Road, Consett Street (designated for medium rise housing), as well as the properties fronting The Parade (that are currently

zoned R2 Low Density Residential and now designated for low rise housing) have been identified by Council's heritage officer to contain a number of properties with potential heritage significance for listing as conservation areas or items. Accordingly, it is recommended that these areas remain as single dwelling areas for the properties currently zoned R2 Low Density Residential or as low rise housing for those properties currently zoned R1 General Residential. For development of the block on the eastern side of Hercules Street (from the light rail bridge to Jack Shanahan Reserve) the height is recommended to be significantly reduced to be designated as medium rise housing (5 storeys), to ensure development in this area harmoniously interfaces with the recommended retained single dwelling areas or low rise housing on the western side of Hercules Street. Notwithstanding, this block (along with the whole precinct) needs to be evaluated in light of the recommended comprehensive heritage study, which should then inform consideration of appropriate land use controls for this area and elsewhere to ensure that any new planning controls respect the existing built environment and any identified heritage significance.

Wardell Road, between Bedford Crescent and Keith Street

Given this strip of main street shop top housing is located in a draft heritage conservation area, it is appropriate to limit development (on the properties 231-245 Wardell Road, Dulwich Hill) to 3 storeys to limit the impact on additions above the heritage elements, and to be consistent with its current 3 storey height of building controls, which currently applies to the properties under MLEP 2011.

Triangular block bounded by Ewart Street and Ewart Lane

It is assessed that the medium-high rise housing (8 storeys) designated for this block (the properties 51A-71 Ewart Street, Marrickville) will create excessive shadowing and visual bulk impacts on existing single dwelling houses to the south-west and apartments to the south-east and make it difficult for the redevelopment for low rise housing to the south to achieve the required solar access, exacerbated by the topography. It will be very dominant in the streetscape given the block prominent position as viewed down Ewart Street. In view of the circumstances, it is recommended that the Land Use Plan for the precinct be amended to designate those properties as "Medium rise housing" (5 storeys).

Cooks River to Iron Cove GreenWay Route

The route of the Cooks River to Iron Cove GreenWay is incorrect running along The Parade and should follow Terrace Road; Ness Avenue; Garnet Street; Tennent Parade to the Cooks River pedestrian bridge crossing. The connection with the GreenWay South West is unclear and should happen at Terrace Road, near the intersection with Ewart Street.

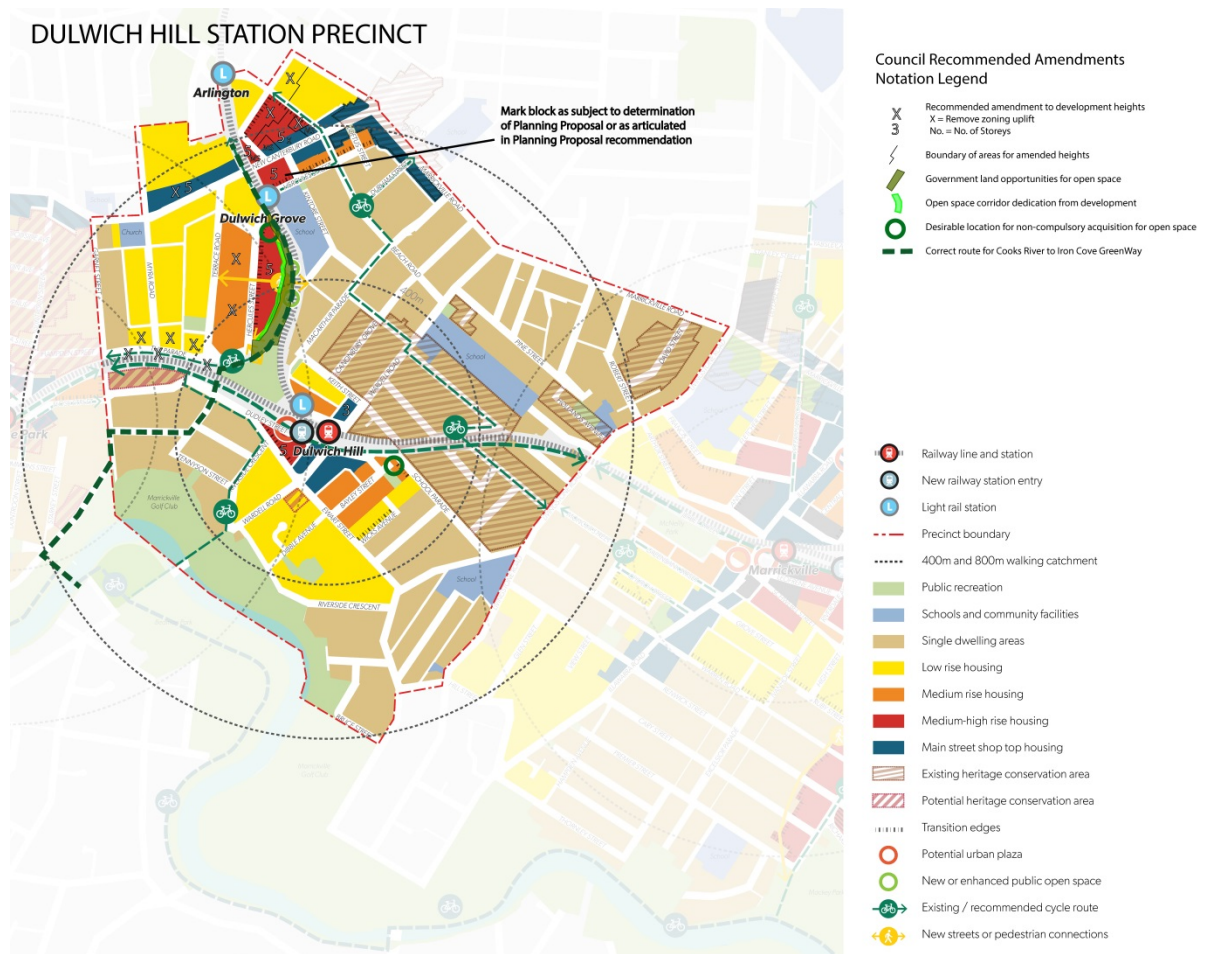
Open Space Amendments

It is also recommended the Land Use Plan and Infrastructure Plan indicate Government land where there are opportunities for renewal as open space (between the light rail lines and the Hercules Street redevelopment properties) and to enhance the provision of this part of the Iron Cove to Cooks River GreenWay corridor. It is also recommended that the rear of those Hercules Street properties backing onto the GreenWay be clearly marked as being required to dedicate land for open space widening.

Given the gap in local open space and to provide a series of parks along the GreenWay South West and Cooks River to Iron Cove GreenWay, non-compulsory property acquisitions and creation of new or expanded open space is desirably located respectively adjacent to Tom Kenny Reserve in Bayley Street and at the top of the Hercules Street development area adjoining the light rail corridor.

Council Recommendation Amendments plan for the Dulwich Hill Station Precinct

Council's Recommendation Amendments plan is shown below and attached, relating to recommended amendments to the Land Use Plan, Infrastructure Plan and other relevant sections of the Dulwich Hill Station Precinct Plan:



**ATTACHMENT 1 - SUMMARY OF CONCERNS RAISED BY THE COMMUNITY ABOUT
THE REVISED DRAFT SYDENHAM TO BANKSTOWN URBAN
RENEWAL CORRIDOR STRATEGY**

SUMMARY OF CONCERNS RAISED BY THE COMMUNITY ABOUT THE REVISED DRAFT SYDENHAM TO BANKSTOWN URBAN RENEWAL CORRIDOR STRATEGY

From the public meeting and submissions received from key groups including The Southern Sydney Regional Organisation of Councils (SSROC), Marrickville Golf and Community Club and Golf Course, Save Dully, Save Marrickville South, Sydenham to Bankstown Alliance and Marrickville Residents Action Group, the following summarises the concerns that have been raised by the community about the revised draft Sydenham to Bankstown Urban Renewal Corridor Strategy:

- The need for effective collaboration and high level of engagement between the Inner West Council and the City of Canterbury Bankstown Council.
- There is overdevelopment proposed in the strategy. These plans have not been written for us, they have been written for developers.
- Marrickville and Dulwich Hill have been asked to take too much density.
- The revised draft Strategy makes no reference to affordable housing and sets no targets throughout the corridor. Similarly, the Strategy makes no mention or provision of affordable rental housing for key workers.
- The revised draft Strategy does not have a detailed and comprehensive infrastructure and delivery plan that is integrated to the land use planning for the corridor.
- The infrastructure should be planned before deciding the height of buildings.
- There is little evidence that the Sydenham-Bankstown Corridor and the related transport network and infrastructure are informed by traffic study or analysis. It is important to undertake the traffic analysis.
- Rather than converting an existing rail line to a metro line, Sydney should be prioritising the extension of a metro line to areas of Sydney on the southern side of the harbour that do not have rail services. There are also concerns regarding the privatisation of the train line. Why are we ripping up and replacing an existing and good service? This is a waste of tax payers' money.
- No rezoning is to occur that exceeds the service capacity of an improved heavy rail line.
- The signing of contracts for the construction of the Sydenham to Bankstown Metro should not occur until after the scheduled NSW Election in 2019.
- Additional waste management infrastructure will be inevitably required to meet the challenge of additional dwellings and people.
- It is not clear in the draft strategy how funds for the identified or other needed infrastructure will be generated and how the infrastructure will be delivered. Section 94 is inadequate as a source of funds for local infrastructure.
- The NSW Government needs to provide clarity on Value Capture and Voluntary Planning Agreements (VPA).
- Marrickville Golf Course is the only golf course in the Inner West Council local government area. How does Council propose to support older citizens sporting activities, if the only golf course within the municipality is reduced in size, or closed entirely?
- We have a deficit of open space. The existing open space areas are already at full capacity. There will be insufficient open space to support the additional development

proposed and the height of the proposed buildings will overshadow these open space areas.

- Linear and pocket parks are not family friendly. We need parks where children can play.
- There are no plans for new schools, community centres or public halls. The only public school in Marrickville is already at full capacity.
- The revised draft Strategy does not place the desired emphasis on liveability.
- Concerns are raised regarding where the transition points are.
- The proposed rezoning of new areas of Dulwich Hill and other suburbs should be delayed so the State Government does not place unnecessary additional pressure on the Bankstown line as it progressively shuts down to build the Metro.
- The revised plan for west Carrington Road in its current form does not transition appropriately from single dwellings to increased zoning heights. It would have a major impact on the houses nearby through overshadowing, reduced privacy, physical domination of existing housing and changes to appearance of the streetscape.
- The LGA is rich in heritage, industrial and creative precincts, streetscapes and Aboriginal history. We need to keep Marrickville's heritage and streetscapes. It is good that the revised draft Strategy protects heritage items, but there is nothing about the protection of streetscapes. The plans disregard the quality of these historic streets and the character of the area will change because of this development. The character is what makes our suburbs significant.
- Retain the heritage streetscape elements, as well as heritage buildings and significant streetscapes, in the southern part of the Marrickville Precinct and retain the heritage industrial buildings along Carrington Road. No areas should be designated for increased density, until a formal independent heritage assessment has been conducted of these areas.
- The revised draft Strategy endorses shop top housing, however this does not work. There are many examples of vacant shop top housing in the area.
- New households will require parking and there must be a parking management plan. New residents will require cars and parking as public transport will not meet all transport needs.
- Protect and foster Carrington Road as a vital enterprise hub for Sydney.
- A number of individual items that reflect Dulwich Hill's diverse and interesting history and are worthy of heritage protection now face demolition under these plans.
- The final precinct plan should support the Uniting Church in Constitution Road, the former maternity hospital at The Parade and the Greek Church in Hercules Street as potential heritage items and should indicate that further heritage items will be investigated in the rezoning process.
- The revised draft Strategy designates the triangular block bordered by Constitution Road, Denison Road and New Canterbury Road for eight-storey development. Concerns about this intense development include: the lack of strategic planning merit as only part of this block is within the 800m radius from Dulwich Hill station, the block's heritage character, there is no guarantee in the precinct plan that the affordable housing lost under this process will be replaced by new affordable rental housing, two bus stops along New Canterbury Road directly adjacent to the block are proposed to be removed and the impacts on existing developments.

- Similarly there are concerns with the block bounded by Hercules Street, Consett Street and Terrace Road, which will be the primary development area for Dulwich Hill. Concerns include heritage impacts, height limits and open space appearing as private use for the unit dwellings.
- Hercules Street industrial site - the most intense development on the site should be on the New Canterbury Road frontage (no more than eight storeys) and for development on the Hercules Street frontage to be limited to four storeys.
- Undertake a contaminated land assessment of the industrial area of the proposed Carrington Precinct and west Carrington Road and undertake flood management planning prior to the development of a final proposal.
- Our history, amenity, sustainability are undermined by these plans.

**ATTACHMENT 2 - SUBMISSION FROM THE SOUTHERN ORGANISATION OF COUNCILS
(SSROC)**



28 August 2017

The Director, Urban Renewal
Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

Dear Director

Re: Sydenham to Bankstown Urban Renewal Corridor Strategy

The Southern Sydney Regional Organisation of Councils (SSROC) is an association of sixteen municipal and city councils. SSROC provides a forum for the exchange of ideas between our member councils, and an interface between governments, other councils and key bodies on issues of common interest. Together, our member Councils cover a population of over 1.7 million, or one third of the population of Sydney.

The details of SSROC comments are as below.

General Comments

The *Sydenham to Bankstown Urban Renewal Strategy* (the strategy) is an important urban renewal project that will affect the lives of tens of thousands of people and households that live on the corridor but also may people in the surrounding areas. The SSROC Secretariat appreciates that the Department of Planning and Environment provided opportunity for comments on the revised draft strategy. The infrastructure plan of the strategy is well received. Key concerns though still remain on how the strategy approaches or fails to address infrastructure and funding, essential services gaps, liveability, affordable housing and responsiveness to community needs. Key comments, suggestions and recommendations are highlighted below.

Specific Comments

Collaborative futures for the Sydenham-Bankstown Urban Renewal Corridor

SSROC had emphasised the need for effective collaboration and high level of engagement with councils that the corridor falls within - Inner West Council and the City of Canterbury Bankstown Council. This has not been addressed and we would like to re-emphasise that the Department of Planning and Environment (DPE) give this due consideration.

SSROC member councils prefer a collaborative partnership governance model for urban renewal corridors and precincts that involves allocation of responsibility, coordination and leadership roles for delivery of key precincts among state planning and infrastructure agencies and councils.

SSROC's preferred model would involve: joint State /Local Government staffed project management office, secondments of council officers to the project team and joint workshop opportunities at key stages. We would urge DPE to enter into a Memorandum of Understanding with Inner West Council and the City of Canterbury Bankstown.

SSROC member councils adopted an MOU to guide major urban renewal and redevelopment projects such as the Sydenham - Bankstown Corridor and is provided for your consideration (see <http://ssroc.nsw.gov.au/planning-and-advocacy/ssroc-memorandum-of-understanding-on-urban-intensification-and-urban-renewal-2/>).

SSROC would like to see State-Council collaboration on the development and application of best practice guidelines for urban renewal projects on the Sydenham-Bankstown corridor. The collaboration should cover housing and employment demand supply assessments, analysis of urban capacity for intensification, including housing and employment uses. It should also include determination of benchmark metrics for liveability and sustainability and ensuring timely and coordinated community infrastructure such as open space, childcare, primary and high school education and affordable housing.

Affordable housing

The revised draft strategy, like the first draft made no reference to affordable housing and set no targets for same throughout the corridor. Similarly, the strategy made no mention or provision of affordable housing for key workers. This is discouraging in a city that is the second most unaffordable in the world and the corridor provides an ideal housing opportunity for key and essential workers and low and moderate income households because of the rail access to the Sydney CBD, a leading key employment hub.

SSROC is concerned that while it is expected that hundreds of relatively affordable housing stock may be lost as part of the corridor redevelopment, there are no assurances that affordable housing that will inevitably be lost will be replaced.

The 11 SSROC member councils in an Affordable Housing Submission to the Greater Sydney Commission endorsed that 5-15 per cent of residential developments in urban renewal precincts and corridors be devoted to affordable rental housing - whether private or non-profit, purchase or rental and including a diversity of housing types. The councils would like this to be adopted in District Plans for Central and South Districts, constituent LGAs, and Priority Urban Renewal Precincts. If the State Government agencies work collaboratively with Councils, it could be possible to attain 15 percent affordable housing on the corridor.

SSROC would like District Plans to support Mandatory Affordable Housing Contributions within Priority Urban Renewal Precincts, large redevelopment sites and government land (State and local) to create affordable rental housing in perpetuity. SSROC and member council will welcome the opportunity to work with State Government agencies to make this happen.

Projected dwelling growth versus upfront infrastructure provision

SSROC realises that since the first draft of the corridor strategy was exhibited, the dwelling growth to 2036 has increased from 30,214 to 35,403. This, in an area that has one of the highest increase in dwelling numbers during the 2006 to 2016 period in Sydney is a huge challenge for infrastructure services and amenities.

SSROC and the two member councils - Inner West and Canterbury Bankstown councils, would be reluctant to support such huge housing development on the corridor if there are no plans and funds to key infrastructure services to meet the needs of the extra tens of thousands of households expected to live in the area.

The Sydenham-Bankstown Corridor urban renewal should embody the Greater Sydney Commission (GSC) direction that adequate infrastructure needs to be provided to support population growth as detailed in the "Directions for Greater Sydney 2017-2056". The revised draft strategy does not have a detailed and comprehensive infrastructure and delivery plan that is integrated to the land use planning for the corridor and Councils need to be involved more in this process. This needs to be taken as priority by DPE.

Adequate funding for infrastructure

The number of infrastructure projects identified in the revised draft strategy shows that infrastructure for the corridor will be funded as follows: State Government (32%), Local Government (46%), works in kind by developers (15%) and jointly funded and by State and Local Governments (7%). Although the costs of the projects will vary, overall, Inner West and Canterbury Bankstown councils seem to be expected to deliver much of the infrastructure.

SSROC is concerned that it is not clear in the draft strategy how funds for the identified or other needed infrastructure will be generated and how the infrastructure will be delivered. If DPE expects councils to fund much of the infrastructure and without adequate provision or mechanism for the funds, it is huge challenge that needs to be addressed before the strategy is finalised.

Councils are not collaboratively involved in the State Infrastructure Contributions schedule for the Sydenham - Bankstown Corridor that is yet to be exhibited. The extent that this could be a source of needed funds for local infrastructure is yet to be seen. Meanwhile, Councils' local contributions plans are yet to be developed. The plans are bound by caps imposed by the State Government on Section 94 and Section 94A Contributions.

S94 Contributions and the Sydenham to Bankstown Corridor

Section 94 is inadequate as a source of funds for local infrastructure and sole dependence on this by Councils as key source of funds for the Sydenham - Bankstown Corridor will not be supported. Section 94 infrastructure contributions have remained capped for years. The City of Canterbury Bankstown's proposed increase in the Section 94A rate from 1% to 4% in Bankstown has not been approved by the State Government.

Capping of s94 Contributions result in the decrease of the relative value of contributions over time even as infrastructure development costs continue to increase. Section 94/94A Plans do not keep pace with the rate of uplifts in land in Sydney and are least equipped to address increased density that often result from apartment and mixed development.

The State Government needs to resolve with councils the mechanisms to meet infrastructure funding gap. This is particularly relevant with the establishment of the GSC, the district planning process and the emphasis on place making and infrastructure to meet the needs of growth in population and housing development.

The NSW Government recently announced that the cap on s94 contributions will be phased out. This may be too little, too late. This is because, councils seeking higher contributions will still need approval from the Independent Pricing and Regulatory Tribunal (IPART). The IPART's assessment and decisions are based on "essential facilities" and the IPART's recognition of what is essential facility is limited. An example is the Bayside Council's experience with Wolli Creek. The IPART declined to support public domain improvements and open space embellishment as these are classified as non-essential. There is therefore a clear difference between IPART's perspective on essential facility and Councils' and Greater Sydney Commission's approach of liveable places and place-making. What constitutes "essential facilities" needs to be reviewed.

Value Capture and Planning Proposals

The NSW Government needs to provide clarity on Value Capture and Voluntary Planning Agreements (VPA) and collaborate with Councils in developing a methodology for calculating Value Capture. The DPE's draft guidelines on VPA is unclear as to whether VPA can be used for Value Capture. The guidelines emphasised that VPAs should not be used to capture "windfall gain" and what constitutes "windfall gain" was not defined. SSROC believes that that the rezoning of land for higher density housing delivers windfalls in value to the land owner at the time of the rezoning. Value Capture is an approach to "capture" a share of this increased value for the community to be used to build, mitigate or improve the existing amenity and infrastructure.

Physical and community infrastructure requirements for the Sydenham - Bankstown Corridor are extensive. The State Government should collaborate with Canterbury Bankstown and Inner West Councils on mechanisms for value uplift capture on the Sydenham - Bankstown Corridor. This is crucial as the Sections 94 and 94A are inadequate to meet councils' local infrastructure funding needs and this will have implications for new and existing residents.

Enforceable mechanism under the EPA Act in relation to Planning Proposals needs to be put in place in the strategy. The mechanism should enable Council's to approve only Planning Proposals that can reasonably demonstrate that the developer/applicant has offered to provide, by an agreement, adequate infrastructure and public benefits. This will ensure that land owners who sought the Local Environmental Plan amendments, and received windfall gains from the sale of the land are made to contribute a fair share to public benefits. This is necessary as the developers who acquired the land from the owners at a premium price, after the uplift has occurred, may not be able to agree to substantial contributions for infrastructure for community benefit because of development feasibility and profit margin considerations.

Designate Sydenham-Bankstown Corridor as Growth Infrastructure Compact area

SSROC would support an initiative to designate the Sydenham-Bankstown Corridor as an area that is subject to the GSC's Growth Infrastructure Compact agreement (GIC).

The GIC considers forecast growth for the area, including housing and employment, growth scenarios and the nature and timing of infrastructure required. It offers opportunity for stakeholders include, State Government, business, Councils and Community to participate in priority setting. It will also give consideration to infrastructure such as open space, schools, transport and community services required to service the growth allow for better integration of land use planning and infrastructure development and delivery. This is what is required for the Sydenham-Bankstown Corridor for a better chance for integrated and responsive planning and adequate funding and timely development of infrastructure.

Liveability

The draft strategy did not place the desired emphasis on liveability. As Central and South Districts are faced with increasing urban intensification, liveability ought to be one of the key outcomes for planning in the corridor. SSROC member councils have adopted a report and position on liveability (see <http://ssroc.nsw.gov.au/planning-and-advocacy/liveability-benchmark-report/>). A copy of the report is attached for your consideration (*Liveability Benchmarks for Central and Southern Sydney*).

As SSROC observed with the first draft strategy, the revised strategy seemed to have been developed without an articulated concept of liveability for the 11 urban centres on the Sydenham to Bankstown corridor. For example, precinct sustainability, provision of schools and educational facilities, and affordable housing were largely left out. Additional 35,000 houses by 2036 on the Sydenham - Bankstown Corridor that is only 15km long is huge. SSROC calls for integrated and embedded concept of liveability in the strategy. SSROC member councils have done a lot of work on the concept and applicability and would be willing to share the information with the DPE.

The State Government needs to recognise and act on the fact that the expected thousands of new dwellings and new homes will have implications for social infrastructure such as childcare, primary and secondary schools and health services. These need to be identified as essential components of the strategy. Existing infrastructure capacity and future demands need to be identified and the types, locations and costs of provision of facilities quantified and sources of funds and implementation and governance arrangement for delivery of infrastructure and facilities collaboratively resolved.

For example, many schools in the Canterbury Bankstown have already attained 100% demand rates. Provision needs to be made for more primary and secondary schools. Campsie urban centre could require one to two additional primary schools.

Environmental sustainability

Additional waste management infrastructure will be inevitably required to meet the challenge of additional tens of thousands increase in the number of dwellings and people in the Sydenham - Bankstown Corridor. The expected 26% increase in waste generated will mean additional costs for waste management. There will be additional transport and collection costs, as well as additional truck movements with the associated environmental and social impacts.

As SSROC emphasised in the submission on the first draft strategy, it is critical that ideas and proven models for waste minimisation, renewable energy and waste recycling options should be considered. Possibilities for consideration include precinct-level renewable energy infrastructure such as neighbourhood waste-to-energy facilities and public-space solar power generation. It is inevitable that large developments will generate major increases in waste generation, but also create opportunities for new technologies to be deployed, such as automated vacuum waste collection systems. As landfilling become unacceptable and increasingly scarce, new technologies for disposing of waste becomes essential. Waste disposal facilities in urban environments are viable today. For these opportunities to be taken up, they will need to be identified early on, before development planning, so that they can be incorporated as part of the new development.

New Priority Precincts

DPE announced in June 2017 that four of the precincts on the Sydenham - Bankstown Corridor are new Priority Precincts. SSROC understands that DPE will lead the preparation of detailed plans and development controls for the priority precincts. There will also be a separate exhibition process. As earlier emphasised, SSROC urges that the process be collaborative and that councils be involved in a substantial way and that Growth Infrastructure Compact agreement be involved or at the least the MOU approached canvassed by SSROC be considered.

Open spaces and facilities

As SSROC expressed in the first draft strategy, there is need for three-way discussions and negotiations involving the Department of Planning and Environment, Department of Education and Councils on public access to public and private school facilities and open space. The modalities need to be worked out and concerns and conditions addressed.

The draft strategy specified new parks but these would be left for Councils to identify and acquire land and provide the required facilities. This is a slow process that relies on accumulating S94 contributions. Often, as rezoning takes place and value uplift takes place before acquisition, it becomes harder for Councils to acquire land because of the high cost, while S94 is capped.

Transport network and traffic analysis

SSROC welcomes the inclusion of an infrastructure plan in the draft strategy that considered key infrastructure and the mechanisms to deliver them. The infrastructure included bus corridors, transport interchanges, light rail infrastructure, road, parks and open space improvements. Others include community infrastructure and the mechanisms to deliver them.

There is little evidence that the Sydenham-Bankstown Corridor and the related transport network and infrastructure are informed by traffic study or analysis. It is important to undertake the traffic analysis. For example, many roads identified in the strategy are already at traffic capacity. Development potentials could be affected if traffic capacity issues of transport networks are not

identified and addressed. The traffic capacity issues and limits of Canterbury Road need to be addressed.

SSROC believes that it is also important that complementary transport infrastructure measures that will assist to efficiently manage public transport use during peak hours are prioritised. There is need for dedicated bus and bicycle lanes and more direct routes along major roads for express services.

Concluding remarks

In order to make this submission within the timeframe of the review, it has not been possible for it to be reviewed by councils or to be endorsed by the SSROC, therefore, consider this submission a draft, and we will contact you further if any issues arise as it is reviewed.

Thank you for the opportunity to provide comments on the draft *Sydenham to Bankstown Urban Renewal Corridor Strategy*. If you have any queries please contact Vincent Ogu, Strategic Planning Manager on 8396 3800.

Yours sincerely,

Namoi Dougall
GENERAL MANAGER
Southern Sydney Regional Organisation of Councils

ATTACHMENT 3 - Submission from Marrickville Golf and Community Club and Golf Course

Marrickville Golf Course

richard.pearson@innerwest.nsw.gov.au

To the Administrator of the Inner West Council and selected candidates standing at the September Council elections.

Dear Mr Pearson and Candidates,

The undersigned are residents of the Inner West Council local government area and members of the Marrickville Golf, Sporting & Community Club.

We write to challenge the validity of a core recommendation of the Dulwich Hill Station Precinct, Sydenham to Bankstown Urban Renewal Corridor Strategy, prepared by the Department of Planning and Environment, which states in part that Council should consider the future of Marrickville Golf Course.

This is a spurious recommendation contained within a substance lacking strategy brochure, of platitudes and artists impressions, is transparently prepared for the purpose of promoting the current conservative State Governments agenda of making already wealthy developers even wealthier, at the expense of the amenity of existing Inner West residents.

However Inner West residents are not fools. They can readily see that the call for increased open space for the public, is really just a prerequisite for planning authorities to justify even greater housing density in the corridor.

As the report itself states: *The future of Marrickville Golf Course should be considered by the Inner West Council to support the projected increase in local population.*

These strategists would have us believe that the largely working class populace of the Inner West is not deserving of even a single golf course within the municipality, for recreational purposes.

As you should be aware, Marrickville Golf Course is the only golf course in the Inner West Council local government area, servicing a population of more than 182 thousand people, plus surrounding municipalities. How does Council propose to support older citizens sporting activities, if the only golf course within the municipality is reduced in size, or closed entirely?

Marrickville Golf Course occupies land that is unsuited to development and subject to flooding from the Cooks River on a regular basis. It acts as a flood mitigation zone between the river and the residential areas. When flooding occurs the land is remediated by staffing of the golf club at the cost of the members, not by Council. This continued flooding also renders the land unsuitable for extended periods as playing fields, which require reasonable, level and well drained surfaces for play, more so than the sport of golf.

The land is subject to subsidence and is built on an old refuse site, any development of the land would be subject to costly land mitigation and environmental repatriation.

In recent years Council has continued to emphasise to the Club the importance of the area as a natural resource and continued maintenance of trees and the environs for the community, which is elsewhere rapidly disappearing as developers move in to claim open space, and reduce trees across the municipality. To this end environmental groups have been working with the club to recover the surrounds with indigenous Australian plantings to return the environs to the historical nature of the Cooks River.

Further, Marrickville Golf Course is a modest par 60 course. It caters for quick games of golf, at reasonable cost (one of the lower cost clubs in Sydney) and typifies the egalitarian nature of public access golf that has underpinned the development of the game in Australia. This proposal seeks to fundamentally compromise this, by making golf a game only for the wealthy, rather than for the rate

paying working class, the mortgage payer and the retired or semi-retired. In many ways Marrickville golf course is a blue print for the future of public access golf.

Golf is a wonderful game, it can be played from childhood to the grave. It instils in people basic fundamentals of honesty and integrity, of a sense of community and respect for others and the environment. We ourselves have golfing friends at Marrickville ranging in ages from mid-teens to their early nineties, who play the game regularly and converse and intermingle, unlike just about any other area of sporting activity.

Whereas sporting fields on the other hand, are essentially useless to anyone over the age of 30.

In New South Wales the population is aging. According to the Australian Bureau of Statistics, the median age of the population of New South Wales is projected to increase from 37.8 years at 30 June 2012 to between 41.9 years and 45.0 years in 2061. Given that there are already limited local sporting options for those over 30 years of age and this proposal seeks to reduce these options further, it seems unless you are a junior, or a cyclist you should just stay home. What form of physical exercise is available for this older (not OLD) group of both women and men, and what other facilities is Council planning to provide for these individuals for recreational and outdoor activity?

Marrickville Golf Club conducts over 30,000 rounds of golf per annum, including Members Golf, Social Golf, Casual Golfers and Veterans Golf.

This amounts to citizens of the local area, who are playing sport on over 30,000 occasions on a sporting facility.

Veterans hold golf events on a weekly basis with over 60 players involved each week at reduced fees (open to anyone), this gives these citizens an opportunity to get out of the house and intermingle and converse with people of their own age, closure of the course would give these people no external activity and result in isolation and inactivity. The council promotes Senior activities with "Men's sheds", etc to promote external contact, mental health and activities for seniors, the golf club is fulfilling this role for these citizens

Marrickville Golf Club is also used by local high schools on a weekly basis for school sports (again at reduced fees), as well as holding school holiday activities, where will the children go if the course is closed or closure due to reduction of the facility.

Additionally, public access to the river within the golf course is not an issue. Many walkers and their dogs use it now, throughout the day and early evenings, particularly as summer approaches more and more people use the course later in the day or early mornings. Without issues between the golfers and others who use this community facility. Concrete paths are not desirable or needed.

Let us also take this opportunity to address the issue of demand for sporting fields arising from population growth. Viewed realistically, as population growth increases all public infrastructure will be subject to greater demand. Not just sporting fields, but roads, transport, shopping centres, hospitals etc. Governments are spending billions to promote the better use of these facilities through the expansion and upgrading existing assets. The same principles and processes should be applied to sporting fields. As anyone can see sporting fields sit unused for much of the week and are often only usable during daylight hours. As demand increases the additional use of lighting and artificial surfaces will go a long way towards satisfying this demand, with existing infrastructure.

For decades Local and State Governments have understood that Marrickville golf course is a recreational and environmental jewel in the Local Government Area crown, to be nurtured and enhanced. This must not now be lost, because once it is lost, it is lost forever.

Marrickville Golf Club is a community based organisation and holds many fundraising events through golf to support charities, for example Rotary, Breast Cancer, Local Sick Children, Seniors Week.

Marrickville Golf Course is a welcoming facility for everyone, male, female, young or old. It is a participant in the Golf NSW, Golf Australia and the PGA of Australia national Swing Fit program to

encourage female participation in golf. Swing Fit is a world-first women's only golf participation program, not just about game-based learning, but also including yoga and pilates-style exercises. Its purpose is to make golf both social and fun for newcomers.

So, If you haven't played in a while dust off the clubs and come down and enjoy, the soon to be, beautiful spring weather. If you are thinking of taking the game up, Marrickville is the ideal place to start, inexpensive and friendly, bring your partner, bring your child. The Club would be most happy to accommodate you.

Not a golfer? No problem, you are still welcome at Marrickville, it is truly the friendly club, and an entertainment hub for the community, come down, have a drink and check it out for yourself.

Glen Grant - Lilyfield
Bill Kelly – Dulwich Hill

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ATTACHMENT 4 - SUBMISSION FROM SAVE DULLY

Executive summary

Dulwich Hill is a historic and diverse suburb a strong and welcoming community.

Its urban form predominantly consists of single dwelling housing dating back to the early 20th century at times alongside more recent low-scale apartment buildings.

Since its formation in the late 19th century, Dulwich Hill has always been subject to incremental and orderly development, which has respected the suburb's human scale.

The revised strategy, however, once again seeks to depart from this approach and instead deliver rapid and unwarranted change which will be completely at odds with the suburb's character and history.

While some streets have now been thankfully and rightfully saved from development, a total of 17 streets across the suburb remain in the firing line and our overall dwelling yield has not changed from the 2015 strategy.

Of these 17 streets, just eight have been subject to a heritage analysis before being recommended for increased density. In addition, no analysis of potential individual heritage items has been undertaken. We think this is unacceptable.

Our submission notes a range of other very significant concerns about the revised strategy, across areas such as infrastructure and open space provision, affordable housing, roads and traffic and the timing of development.

We remain concerned that there will be insufficient infrastructure and open space to support development proposed in our suburb, and that new development will be timed when our railway line is at its weakest. We also remain concerned that new apartment buildings will uproot affordable housing and replace it with unaffordable housing.

In short, it's our view that this plan continues to represent the biggest potential threat on the urban fabric, community and infrastructure of Dulwich Hill, since it began to be subdivided as a residential suburb in the 1880s.

Key recommendations of our submission

Heritage

- No areas should be designated for increased density, until a formal independent heritage assessment has been conducted of these areas.
- The final precinct plan should support the Uniting Church at Constitution Rd, the former maternity hospital at The Parade and the Greek church at Hercules St as potential heritage items and should indicate that further heritage items will be investigated in the rezoning process

Affordable housing

- The NSW Government should commit to ensuring there is no net loss of affordable housing, as a result of the redevelopment of existing affordable housing into expensive apartments, supported by a council-led community impact study which maps existing affordable rental housing which is under threat.

Infrastructure and open space

- Any development plans for Dulwich Hill and for the broader corridor should seek to retain the same level of open space per head of population

- A full infrastructure plan for Dulwich Hill should be included alongside the final strategy which outlines how school, health and other infrastructure will be provided alongside growth in our suburb

Timing of development

- The proposed rezoning of new areas of Dulwich Hill and other suburbs along the Sydenham to Bankstown corridor should be delayed so the government does not place unnecessary additional pressure on the Bankstown line as it is progressively shutdown to build the Metro.

Roads and traffic

- New or expanded roads should be avoided in Dulwich Hill alongside new development, because of the likely increased traffic.

Transparency and integrity issues

- The Minister for Planning should formally retract his statement that Dulwich Hill has 1,400 less dwellings in this plan, given we have the same number of proposed dwellings as in 2015
- The urban feasibility model which apparently found it was only feasible for 627 dwellings to be built in Dulwich Hill should be released immediately for community feedback

Heritage and character

Need to conduct heritage streetscape analysis of all development areas

Save Dully remains disappointed and deceived about the approach taken to heritage planning in our suburb. We think the process has been highly flawed and has wrongly exposed high-quality streetscapes in our area to demolition.

On 3 August 2016, in a meeting with Departmental officials, we were informed that a heritage review will take place of just four areas within our suburb, namely:

- Durham St
- Wardell and Riverside Crescents
- The block bounded by Hercules, Consett and Terrace Rd; and
- Ewart St

We were immediately concerned at this suggestion, as there did not seem to be any basis as to why only some streets would receive the benefit of a review. Some meeting participants recall receiving a verbal assurance from Departmental officials, under questioning, that they would review the heritage value of all streets before rezoning.

On 12 August 2016, we wrote to the Department's Executive Director Urban Brendan O'Brien, stating that "we were concerned there seemed to be no clear methodology for the proposed heritage review. In particular, we do not understand why some streets were chosen to be reviewed but not others. We seek an assurance in writing that all streets will be subject to a publicly-available independent heritage review." There is no record of us receiving a response.

In the revised strategy released in June 2017, true to form, only these four areas are subject to a review, despite our protest.

It has emerged that the decision to only review these four areas came about after council and Departmental staff walked around the suburb and thought these streets were the most appropriate for a review. We are concerned that the council was party to this decision.

The upshot of the approach to heritage planning is that high-quality streets in our suburb such as The Parade, Constitution Rd, Denison Rd and School Parade have not had any heritage review yet are still proposed for wholesale redevelopment. We think this runs contrary to all principles of good urban planning. We list the values of these streets in more detail in the following chapter.

It is our strong position – and has been for at least a year – that all streets should have a heritage review before they are designated for increased density in the corridor strategy.

Local heritage items under threat

A number of individual items that reflect Dulwich Hill's diverse and interesting history and are worthy of heritage protection that now face demolition under these plans.

We would consider the items to be of highest value are:

- The former maternity hospital on the corner of Terrace Rd and The Parade (see more information on page XX)
- The Uniting Church on Constitution Rd (see more information at XX)
- The Greek Orthodox Church of the Holy Unmercenaries at Hercules St, which although apparently spared from demolition as part of a redevelopment plan, has no formal heritage protection.

None of the above items have any form of heritage protection.

Save Dully wrote the Department (and Inner West Council) in October 2016, indicating that we were keen to preserve these and other icons in our suburb. Thankfully, some of the other suggested items have since been removed from development areas. There is no record of us receiving a response.

These three buildings should be designated as potential heritage items in the final precinct plan, and further investigations should take place for other heritage items as the rezoning process proceeds.

There is some precedent for this, given that the precinct plan for the suburb of Canterbury includes individual heritage items.

Lack of planning for infrastructure

It is regrettable that, for the second time, the precinct plan has an inadequate and indeed misleading approach to planning for infrastructure.

Lack of clarity on existing constraints and future needs

For instance, your plans, for the second time, fail to outline what the current infrastructure constraints are in Dulwich Hill, including school, hospital and child-care capacity. This is a serious flaw.

Additionally, the plans for the second time, do not identify any proposed new State social infrastructure (such as schools or health facilities) for 2,000 additional dwellings. We have to instead believe that a State infrastructure contribution will pay for this infrastructure, without seeing the detail of this contribution. This is also a major flaw.

We believe it is irresponsible to seek to rezone large areas without any upfront planning for this infrastructure.

Incorrect analysis in social infrastructure report

Our concerns about infrastructure planning are exacerbated by the fact the social infrastructure study ¹ on which infrastructure planning in the corridor is based wrongly claims that Dulwich Hill's population will grow by 1,250 by 2036.

In fact, given that Dulwich Hill will have an additional 2,000 dwellings over this period, the population is more likely to grow by 4,600 people. ²

This anomaly is not explained and calls into serious question the accuracy of the infrastructure analysis conducted for our suburb, and indeed the broader corridor.

It means for instance, that, whatever infrastructure needs assessments have been made for our suburb based on this report, they are likely to be less than a third of what is really needed.

Furthermore, the social infrastructure report mentioned above does not fully indicate how it has come to its conclusion on the suburb's school capacity needs.

It says these are based on "projections for each precinct provided by the Education Department in January 2017". However these projections have not been made public alongside the social infrastructure report, leaving the community in the dark as to the basis for decision-making on this important subject.

Our perspective on school infrastructure needs

As mentioned above, we have grave concerns about the professionalism of the analysis of infrastructure needs in our suburb.

As such, we are keen to undertake our own analysis.

We think the simplest approach is to base any analysis on the fact that, in 2015, NSW had one primary public school student for every 16 the State's 7.64 million residents, and one high school public student for every 24 NSW residents. ³

On this basis, with some 2,000 additional dwellings and therefore 4,600 new residents, Dulwich Hill will need to cater for an additional 287 public primary school students and 191 new public high school students.

This compares to the 60 additional primary school enrolments and 34 additional secondary school enrolments calculated for Dulwich Hill in the social infrastructure report released as part of the revised strategy. In other words, we think the government's has estimated just 20 per cent of our actual school infrastructure needs.

¹ See page 40 at <http://www.planning.nsw.gov.au/~media/Files/DPE/Reports/sydenham-to-bankstown-social-infrastructure-study-2017-08.ashx>

² This is based on the conservation assumption on page 25 of the 2015 ARUP social infrastructure report that there are on average 2.3 people in each dwelling at <http://www.planning.nsw.gov.au/~media/Files/DPE/Reports/draft-sydenham-to-bankstown-social-infrastructure-study-2015-09-30.ashx>

³ Based on enrolment information here - <http://www.teach.nsw.edu.au/documents/2015%20-%20DGS14-253-Website%20Enrolment%20Information.pdf>

We think all the evidence points to the fact that the NSW Government is grossly under-estimating the infrastructure needs to cater for growth in our suburb and our corridor.

Canterbury community centre

We are alarmed at the statement that Dulwich Hill residents would need to travel two suburbs to Canterbury (in a different council area) to take advantage of any new community centre facilities needed for our growing population.

Proposed bike track inconsistent with local cycling strategy

The “proposed cycle route” shown on page 32 of the precinct plan is inconsistent with the Marrickville Bicycle Strategy 2007. For instance, the Marrickville Bicycle Strategy ⁴ shows an east-west route along Pine St Marrickville before going into Beach St, Dulwich Hill, while the route in the precinct plan shows an east-west route along Challis Avenue, then Margaret St and Macarthur Parade, Dulwich Hill.

The reason for the inconsistent approach is questioned, given the in-depth community consultation which went into the Marrickville Bicycle Strategy.

Open space and public domain

Lack of strategic basis for decisions on open space

The revised corridor strategy and the suburb precinct plan again provide no evidence base and criteria for decision-making on open space. The strategy merely says that there is now “more detail” about what open space will be provided.

However, this falls well short of a comprehensive analysis of the open space needs of the corridor and our suburb. As a result, we remain gravely concerned that the open space needs of our growing population will not be met.

There is no detailed document alongside this strategy which looks at open space needs. Open space needs are covered over just two pages of the revised strategy, and one map.

This means the only open space study conducted for the corridor was the background report commissioned from the NSW Government Architect’s office which was released alongside the 2015 strategy. ⁵

However, this background report was a seriously flawed document. For instance, this document:

- Does not report on the existing amount of open space in the corridor, nor the total amount of new open space planned.
- Largely bases its open space analysis on whether people are within a certain distance of local, district or regional open space. This approach is flawed because it does not take into account the current or proposed future density of people within this radius and therefore cannot consider whether these spaces will be over-crowded.
- Bizarrely argues to ‘minimise’ the traditional approach of providing new open space alongside new development or by acquiring new sites, by arguing instead that a

⁴ See <https://www.marrickville.nsw.gov.au/en/council/forms-and-publications/council-plans/bicycle-strategy/>

⁵ <http://www.planning.nsw.gov.au/~media/Files/DPE/Strategy-documents/draft-sydenham-to-bankstown-corridor-strategy-open-space-and-recreation-strategy-2015-05-25.ashx>

preferred approach is to use 'under-utilised infrastructure' such as carparks and railway easements ⁶

- Relies on a nine-year-old report from the regional organisation for all southern Sydney councils which runs from Botany Bay from Sutherland Shire ⁷, to come to a conclusion that there are sufficient sporting fields in the area. This report is old, has an extremely broad focus and was not written to support a major growth corridor. To rely on such a report is a disgrace.

This lack of evidence-based planning for open space compares with a comprehensive analysis of open space undertaken by the City of Sydney last year.

The city council analysed current and proposed open space across its council area and whether it was going to meet open space benchmarks in the Department's own Recreation and Open Space Planning Guidelines for Local Government released in 2010.

These guidelines indicate it is good practice for 15 per cent of a residential area to be for open space, including nine per cent for local and district open space and a further six per cent for regional open space. ⁸ The City of Sydney is now putting in place acquisitions and other measures to meet this benchmark.

In its open space analysis, the City of Sydney also says that an analysis of available research, government guidelines and user demand indicates that there should be one sporting field per 5,600 residents. ⁹

This comprehensive and evidence-based approach to open space planning – based on both an overall geographic area and per capita calculations – compares very favourably to the slipshod approach in this document.

It means that collectively as a community we are 'flying blind' into the future – we don't understand the open space issues in our corridor and suburb at the moment, nor whether the proposals in this strategy will meet future needs.

New open space suggestions in our suburb

Although we have concerns about the lack of evidence base to the Department's work as mentioned above, we do appreciate that additional effort has been put into creating open space proposals in our suburb.

These proposals include:

- The proposed linear park alongside the Metro line
- Investigating the reuse of Marrickville golf course for open space or an active transport trail
- Opening-up the grounds of Dulwich Hill primary school for community use outside of school hours.

⁶ See page 16 at <http://www.planning.nsw.gov.au/~media/Files/DPE/Strategy-documents/draft-sydenham-to-bankstown-corridor-strategy-open-space-and-recreation-strategy-2015-05-25.ashx>

⁷ See page 37 of the Department's open space background study available at <http://www.planning.nsw.gov.au/Plans-for-Your-Area/Priority-Growth-Areas-and-Precincts/Sydenham-to-Bankstown-Urban-Renewal-Corridor/Resources>

⁸ See City of Sydney report on public exhibition of DRAFT OPEN SPACE SPORT AND RECREATION NEEDS STUDY 2016 – PUBLIC EXHIBITION in May 2016

⁹ See Sports Facilities Demand Study at <http://sydneyyoursay.com.au/open-space-study/documents>

We caution that these proposals are by no means certain of happening and should not be counted as part of our open space inventory to support growth.

For instance, community access to the public school grounds has a long and difficult history. The community enjoyed this access to the school's bottom oval from at least 1992 (when council play equipment was installed in the oval) until February 2010, when a perimeter fence was built around the oval. After a strong campaign, the community then regained access in December 2010, only to be locked out again in June 2015 on the basis that there was no formal agreement in place to support community access. This history illustrates the difficulty of getting access to Education Department grounds.

Separately, the concept of shortening or removing Marrickville golf course has a long and fractured history, which indicates that the golf club is likely to mount a political campaign against any move to be removed from its land.

Confusing numbers for Dulwich Hill

Save Dully is very disappointed in regard to the inconsistent position of the NSW Government in regard to dwelling projections for our suburb.

We note that, in his media release issued on 25 June, Planning Minister Anthony Roberts claimed that the number of dwellings proposed for Dulwich Hill has dropped by 1,400 compared to the initial plans for the Sydenham to Bankstown corridor released in October 2015. In fact, an analysis of the figures in the revised strategy shows that Dulwich Hill will still be required to accommodate 2,000 new dwellings, which represents only a marginal reduction from the 2,059 new dwellings in the 2015 strategy.

To date, we have yet to get a coherent explanation for the 1,400 dwelling reduction claim.

In addition, we note that the ARUP social infrastructure analysis released alongside the revised strategy stated that the Department's 'urban feasibility model' found it was only feasible for 627 dwellings to be included in Dulwich Hill. We asked for a copy of this model, only to be told we couldn't have it and it was a mistake. We think this is unacceptable.

Development timed during line shutdown

Save Dully strongly objects to the decision by the NSW Government to accelerate development in the corridor during the period when the Bankstown line is being shut down.

Save Dully notes that an analysis of precinct plan dwelling forecasts in the revised strategy shows that at least 10,000 new dwellings (containing up to 30,000 residents) will be built along the Bankstown line between next year and 2024. This will include some 810 homes in Dulwich Hill.

The wave of new homes will put massive pressure on the Bankstown line, which from 2019 to 2024 will be progressively shutdown to build the Metro. From 2019, the line will be shutdown for two months a year, with a final shutdown of up to six months in 2024.

Across the proposed 16 months of shutdowns, it is estimated that at least 35 million trips on the line will be delayed, with commuters expected to be forced on to bus services or our already over-crowded light rail services. Even Transport Minister Andrew Constance told the SMH "it is going to be a disruptive time...I won't sugar coat it".¹⁰

¹⁰ SMH story at www.smh.com.au/nsw/conversion-of-bankstown-line-for-metro-trains-will-force-commuters-to-catch-buses-for-months-20160413-go52wc.html Reason six: Inconvenience during the shutdown period

This early construction of dwellings has been facilitated by the decision to change the Statewide rules for developer-initiated rezonings in August 2016. This rule change allows developers to use the revised strategy to support their rezoning proposals – even when this strategy is on public exhibition. The Department of Planning and Environment did not allow this to happen for the 2015 strategy.

We do not understand the logic of this approach. It appears to be the antithesis of orderly planning.

We call on the NSW Government to delay any rezoning of areas until the rail line is complete.

Affordable housing

Dulwich Hill has had a high proportion of renters, who typically occupy the medium and high-density housing which comprises the majority of the suburb's housing stock. In fact, four out of ten households in Dulwich Hill are renting households. These households are critical part of the suburb's diversity and social strength.

Both the proportion of high density dwellings and the number and proportion of households who rent have increased since the 2011 census. The trend for renters may reflect the fact that the possibility of purchase is receding for all except the wealthy and speculative investors.

Furthermore, Dulwich Hill does provide one of the remaining few pockets of affordable housing in the Inner-West for these renters.

A background paper prepared by Inner West Council for its Affordable Housing Policy in late 2016 shows that it is possible to rent a one-bedroom unit in an older block for around \$365 a week or a two-bedroom dwelling for around \$530 a week. After taking into account the area's median income, these rents deliver borderline but still feasible levels of affordability for those on low to moderate household incomes.

Our affordable housing precincts are home to many members of our community on low to moderate incomes: young workers, teachers, care workers, hospital and aged care para medical staff, retail and hospitality workers, people in relatively low paid university and technical jobs, older people on pensions and limited super and many single people, including older single women.

With this in mind, we are surprised that the revised strategy continues to ignore the impacts of the projected intense redevelopment on existing members of our community, especially those on low and moderate incomes, while at the same time including no specific targets for new affordable housing proposals.

We believe that it is entirely possible that our net stock of affordable housing will decrease under this revised strategy. We believe this is the case because:

- The proposed rezoning areas in our suburb appears to target precincts containing existing affordable housing, in particular areas such as Constitution, Denison, Ewart, Hercules and Bayley Rds; and
- The low five per cent affordable housing targets for new development proposed by the Greater Sydney Commission means that new development is likely to contain less affordable housing dwellings than the former affordable housing dwellings bulldozed by this new development; and

- Evidence shows that market rents for new properties are substantially higher than for existing properties, irrespective of the increased supply, which means people evicted from bulldozed existing homes will not be able to move into the new ones; and
- The weak provisions of the Affordable Rental Housing SEPP do little to protect existing affordable rental housing even if it is not being targeted for redevelopment (such as when this housing is being strata-subdivided and sold-off).

In short, we believe the proposed complete dependence on developer-led, high density construction, particularly in suburbs such as ours, is short-sighted and is not likely to lead to a balanced, responsible approach to affordable housing. Such an approach also means there can only be one possible solution – allowing buildings are large and as tall as possible to deliver a reasonable portion of affordable housing, irrespective of the impacts on the local environment and heritage. We don't think this is the correct approach.

We believe council and the NSW Government should have a tandem focus on protecting existing affordable housing via rigorously applying and indeed strengthening its existing guidelines and statutory protections for existing affordable housing.

Research accompanying the council policy argues that, *left to market forces* alone (as is being proposed via rezonings in the Sydenham to Bankstown urban Renewal Strategy), virtually no **new** strata 'products' (i.e. multiunit dwellings) in the Inner West will be able to be *purchased* by very low, low or moderate income households and that *all* households with children will be excluded from purchase.

Similarly the vast majority of households needing affordable rental housing in the low and *moderate* income categories will also be excluded.

This conclusion is backed by research from the NSW Tenants Union in their annual rent tracker survey that increases in dwelling supply via new construction coexist with *increases* in both purchase prices and rentals in areas such as ours.

In an article in the Sydney Morning Herald, Ed Cutcher from the Tenants Union confirms our local experience and anecdotal evidence. "Research confirms that supply is being driven into the more-expensive end of the market than the low end,""Investors are buying more-expensive, well-appointed and well-located properties." (Rising rents plague city: Sydney prices surge despite record home building SMH Jennifer Duke June 17, 2017)

We are seeing this trend at Dulwich Hill. For example, one bedroom apartments with car spaces start at \$500 /week in the Cooperage, a relatively new upscale development on new Canterbury Rd.

Should the revised strategy proceed without careful community planning, overlaid by a master planning process and overseen by the elected council, many low and moderate income people will be forced out of Dulwich Hill.

We therefore propose that before the revised strategy is approved the Department of Planning request the elected council to undertake a community impact study, including a map of all of the *existing* affordable rental housing in Dulwich Hill.

Affordable housing policies need to focus as much on strategies to conserve existing low and moderate rent housing and a *planned, staged* approach to new development, with other alternatives in the mix - such as community housing and group housing in lower scale and terrace developments alongside existing older types single dwellings and walk ups.

Street-by-street analysis

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

The revised strategy once again designates the triangular block bordered by Constitution Rd, Denison Rd and New Canterbury Rd for eight-storey development. This is a highly diverse and interesting block, with a wide range of uses.

The decision to once again propose it for intense development is an odd decision, for the following reasons.

Lack of strategic planning merit

Only part of this block is within the 800m radius from Dulwich Hill station. Given that the walk to the train station is of course not in a straight line, the actual distance is well over 1km (as accurately measured via Google Maps) and it can take up to 20 minutes to reach the station – hardly a commuter-friendly walk.

Despite this, it is only one of three precincts in Dulwich Hill which have been designated for highly intense eight storey development. The other two precincts – Hercules St and Ewart St – are far closer to the railway station.

Furthermore, maps released for the first time as part of the revised precinct plan show that, in the lead-up to the exhibition of the original strategy in 2015, planning consultancy JBA had not even recommended that this area should be subject to an investigation for increased density. The analysis by JBA was done to “identify areas...having the most renewal potential”. This area was blank in the JBA analysis.

Finally, this block is not included in the proposed planning direction for our suburb in this revised strategy. This is an indicator of the lack of strategic planning thinking that has gone into this block.

Block's heritage and social value

No analysis has been undertaken of the block's heritage character. This is despite the fact that it includes rows of contributory character housing, including one of the few examples of intact Victorian terraces in Dulwich Hill (in both Constitution Rd and Denison Rd). Save Dully's strong position is that no area should be designated for increased density until such an analysis has taken place.

The block contains a very interesting mix of socially-useable uses, including an early childhood centre, a number of affordable housing blocks and a 1920s Uniting Church (formerly a Presbyterian Church), which could all be lost in the redevelopment process.

The church currently has no heritage protection and could tragically be demolished as part of redevelopment of this block. The church forms part of the very interesting history of Dulwich Hill as being the national home of the “protestant resistance movement” of the 1920s, which sought to reduce the influence of the Roman Catholic Church. We request that you support the heritage listing of this important part of our history.

Small block size

We urge the Department to revisit its analysis of small lot sizes in this area.

The original 2015 strategy designated no blocks under 400 square metres in this block.¹¹

However, an online check of lot sizes in the block shows that many of them are indeed under 400 square metres, including the terraces on Denison Rd and single dwellings on Constitution Rd. This suggests that this area may not have been surveyed for small lot sizes at all in the original strategy. Clusters of small lots have been used as the basis to not designate areas for development in other parts of the precinct.

This raises serious concerns about whether an orderly development pattern can be achieved in this area, or development at all, and increases the potential for owners of smaller land blocks to be left isolated as development happens.

Impacts on affordable housing

Older-style affordable housing unit blocks are located throughout the block, particularly off New Canterbury and Constitution Rds.

The eight-storey designation may provide enough incentive to redevelop these blocks. There is currently no guarantee in the precinct plan that the affordable housing lost under this process will be replaced by newer affordable housing under a future NSW Government target for new developments.

Bus stop removal

The lack of supporting transport capacity of this block is further undermined by the fact that two bus stops along New Canterbury Rd directly adjacent to the block are proposed to be removed, under plans published by Roads and Maritime Services in February 2017 to “speed up” bus services in the inner-west.¹²

It is ironic that one arm of government is supporting development in this area, while another is removing essential transport infrastructure.

Existing development impacts

This small pocket of Dulwich Hill, just north of New Canterbury Rd, has already seen significant development and has very much “done its bit” in terms of housing supply.

This includes the extraordinarily large development alongside the Arlington light rail stop (still under construction), three approved development applications in Hill St, along with recently constructed infill development at Williams Parade and on the northern side of Denison Rd. None of this development was subject to an overall precinct masterplan. The development is putting pressure on a light rail line which already has peak-hour overcrowding and presents a strong case for sparing this block from intensive development.

Traffic impacts

Constitution Rd is already subject to excessive and dangerous traffic, as it is the main route to travel north out of the Dulwich Hill suburb. It is not suited to this level of traffic, having a narrow carriageway with cars parked on either side of the street. Access out of driveways is already dangerous due to poor visibility.

¹¹ See page 9 at <http://www.planning.nsw.gov.au/Plans-for-your-area/Priority-Growth-Areas-and-Precincts/Sydenham-to-Bankstown-Urban-Renewal-Corridor/~media/CDA49A7CC8ED42BAAD95CF6C8E1857C7.ashx>

¹² See <http://www.rms.nsw.gov.au/documents/projects/sydney-inner/camperdown-stanmore-dulwich-hill-marrickville-bus-priority/camperdown-stanmore-dulwich-hill-buses-community-update-2017-02.pdf>

Local residents report that the Arlington Grove development, when complete, will add at least an additional one car per minute to local streets. The development at Hill St (yet to commence) of 70+ units would add an additional car every three minutes.

New development within the block of Constitution, Denison and New Canterbury Rds is likely to exacerbate existing local traffic issues.

Our preferred way forward

As outlined above, we have considerable concerns about the integrity of planning process for this block. We have presented some credible reasons why this block should not be subject to intense development.

Given our significant concerns about the questionable, even flawed, evidence-base in support of this block as an eight-storey development zone, we think it should be removed or deferred from the final strategy to allow the council to consider relevant strategic planning issues in regard to the block.

We also think an eight-storey designation is completely inappropriate at this block, given its heritage attributes, the number of small lots and its socially-useful existing land uses.

A further point in regard to this area relates to the block bounded by New Canterbury Rd, Denison Rd and Dulwich St. This block is shown on page 23 as being an existing 'low-rise' area, which presumes that residential flat buildings are permitted across this entire area. This is not the case. At least a quarter of this block retains a low-density residential zoning. We seek for the precinct plan to be corrected in this regard, as it could cause confusion future planners.

Hercules, Consett and Terrace Rds block

Under the revised strategy, the block bounded by Hercules, Consett and Terrace Rds will be the primary development area for Dulwich Hill. The revised strategy ups the ante in this block by moving to a full masterplan approach, showing the outline and scale of proposed apartment buildings.

This has proven distressing to some residents, who have seen their houses replaced by apartment buildings even before consultation has finished on the revised strategy.

Many of these residents have a deep preference not to sell their land and would prefer to remain in the neighbourhood, but are obviously unnerved by the possibility of being isolated and surrounded by apartment towers. The masterplan takes an unrealistic planning puritan view of the area that it will be entirely developed (like for instance an industrial site) when in fact the outcome is likely to be very different and far more inconsistent.

In addition, only a summary of the masterplan has been issued alongside the plans. This makes it somewhat difficult to comment on this masterplan and runs contrary to an approach of full transparency.

We make the following comments in regard to this block.

Heritage

The heritage analysis for this block finds a number of intact rows of contributory buildings, including in Hercules, Terrace and Consett Sts, along with a number of high-value isolated individual homes, including weatherboard Federation homes.

It is distressing for Save Dully to see that these homes are proposed to be sacrificed to wholesale urban development in the revised strategy.

We are also uncomfortable with the fact that the scale of development proposed means that, if these rows or individual homes were preserved, they would be overwhelmed by adjacent development. We think there is a better way to approach this issue, which we outline below.

Height limit

The masterplan appears to show the maximum height of buildings flush (or close to) the land boundary. This is not a sensitive approach is likely to result in very high 'street walls', when in fact there should be a more modest interface with the street and open space areas.

For instance, the masterplan shows the tallest buildings on the block (eight-storeys) to be running alongside the light rail boundary of homes along the eastern side of Hercules St.

Such an approach is likely to cause privacy and over-shadowing for sensitive areas, including the Dulwich Hill primary school and the backyards of homes on Macarthur Parade and Blackwood Avenue.

Given it is located to the west and north of Jack Shanahan Reserve and the proposed Greenway, the eight-storey height limit also has the potential to overwhelm and overshadow these open space areas.

We also note that the masterplan is proposing that six storey development be imposed on the eastern side of Hercules St and Terrace Rd, when the zoning map shows it as five storeys.

Roads

As outlined in our comments on public domain issues below, we object to the creation of expanded or new public roads as part of this masterplan, including alongside the light rail line. We should be encouraging people to walk or cycle to parks, not to drive to them.

There has been no evidence presented as to why new or expanded roads are a good idea.

We suspect the only evidence is that it helps property developers.

We also don't agree that the new parkland in this area should be delivered by developers as 'works-in-kind' by developers. This work should be co-ordinated by the local council.

Open space

Open space in the masterplan appears internal to unit blocks. This makes the use of open space by the broader community far less likely as the open space appears as private use for the unit dwellings.

Proposed way forward

We are recommending the proposed planning direction for Dulwich Hill be amended to explicitly state that any redevelopment in this area should deliver fine-grain planning that will ensure that any residents who want to stay in the area are not unduly impacted by adjacent development.

We believe that it should not specifically refer to the masterplan, given the community has not had an adequate opportunity to examine this full masterplan.

We also recommend the precinct plan amend the height limit in this block to a more sensible level, which is more in keeping with the urban fabric of Dulwich Hill, say a maximum of four storeys. We then think that measures should be put in place reduce impacts on adjacent properties (such as a reduction to three stories alongside land borders along with reasonable side setbacks).

This approach will allow people who do not want to sell, or have properties of high heritage-value to remain in the area and not be overshadowed by new six or eight-storey towers.

In addition, we believe that any new open space created as a result of development patterns should maximise the creation of new open space which will be of communal and broader public benefit, rather than simply of apartment dwellers.

Hercules St industrial site

During July 2017, a developer-initiated rezoning proposal was released for this site.

While it was welcome that this proposal retained the Greek church on the site and proposed a new pocket park, many aspects of the proposal were of concern.

In particular, it was concerning that an eight-storey designation on this site would cause overshadowing impacts during the middle of the day and the early afternoon for students using the top oval of Dulwich Hill primary school. In addition, the proposal did not seek to heritage-list the Greek church, thus leaving it exposed to future development.

The release of this rezoning proposal has reinforced our concerns that eight-storey development is unlikely to be appropriate across this entire site, particularly on the Hercules St frontage.

Once an eight-storey development designation is included in the final structure plan, the developer is likely to seek this across the entire site. The current structure plan does not even indicate the need for an interface examination on the Hercules St frontage (as it does for other intense development sites).

We acknowledge the need for urban renewal on this site, and its location immediately to the east of the Dulwich Grove light rail stop. We however urge that the most intense development on the site be on the New Canterbury Rd frontage (no more than eight storeys) and for development on the Hercules St frontage to be limited to four storeys.

There is a strong precedent for planning instruments to preserve sunlight to open space. Many parts of the Sydney CBD are affected by sun access planes, which preserve winter sunlight to areas such as Hyde Park, the Botanic Gardens and Wynyard Park.

The Parade

The Parade is an existing low-density street which runs alongside the northern side of the Bankstown line. It contains some rare examples of weatherboard Federation housing, alongside other character homes. These homes largely present as an intact and contributory group to the street.

The street's character is enhanced by the stunning, large and elevated Federation home at the corner of The Parade and Terrace Rd which was used as a maternity hospital – known as Nurse Gee's hospital – in the 1920s and 1930s.

This home has a commanding corner presence, wraparound balcony and highly detailed roofing features. This home in itself is eminently worthy of heritage protection.

Despite this, and for reasons that remain unclear, The Parade was never considered for a heritage conservation area analysis by the Department or the local council in the preparation of the revised strategy. We consider this to be a grave mistake.

The Parade was proposed for development up to seven storeys in the 2015 strategy. It is now proposed for development up to three storeys. The reduction in density is appreciated but it will still have the net effect of destroying the intact nature of the street.

We believe that no decision should be made to upzone any street in Dulwich Hill, including The Parade, until a heritage analysis has taken place.

It should also be noted that the homes designated for upzoning along The Parade effectively occupy a small 'island' style site, and will deliver a relatively low housing yield, and therefore should be able to be easily removed from the plan and returned to a single dwelling designation.

School Parade

School Parade is located to the south of the Bankstown Line. It is proposed to have a very clumsy and unwarranted planning outcome.

A short 150m section of School Parade (not separated by any cross-streets) is proposed to have three different height limits – five storey, three storey and single dwelling.

This is despite the fact that School Parade, like many other streets, has not been subject to any heritage analysis. This is somewhat surprising, given the fact that the northern side of School Parade is an existing heritage conservation area and the intact and harmonious nature of the dwellings in this street.

In addition, the proposed rezoning could see the replacement of an existing block of affordable rental housing, alongside the railway line.

We ask for you to preserve School Parade in its current form, with interface measures put in place to protect the amenity of the preserved homes.

Riverside Crescent and Wardell St

We welcome the decision to lower building heights in Wardell Rd, from up to seven storeys to up to three storeys.

However, we are arguing for Riverside Crescent to be retained as a single dwelling area, particularly the western side of Riverside Crescent. This would create a harmonious outcome which would preserve both sides of Riverside Crescent as single dwelling areas.

Comments on individual public domain proposals

The Fine-Grain Public Domain and Station Integration Study ¹³ written in December 2016 and released with the revised strategy proposes seven new potential public domain projects in Dulwich Hill. Elements of these projects are included in various forms and areas of the precinct plan.

¹³ Available at http://www.planning.nsw.gov.au/Plans-for-your-area/Priority-Growth-Areas-and-Precincts/Sydenham-to-Bankstown-Urban-Renewal-Corridor/~/_link.aspx?_id=1D48A528C9AC4A4C9F16FFD6F914131D&_z=z

At times, the proposals in the study are different to proposals for the same area in the precinct plan. This makes for a confusing narrative for the community to absorb. Furthermore, the precinct plan exhibition represents an inadequate mechanism for community consultation for these highly complex projects. As such, we are urging that the final structure plan does not fully commit to these projects.

In addition, we disagree with the levels of development which are required to fund these projects. While the community may win some additional public domain benefits, we will lose significantly through attacks on our character and heritage via the development which will fund these benefits.

Nevertheless, we are providing some initial feedback on the projects below.

The Hill

This is a project to turn the southern carpark and adjoining private land at Dulwich Hill into some form of open space, with the carpark underneath.

This would appear to be an extraordinarily complex and expensive proposal, involving the integration of private land and the burying of a commuter carpark. Proposals such as this seem to be based on advice from the Government Architects' office (referred to on page 34 of the precinct plan) that carparks and easements should be turned into open space to "minimise" the creation of new open space to support growth.

We reject this logic and think that the traditional way of providing new open space – through acquiring new sites or by developers handing over land – should be the priority and there should no move to "minimise" this activity in growth precincts. These traditional approaches are also far simpler compared to the difficulty of working on this site.

The community has almost no information on which to base an opinion on this proposal, but the issues that are likely to be raised include:

- Will the level commuter carparking be reduced, which is of particular concern given the likely increased demand for the higher-frequency Metro service?
- Will it be dangerous to park in an underground carpark?
- How will the relevant government authority access the private land to create this new public domain?
- What are the changed traffic arrangements and what impacts with these have on the wider precinct?

We also note that this proposal is not fully supported in the precinct plan, which instead refers to the concept of an "urban plaza" near Ewart St but not for a new hill.

In conclusion, we think the beautification and improvement of the existing carpark, alongside a small urban plaza outside the southern entrance of the railway station, would be a more sensible option here.

We are recommending that the action in the precinct plan be amended to refer to the fact that this area should be investigated for an improved urban design outcome, alongside extensive community consultation.

Renew Dulwich Hill

This proposal is seeking to redevelop existing detached housing in Bedford Crescent into mixed-use developments, including low-cost shops, along with extending Bedford Crescent

along the line of a current pedestrian walkway so it joins Macarthur Parade. We note there is no action in support of this road extension in the precinct plan.

In terms of the public domain aspects of this proposal, we oppose the proposal to extend the Bedford Crescent roadway. It is not entirely clear why this is being proposed. We do not think it is appropriate to be encouraging additional traffic around the station.

This new roadway is likely to create a new 'rat run' near the station, along with encourage people to circle around the station entrance – via Bedford, Macarthur, Keith and Wardell Rds - looking for a parking spot. Our preference is to improve the pedestrian walkway, by making it wider and improving lighting.

We also resent the use of the word "renew" in this proposal. We believe that Dulwich Hill is quite beautiful as it is and does not require "renewing".

Gateway Park

This is a proposal to create a new park near the corner of Hercules and Consett St, to act as a mechanism to allow cyclists and pedestrians to move north from the active transport route at Jack Shanahan Reserve and over the Hercules St railway bridge.

We support the concept of creating a park in this location, as part of the broader Greenway active transport corridor. However, we vigorously oppose the proposed extension of Consett St to the eastern side of Hercules St, concurrently with the creation of this park.

We feel, as with the previous proposal, that this will encourage additional traffic in this location.

We also feel it would be far preferable for the land earmarked for this road (whether this would be private or public land) to instead be available for public open space.

Wrong side of the tracks

This is a proposal to build a new pedestrian walkway over the light rail at Blackwood Avenue, along with associated other changes.

While the proposed new walkway over the light rail is supported, we oppose it being used as a stalking horse for urban renewal on the eastern side of the light rail tracks.

Separately, it is alarming that this proposal continues the idea of a roadway alongside the western side of the light rail line, along with the concept of a new road carriageway extension of Hercules Lane. We don't support encouraging additional traffic in the locality.

Finally, any proposal to reduce the height of, or remove, the boundary fence alongside the school would obviously require extensive consultation with the school community.

A cultivated entrance

This is a proposal for a new pedestrian entrance to Jack Shanahan Reserve, under the former goods line 'western fork', including community gardens. It is noted that there is no formal action in support of this initiative in the precinct plan.

This proposal is supported, although as stated above the complementary proposal for a new road is not supported.

The appropriateness of suggesting that people should be riding horses in and around this densely used urban area is however questioned.

Bike hub

This proposal seeks to use the 'western fork' bridge over Terrace Rd as a new cycling entrance to the precinct, along with build a new cycling bridge over Terrace Rd alongside Ewart St.

It is noted that there is no formal action in support of these initiatives in the precinct plan.

The proposal for The Parade is in-principle is supported, although it is noted that it could endanger several mature trees which give a great presence to this street. Any works should not endanger these trees.

Rehabilitating the Cooks

This is a proposal to return the Cooks River to its original route, and in doing so remove the last four holes of the golf course and create a wetland.

This is without question the most bizarre of all the public domain proposals.

We note that the precinct plan does not support this proposal, and instead proposes a completely different solution which is to build a new walkway through the golf course. The fact that there are competing proposals for the same parcels of land among what is supposed to be two complementary government documents makes it extraordinarily difficult for the community to understand what is going on.

This is a contentious proposal. The proposal of a wetland extension may be perceived as a flood risk and reduced amenity threat by nearby residents. The golf club would no doubt oppose the reduction of its golf course, as do many local residents. Other local residents may support the opportunity for an increased open space resource.

Given the mixed views within the community on this issue, we recommend that no specific action is put against the land and instead it is noted for further investigation, alongside extensive community consultation.

We also note with concern the proposal for increased density at North Earlwood alongside this proposal. We would urge the NSW Government to consult with residents of North Earlwood if there is any possibility of this idea getting official support.

Feedback on specific infrastructure actions mentioned in the precinct plan

Action	Action description	Our response
T2	Build Metro	A full business case and environmental impact statement should be released for the Metro before support should be given to it. The Metro, as a private line to be owned by a property developer, is being wrongly used to force overdevelopment on our suburb.
T2	Upgrade interchange between rail, buses and light rail	Agree in-principle, subject to response above.
T3	Extend bus route from Tempe to Airport and Wollli Creek	This appears to be referring to the statement in the main corridor strategy (page 24) to extend the 425 bus route between Dulwich Hill and Tempe, to the airport and Wollli Creek. Of course an extension of public transport of this type is supported however the route shown in the map on page 32 of our precinct plan shows the route travelling through Terrace Rd and The Parade. These are largely quiet residential streets. The

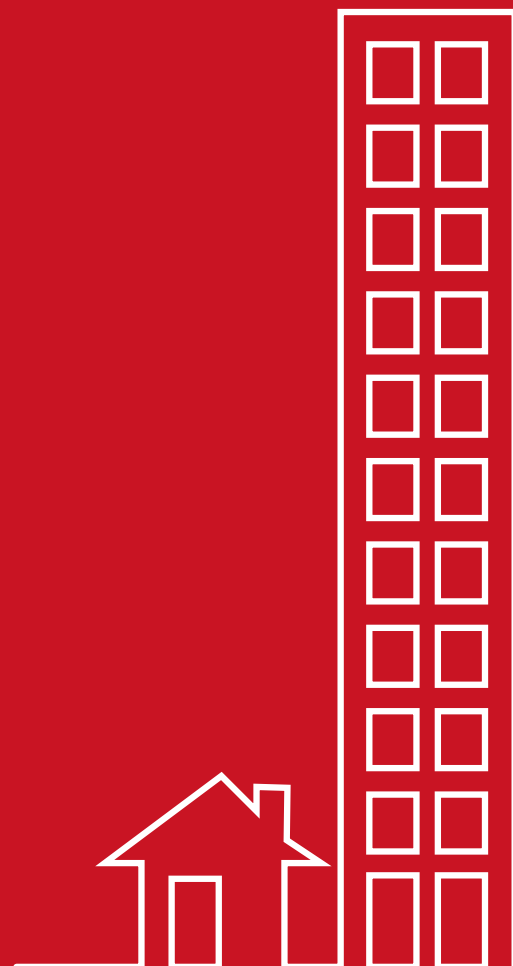
		<p>route extension appears to be based on proposals to redevelop these areas.</p> <p>We think it makes more sense for the bus extension to largely run along New Canterbury Rd, or alternatively think the action should be amended to refer for the need for consultation with residents before bus routes are changed.</p>
P1	Shared bicycle and pedestrian path along rail corridor	Support
P2	Extend the Greenway	Support
P3	Improved pedestrian protection near station entrance	Support
P3	Signalised crossing near Dudley and Wardell Sts	<p>Support in-principle, although further community consultation and traffic management analysis would be preferred before any decision is made.</p> <p>As such, we would suggest this action is amended to refer for this proposal to be included in a station precinct traffic management scheme for public exhibition.</p>
P4	Convert section of road between Ewart St and Wardell Rd to a 10km/zone	<p>Oppose. The action description and map reference is most unclear. This would appear to be suggesting Ewart St is slowed to 10km/h.</p> <p>This would not appear sustainable and this action should be deleted, or at the very least included in an exhibited precinct traffic management scheme.</p>
P5	New pedestrian connection through Marrickville golf course	<p>It is preferable that the action is changed to be less specific and instead refer for the need for a full investigation, with community consultation, into the use of the golf course as public open space and/or walking and cycling.</p> <p>A new pedestrian connection through the golf course requires careful investigation, particularly in regard to public safety and urban design issues.</p>
P6	New street connecting Terrace Rd to the new linear park along the railway line	<p>Oppose. We don't agree that a new vehicular street is needed. The only purpose for a carriageway would be to increase development potential. We should avoid new roads if possible in our suburb. A park connection can be achieved through a pedestrian connection.</p> <p>The concept of widening the laneway also presume that homes alongside this laneway can and should be demolished. There are fine homes on either side of this laneway which should be investigated for individual heritage protection.</p>
P7	Crossing of Blackwood Avenue	Support, but not if it is used as an excuse for development on the eastern side of the light rail line
P8	New pedestrian connection from Hercules St to Jack Shanahan Reserve	Support
P9	New 40km/h high pedestrian activity area on Wardell Rd	Support in-principle, but should be amended to refer for this proposal to be included in a station

		precinct traffic management scheme for public exhibition.
P10	New street or pedestrian route along the western edge of the light rail line to be delivered as 'works in kind' by developers	<p>We oppose the concept of a new street along the western edge of the light rail line. We don't understand why a new street is being proposed and think this action will exacerbate traffic issues and is primarily being undertaken to benefit developers. We support the pedestrian route.</p> <p>We do not support these works being delivered as 'works in kind' by developers due to the practical difficulties of completing a linear outcome on a site-by-site basis. This pedestrian route should be funded via levies and then co-ordinated by the council.</p>
O1	New linear park along the light rail line to be delivered as 'works in kind' by developers	We do not support these works being delivered as 'works in kind' by developers due to the practical difficulties of completing a linear outcome on a site-by-site basis. This initiative should be funded via levies and then co-ordinated by the council.
O2	New urban plaza on Ewart Lane	This action should be amended to reflect this as an initiative for investigation only. There needs to be much greater community consultation on this initiative, particularly around the potential impacts on commuter parking.
C1	Provide community access after hours to Dulwich Hill public school	Support, but note the need for in-depth consultation with the local school and the school community and for potential public domain upgrades to support community access

ATTACHMENT 5 - SUBMISSION FROM SAVE MARRICKVILLE SOUTH

A submission prepared by Save Marrickville South in response to the revised Marrickville Plan

SEPTEMBER 2017



Contents

Executive Summary	3
Recommendations	4
Focus of Submission	5
Save Marrickville South Submission	6
Supporters	15
Local Voices	20
Save Marrickville South Community Group Members	24

Executive Summary



IMAGE: Marrickville's industrial heritage - the General Motors Plant on Carrington Rd, built in 1926. The GM plant is now home to over 100 enterprises.

The Marrickville Plan and plans for the Carrington Precinct should adhere to good planning principles and produce the best possible urban environment and public amenity for the area's existing and future residents, and enterprises. The revised plan for west Carrington Road does not transition appropriately from single dwellings to increased zoning heights. This will have a major impact on the neighbourhood through overshadowing, impact on privacy, physical domination of existing housing and changes to appearance of the streetscape.

The proposed population density will have a dramatic impact on traffic, parking, schools, playing fields and other open space. These are not properly addressed in the current draft precinct plan.

The Carrington Road area is currently light industrial with a concentration of creative industries and manufacturing enterprises. These businesses produce goods and services that are needed in the Inner West and Sydney and provide employment for an estimated 1,800 people. Enterprises have not been directly consulted over the proposed redevelopment and their space needs have been ignored.

339 inner west residents support the Save Marrickville South submission

SEE FULL LIST ON PAGE 15

Redevelopment of the single dwelling housing east of Illawarra Road would have an adverse impact on the character of the neighbourhood. In single dwelling housing areas we strongly urge single-storey building heights with transition edges to any adjacent medium and high-density areas.

There is no detail for the Carrington Precinct, but it appears to be up to 25-storeys. This will have an unreasonable impact on surrounding neighbourhoods, in terms of roads, parking, schools and open space. This precinct should retain industrial zoning until genuine consultations have been undertaken with local residents and existing enterprises. The space needs of existing enterprises should be incorporated into any redevelopment plans. Where residential and/or mixed-use features in the precinct, it should be five storeys on average and include a significant area of open space north of Richardsons Crescent.

South Marrickville is a heritage housing area with Victorian and Federation streetscapes and evidence of the industrial history from 1880s quarry walls to heritage factories built in the 1920s and 1930s. The streetscapes and industrial heritage of south Marrickville are important components of its character and must be preserved. Any increase in housing density in the area, must be done so that it is sympathetic with this local character.

Recommendations

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- Recommendation 1:** Commence a precinct-specific strategic planning process for Carrington Road, retaining all existing zoning, with any subsequent rezoning only following genuine engagement with local residents and existing enterprises.
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- Recommendation 2:** Building heights along west Carrington Road must remain low-rise. Building heights on the east side of Carrington Road must transition, in sympathy with the surrounding area's single-storey housing, with no more than medium-rise on the land fronting east Carrington Road.
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- Recommendation 3:** The average height of the overall Carrington Precinct (east Carrington Rd) be no more than medium rise or five storeys, across the whole precinct.
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- Recommendation 4:** The area zoned low-rise between Illawarra and Carrington Roads be retained as single-dwelling houses.
-
- Recommendation 5:** Retain the heritage streetscape elements identified in the development plan, as well as heritage buildings and significant streetscapes, in the southern part of the Marrickville Precinct.
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- Recommendation 6:** Retain the heritage industrial buildings along Carrington Road in their current form and height to preserve their heritage value and architectural integrity.
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- Recommendation 7:** Residential developments for the Carrington Precinct and west Carrington Road to be required to provide off street parking for one vehicle for each one-bedroom dwelling, and two vehicles for each two-bedroom dwelling.
-
- Recommendation 8:** Commercial developments in the Carrington Precinct and west Carrington Road to be required to provide off street parking for one vehicle for each projected employee, plus customer parking.
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- Recommendation 9:** Implement a plan of two-hour or time-limited parking, with local residents excepted, for streets west of Carrington Road, including from Premier Street to Myrtle Streets.
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- Recommendation 10:** Make Warren Road one way to enable parking on both sides of the street during the day.
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- Recommendation 11:** Develop a plan for traffic infrastructure and management, based on population projections, with planned housing density not to exceed capacity of planned roads and traffic systems.
-
- Recommendation 12:** Require inclusion of a new through road parallel to Carrington Road, bordering the railway line on the eastern edge of the Carrington precinct and connecting Myrtle Street with Richardsons Crescent.
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Recommendations continued

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- Recommendation 13:** Install traffic lights or roundabouts on streets connecting with Carrington Road, including Warren and Renwick, to enable traffic to enter Carrington Road from these streets.
-
- Recommendation 14:** Create usable open space within the Carrington Precinct as envisaged in the original plans, including a large open space north of Richardsons Crescent to avoid overshadowing of Mackey Park.
-
- Recommendation 15:** Retain Mackey Park as grassed playing fields and provide a raised pedestrian and cycle way from the Carrington Road area to allow safe access to the open space.
-
- Recommendation 16:** Create a walkway along the line of the drain west of Carrington Road as envisaged in the original plans.
-
- Recommendation 17:** Develop a new cycleway to the east of the Carrington Precinct close to the railway line boundary from Myrtle Street through to Richardsons Crescent and Mackey Park with a raised pedestrian and cycleway to allow safe access to the Cooks River cycleways.
-
- Recommendation 18:** Allocate land and building space for at least one new primary school, long day care and outside of school hours care facilities, in the plan for the Carrington Precinct.
-
- Recommendation 19:** Incorporate a new local or district community centre and upgrades to the existing youth centre into the development plan.
-
- Recommendation 20:** Undertake flood management planning prior to the development of a final proposal.
-
- Recommendation 21:** Undertake a contaminated land assessment of the industrial area of the proposed Carrington Precinct and west Carrington Road.
-
- Recommendation 22:** Retain existing heritage industrial buildings and IN1 and IN2 zoning to protect and foster Carrington Road as a vital enterprise hub for Sydney.
-
- Recommendation 23:** Develop a plan to transition and relocate any existing businesses in the Carrington Precinct displaced by redevelopment, to new IN1 and IN2-zoned buildings with equal or better technical provisions to meet their space needs, in the precinct, as development takes place.
-
- Recommendation 24:** All existing residents, resident organisations, and enterprises in the Warren Area and Marrickville be consulted and engaged by Planning NSW and Inner West Council in all stages and aspects of the planning and development of Carrington Road and the Carrington Precinct.
-

Focus of Submission



IMAGE: New Directions building on the corner of Carrington Rd and Ruby St is an outstanding example of Art Deco architecture and symbolises Marrickville's industrial heritage and character.

“Our concerns and suggestions to this substantial change to our area are completely reasonable. They come from years of living in this area and building this community. If we are not heard through this consultation process, I will feel completely voiceless and powerless in my own city, suburb and home.”

READ MORE FROM OUR LOCAL VOICES
ON PAGE 20

This submission from the Save Marrickville South (SMS) community group focuses on the revised Marrickville Plan as it affects the area of Marrickville, south of the Sydenham to Bankstown railway line, from Premier Street to Myrtle Street and the adjoining neighbourhood between Illawarra and Carrington Roads. Comments and recommendations are in regard to the area west of Carrington Road, where the Marrickville Plan has specific zoning proposals. Recommendations for east Carrington Road, the “Carrington Precinct”, are more general as it is understood that this area is being considered under a separate planning process involving Inner West Council, and details are not yet available. We note that the Carrington Road precinct is defined differently in different documents, with some including both sides of Carrington Road in the precinct.

The approach of this submission is that it is not opposed to all development, but that the Marrickville Plan and plans for the Carrington Precinct should adhere to good planning principles and produce the best possible urban environment and public amenity for the area's existing and future residents, and enterprises. SMS feels it is imperative to get the suggested rezoning of areas in this strategy correct, and infrastructure planning complete, before the master-planning stage.

Save Marrickville South Submission

ABS and NSW Planning Department data shows that development in Sydney is extremely uneven; proof the State government is saddling some suburbs with overdevelopment despite them having met or exceeded their targets. The Marrickville community is bearing an unnecessary load with 6000+ apartments - and this does not include the Victoria St precinct with an additional 1,200 apartments already approved. By analysing this data, we can see that LGAs, like Marrickville, are building vastly beyond their agreed targets, and bearing an unfair share of the cost of providing new housing across the wider Sydney area.

Massive overdevelopment and excessive building is blighting this suburb and this destruction is absolutely unnecessary, considering that it has already met its agreed targets. Additional development beyond this, is way out of line with appropriate strategic planning for Sydney's growth. We urge the NSW State Government to implement equitable strategic planning to protect Sydney's unique neighbourhoods, such as Marrickville.

1. BUILDING HEIGHTS AND DENSITY

1.1. Carrington Road

The revised Marrickville Plan has zoned all existing industrial/commercial land on the west side of Carrington Road as medium-high rise housing, which is "a maximum of eight storeys". This eight-storey zoning is, in most cases, immediately adjoining single dwellings.

At all other locations in the Marrickville Plan housing heights and density are stepped up, so that single dwellings are next to low rise, and low rise is next to medium rise housing, and there is no reason for Carrington Road to be an exception to this principle of good planning.

The revised plan for west Carrington Road in its current form does not transition appropriately from single dwellings to increased zoning heights. It would have a major impact on the houses and the neighbourhood nearby through overshadowing, reduced privacy, physical domination of existing housing and changes to appearance of the streetscape. Eight-storey residential buildings will also have a profound impact on population density in the area, which will impact on the existing neighbourhood, including traffic, parking, schools, playing fields and other open space.

A significant number of new residential dwellings can be accommodated without eight-storey buildings west of Carrington Road. We suggest that retaining low-rise industrial space, low-rise housing, or a maximum of three-storeys is appropriate for this area.

There is no detail of zoning for the precinct east of Carrington Road, but it appears to be up to 25-storeys.

Density for the Carrington Precinct should be kept at a level which will not have an unreasonable impact on surrounding neighbourhoods, and which can be accommodated by available roads, parking and other infrastructure. Without having planning details for the Carrington Precinct, the general comment is that industrial zoning be retained and that existing residents, creative industries and manufacturing enterprises be consulted over their space needs in the precinct before any rezoning or redevelopment proceed. Residents' views and enterprises' space needs should be properly incorporated into the precinct's strategy. Should residential and/or mixed-use also feature in the precinct, then this should be medium-density (5 storeys) on average

across the whole precinct. Paris is one of the most densely populated and successful urban environments in the world, and its older quarters are predominantly medium density of about five storeys, with significant public open space.

Density of development which is too great for the roads and infrastructure, and lack of public open space, will create a congested and poor living environment for existing and new residents.

Recommendation 1: Commence a precinct-specific strategic planning process for Carrington Road, retaining all existing zoning, with any subsequent rezoning only following genuine engagement with local residents and existing enterprises.

Recommendation 2: Building heights along west Carrington Road must remain low-rise. Building heights on the east side of Carrington Road must transition, in sympathy with the surrounding area's single-storey housing, with no more than medium-rise on the land fronting east Carrington Road.

Recommendation 3: The average height of the overall Carrington Precinct (east Carrington Rd) be no more than medium rise or five storeys, across the whole precinct.

IMAGE: One of a pair of heritage sandstone cottages on Schwebel St.



1.2. Area between Illawarra and Carrington Roads

While we commend the change in building heights in the draft proposal for the residential areas between Illawarra and Carrington Roads, we feel strongly that areas zoned as low-rise housing should remain as single dwellings. We note that rezoning of these areas will only occur when development applications are made to Inner West Council, but feel that the indication that this is to be rezoned as low-rise (up to four storeys as this is within 500m of the station) will lead to developer pressure on residents and a change in the heritage character of the area.

Redevelopment of these areas of single dwelling housing would have an adverse impact on the character of the neighbourhood. The change of zoning to single dwelling houses would need to be accompanied by transition edges to the adjacent medium-density areas.

Recommendation 4: The area zoned low-rise between Illawarra and Carrington Roads be retained as single-dwelling houses.

2. HERITAGE AND CHARACTER

We understand that a heritage study was undertaken by NBRIS, however this focused only on Warburton, Moyes, Greenbank, Church, Silver and Gladstone Streets. Heritage items were identified to the south of Marrickville Station - "historic streetscape elements like stonewalls, terracing and street planting on High, Junction, Ruby, and Schwebel Streets, the industrial facades and Canary Island Palm tree planting on Carrington Road and the Sydney Water Pump House". While we support retention of these heritage items, we recommend that other heritage buildings are recognised including, stone cottages on Schwebel and Esk Streets, stone stables on Grove St, Victorian villas on High St. There are also significant heritage streetscapes that are a vital part of the character of the area. While many of the houses do not retain all their original Victorian or Federation features,



IMAGE: The General Motors building as it stands intact today with protected Phoenix palms lining Carrington Rd. This building is an important part of industrial heritage.

many modifications reflect the history of Marrickville as an immigrant suburb. Many of these areas are included in areas of low to medium-rise housing.

Documents accompanying the revised Marrickville Plan show an earlier version of the plan (Dec 2016) which retained, in their current form and height, the heritage buildings along Carrington Road (General Motors Building and New Directions Building). The current plan only retains the façades of these buildings, and the original planning intention should be restored. It is a matter of concern that so little investigation of the existing fabric of Carrington Precinct has been undertaken in light of its obvious significance in the industrial history of Sydney, its existing adaptive reuse and therefore potential to contribute both to the character and economy of the area.

Recommendation 5: Retain the heritage streetscape elements identified in the development plan, as well as heritage buildings and significant streetscapes, in the southern part of the Marrickville Precinct.

Recommendation 6: Retain the heritage industrial buildings along Carrington Road in their current form and height to preserve their heritage value and architectural integrity.

3. PARKING

Residential development of west Carrington Road and the Carrington Precinct will have a major impact on demand for parking in existing streets. Recommendations to reduce density will reduce that demand, however new households will require parking and there must be a parking management plan.

The assumption is often made that new dwellings located near a metro station will not need or use cars. However, these new residents will require cars and parking as public transport will not meet all transport needs. Therefore, the approval process for residential and commercial developments in the Carrington Precinct must include requirements for developers to build and provide adequate off-street parking in or next to residential and commercial buildings. The fine-grain plan recognises that Carrington Road is on a flood zone, and below ground parking will be difficult or not possible, therefore other planning solutions will be required.

In addition, existing residential streets west of Carrington Road will be affected by the increased demand for street parking due to increased residential density on Carrington Road. Parking is already difficult on streets such as Ruby, Warren, Renwick and Cary, due to pressure from people working in the current Carrington Precinct industrial/commercial businesses. A scheme of restricted parking will be required to ensure that residents of single dwellings are able to park near their place of residence.

Recommendation 7: Residential developments for the Carrington Precinct and west Carrington Road to be required to provide off-street parking for one vehicle for each one-bedroom dwelling, and two vehicles for each two-bedroom dwelling.

Recommendation 8: Commercial developments in the Carrington Precinct and west Carrington Road to be required to provide off street parking for one vehicle for each projected employee, plus customer parking.

Recommendation 9: Implement a plan of two-hour or time-limited parking, with local residents excepted, for streets west of Carrington Road, including from Premier Street to Myrtle Streets.

Recommendation 10: Make Warren Road one way to enable parking on both sides of the street during the day.

4. TRAFFIC

Similar to parking, residential development and greatly increased resident numbers west of Carrington Road and in the Carrington Precinct, will generate a major increase in traffic using Carrington Road and all the streets running off Carrington in both directions. Traffic is already busy on Carrington Road and streets such as Warren and Renwick, and it is difficult to turn onto Carrington Road from these streets during peak times.

Carrington Road is a much used bypass for traffic travelling from areas such as Newtown and the city to the Princes Highway. This leads to traffic congestion particularly in peak periods. We are concerned that other new housing developments in the area, such as the Marrickville Hospital and Victoria Road sites, will exacerbate this problem. We are

IMAGE (top): Traffic banked up leaving Carrington Rd at 5.35pm weekdays.

IMAGE (bottom): Traffic congestion leaving Cary St at 3.30pm on school days.



also concerned that drivers will use the nearby residential streets to 'rat-run' to avoid the congestion which will negatively affect pedestrian safety.

Minimising development density will help to restrict the traffic increase, however there will still need to be a thorough traffic management audit completed prior to considering housing densities. This will require an additional through road parallel to and east of Carrington Road, and measures to enable traffic to flow onto Carrington Road from connecting residential streets, eg roundabouts.

Recommendation 11: Develop a plan for traffic infrastructure and management, based on population projections, with planned housing density not to exceed capacity of planned roads and traffic systems.

Recommendation 12: Require inclusion of a new through road parallel to Carrington Road, bordering the railway line on the eastern edge of the Carrington precinct and connecting Myrtle Street with Richardsons Crescent.

Recommendation 13: Install traffic lights or roundabouts on streets connecting with Carrington Road, including Warren and Renwick, to enable traffic to enter Carrington Road from these streets.

5. OPEN SPACE

The proposed increase in residential density in the south Marrickville area will require a proportional increase in open space (15% for the density that is being suggested). The Marrickville Precinct has an identified open space deficit, particularly in the Carrington Road area. The Bankstown to Sydenham Corridor Strategy: Open Space and Recreation Strategy Draft 25.05.2015, calls for a new large open space area in the Carrington Road Precinct, however this does not appear in the later planning documents.



IMAGE (top): Mackey Park is used year round for recreational purposes. It is also the home to the Marrickville Devils for soccer during autumn/winter and Marrickville Cricket Club in the summer.

IMAGE (bottom): The narrow cement drain/canal is not an acceptable alternative to public open space. It is low-lying, narrow and represents a drowning hazard which is why it is fenced off.

We note with concern the proposal to allow public access to school grounds out of school hours as a way of addressing the open space issues.

Current local open space includes Mackey Park, which is heavily utilised by sporting groups such as the Marrickville Soccer Football Club and the local cricket club. This area needs to be retained as local playing fields, with an additional playing field added. Current access to the fields from the proposed Carrington Road Precinct is poor and we would like to see raised pedestrian crossings included in the proposals.

The proposed building heights in the Carrington Precinct (25 storeys) and along west Carrington Road, will lead to significant

overshadowing of Mackey Park and increase the rate at which the fields are closed due to being overly wet and soggy.

Recommendation 14: Create usable open space within the Carrington Precinct as envisaged in the original plans, including a large open space north of Richardsons Cres to avoid overshadowing of Mackey Park.

Recommendation 15: Retain Mackey Park as grassed playing fields and provide a raised pedestrian and cycle way from the Carrington Road area to allow safe access to the open space.

6. WALKWAYS AND CYCLEWAYS

We support the inclusion of new walkways and a cycleway in the proposed redevelopment in the Carrington Road area. However, retaining the existing cycleway along Carrington Road is a concern given the likely increase in traffic levels. We recommend moving the cycleway to the other side of the Carrington Precinct development and providing a raised pedestrian and cycleway to provide access to the Cooks River cycleways.

The draft proposal includes a walkway along the existing storm water drain to the west of Carrington Road. This is currently partly open and partly closed with dwellings above. We support creation of this planned walkway, but are concerned that developing this narrow drain area will be counted as creation of functional open space.

Recommendation 16: Create a walkway along the line of the drain west of Carrington Road as envisaged in the original plans.

Recommendation 17: Develop a new cycleway to the east of the Carrington Precinct close to the railway line boundary from Myrtle Street through to Richardsons Crescent and Mackey Park with a raised pedestrian and cycleway to allow safe access to the Cooks River cycleways.

IMAGE (below): Ferncourt Primary School is at capacity and its catchment boundaries have already been reduced in recent years.



2012 - Flooding at the bottom of Renwick Street



2015 - Flooding in South Renwick Street

7. SCHOOLS

The social infrastructure assessment of the Marrickville area indicates that new day care, outside of school hours care, primary schools, and secondary schools are required with an additional 975 and 805 primary and secondary school placements respectively. The schools within South Marrickville are Ferncourt Public Primary School and Tempe High School. Both schools are currently at capacity. There are no plans in the proposed draft development plan for new schools. The plan suggests that upgrades to the existing secondary schools should accommodate the additional placements required.

Recommendation 18: Allocate land and building space for at least one new primary school, long day care and outside of school hours care facilities, in the plan for the Carrington precinct.

8. COMMUNITY SPACES AND VENUES

There are no community centres or public halls within the proposed development area. Planning documents identify the need for more community halls and centres and we recommend their inclusion in the final plan.

Recommendation 19: Incorporate a new local or district community centre and upgrades to the existing youth centre into the development plan.

9. ENVIRONMENTAL IMPACT

The Carrington Road area has been recognised as flood prone with the entire development area within the 1 in 100 year flood zone. We are concerned that detailed environmental studies will be undertaken only at planning proposal and development application stages. The flood prone nature of the site will restrict parking options and this needs to be considered in the early development stages.

Only limited environmental studies have been completed and we are concerned that more extensive studies will reveal contaminated land related to the long-term industrial usage of the Carrington Road area. A more thorough historical environmental study needs to be undertaken to better understand the industrial history of the area.

Recommendation 20: Undertake flood management planning prior to the development of a final proposal.

Recommendation 21: Undertake a contaminated land assessment of the industrial area of the proposed Carrington Precinct and west Carrington Road.



IMAGE: Carrington Rd is a thriving area of businesses - from auto repairs and food production to studio hire and fashion design.

10. EMPLOYMENT

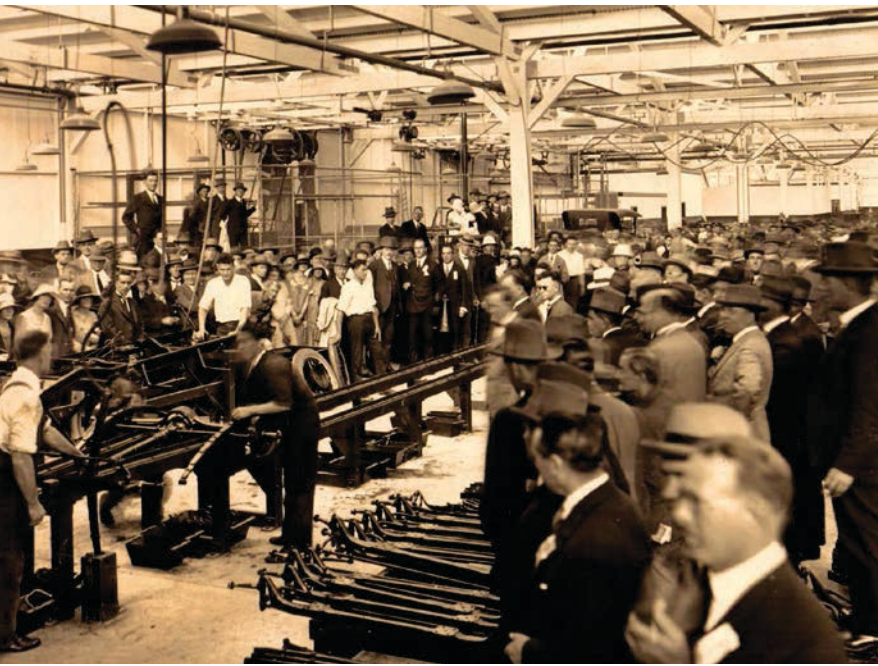
The Carrington Road area is currently used by over 200 businesses that span the creative industries, manufacturing, warehousing and publishing, and range from production of oils and soaps, gourmet food, film props, car repair, a large taxi base, and community services such as the Choice consumer body. The businesses located in these premises produce goods and services that are needed in the Inner West and Sydney as a whole, and according to a recent UOW/ QUT/UTS/Monash University study ([http://](http://www.urbanculturalpolicy.com/wp-content/uploads/2017/08/Made_in_Marrickville_DP170104255-201702.pdf)

www.urbanculturalpolicy.com/wp-content/uploads/2017/08/Made_in_Marrickville_DP170104255-201702.pdf), provide employment to an estimated 1800 people. As that study reports, the affected businesses have little knowledge of the details of renewal plans, and have not been directly consulted by Planning NSW about potential impacts. That study details that most of Carrington Road's businesses employ local people. In a city aiming to promote the '30 minute' principle of living and working within reasonable proximity, the Carrington Road precinct is a vital inner-city employment hub. It is a location close to residential areas and transport options, so that people do not have to commute long distances.

Also, the UOW/QUT/UTS/Monash University study outlines, from interviews with affected businesses, that relocation to city fringe sites is not feasible. For reasons of proximity to the CBD, affordability, availability of suitable buildings, and connections to the Inner West's unique social and cultural character, these businesses are tied to the location. Renewal plans currently make no provision for the space needs of these 200+ businesses and 1800 workers. Retaining the ground floor of buildings in the Carrington Precinct for light industrial and commercial use will not sufficiently house all the affected enterprises, and may not accommodate their space needs adequately in terms of roof height, rigging, truck access, noise provisions and internal flexibility of workshops.

Retaining an equal amount of space zoned IN1 and IN2 will be necessary to retain these local jobs and unique mix of creative industries and manufacturing enterprises.

As the Carrington Precinct is in a flood zone, it is not possible for the ground levels to be residential premises. The revised Marrickville Plan stipulates that the ground floor of buildings in the Carrington Precinct should be retained for commercial use. Our view is that this aspect of the Marrickville Plan is not sufficient to protect local businesses and jobs. Building apartment blocks with cafes



IMAGES: The opening of the General Motors manufacturing plant on 30 October 1926. Marrickville has a long history of local employment which continues today.

and retail on ground floor is not the same as providing functional industrial space. Nor will a standalone 'maker space' be sufficient. Should any redevelopment of existing buildings displace existing enterprises, there will need to be equal new IN1 or IN2 space provided as well as a plan to relocate and transition existing businesses to the newly built industrial premises in the precinct, as the area is redeveloped.

Recommendation 22: Retain existing heritage industrial buildings and IN1 and IN2 zoning to protect and foster Carrington Road as a vital enterprise hub for Sydney.

Recommendation 23: Develop a plan to transition and relocate any existing businesses in the Carrington Precinct displaced by redevelopment, to new IN1 and IN2-zoned buildings with equal or better technical provisions to meet their space needs, in the precinct, as development takes place.

11. COMMUNITY INVOLVEMENT IN PLANNING

We understand that when the Minister for Planning approves the final Marrickville Plan, Inner West Council will still be involved in approving development proposals, but will be required to have its local plans adjusted to align with the Marrickville Plan.

We also understand that the Carrington Precinct is being planned under a separate process involving Inner West Council.

The existing residents of the Warren area and close to Carrington Road have a significant investment and interest in the quality of future planning and development of the Carrington Precinct and the area west of Carrington Road. These residents must be consulted and closely involved with all stages and aspects of planning and development on Carrington Road, to achieve the best possible outcome for existing residents and the future built environment and public amenity of this area.

Recommendation 24: All existing residents, resident organisations, and enterprises in the Warren Area and Marrickville be consulted and engaged by Planning NSW and Inner West Council in all stages and aspects of the planning and development of Carrington Road and the Carrington Precinct.

Supporters

Save Marrickville South collected 339 signatories in support of its submission.

NAME	SUBURB		
1. Lucy Abbott	Marrickville	35. Sharon Broady	Marrickville
2. Jonathan Adams	Marrickville	36. Angela Brown	Marrickville
3. Harry Afentoglou	Marrickville	37. J. Brown	Dulwich Hill
4. Gina Agius	Marrickville	38. Nerida Brown	Dulwich Hill
5. Tomomi Akamine	Marrickville	39. Cally Bruer	Marrickville
6. Suzanna Allan	Marrickville	40. Elizabeth Bryan	Marrickville
7. John Anderson	Marrickville	41. Bianca Budd	Marrickville
8. Sally Anderson	Marrickville	42. Paul Burns	Dulwich Hill
9. Jasmine Andrews	Marrickville	43. Greg Buxton	Marrickville
10. Diana Angelius	Marrickville	44. M. Byrne	Marrickville
11. Sharon Aris	Marrickville	45. Richard Byrnes	Marrickville
12. Charles Aroney	Marrickville	46. Megan Cameron	Marrickville
13. Marina Aroney	Marrickville	47. Vesna Camuglia	Marrickville
14. Stella Aroney	Marrickville	48. Aaron Catley	Marrickville
15. Sandra Bailey	Marrickville	49. Robert Cavrak	Marrickville
16. Doug Bailey	Marrickville	50. Belle Charter	Marrickville
17. Peter Baker	Marrickville	51. C. Christie	Dulwich Hill
18. Jane Bardell	Marrickville	52. Andrew Clarke	Marrickville
19. Olive Barry	Marrickville	53. Peter Clarke	Marrickville
20. Alex Barthel	Marrickville	54. Lora Cobanov	Marrickville
21. Vera Batalha	Marrickville	55. Diane Collins	Marrickville
22. Brenda Batlett	Marrickville	56. Helen Conidaris	Marrickville
23. Marcel Batten	Marrickville	57. Elizabeth Connolly	Marrickville
24. Robert Beadle	Marrickville	58. Raeann Connors	Marrickville
25. Yvette Beaumont	Marrickville	59. Melissa Coote	Marrickville
26. Paul Berwick	Dulwich Hill	60. Gerard Corboz	Marrickville
27. Kerrie Bisaro	Marrickville	61. Chantal Cordey	Marrickville
28. Throsti Bjork	Marrickville	62. Jonathan Cortledge	Marrickville
29. Hetty Blythe	Marrickville	63. Alexandra Crosby	Marrickville
30. Dan Bowers	Earlwood	64. Dean Crowe	Marrickville
31. Sally Bowers	Tempe	65. Josephine D'Agostino	Marrickville
32. Rebecca Bowman	Marrickville	66. Tony D'Agostino	Marrickville
33. Fiona Boyan	Marrickville	67. Kelsie Dadd	Marrickville
34. Nicky Breen	Marrickville	68. Rufus Dadd	Marrickville
		69. Pearl Dadd-Daigle	Marrickville

Supporters continued

70. Heather Davidson	Marrickville	108.Ghal Ghaleb	Marrickville
71. Heather Davie	Marrickville	109.Devleena Ghosh	Marrickville=
72. Alex Davies	Marrickville	110.Jade Gibson	Marrickville
73. Luka Davies	Marrickville	111.M. Gilbert	Marrickville
74. Manuel De Freitas	Marrickville	112.Chrisanthi Giotis	Dulwich Hill
75. Maria De Freitas	Marrickville	113.Geoff Goddard	Marrickville
76. Ross Dean	Marrickville	114.Kim Good	Marrickville
77. Beth Deguara	Marrickville	115.M. Goundry	Dulwich Hill
78. Judy Deguara	Marrickville	116.Pete Grube	Marrickville
79. Tony Deguara	Marrickville	117.Deirdre Hahn	Marrickville
80. Veronique Delaunay	Marrickville	118.Amanda Hale	Tempe
81. Kelly Dent	Marrickville	119.Brad Hall	Marrickville
82. Bailan Devereaux	Marrickville	120.Milvia Harder	Marrickville
83. Christopher Devereaux	Marrickville	121.Glenn Harrison	Marrickville
84. Luke Dinham	Marrickville	122.Robynne Hayward	Sydenham
85. Melissa Dominguez	Marrickville	123.Jen Healey	Marrickville
86. Christiane Donnelly	Marrickville	124.Peter Healey	Marrickville
87. Nicholas Donnelly	Marrickville	125.Carlie Henderson	Marrickville
88. Bronwyn Dowdell	Dulwich Hill	126.P. Herring	Marrickville
89. Jonathan Dowling	Marrickville	127.Stuart Hickson	Dulwich Hill
90. Maree Doyle	Marrickville	128.Kim Hillard	Lewisham
91. Gabriel Durie	Marrickville	129.Laura Hillard	Lewisham
92. Paul Dyson	Marrickville	130.Jane Hogan	Marrickville
93. L. Edgecombe	Sydenham	131.Duong Hong	Marrickville
94. Eberto Escandon	Marrickville	132.Pham Hong	Marrickville
95. Ruby Everett	Marrickville	133.Ian Hoskins	Marrickville
96. Alan Everett	Marrickville	134.Mat Howard	Marrickville
97. Lynn Ferris	Marrickville	135.Phil Howard	Marrickville
98. Gillian Ferru	Marrickville	136.William Howatson	Marrickville
99. Gareth Figg	Dulwich Hill	137.Sam Hughes	Marrickville
100.Heather Flyght	Marrickville	138.Lorne Hyde	Marrickville
101.Lisa Fowkes	Marrickville	139.Olivia Hyde	Marrickville
102.Natasha Fowkes	Marrickville	140.Andrew Inman	Marrickville
103.Emilla Frederick	Marrickville	141.Janet Irving	Marrickville
104.Michael Frost	Marrickville	142.Jon Jacka	Marrickville
105.Joseph Furolo	Marrickville	143.Nicola Jackson	Marrickville
106.Lynne George	Marrickville	144.Deborah Jago	Marrickville
107.Janine Germagian	Marrickville	145.Karen Jaldrich	Marrickville

Supporters continued

146.Laline Jayamanne	Marrickville	184.Caroline Mackie	Marrickville
147.Anthony Johnsen	Marrickville	185.Andrew Maher	Marrickville
148.Matt Johnson	Marrickville	186.B. Malligan	Dulwich Hill
149.Rob Johnson	Marrickville	187.Helen Mamis	Marrickville
150.Petra Jones	Marrickville	188.John Mamis	Marrickville
151.Yvonne Jones	Marrickville	189.Margaret Manson	Marrickville
152.Christine Karais	Dulwich Hill	190.Maria Manson	Marrickville
153.Kerri Kennedy	Marrickville	191.Su Mariani	Marrickville
154.Laurence Kenny	Marrickville	192.Orna Marks	Marrickville
155.Sonia Keogh	Marrickville	193.Damien Martin	Dulwich Hill
156.Anna Keohan	Marrickville	194.Richard Martin	Marrickville
157.Joanne Kershaw	Marrickville	195.Susan Martinez	Marrickville
158.Joanna Kipreos	Marrickville	196.Anita Marton	Marrickville
159.Frida Kollberg	Marrickville	197.John Mason	Marrickville
160.Michol Kos	Marrickville	198.Melissa Mason	Marrickville
161.George Kritikakis	Marrickville	199.Chris Maybury	Marrickville
162.Sophie Kuchar	Marrickville	200.Anne McCarthy	Marrickville
163.Peter Lalor	Marrickville	201.Sally McCausland	Marrickville
164.Sue Lalor	Marrickville	202.Anne McDougall	Marrickville
165.Michael Lansdowne	Marrickville	203.Nick McIntosh	Marrickville
166.Stephen Lansdowne	Marrickville	204.Hannah McPherson	Marrickville
167.John Larson	Marrickville	205.Francisco Milho	Dulwich Hill
168.Artur Lasota	Marrickville	206.Maria Milho	Dulwich Hill
169.Keren Lavelle	Marrickville	207.Geoff Miller	Dulwich Hill
170.Miria Lawlor	Marrickville	208.Jim Miller	Dulwich Hill
171.Mary Lawson	Marrickville	209.Emma Miszalski	Marrickville
172.Rob Lawson	Marrickville	210.Bill Monday	Marrickville
173.Stephanie Lawson	Dulwich Hill	211.Jim Morris	Hurlstone Park
174.Paul Leabeater	Marrickville	212.James Morrison	Marrickville
175.Melinda Leves-Isted	Marrickville	213.Melanie Morrison	Marrickville
176.Esther Levy	Marrickville	214.Paul Mortimer	Marrickville
177.Phil Limberg	Marrickville	215.Tom Morton	Marrickville
178.Joan Ilewellyn	Marrickville	216.Julie Moss	Marrickville
179.Michael Isted	Marrickville	217.Daniel Mulhern	Marrickville
180.Liz Locksley	Dulwich Hill	218.Michelle Murch	Marrickville
181.Dennis Long	Marrickville	219.Allan Murray	Marrickville
182.Rachel Loughry	Marrickville	220.Enda Murray	Marrickville
183.Julie Mackenzie	Marrickville	221.Amber Naismith	Marrickville

Supporters continued

222.Richard Nash	Marrickville	260.Olivia Rousset	Marrickville
223.Jenni Noble	Marrickville	261.Rosemary Rumbel	Marrickville
224.Susan Nowell	Dulwich Hill	262.Christopher Rutnam	Marrickville
225.Katie Nygh	Marrickville	263.Vanessa Samuels	Marrickville
226.Corinne O'Laughlin	Marrickville	264.Wei Shan	Marrickville
227.Voren O'Brien	Marrickville	265.Alie Shave	Marrickville
228.Claire O'Conor	Marrickville	266.Luke Shave	Marrickville
229.Lisa O'Hara	Marrickville	267.Julia Shingleton	Marrickville
230.Juliet Olive	Marrickville	268.Liz Shreeve	Marrickville
231.Sue Olive	Marrickville	269.Michelle Simon	Marrickville
232.George Organ	Marrickville	270.Carolyn Smith	Marrickville
233.Christine Osmond	Marrickville	271.Michael Smith	Marrickville
234.Sharun Parker	Marrickville	272.Karen Soo	Marrickville
235.Sofocles Paschal	Dulwich Hill	273.Marcelo Soto	Marrickville
236.Maureen Pasfield	Campsie	274.Matthew Stanton	Marrickville
237.Megan Paterson	Marrickville	275.Steve Stergiou	Marrickville
238.Fiona Pearce-Burrows	Marrickville	276.Ben Sterrey	Marrickville
239.Joanna Peppas	Marrickville	277.Laura Stevens	Marrickville
240.Anton Perkins	Marrickville	278.Briony Stevenson	Marrickville
241.Kellee Pestero	Marrickville	279.Timothy Stokes	Marrickville
242.Michele Pezzutti	Marrickville	280.Greg Strachan	Marrickville
243.Thang Pham	Marrickville	281.Oscar Syarif	Marrickville
244.Michele Pizzutti	Marrickville	282.Colin Symes	Marrickville
245.Liz Potten	Marrickville	283.Sally Taggart	Marrickville
246.Jonathon Prosser	Marrickville	284.Alicia Talbot	Marrickville
247.Victoria Pye	Marrickville	285.M. Talty	Dulwich Hill
248.Jacqui Pyke	Marrickville	286.Stephen Tate	Marrickville
249.Glenn Redmayne	Tempe	287.Beth Taylor	Marrickville
250.Steven Reibano	Marrickville	288.Donna Taylor	Marrickville
251.Mark Richards	Hurlstone Park	289.Suzie Taylor	Dulwich Hill
252.Adrienne Richardson	Dulwich Hill	290.Bruce Thomas	Marrickville
253.Bim Ricketson	Marrickville	291.Don Thompson	Marrickville
254.Zeini Rockliff	Marrickville	292.Steph Thompson	Marrickville
255.Janet Rockliffe	Marrickville	293.Sam Thomson	Marrickville
256.James Roden	Marrickville	294.Tanya Tierny	Marrickville
257.Charlie Rodgers	Marrickville	295.Diana Tilley-Winyard	Marrickville
258.David Rollinson	Dulwich Hill	296.Will Tillman	Marrickville
259.Kirsty Rose	Marrickville	297.Sue Topham	Marrickville

Supporters continued

298.John Torsey	Marrickville	324.Don Wright	Marrickville
299.Peter Tozer	Marrickville	325.Lindsay Wright-Murray	Marrickville
300.Joe Tripolone	Marrickville	326.Mei Ling Yap	Marrickville
301.Chris Trudgett	Marrickville	327.Binh Yarn	Marrickville
302.Giap Tun	Marrickville	328.Jacqueline Yelzotis	Marrickville
303.Par Tun	Marrickville	329.Nick Yelzotis	Marrickville
304.Charlotte Van Veenemoaal	Marrickville	330.Ian Yensch	Marrickville
305.Helen Veros	Marrickville	331.Tammy Younan	Marrickville
306.Susanne Voysey	Marrickville	332.Went Zhang	Marrickville
307.Christian Wahl	Marrickville	333.Alicja	Marrickville
308.David Watkins	Marrickville	334.Ally	Marrickville
309.M. Watson	Marrickville	335.Charlene	Marrickville
310.G. Webb	Marrickville	336.Isobel	Tempe
311.S.J. Webb	Marrickville	337.Jane	Marrickville
312.Calvin Welch	Marrickville	338.Nicky	Marrickville
313.Shane Welsh	Marrickville	339.Phinn	Marrickville
314.Zena Welsh	Marrickville		
315.P. Wilkins	Dulwich Hill		
316.John Williams	Marrickville		
317.Meredith Williams	Marrickville		
318.T. Williams	Marrickville		
319.John Willis	Marrickville		
320.Gail Wilx	Marrickville		
321.Alison Windmill	Marrickville		
322.Alison Wright	Marrickville		
323.Carol Wright	Marrickville		

Local Voices

Comments compiled from written submissions to Save Marrickville South:

"Heritage Not High Rise!"

"This plan completely disregards Marrickville's character and heritage. Marrickville may not have harbour views and look pretty but it is incredibly rich in history and diversity. If the state government's plans go ahead Marrickville will be ruined forever and Sydney will be poorer for it."

"Development needs to take into account the local environment and community. These plans are going to strip Marrickville of what it is and make us just another Burwood or Hurstville. The proposal around the station and Carrington Street is going to ruin this suburb as these streets are already overcrowded with cars. I am all for low rise single or double dwellings that maintain the community feel and provide housing solutions. This plan is unacceptable."

"It is so important that existing residents help to shape what could be an exciting development. No developer greed in South Marrickville."

"While I believe that development is inevitable I think the scale at which they are planning to add residents to Marrickville without the corresponding green space and schooling is unacceptable."

"We need affordable housing, transport plans, green space and public amenity."

"Absolutely devastated with this news of high rises right out the front of our house. This is over development on steroids and must not go ahead. It will destroy Marrickville not improve it, it will become another Wolli Creek and Mascot lookalike. Disgusted with the government."

"I have numerous issues with the government's plan, which is a sham - there is no planning here."

"Affordable workspaces are at stake, dense residential development is ill-placed on a noisy freight line and the proposal flies in the face of the government's stated objective of putting development next to the train stations - that is, if the density is being delivered on the back of a new metro line, why is so much of the new development proposed so far away from the stations?"

"Why replace a perfectly good railway line with a not so good railway line? You don't know what you've got until it's gone."

Local Voices continued

"Save our streets, help our heritage!"

"Not all development is bad, and urban density needs to increase, but this is a bad plan, because there is no infrastructure and no sensitivity to the existing community."

"I love Marrickville, have lived here such a long time but am really worried about the proposed development. It is ill thought out and will ruin the area."

"Marrickville is a special place."

"Too many people without proper transport or education arrangements."

"The redevelopment proposal for 'Victoria Rd Precinct' (also in the hands of the Dept of Planning) needs to be considered alongside this proposal as I am not opposed to development. I am, however, opposed to development that does not incorporate design excellence that acknowledges the pre-existing culture and character. I am also against building heights that do not harmonise with pre-existing streetscapes and topography. There is also a history of developers not allowing for apartments large enough to accommodate the families that will be moved in. There need to be apartments with 4+ bedrooms. Failure to do so will impact negatively on the demographic and result in less diversity."

"In Ruby St, we're all really worried about the 'low rise' planned for the north side of our little community street. We already don't see the sun between 8am and 9am. So we fear that 5 storey apartments will take our sun and privacy away. Parking is already too tight in our street. And I want my little girls to go to school."

"This whole development is a rush job by the state government with no forethought or proper planning and should be properly thought through with more community involvement from residents and from the 100s of tenants and businesses in the precinct that will be affected. This should happen before the land is rezoned."

"We need to save our suburb from property developers and the privatisation of our public transport. Marrickville needs to retain its character and charm and high rise is not suitable. Marrickville is an historic village suburb and it's obvious the city planners know nothing of this area nor do they care. We do not want this sort of development here. Most of us live in historic homes and want to retain these homes and the village-like shopping areas as well."

Local Voices continued

"Development and progress are two much-abused terms which need to be redefined around principles of quality of life for local communities, environmental responsibility and an appreciation for the uniqueness of place."

"The state government are little more than shells for old style property developers - knock it down, build something that will make a great deal of quick money and get out as fast as possible - this must stop!"

"There are minimal plans for low income housing so this type of development will not help with housing affordability in the inner west or Sydney as a whole. In fact it will take away older housing stock which presently provides lower cost rentals for older and younger people."

"No more high rise or private trains."

"These proposed changes will bring too many people into a space not able to accommodate them. Issues around traffic, safety and public amenities will be problematic. Happy to bring people into this corridor - just not over 6000."

"I have lived in Marrickville for 35 years and I am very distressed that more people and traffic are taking over Marrickville and causing more and more busyness."

"Let's stop these tyrants. It is just crazy. Marrickville is dense already."

"I no longer live in Marrickville, but in neighbouring Earlwood. I am regularly in Marrickville South and use the amenities there. Such overdevelopment adversely impacts not just those living in Marrickville South but also those in surrounding areas."

"We need to be providing livability and sustainability when planning increased housing development rather than pandering to developers and lining pockets. The inner west is already a crowded area with minimal green space and local services (schools, medical and infrastructure) already strained. Infrastructure already doesn't cope so 20,000 people will not help the issue."

"As a tenant of the unique Carrington light industrial precinct I'm really saddened by the proposed residential development. This is one of the very few remaining areas in Sydney where eclectic and largely creative small business has survived and flourished organically due to positive relationships and an understanding between tenants and the landlord. What's more there is great heritage and history along this strip."

Local Voices continued

"An imposed and highly compromised light industrial and residential 'marriage' on South Carrington Rd will be small comfort to the large range of small businesses and sole operators that will be shoved out onto the street and made to compete for over-priced and gentrified industrial spaces with the obvious operational restrictions that apply to working in residential areas. Prices for the services currently offered will sky rocket or the businesses will go under. Please don't sacrifice what makes a place great to more developer interest and \$\$\$, why would any council choose a well-established, hard-won and unique industrial space to build more flats?"

"I would think very hard before encouraging residents to invest in or live above South Carrington Rd as swirling flood waters (I've seen industrial skips do laps of the car park in knee deep water), road closures, parking and pedestrian access difficulties will be a regular issue for them."

"The Carrington Road area floods from the Cooks river often (not 1 in 100 years! Try 3 to 5 times in the last 7 years)."

"I'm sick of this out of control 'development'. There is no sense of planning, it is just a free-for-all for 'developers'."

"I'm anti high-rises being built in Marrickville."

"These plans are so bad on so many levels. Too large, too high and too many and will change the unique character of Marrickville forever. Loss of jobs, no extra open space, no extra funding for the amenities and infrastructure needed for the extra people... then you have the over-shadowing of local residents, affecting their solar panels and looking into their yards. The increased traffic has not even been studied and the bike paths suggested on roads such as Illawarra, Unwins Bridge and Warren Rd are unsafe at best and not at all practical. These roads are too narrow and too busy to provide safe bike routes."

"There are no specific controls set with the developments, just a wide set of guidelines which will allow developers to do deals with council and the state to increase density even further for trade-offs. This is completely unacceptable. Specific building guidelines need to be in place so that this is not a developer driven forest of cheaply built high rise that will not enhance Marrickville and become the slums of tomorrow."

Save Marrickville South Community Group Members

SPOKESPERSON

Paul Mortimer	133 Warren Rd Marrickville	paul.mortimer@iinet.net.au
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Kelsie Dadd	Marrickville	Claire O'Connor	Marrickville
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Artur Lasota	Marrickville	Ian Hoskins	Marrickville
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Alexandra Crosby	Marrickville	Kim Good	Marrickville
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Carolyn Smith	Marrickville	Anthony Johnsen	Marrickville
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Alison Wright	Marrickville	Melinda Leves-Isted	Marrickville
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Amber Naismith	Marrickville
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Artist's impression of the
Marrickville Plan created by
a 7 year old student from
Ferncourt Public School

ATTACHMENT 6 - SUBMISSION FROM SYDENHAM TO BANKSTOWN ALLIANCE

From: Karen [<mailto:fivecampbells@optusnet.com.au>]
Sent: Thursday, 20 July 2017 12:43 PM
To: Inner West Council
Subject: (DWS Doc No 4444755) Outcomes- Sydenham to Bankstown Community Forum

Dear Mr Pearson,

I am writing to share with you the outcomes from the Community Forum hosted by the Sydenham to Bankstown Alliance, to which you were invited, on Sunday July 9 in Marrickville.

We would also appreciate the opportunity to meet with you to discuss the concerns of residents regarding the proposed Sydenham to Bankstown Metro and the associated re-zonings along this line.

The forum was very well attended with over 250 people present. The overwhelming sentiment of the meeting was against the proposed Metro project from Sydenham to Bankstown.

The forum unanimously passed the following motion.

This meeting :

- opposes the privatisation and conversion of the Bankstown line between Sydenham and Bankstown
- states that the Government's plan to replace the Bankstown line heavy rail service is a waste of tax payers' money
- calls on the Government to extend the Metro on the southern side of the harbour to areas of Sydney that do not currently have a rail service
- opposes the proposed over-development of suburbs along the Sydenham to Bankstown rail corridor and the pressure this over-development will put on these suburbs
- opposes the irreparable heritage destruction that the over-development of the suburbs along the Sydenham to Bankstown rail corridor will cause
- demands that no rezoning occurs that exceeds the service capacity of an improved heavy rail line.

Another major concern of the meeting was the signing of construction contracts for the Sydenham to Bankstown line. Strong opinion was voiced that the signing of these contracts should not occur until after the scheduled NSW State Election in 2019.

Clearly, many in the Sydenham to Bankstown community are not happy with the Metro Project. Recently,

the Administrators of both the Inner West and Canterbury-Bankstown councils expressed considerable concern regarding the pressures of over-development along the corridor. More pointedly many community members see the proposed replacement of the existing heavy rail line with a Metro line as a missed opportunity to expand the rail network and a waste of taxpayers' money. If it were to proceed it would be a failure of responsible transport policy.

The Sydenham to Bankstown Alliance will keep campaigning against this project and we hope that you will join us in this.

Yours sincerely,

Karen Campbell

Secretary

Sydenham to Bankstown Alliance

9569 7275 / 0431 774 855

This email has been scanned by Symantec Email Security cloud service on behalf of Inner West Council.

ATTACHMENT 7 - SUBMISSION FROM MARRICKVILLE RESIDENTS ACTION GROUP

Marrickville Residents Action Group



Sydenham to Bankstown Urban Renewal Submission 2017

31/8/2017

Executive Summary

Marrickville is a historic suburb with a long industrial history, which has welcomed many waves of immigration and today has a rich ethnically diverse community, providing a home for families of all shapes and sizes, with residents of all age groups and financial means.

From the 1880's when a tramway and railway line were built there was widespread suburban development with an increase in working class housing, a proliferation of large villas and middle class residences and a corresponding development of community facilities

The built environment has changed over the years, however many of these original buildings remain within low density residential areas. With an Urban Renewal target of 6,000 homes within 800 metres of Marrickville Station it is of great concern that hundreds of beautiful and humble old historic/period houses will be bulldozed and replaced with ugly cement medium/high rise developments.

Creating a conservation area for Silver St and Gladstone St is a positive change in the revised strategy, however it is of great concern that many other streets have not been given the same protection. Stonewalls, Carrington Rd palm trees and the Sydney Water Pump House are listed as worth saving however many beautiful historic stone houses, rows of Federation workers cottages and large villas scattered throughout the streets in the Marrickville precinct are not.

The revised strategy has reduced the area to be "renewed" and some of the heights of new buildings, however the character and heritage of the suburb of Marrickville will be lost forever if the proposal is not revised with the historical, and social values considered.

The proposal is excessive, disrespectful to heritage and character of inner city communities, poorly planned and lacks funding and vision.

Our submission notes a range of other very significant concerns about the revised strategy regarding, destruction of existing Sydenham to Bankstown Public transport railway line, developer initiated zonings and lack of a master plan, lack of planning for infrastructure, (schools, hospitals, utilities) and provision of open space, loss of and provision of affordable housing, loss of employment lands to residential development, existing and future problems with roads and traffic, timing of development in relation to Metro proposal and amalgamation of Councils with residents currently have no elected council and no provision for impact of Climate Change.

The proposal requires major changes to ensure that increase in population density is measured and done well through extensive community consultation and integrated planning to preserve heritage and character of suburbs along the line, that high density buildings are well designed architecturally and sympathetic to environment in order to maintain liveable, sustainable city environments and to preserve diversity within healthy and connected communities.

Key Concerns and recommendations of our submission

Destruction of the existing Sydenham to Bankstown public transport line and replacement with privatised Metro line

Many residents are concerned that we have a perfectly good railway line and it should not be converted to an expensive Metro. This squanders the opportunity to extend Sydney's transport network. Public transport is in already in short supply (before predicted population growth) in many Sydney suburbs and the money would be much better spent extending the Metro to e.g. Badgery's Creek Airport line where public transport is desperately needed. A metro should be built where there is currently no public transport. Increased capacity on the Bankstown line could easily be improved with higher frequency double decker trains instead of an expensive Metro. This could be achieved through upgrading the signalling

system, improving stationary time at the platform and re-employing train maintenance staff so that trains do not break down and cause disruption of the whole network.

Without the Metro, 4,000 homes would not need to be demolished and overdevelopment along the corridor would not be necessary.

Developer initiated zonings and lack of a master plan

When reading the 2017 revised strategy it is clear that the government has been working closely with individual developers to craft planning controls for individual developments which are now likely to be brought forward.

Senior officials from the Department of planning and Environment have verbally indicated that they will now be allowing developers to use the draft strategy to bring forward spot rezoning proposals. This is a concerning change from 2015/16 when the government refused developers to use the draft strategy as a basis to over-rule council planning instruments, in respect to the community consultation process.

This new approach means that the whole corridor is now open to ad-hoc, unco-ordinated planning proposals and makes a mockery of the community consultation process and carefully researched Local Environment Plans.

Drawing 400metre and 800 metre concentric circles around stations, then colouring in streets for heights of up to 25 storeys regardless of existing streetscape, heritage, topography, current lack of infrastructure and open spaces, traffic congestion and services does not appear to be a good strategy to address needs for housing and future quality of life.

Planning for healthy communities with a demographic mix of all ages, for families and singles should require a mix of dwelling types, including houses, terraces and apartments of varying sizes to accommodate singles and families. Of great concern is the trend for developers to favour smaller units and boarding houses for singles.

Rather than, rushing developments in close proximity to the Railway stations a staged implementation should be considered. The highest priority should be to start with industrial lands on Carrington Rd and the Sydenham Precinct in the Enterprise area then areas close to the station

(still should be not be overdeveloped and developed sensitively), followed by main street developments, and lastly the lower priority areas of streets more removed from these locations.

Good planning outcomes of this scale cannot possibly be achieved if development is allowed to proceed in an ad-hoc manner without genuine community consultation or without binding obligations for delivery against certain agreed liability targets and precise build outcomes, determined through precinct wide master planning. This needs to occur before Local Environment Plan amendments could be considered.

Overdevelopment and request to uphold density levels set by Local Environment Plan 2011

The former elected Marrickville Council consulted widely over many years to develop the Local Environment plan and has been meeting its commitment to providing increased residences for a “growing Sydney” through this plan.

The Marrickville LGA LEP from 2011 met the State demands for population growth through identified areas and medium density along shopping strips. 4,150 new dwellings and 500 new jobs were part of the plan to be implemented by 2031 This enabled the streetscape of detached housing in residential streets to basically stay the same and to retain the character and fabric of the well-established community. Certain sites were selected for higher densities to also protect low density residential areas.

It is important to note that the population increase was over the whole Marrickville electoral area at the time, but 6,000 new residences for renewed plan are to be built only within 800 metres of the Marrickville Railway Station.

Development under the existing LEP is well under way, The “Revolution Apartments” already built, (184units in 5-9 storeyed buildings – not 3-5 on proposal), old Hospital site (221 units) under construction and 5 & 6 storeyed developments (not 3-5) all along, Marrickville, Illawarra Rd and Addison Rd. Added to this plan is the Sydenham precinct and new land uses in the Victoria Rd Precinct, Lewisham towers, old mill developments, large planned Carrington Rd development (2-26storeyed) near Tempe Station, the proposed Parramatta Rd Urban Development and other

developments in the enlarged Council area and population targets and densities will be more than realised without the proposed, Sydenham to Bankstown Urban Renewal plan. There should be no need to bulldoze whole streets for redevelopment.

Heritage Destruction and Protection

Urban renewal is necessary and there are many areas in Marrickville that need revitalising and urban infill is supported on condition that it is done sensitively and without destroying the character of our inner city suburbs.

The revised strategy includes more heritage conservation areas in Marrickville, Dulwich Hill and Hurlstone Park, however some of these areas are “pocket sized” and heritage areas need to be greatly expanded.

The key issues raised in response to the 2015 plan that “Streets with heritage character should not be redeveloped and Federation streetscapes should be preserved” and that Council recommendation that “Any areas of quality streetscapes or period buildings be retained as single dwelling houses” remains the same.

Although a Heritage survey was conducted by NBRS Architecture on Warburton, Moyes and Church Streets we believe that the conclusions drawn were not consistent with community expectation and values. There are still many examples where the traditional character has been retained and although the report states “some houses have been compromised by rendering and aluminium windows” they still are identified by many as Federation style. With an influx of young people to the community, many of these new residents are faithfully restoring original detail to their Federation houses.

More streets have been retained for lower density and this is fully supported however the number of streets and area needed to be greatly expanded in accordance with the Marrickville LEP.

The Silver St and Gladstone Rd recommendation for Conservation area is fully supported, however this is a very small area when we consider the overall area of the Marrickville Precinct.

There are individual houses and rows of houses that should be saved. E.g. the beautiful stone houses on Arthur St and Corner of Anne St should be

saved and should not be bulldozed for 12 storeyed developments planned.

No area/street should be designated for increased densities until a formal independent heritage assessment has been conducted for all houses in that street/area

A major concern for resident is the proposal to bulldoze streets of lovely historical and period houses to replace them with cement high rise of dubious architectural design and poor quality workmanship. This concern is based on recent experience with e.g. "The Quarry" Besa block units on Illawarra Rd, "The Revolution Apartments" on Illawarra Rd, which have stolen iconic city views from thousands of residents, now dominating the landscape and looking like a prison block from the south side and "The Domain" a fairly recent apartment block on Marrickville Rd which now needs extensive, expensive work to eradicate concrete cancer.

Beautiful historic and period houses not only need to be retained but they should not be surrounded, wall to wall and overshadowed by medium/high rise developments.

The Scale and Reach of Proposed Urban Renewal

The density and scale of 6,000 additional dwellings within an 800 metre radius of Marrickville Station by 2036 is too great and unsustainable.

An 'opportunities and constraints' analysis was undertaken by JBA and it identified areas around the Marrickville Station as having potential for redevelopment of low rise apartment buildings of between 3 and 5 storeys. Why then have these areas within 400 metres now been changed to 5-12 storey buildings? Proximity to the station should not be the only criteria used.

Council recommendation below from 2015 submission should still apply.

"Wherever there are quality streetscapes and/or period buildings single dwelling housing should be the default position. Many of the areas identified for 5+ storey development contribute to the character of the Marrickville village and town centre. The narrow streets will not accommodate the street wall heights proposed." Prime example is Central Avenue Marrickville which is a "No through Road" as is Fletcher St and very difficult to drive into or out of at present. Francis St, Petersham Rd

and West side of O'Hara St (now added and had height increased rather than decreased as claimed on plan) have heights that are unsuited to the already crowded town centre area. The 12 storey heights proposed for Anne St, Byrnes Str, Myrtle St, Illawarra Rd, Station St and Leofrene St close to the station would still result in a high walling affect. Developers have requested higher densities here. However, residents have always strongly opposed them.

The fact remains that high density will have negative amenity impacts on surrounding low density residential areas and some "Transition areas" planned will not alleviate the problem. Single storeyed dwellings that back onto those in 9 storeyed developments in Carrington Road will have great loss of amenity and the planned Transition area looks as if it will be most ineffective. In O'Hara St heights have actually been increased (not decreased as claimed) with 4 storeyed low rise on East side planned (previously single storeyed) looking at larger blocks of 6 storeyed buildings (previously 2-4).

There is also concern regarding the fact that "Additional height may be achieved on large sites in consolidated ownership where community facilities and/or public open space is provided to Council." We do not want another dirty plaza at the station as a trade for higher density on the site near current station entrance. A previous Development Application for such a plan was resoundly rejected by residents, State Rail and Council. The station has had an upgrade and the immediate area surrounding is limited and needed for dropping off /picking up less mobile passengers. Covering this newly established drop off and access area is not necessary nor desirable.

Reduction in heights on revised plans for High, Grove, Ivanhoe and around St Brigit's Church is a step in the right direction however, considering the fact that they fall within the 400metre circle of the station they can still be burdened with heights of 4 storeys which is still too high.

Design and Sustainability

Marrickville housing has traditionally comprised of mostly single storey housing, however apartments now account for 28% of housing in Sydney and implementing the strategy will increase the percentage in the precinct. Many flats being built, although described as "luxury apartments" are just for "investor grade market" and concern has been

expressed regarding poor design, build quality, defective materials and fire compliance. Concerns are growing that the slums of the future are being created with such a rapid expansion of medium/high rise developments, particularly around transport nodes.

Too many of the current newer developments in the Marrickville precinct fail to meet community expectations when it comes to architectural excellence. There needs to be greater regulation of apartment planning design and construction as highlighted in 2015 "NSW Independent Review of the Building Professional Act". Clear directives are needed for developers and Councils in the corridor.

Affordable Housing

There is no housing affordability requirement in the strategy which is a gross oversight considering that housing diversity, choice and affordable supply is fundamental to urban renewal in global cities around the world. A mandatory inclusion of affordable housing (inclusionary zoning) and value uplift capture are the most workable and successful mechanisms to achieve affordable housing in the short term. 10-15% affordable housing should be mandated as in other global cities' urban requirements and capture of 50% of land value uplift as contribution towards public benefits (including affordable housing) in renewal areas, rather than the value being directed to a few fortunate landowners. A building should also not need to be higher than 15 storeys before affordable housing is provided.

An inventory of current availability of affordable housing should be made to ensure that there is no net loss. It is of great concern that many of the streets targeted for renewal provide affordable housing through boarding houses or older style Unit blocks. Anne St and Petersham Rd provide examples of such streets.

The myth that more development will provide cheaper housing is quickly dispelled when looking at current new developments. In the new Mirvac development on the old Marrickville hospital site a one bedroom unit with no car space is \$715k, two beds, well over \$1million. Higher rents are also charged in new developments. New Boarding House rents for "bedsits" are over \$300 which is also concerning.

Developers are pushing up prices in their quest to land bank, making it harder for families and first home buyers to purchase properties in this area.

Lack of Infrastructure Planning

Infrastructure is needed before thousands of more residents are settled. Careful planning for infrastructure is essential before any increase in housing/population occurs upfront commitment of funds is also required to achieve integrated planned outcomes and will be essential for the creation of liveable communities before redevelopment begins.

Education

Childcare and Pre-school places are already in short supply and there is no plan to redress this.

Primary and secondary schools are already experiencing increased demand and many already at capacity with more young families moving to the area and increased demand from current new developments. No new schools are proposed however reports indicate that primary school enrolments are predicted to increase by 37% and secondary school enrolments by 56% by 2036.

Ferncourt Primary School is the only public Primary School in the precinct. It is already at capacity. Marrickville High School has some capacity however Tempe Secondary, close to the Carrington Development, is beyond capacity and currently has long waiting lists. Intensifying development of existing schools means less open space/sports fields and playground for the children for active recreation. This is very important for children who live in apartments and to avoid obesity. The proposal for high-rise schools with larger class sizes is not a good strategy. This may work for some secondary school children but if we continue to enrol 4 1/2 year olds in Kindergarten, this could be very impractical. Children will be denied the right to a good public education, which is a basic human right unless more schools are built before the population expands.

The Executive Summary states that “The Department of Education will identify locations for new schools within the corridor based on growth proposed in the strategy”. Location of these schools and committed State

funding for them should be published in detail and work started on the schools before the expected growth in population.

Health

Getting in to see a doctor or dentist of your choice in an emergency is already difficult. Royal Prince Alfred hospital (precincts closest hospital) already services one of the largest catchments in Metropolitan Sydney. The queues of ambulances at RPA, the long waiting lists for elective surgery and emergency care on any day indicate that the current provision of health care is inadequate before addition of tens of thousands of more residents. Horror stories abound regarding long waits in queues of patients on trolleys in the Emergency Ward. Services at Canterbury hospital are also stretched beyond capacity with no plans to increase capacity. With population increases predicted there is a need for another hospital but there is nothing planned. With an aging population, increased demand for Mental Health services, health provision must be expanded. Nursing home places are also already scarce and inadequate.

Open Space

With such a large increase in population there is a great need for open space and sporting fields which are already stretched beyond their capacity and in short supply. Examples include the current problems for training and matches for football (soccer) and paucity of netball courts in the LGA despite it being No. 1 women's sport in Australia. With obesity and increased number of people living in smaller apartments there is a much greater need for open active, sporting space. Many open spaces in Marrickville are "pocket parks" so there is already a deficit of open space in the Marrickville LGA.

Further research is needed to develop evidence based needs. Plans can then be developed and funding made available to increase sporting fields within the precinct under the Urban Renewal plan.

Within the current Strategy, Churches such as St Brigit's, with a school attached, and the Uniting Church with a Nursing home on the grounds are still being counted as "Private Recreation" spaces which shows poor research and is misleading.

There is no funding in this plan to support Councils to purchase land and there will not be any land left to purchase for infrastructure needs. Although draft plans for a “Specific Infrastructure Contribution” are mentioned the strategy will place heavy demands upon Council's S94 contributions Plan to build the financial capacity for much of the additional infrastructure for parks and playing fields. Considering the high land values and the \$20k cap on levies, purchase of open space is not feasible to meet current needs, let alone with extensive planned growth. This draft plan needs to be presented with much more detail on funding available to councils and methods of distribution.

Developers will need to contribute much more to communities where they build. There needs to be capture of the value uplift that is created by up-zoning and significant investment of public money in transport infrastructure, open space, health and education services for public benefit. Most authorities push to capture of 50% of land value as contribution towards public benefits in renewal areas.

We are strongly opposed to any proposal to take over the Marrickville Golf club for public use as it is one of the few remaining large recreational green spaces in the Marrickville area. People can already walk there if they wish, but it should not be converted to other uses

The use school playgrounds is also problematic. If a school has a one day per week general assistant to care for the playing fields then it is not possible to maintain playground green space for the children who play there. If fields are muddied after training or games, this will make it more difficult for children in their own playground during school hours.

The proposal to expand the children’s playground and reserve at the end of O’Hara St by removing a house will not happen as there is currently a Development Application with Council to build two three storeyed houses there. Council would not have the funds to purchase the land and it would be unlikely that a developer would purchase such valuable land for a park extension.

The plan to provide linear open space corridors along Carrington Precinct between the Cooks River and Marrickville Station runs along a drain and would not provide a pleasant place for playing or picnics. The plan also notes “the potential for a new linear park along the metro that could create a new and interesting place for leisure and recreation”, however

we do not believe that this would be such a good place for active recreation.

Before the Development plans are finalised for the Marrickville Precinct and the broader corridor should seek to retain the same level of open space per head of population. This will require an a much more comprehensive plan for sporting fields and active green, public recreation areas.

Utilities

As the existing population along the corridor is expected to double by 2036, the capacity of existing infrastructure and services, including water, sewerage waste water, gas and electricity will need to be upgraded to support this increase. There's also the problem for demand on aging utilities. A resident in O'Hara St had a street shared waste water pipe burst in his back garden a few years ago and he had a geyser of sewerage in his garden. The Sydney water worker who came to assist informed him that old terracotta pipes around Sydney are due to blow all around Sydney and likened them to a timed bomb waiting to explode. If the sewerage system can't cope now, how will it be able to cope with millions more residents and their buildings "plumbed" into an already overcapacity, failing system? A retired electrician has also explained that he is very concerned about the electrical system and its capacity to cope with such an enormous increase in demand. This will be exacerbated by the need for air conditioning, all the luxury electrical gadgets needed for luxury apartments and dryers as there will be no outside clothes lines. He talked about the wires "frying" with overload and not just on hot days. In the Sydenham to Bankstown Urban renewal plan there are no additional funds for utilities so this needs to be rectified if we are to have safe and hygienic, liveable suburbs.

Traffic and Parking

There's also the nightmare of traffic and parking. There is very little off street parking in Marrickville where demand already greatly exceeds demand. Planners cannot assume that people who live close to a station will not own a car because often they have more than one car, especially where there are many more house sharing arrangements and where older children stay at home for much longer now and with many more young professional people living in Marrickville, there are many more work

vehicles to park in addition to the family cars. Not everyone can ride a bicycle (especially considering our ageing population) and car share options suit some but not everyone due to availability. Planners cannot assume that people who live close to a station will not own a car because often they have more than one car, especially where older children stay at home for much longer now and with many more young professional people living in Marrickville, there are many more work vehicles to park in addition to the family cars. Not everyone can ride a bicycle (especially considering our ageing population) and car share options suit some but not everyone due to availability.

The lack of parking provision for smaller units is already impacting on residential streets and exacerbating an already difficult situation and making residents' lives more stressful. With an aging population we have to consider the fact that we can't all ride bicycles to fix this problem.

There are no commuter car parking facilities planned along the Metro corridor which may encourage people to continue to use their cars.

What is going to be the cumulative effect of so many more planned medium and high rise buildings in such a small geographical space? This aspect of planning needs much more serious research instead of just assuming that residents won't drive a car.

Timing of Development

The rezoning is being implemented well before the planned Sydney Metro is built. An analysis by the Sydenham to Bankstown Alliance shows that at least 10,000 new dwellings (2,430 in Marrickville) will be built along the line between 2018 and 2024, specifically due to the Urban Renewal Strategy. This will put enormous pressure on the Bankstown Line which will need to be closed at different points in time from late 2018 for unknown periods of time year prior to the Metro opening in 2024. This will create major disruption for hundreds of thousands of residents along the corridor. The Alliance estimated that 35 million trips on the line will be delayed with commuters expected to be forced to use bus services. If the Metro is to be built it should be built well before 100,000 people are added to the rail corridor.

With the sacking of our Councillors in 2016, appointment of an administrator and amalgamation of three councils, Marrickville residents

and many residents along the corridor currently have no elected council. No major decisions regarding LEPs were to be made during this time. Submissions close on September 3 and Council elections will be held on September 9 so decisions will be made by a newly amalgamated Council finding its way. An extension has been granted for the new Council to present its submission, however changes to the LEP should not be rushed as the community would be very concerned about transparency and Integrity issues.

The Environment and Planning for Climate Change

There appears to be a paucity of planning considering the future impacts of climate change and the massive increase in population densities on the local environment. It should be mandated for all future developments to reduce emissions and include water sensitive urban design and water management facilities. 30% of a development property should be left for deep soil to avoid all the run off and reduce flooding. Planting more trees is one solution to reduce heating of our suburbs but much more needs to be done. In France new developments must install roof top gardens or solar panels to reduce the carbon footprint of the building.

Prospect of increased flooding and high tidal surges along the Cooks River should also be considered when planning developments near the river. The Carrington Road area already floods so special measures must be put in place to ensure that all residents and their properties will be protected.

There is no mention of the Wildlife corridor along the Cooks River and Greenway or enhancement of existing biodiversity along the corridor which is currently in a degraded condition.

The strategy mentions the ANEF (Aircraft Noise Exposure Forecast) of 25-30 and the fact that heights need to be restricted due to Airport Controls however some developers think that this does not need to apply to their development.

Researchers around the world are constantly verifying the long term damaging effects of noise on the education of children and health of people and the ongoing costs to the state. Previous State Government recommendation to "minimise the number of inhabitants in high noise areas" needs to be heeded around Marrickville Station especially

considering the additional noise of two increasingly busy freight lines and the suburban train line.

The Strategy needs a thorough independent Environmental Impact study before the final proposal.

Loss of Employment Lands and Industrial Heritage

There is currently high demand and low vacancy rates for Industrial and employment land in Marrickville and Sydenham, however the Strategy plans to use large tracks of this land.

Plans to develop the Carrington Rd precinct, Sydenham Precinct and Victoria Rd will remove all the small factories that have employed many people.

A large area of factory space and many small factories have already been demolished at Sydenham for the dive site and stabling yards for the Metro. The sites have historically provided vital employment opportunities and there needs to be a more balanced approach to residential development and employment lands otherwise employment opportunities will be gone for good.

Divisive Community Issues

When 2015 proposal was released the sudden and divisive impact of such significant change started to divide established communities and neighbours in streets. Large numbers of developers have been quite aggressively active in contacting residents to sell their properties, promising many millions of dollars and confident that they may be able to build 19 storeys close to the station and several holding meetings to encourage "proponent led" planning proposals. Many residents, some of whom have lived in their houses for several generations have been very distressed by the number of approaches, the "urgency to sell message" and the lack of respect shown for their lovingly preserved homes with the developers very blunt about their only wanting the land. This "survival of the fittest approach" to planning, with some home owners/speculators saying "I've got X square metres, what floor space ratio can I get on my land?" pressuring others to sell their homes to increase that area and the money realised, despite the fact that the other owners love their homes and were planning to stay there indefinitely. This is not a civilised way to

enact change. If the strategy acts as the only guide for privately led rezonings there will be many distressed residents who may well be taken advantage of and lose their homes, with the final result being poor and uncoordinated planning outcomes.

Loss of Iconic City Views

Residents across the precinct will lose of iconic city views south of the railway, especially residents in Schwebel St. and those on higher ground in The Warren. Byrnes St residents on the north side of the line who have invested heavily in their Revolution Apartments will also lose their views if across the road blocks of 12 storeys are constructed. Overshadowing of other residents will also be common across the development proposal areas.

Wind Tunnel Danger

Of special consideration is the problem of creating a dangerous wind tunnel on Marrickville Station if there is medium or high density either side of the railway. One only has to stand on the corner of Marrickville Rd and Victoria Rd on a windy day to experience the strength of the wind tunnel created by only 7 storeyed buildings on either side of the road. Heights should be restricted close to the station area on the Station St side to prevent this dangerous situation.

Planning for Ageing Population

There was no change to the strategy regarding the concerns that there should be better provision for an aging population. The strategy lacks vision for the future especially considering the many different needs of our increasingly ageing population. Issues for Senior citizens include affordable housing, access to health care, community centres, good public transport, support services, safe footpaths and quality retirement/nursing home options however this proposal appears dismisses this demographic.

This proposal needs a major re-think. There is much at stake for the future of our quality of life, the preservation of the heritage of our suburbs, which includes historical factors, social aspects and aesthetic images. Urban renewal needs to be sensitive to current character and to future sustainable needs careful consideration the impacts of climate change, demographic change as well as economic factors and the need to provide

housing for an ever expanding population. It should not be left to developer driven ad-hoc spot zoning and needs serious planning with genuine consultation from local councils and residents not just developers.

Comments on Individual Streets

Byrnes St is an existing low density street which runs alongside the northern side of the Bankstown line. There are 8 houses in the street, 3 of which are single fronted. The blocks are only 30m in depth. No 1 is an excellent example of a well preserved Federation cottage. The eastern end frequently floods and new houses constructed around the corner have not been permitted to use the lower level for habitation due to flooding issues. The strategy suggests 12 storey developments however this is far too dense for the blocks and would block the iconic views of residents in the apartments and tower over residents in Central Avenue. On the opposite side are the Revolution apartments which range from 5,7 and 9 storeys at the Illawarra Rd end. A developer would like to increase the heights from 9 to 18 storeys but this should never be permitted.

O'Hara St runs off Byrne St and has a mix of Federation cottages, a Victorian 2 storey terrace, several Californian bungalows and some newer terraces. On the Eastern side the dwellings are mostly single fronted and single storey. In the 2015 strategy the Eastern side was single storey housing and the western side low rise. The revised strategy says that there has been a reduction to medium and low rise housing to provide better transition to single dwelling areas however the heights have been increased not reduced. We would like this decision reversed.

Central Avenue is a narrow "No through Rd" street and heights have been reduced from Medium High to Medium rise however this is not appropriate for this street.. All houses are currently single storey and low rise should be the highest that the site can bear.

Silver St and Gladstone St have "potential to be listed as a heritage conservation area" and this is strongly supported by the community.

Petersham Rd is a narrow, well used street with some two storey terraces and quite a few beautiful stone and period houses. These should not be removed for Medium and Medium High rise housing and should be limited to low rise housing as recommended in the JBA Analysis.

Fletcher St is a narrow “No through Rd” and also should not be burdened with Medium and Medium High rise housing but be limited to low rise housing as recommended in the JBA Analysis

Frances St will have 2-12 storey buildings with 5 different building zones. This is very “messy” in quite a small area and should be limited to low rise housing as recommended in the JBA Analysis. The strategy mentions that heights have also been reduced on Frances St and Fletcher St from Medium rise to Low rise, however this is misleading. Only a small section of the area has been reduced and it would be much better if the whole streets on both sides were reduced to low rise.

Anne St should not be 12 storey High Rise mixed use due to Topography, its position on a ridge and producing a high walling effect.. It is not a long Street, has old houses and an older 60s style block of units. The whole street currently provides affordable housing with many boarding houses and lower rents in the older style units. On the corner of Anne St and Arthur St there are two beautiful Victorian stone dwellings and they should not be removed for 12 storey high rise. It would also be poor planning to have them overshadowed by 12 storeys so heights should be greatly reduced and be limited to low rise housing as recommended in the JBA Analysis

Arthur St has been reduced considering the topography. This reduction is supported.

Station St residents did not ask for high rise in this position and this request was obviously developer driven given the history of the site. Council, State Rail and residents opposed the concept of high rise and a Plaza on this very congested site. Council Officers made the point that a dangerous wind tunnel could be created on the station if high rise was positioned here so heights should be reduced. The developer will once again argue that he will “provide public open space to Council” with the construction of the plaza and seek additional height. The community do not need or want another dirty Plaza like the Alex Trevillion Plaza near the Post Office. The buildings need urgent attention as they at the exit of the station they are at the “Gateway to Marrickville”, however design and height are extremely important on this site.

265-272 Illawarra Rd we support the revised strategy to continue to show shop top housing for this site as higher levels are not appropriate for this location

Illawarra Rd between Schwebel and Grove St this area should also be designated as shop top housing as 12 storey buildings are not appropriate for this sloping congested location. The block is a consolidation of smaller blocks to Blamire Ln and the developer may ask for greater height however this should definitely not be permitted.

Loefrene St If Loefrene St is developed with 12 storey buildings this will steal the iconic city views and overshadow the 800 current residents in Schwebel St. These residents many of whom have lived there for more than 20 years paid prime real estate for their properties with the iconic view and object strongly to this proposal. Schwebel St Current residents also object to increased heights on their street, reason being that they consider that the area around the station is being over developed.

Warburton St has been reduced to Medium rise density, however considering the quality of the houses on the Southern side, and the significant street trees, there should be no change from the current R2 zone.

McNeilly Rd shown as Medium High housing should also be reduced to Low rise as Medium high rise will overshadow and tower over this well used park.

Greenbank St has been reduced and this is supported however there are still many lovely old houses in Greenbank St and Church St and single dwelling area would be preferred.

Grove St, High St, and Ivanhoe St have been reduced and this is supported. However, the existing R1 and R2 zoning should be retained to support the existing beautiful old houses in these streets.

New Marrickville Station Entry is supported however the need to increase Myrtle Street to high rise is not

Carrington Rd The plan for Carrington Rd to be developed with heights of 6 to 26 storey buildings is not supported considering that the area is in a serious flood zone and the undue strain it would put on services and facilities in the area. It should be noted that building heights and densities

in this precinct exceed those originally established for development within the areas between 400m and 800m from train stations in the corridor. Further reference should be made to the Save Marrickville South submission.

Carrington Rd West-side strategy shows 8 storey buildings. This is not acceptable considering that they back onto a large area of single storey homes. Low rise housing would be more suitable here and would provide a better transition to the Carrington precinct. Further reference should be made to the Save Marrickville South submission.