



Submission by Save Dully to planning principles consultation by Inner West Council

August 2024

Introduction

Save Dully thanks Inner West Council for the opportunity to comment on draft principles in relation to the development of the Inner West LEP.

We think it is quite likely that the council will arrive at a more sensible planning outcome than what would have happened if the NSW Government had imposed a strict 400m rezoning around Dulwich Hill station, and also implemented its Low and Mid-Rise reforms.

Save Dully is a residents' action group based in the suburb of Dulwich Hill and has been in place since 2015. During this time, Save Dully has been advocating for good planning outcomes. We are an incorporated association with around 50 formal members and around 220 people on our subscription list. This submission has been shared with members and subscribers, and endorsed by the Save Dully committee.

In preparing this submission, we have drawn on [draft planning principles](#) we prepared in 2022 (also available at Attachment B) and our [Our Suburb, Our Future](#) report released in 2019.

We acknowledge the need to deliver more housing in Dulwich Hill, and the fact the suburb is likely to need to accommodate more housing given the fact that Dulwich Hill station will be converted to Metro operations. However, there is no point in delivering this housing if it ruins the liveability of the suburb.

With this context in mind, we make the following general comments to inform the development of the LEP. Attachment A is based on these comments and includes a specific response to each principle, and suggested new principles.

Concentration of development

It seems to us that, under the proposed principles, development is very much concentrated to the south of the LGA, and in particular Ashfield Ward. This is exacerbated by the fact that the principles state that:

- Development in private land around the Bays Precinct will only be considered after planning on government land is known
- The Parramatta Rd urban renewal corridor is not mentioned
- Haberfield is listed as a protected area

Dulwich Hill has already accommodated significant density around Arlington light rail station, on parts of New Canterbury Rd (and to a lesser extent Wardell Rd south of the railway station).

Save Dully is calling for a fairer distribution of development impacts, particularly given this was the stated aim of the Mayor when deferring plans for Ashfield, Dulwich Hill and Marrickville in 2022.

Impact on small lots and unit blocks

Save Dully has always opposed circle-based planning (ie: permitting higher densities within a radius of a certain point). This is because the suburb of Dulwich Hill has many unique features which need to be considered in the planning process, which is not possible if you undertake one-size-fits-all circle based planning.

One issue is that of small lots. Dulwich Hill has a wide range of lot sizes, including smaller lots, and existing unit blocks, which may be more difficult to develop. We would ask that planning carefully considers this issue and avoids a situation where owners of these sites are not isolated or subject to unreasonable impacts in the planning process. An unreasonable impact could include being located next door to a development more than three storeys in height.

We would also ask that a situation is avoided where individual street blocks are divided by markedly different zoning and height limit arrangements, as has happened through a strict 400m radius interpretation in other Transport Oriented Development areas. This is without question a poor planning outcome.

Heritage

Dulwich Hill's heritage areas are an important and valued part of the Dulwich Hill story and should not be removed in entirety, as part of a "clear fell" approach to planning advocated by some. To do this, would undermine the ongoing liveability of the suburb.

Save Dully would support a situation where Dulwich Hill's heritage conservation areas were given special consideration in any planning outcome. This could include preserving these areas, or allowing modest infill development at the rear of houses.

Separately, we think there is a need to examine the preservation of new heritage items, alongside any rezoning effort. We think the following items are arguably worthy of heritage protection, which wouldn't preclude development happening on the relevant land but could stop a total demolition.

Since 2016, we have been advocating for the protection of a number of [Dully Icons](#), including the former Uniting Church on Constitution Rd, Greek Orthodox Church of the Holy Unmercenaries, on Hercules St and the former Maternity Hospital, on the corner of Terrace Rd and The Parade.

We would also like to add two buildings to our proposed protection list:

- Hand's retail building, on the corner of Constitution Rd and New Canterbury Rd
- Former St Aidan's Church, Bedford St (former branch church of Holy Trinity, sold for private use in 1991)

Photos of these buildings are shown below:



Buildings worthy of preservation clockwise from top left - Hands Building, Former Uniting Church, Former maternity hospital, Greek Church and former St Aidan's Church

Industrial land

Our position ([as explained at this link](#)) is that we do not oppose the redevelopment of the Hercules St industrial site (Dulwich Hill's last major development site), subject to measures to limit its height to around 5-6 storeys on the New Canterbury Rd side, and three storeys on the Hercules St side, to protect overshadowing and overlooking of Dulwich Hill public school and to manage traffic and parking impacts. Other traffic and parking improvements may also be required around the school, concurrently with this development.

Location of development

While it may be difficult to achieve, we would welcome efforts to limit redevelopment in existing residential areas, given the suburb's historic character.

We think for instance that New Canterbury Rd, or the Seaview St or Loftus St carparks, present urban renewal opportunities, which may help reduce the impact on residential areas.

There are also opportunities for renewal within the main town centre, which could involve activating and enlivening the suburb's unique network of laneways and public spaces, delivering new social and affordable housing on public land, and creating new sustainability outcomes. For further information on this area, see our [Heart of Dulwich Hill](#) initiative.

Infrastructure

It is wholly unclear what future infrastructure will be needed by the population growth proposed in our suburb, and how this will be delivered through the LEP process. We have identified the following issues:

- Studies show that Dulwich Hill currently has a comparative deficit of open space
- The high school is crowded and the primary school relies on fund-raising for basic maintenance.
- The suburb currently has a very small library, and a comparatively antiquated community hall with no modern facilities (such as a permanent projector).
- High school students currently struggle to find a place to study with their friends at Marrickville Library, and that as more students live in apartments they will be looking for quiet places to study.
- Dulwich Hill town centre, in comparison to other Inner West town centres, is tired and rundown with long-held plans for a new town square unfunded and unrealised.
- The GreenWay 'green street' vision remains unrealised, and many footpaths are made-up of harsh concrete when they could contain nature strips and greening.

- There is a limited active transport network through the suburb, resulting in car dependency and a less than optimal pedestrian environment. Some areas near the train station are poorly-lit and dangerous (particularly laneways leading off Bedford Crescent)
- There is a need for an understanding of the capacity of essential utilities, for example electricity, potable water, sewage and telecommunications. Some Sydney Water communications indicate sewage systems are nearing capacity.

Overall, there is a need for a clear analysis of existing infrastructure deficits, the needs of future residents, and funding mechanisms, as part of any rezoning plan.

Parking

The rezoning plans are likely to have a significant impact on on-street parking, which is an issue as many Dulwich Hill residents rely on on-street parking. As a result, we'd ask that funding is set aside to support proactive council investigations into parking impacts and solutions, preferably before the completion of any developments. This would be likely to lead to the creation of new resident parking areas, and will remove the onus on residents to campaign and reach a certain threshold to get resident parking schemes installed.

Affordable housing

We support higher levels of affordable housing, compared to the 2% of new housing proposed by the NSW Government. We note the challenges in delivering a higher outcome, in that it may undermine development feasibility or lead to calls for breaches for development standards which impact the overall liveability of the suburb.

Consultation

As a final point, we note the principles are silent on planning process. We would ask that the community is consulted, in depth, before the making of any planning provisions in our suburb.

Attachment A – Response to proposed principles

Principle	Response
Delivering place-based planning through local planning controls	Support
Upzoning of precincts around Ashfield, Croydon, Dulwich Hill and Marrickville station	Support, while noting concerns about development over-concentration in southern LGA and need for careful planning in Dulwich Hill
Support for increased densities on main streets through shoptop housing in order to protect high value heritage conservation areas from upzoning	Support, although some infill development could still be allowed in heritage areas
Providing density incentives for the amalgamation of lands in areas identified for upzoning	Oppose. The principle appears to suggest that it will be acceptable to develop without amalgamation, and if you amalgamate you will get a bonus. We prefer controls to support amalgamation, including for smaller blocks, but question whether incentives are the appropriate way to do this. This needs to be re-considered.
Increased residential densities around light rail stations	Support, while noting that Arlington Station already has accommodated significant density and therefore should not be a priority for future renewal
Support for suburb of Haberfield being on the State heritage register and being excluded from rezoning	Support State heritage register listing, but oppose rezoning prohibition, given opportunities for sensitive infill development and renewal on Parramatta Rd and in town centre. Principles places excessive pressure on other suburbs in the LGA.
Support for the masterplanning of the Bays Precinct with dwelling targets to be determined on government owned land prior to any consideration of any additional rezoning in adjoining suburbs	Oppose. Bays Precinct planning should cover private and government land at same time. Staging places development pressure on other suburbs in LGA.
Support for the NSW Government policy of 30% of all new housing on government owned land to be maintained in perpetuity as public housing	Support
Setting a target of 1,000 or more new public housing dwellings to be delivered on State Government and Council owned land	Support, but note that it may be preferable for this development to include both public and affordable / essential worker housing, to deliver good community outcomes

Incentives for the conversion of land owned by religious and faith-based organisations for social and affordable housing	Support, subject to sensible planning
Progression of new Special Entertainment Precincts	Support
Protecting and expanding existing employment lands to attract increased employment and new industries	See our comments above on the Hercules St site
Incorporating the State Government's Pattern Book for improved design into Council's planning controls	Oppose. It is reckless to make this a principle, before we have seen the Pattern Book.

In addition, we suggest the following additional principles:

- Ensure development has high climate resilience, is highly energy efficient and incorporates renewable energy generation. Designate development areas as net zero precincts - in line with the Local Strategic Planning Statement
- Retain and protect the existing gazetted biodiversity corridor which runs through the suburb.
- Include requirements for green roofs and walls in new development to provide cooling, wildlife habitat and amenity for residents
- Use the GreenWay as the catalyst for a suburb-wide network of green streets and promotion of Dulwich Hill as an active transport hub
- Ensure growth is supported by infrastructure (including open space) which meets the needs of existing and future residents
- Parramatta Rd to be included as a renewal corridor
- Support for affordable housing levels on private land to be raised, subject to a feasibility analysis

Attachment B - Save Dully planning principles from 2022

After noting that:

- Between 2015 and 2022, community uprisings have resulted in the abandonment of three failed intensive development schemes for our suburb (two by the NSW Government and one by the Council)
- The Committee for Sydney, which lobbies on behalf of developers, [has stated that the area around Dulwich Hill station is not a priority for urban renewal](#), because of the area's heritage status and existing strata schemes – both of which are a constraint on development
- The NSW Government's [2021 official housing supply forecast](#) has stated the suburb of Dulwich Hill is expected to contribute a modest 180-200 dwellings over the next five years, at the same time the Council has been planning for 380-460 homes in one section of the suburb
- The Inner West Mayor, [at the Council meeting of 9 August 2022](#), conceded the Council had been pursuing an overly concentrated housing growth model leading to inappropriate outcomes in Dulwich Hill
- The Inner West Council's Housing Strategy, developed in 2020, wasn't sufficiently transparent as to how housing targets were developed, particularly relating to how some future potential development sites, the likely uptake rate of new development and boarding houses and affordable housing affected the target rate
- Before it released its plans for the suburb in August 2022, the Inner West Council had been working on these plans for more than two years, without at any stage informing or talking to the community
- Save Dully in 2019 produced [Our Suburb, Our Future](#), listing ten principles we think should be carefully considered in any planning for our suburb. This was followed in 2021 by our Heart of Dulwich Hill which suggested improvements to the Dulwich Hill town centre
- Dulwich Hill has an unfortunate past record for poor quality design outcomes, including the Arlington Grove project and low quality projects near the station.

Save Dully endorses the following updated principles for planning for the suburb.

1. Protect the existing low density residential fabric and character of our suburb
2. Improve our main village centre as an urban place
3. Use the GreenWay as the catalyst for a suburb-wide network of green streets and promotion of Dulwich Hill as an active transport hub
4. Share growth more evenly across the LGA
5. Ensure any Housing Strategy for the LGA considers and better incorporates existing growth and be transparent about future dwellings

6. Regularly review and respect Dulwich Hill's rich built, social, natural and indigenous heritage value
7. Ensure there are strong controls and development assessment resources to guarantee high-quality design and build
8. Protect and grow Dulwich Hill's unique commercial nature, including retain and encourage local shops and family-run businesses
9. Protect existing affordable housing and deliver new affordable housing on private and public land, in a way that respects local character
10. Retain and protect the existing biodiversity corridor
11. Deliver a transparent and ongoing conversation with the community about planning issues
12. Support community-led and human-scaled planning outcomes, as distinct to the failed intense development approach of the past
13. Ensure all new development has net zero greenhouse emissions, and if possible improve on this outcome