



**Save Dully submission to the revised Sydenham to
Bankstown urban renewal corridor strategy**

September 2017

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
- The Uniting Church on Constitution Rd
- 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.



Uniting Church on
Constitution Rd



Former maternity
hospital at The
Parade



Greek church on Hercules St

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.

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>

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.

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 Strategy⁴ 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.

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

⁴ See <https://www.marrickville.nsw.gov.au/en/council/forms-and-publications/council-plans/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 preferred approach is to use ‘under-utilised infrastructure’ such as carparks and railway easements⁶
- Relies on a nine-year-old report from the regional organisation for all southern Sydney councils which runs from Botany Bay to Sutherland Shire⁷, 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 not appropriate.

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

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>

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>

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.

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 and the community locked-out. 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.

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>

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

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.

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

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 (along with suburbs such as Ashfield and Marrickville) does provide one of the remaining few pockets of relatively affordable housing in the Inner-West for these renters.

Save Dully has been monitoring the incremental loss of affordable housing able to be accessed by very low income people in our suburb. We have drawn attention to the potential loss through a strata conversion of 47 dwellings rented at \$250 per week in Osgood St, near the border of Dulwich Hill and Marrickville and noted the weakness of the Affordable Housing SEPP as a protection for such housing.



Osgood St affordable housing development

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. These rents deliver borderline but still feasible levels of affordability for those in the upper bracket of low to moderate household incomes.

The 2016 census shows that 22.6% of Dulwich Hill households are on 'medium low' weekly incomes of between \$750 and \$1481. The thirteen percent on low incomes are already excluded from the

rental market, especially if they inhabit the few remaining dwellings at rents below \$300 a week, some of which are in the rezoned areas.

Our affordable housing precincts are home to many members of our community on such low to moderate incomes: young workers and students, 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 corridor strategy continues to ignore the impacts of the projected intense redevelopment on these 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 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 appear to target precincts containing existing affordable housing, in particular areas such as Constitution Rd, Denison Rd, Ewart St, Hercules St and Bayley St; and
- The low five per cent affordable housing targets for new development proposed by the Greater Sydney Commission means that new development would contain far fewer affordable housing dwellings than the current affordable housing bulldozed by this new development; and
- Evidence indicates that in areas such as Dulwich Hill, market rents for new properties are substantially higher than for many 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 threatens an obdurate reliance on one solution – allowing buildings as large and as tall as possible to replace the modest multi-unit dwellings that prevail locally, in the hope that trade-offs or levies can deliver some affordable housing. Such an approach remains insouciant towards impacts on local people, the local environment and heritage. We don't think this is the correct approach from the perspective of fairness, public amenity, sustainability or indeed – as a developer free for all – the integrity of the public planning process.

In addition to inclusionary provisions for master planned new development, 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.

Equally 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 its 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 and at an accelerated pace.

We therefore propose that before any 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 with a view to devising approaches to protecting and improving current stock.

Affordable housing policies need to focus as much on strategies to conserve existing low and moderate rent housing, together with a planned, staged approach to inclusionary zoning in 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

The following chapter includes an analysis of some of the key proposed redevelopment areas in Dulwich Hill. We have not mentioned all streets subject to a proposed rezoning. This should not be interpreted, in any way, as meaning that we support development in the streets we have not mentioned.

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.

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.



Homes on Constitution Rd



Homes on Denison Rd



Affordable housing on New Canterbury Rd

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

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

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.

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

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>

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 area 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.

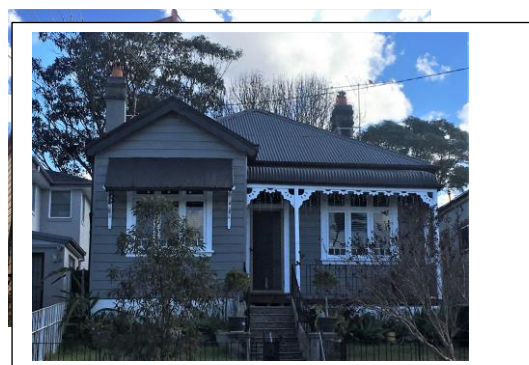
We make the following comments in regard to this block.

Heritage

The heritage analysis for this block finds a number of intact rows of contributory buildings, including in Hercules and Terrace Sts and the entire length of Consett St, 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 any outcome which would see these individual homes, or rows of homes, preserved but intensive development allowed around them.



Homes in Hercules St



Homes in Consett St

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 they help 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

Given the significant groupings of contributory buildings – along with several contributory individual buildings - in the block bounded by Hercules, Consett and Terrace Rds – we do not think it is appropriate that this block is sacrificed to comprehensive development and ask that it is returned to a single dwelling area.

Our long-held position is that we do not support the redevelopment of Hercules St East. However, if such development is pursued, we think the intensity of development should be significantly reduced so it has a low-scale harmonious interface with the newly-formed single dwelling area to the west and a similar approach taken so that it does not cause overshadowing and privacy impacts on private and public property to the east.

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.

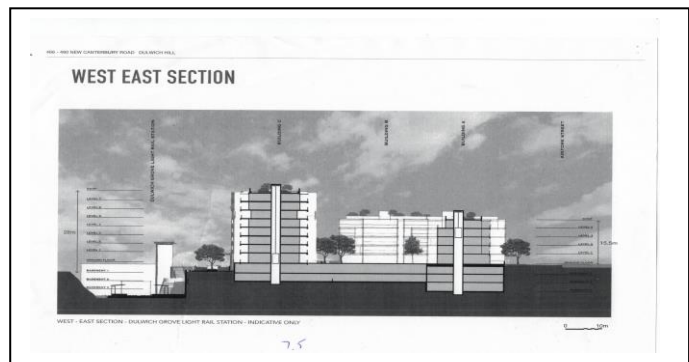
While it was welcome that this proposal retained the Greek church on the site and proposed a new pocket park, many aspects of the proposal were of concern.

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. The sheer bulk and height of the development would also cause privacy impacts.

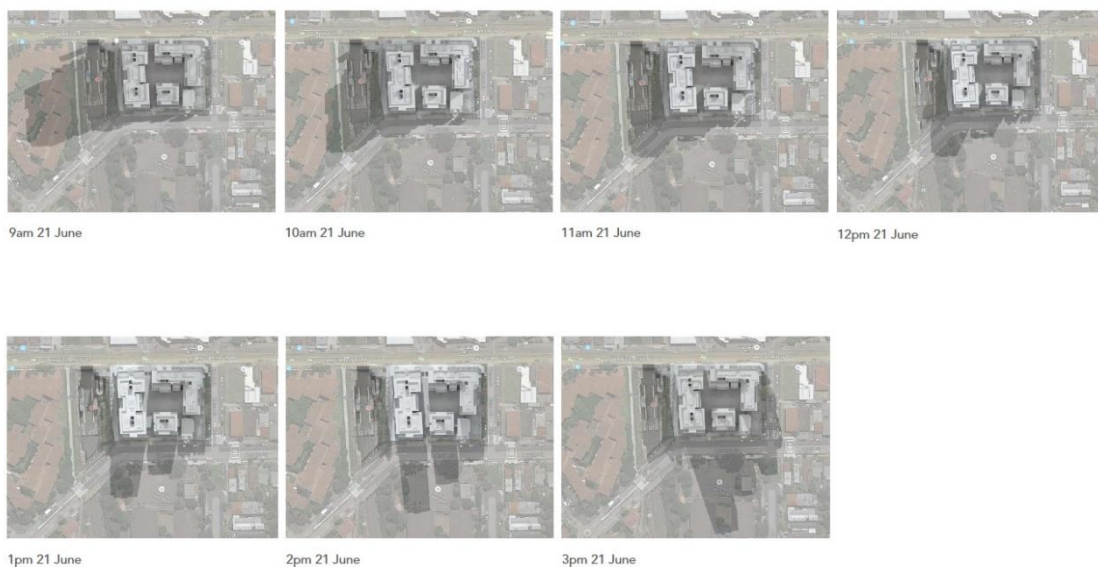


Left: Looking from the Dulwich Hill top oval towards the Hercules St development site

Below: Elevation of the proposed development on the site



SHADOW DIAGRAMS



Above: Shadow diagrams which accompany the developer-initiated rezoning proposal, which shows how the development will put the top oval in shadow from as early as midday in midwinter

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 on 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.

We acknowledge the need for urban renewal on this site, and its location immediately to the east of the Dulwich Grove light rail stop. However, we believe the intensity of development at the site should be reduced.

As a result, we urge that the most intense development on the site be on the New Canterbury Rd frontage, and this be no more than six storeys in line with development in other parts of New Canterbury Rd. Similarly, we would seek for development on the Hercules St frontage to be scaled down and limited to three storeys, to reflect its sensitive location opposite a school.

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.



Weatherboard home on The Parade



Weatherboard home in The Parade

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, Wardell and Ewart 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.

In addition, we do not see the linkage between the proposed urban plaza and the decision to increase heights to eight stories on Ewart St, immediately to the south of the station carpark. We think the urban plaza could have been accommodated at the previous heights for this block outlined in the 2015 strategy.

Being on an elevated location on the side of a steep hill, this block is set to have a major impact on the Dulwich Hill skyline and on neighbouring low-scale streets and the wisdom of an eight-storey height limit is therefore questioned.

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.

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 (in terms of personal safety) 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.

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

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.



Proposal for 'The Hill' at Dulwich Hill station

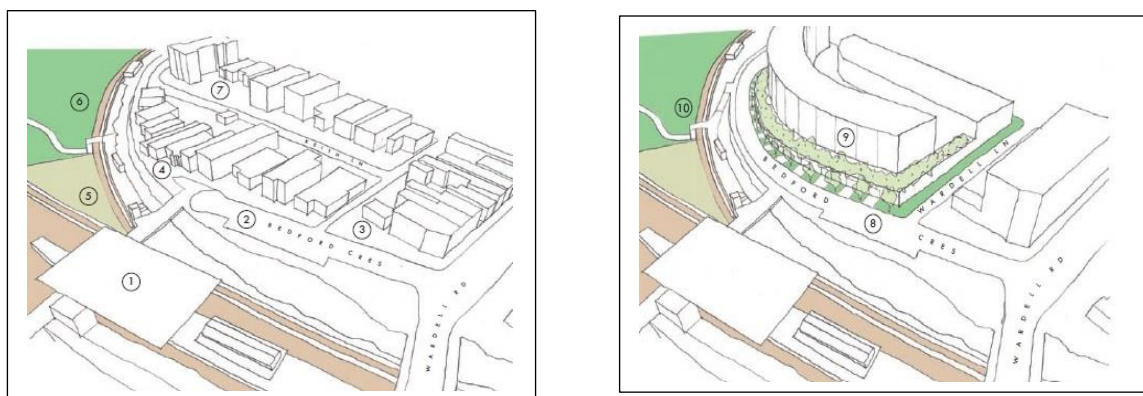
Renew Dulwich Hill

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".



Proposed before and after of Bedford Crescent

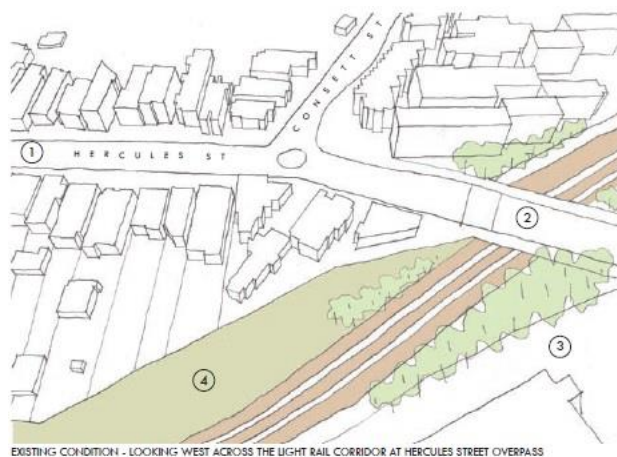
Gateway Park

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.

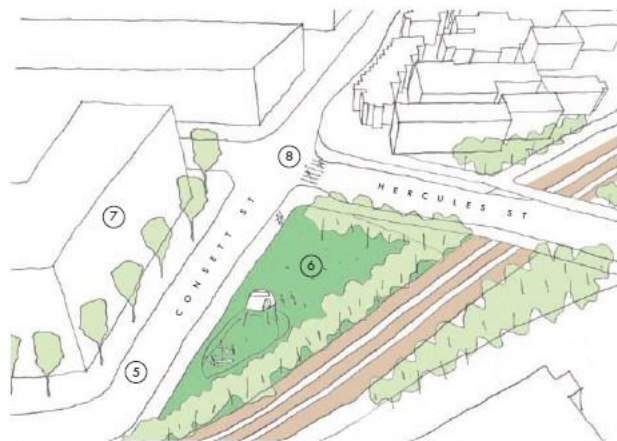
We feel, as with the previous proposal, that this will encourage additional traffic in this location.

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.



EXISTING CONDITION - LOOKING WEST ACROSS THE LIGHT RAIL CORRIDOR AT HERCULES STREET OVERPASS

Before and after artist's impressions of the proposed new extension to Consett St alongside the light rail line



PROPOSAL - LOOKING WEST ACROSS THE LIGHT RAIL CORRIDOR TO HERCULES STREET OVERPASS

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.



New swamp proposal for golf course land west of Wardell Rd, Dulwich Hill

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 Wolli Creek	<p>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 Wolli 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 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/h 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 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