

Draft Eastern District Plan

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Organisation name: Save Marrickville

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First name: Carolyn

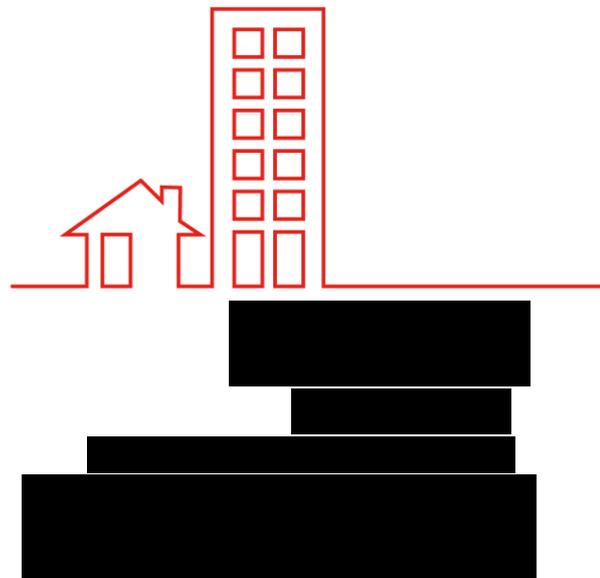
Last name: Smith

Suburb: 2204

Submission content: Please see submission attached by the Save Marrickville Resident Group.

Number of attachments: 1

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Save Marrickville Resident Groups Response to the Greater Sydney Commissions Draft Eastern City District Plan December 2017

The Save Marrickville resident group represents over 500 direct members from the Inner West. We welcome the opportunity to make a submission on the Draft Eastern City District Plan. The Save Marrickville Resident Group hopes to be able to work constructively with the Greater Sydney Commission to ensure the vision for our Inner West Suburb is a collaborative one.

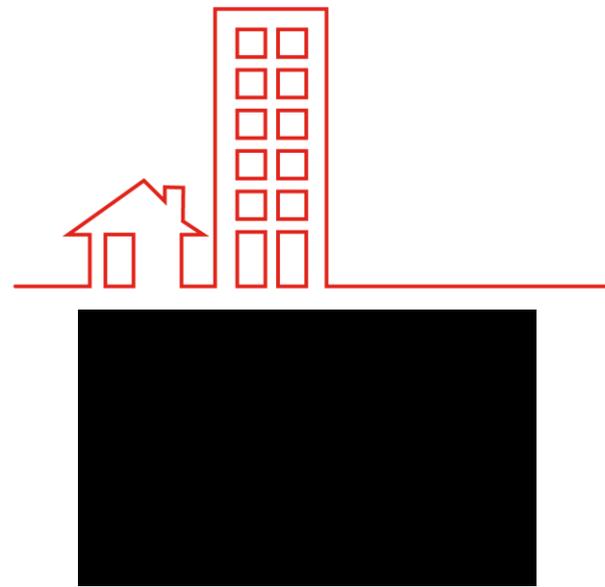
The Save Marrickville Resident Group has 5 main priorities for the Marrickville / Inner West area:

1. Sympathetic development and density
2. Local council and community control
3. Heritage and local character preserved
4. Industrial lands and employment preserved
5. Infrastructure planned first

The Save Marrickville Group commends the Greater Sydney Commission on working toward an overarching plan that aims to ensure Sydney is connected and prepared for the inevitable population increase that will occur over the next 30 years. We see this at this early stage as a genuine opportunity to get the principles and strategies right so that the character and essence of our communities are enhanced, not lost.

The Save Marrickville Group has significant concerns about the overdevelopment of the Inner West. Particularly the aims of the Sydenham to Bankstown Urban renewal plan, specifically rezoning of land along the corridor and proposal for a short-term housing target of 5,900 dwellings between 2016 & 2021 for the inner West Council area. We are particularly concerned about the level of density being forced upon the Inner West, the lack of specific and active planning around infrastructure, the risk this brings to our heritage, the character and diversity of our suburbs. We are concerned that there is already a lack of

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green open space and the GSC plan does nothing to remedy this. We are fearful of the traffic gridlock so many people will bring without good planning for public transport and roads. We fear the replacement of our high standard heavy rail will waste money and the time of local residents (including years of disruption). We worry about how liveable Marrickville and surrounds will be after 2021 if developers drive the future of our suburb – one that has taken decades to evolve and grow.

As we are focused on 5 particular areas, we have addressed our suggestions and concerns to the GSC Draft plan under each.

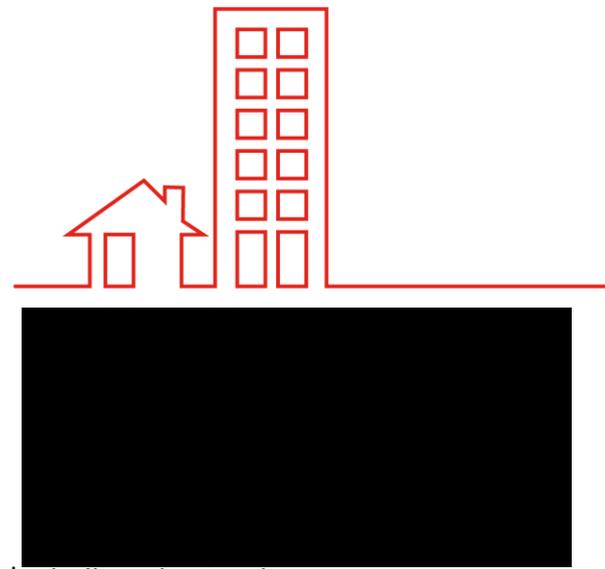
1. Sympathetic development and density

It appears that the GSC focuses on the Sydenham to Bankstown Corridor and the opportunity to place high density housing along this area, however there is little consideration of the noise from aircraft and the potential loss of nearby industrial lands that are vital to the cultural and artistic richness of our city as they are so close to the CBD and airport.

It is unclear how high-rise towers can be sympathetic to suburban neighbourhoods. You note on page 11 that the last plan raised concerns about density and showed a preference for medium rise housing over high development. It is unclear from your report if this has been heard and applied. The GSC speaks of the importance of good transition points but appears to give no specific recommendations on how this can be achieved. This is of particular concern when it appears that LEP must comply to DoP zoning recommendations and any directions given by the Minister of Planning.

Eastern City housing targets 2016-2021 by local government area (page 42) indicate that the targets are unfair. The Inner West's target is 5,900, however there are only 150 in Hunters Hill, 300 in Woollahra and 1,250 in Waverly with six out of the nine suburbs in Eastern City District having a target of less than 3,650. Such inequitable housing targets will create major divisions in our city and result in extraordinary disruption for years to come to the lives of Inner West residents, irreparably changing the nature and character of our suburbs forever.

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Sympathetic development speaks to the need to work with the built and natural environment. In the rush to build in seemingly 'underutilised' areas, we should stop to ask why these areas have minimal or specific infrastructure on them. A case in point is the Carrington Road District that regularly floods in heavy rains. With the prospect of increased flooding from the Cooks river in the future with climate change, it does not seem sensible to be loading this area up with thousands of people (recent proposal suggests potentially over 7000 residents). We should be working with the natural environment (in this case the watershed of the former Gumbramorra Swamp) not overloading it. Working with the environment includes maintaining our existing tree canopy. Marrickville cannot afford to lose established trees and they should be protected in the face of any new developments.

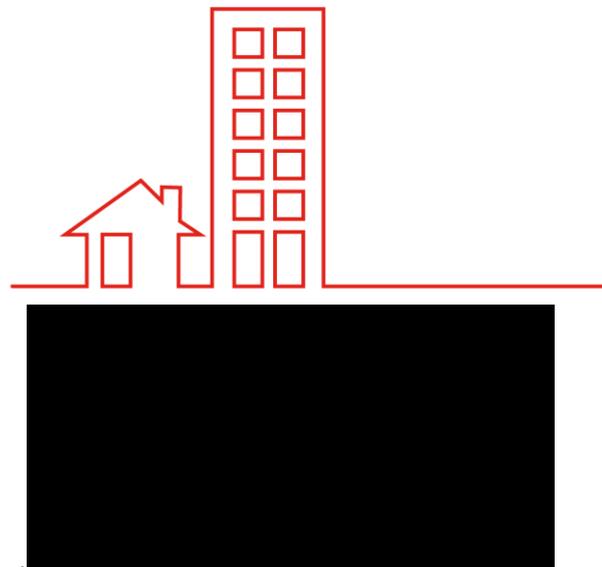
Recommendations 1:

- 1.1 GSC review the distribution of density of housing and share the load amongst the city and suburbs more equitably.
- 1.2 Land use should not overwhelm the local community and environment but work with it in a sympathetic way.
- 1.3 GSC should work toward spreading density across Sydney with low to medium rise housing – not high rise in suburbs.
- 1.4 Environmental studies should be conducted in flood prone areas.
- 1.5 Housing numbers/projections should be clarified for Inner West residents as it is unclear which developments in our suburbs make up the 5 900 targets.

2. Local council and community control

The collaboration in decision making between all three tiers of Government is a positive approach, however in order for residents to have a meaningful say in how their suburbs are grown, our local councils should have ultimate control and the final say about developments. This includes priority precinct areas. Local councils know their areas and have forums where residents can genuinely participate. We fear that the approval of major

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developments can subvert this fair process if councils object, leading to disjointed poor planning and potential for overdevelopment.

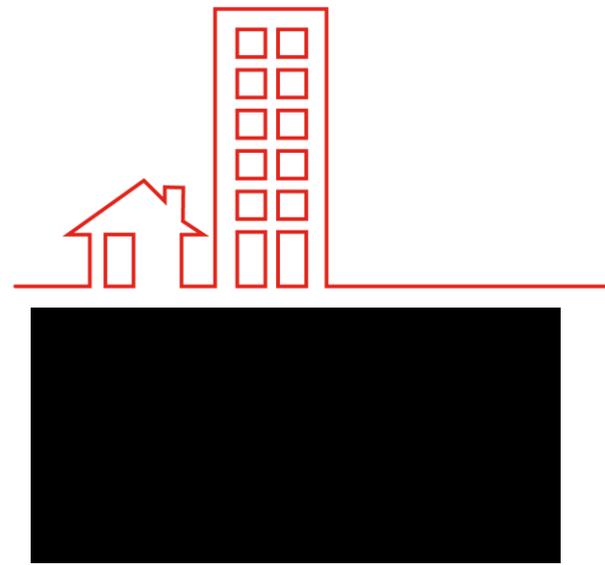
The Marrickville LGA LEP from 2011 met the State demands for population growth through identified areas and medium density along shopping strips. 4,150 new dwellings and 500 new jobs were part of the plan to be implemented by 2031. This enabled the streetscape of detached housing in residential streets to retain the character and fabric of our well-established community. Certain sites were selected for higher densities to also protect low density residential areas. Development under the existing LEP is well under way in the enlarged Council area and population targets and densities will be more than realised without the proposed, Sydenham to Bankstown Urban Renewal plan and densities. We support your suggestion that better transport will mean people will be closer to jobs, services, entertainment, sporting and cultural facilities (page 11). However, in order for these essential services to be in place, it must be driven and determined by local councils, not developers or an unnecessary Metro that appears to want to replace a perfectly functional heavy rail line.

The money that is proposed to be spent on the Metro would be better placed with areas of Sydney that don't yet have access to public transport, particularly Badgery's Creek where the new Airport desperately needs efficient connection to the rest of the city. A local residents and council driven decision in this area would suggest that we simply increase the capacity on the Bankstown line with more frequent double decker trains. As Marrickville station has just had an expensive upgrade, it seems ridiculous to upgrade again (to the benefit of Private owners) at extraordinary cost. A locally driven decision would also suggest that any upgrade to the Bankstown line should occur after the 5,900 dwellings are built by 2021, not during.

The Sydenham to Bankstown Urban renewal proposal appears to be developer driven, with developer's land banking and putting pressure on whole streets of residents to sell to them so that they can increase the footprint of their development, height and floor space ratios and number of units that they can build. We fear with larger blocks to develop, councils will be overridden by Minister Directions.

Driving redevelopment by the concept of 'Value Capture' is of great concern. This haphazard approach to redevelopment is not the way to develop sustainable suburbs.

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Developers are claiming that that they can build higher than the already too high 12 storey developments on blocks, close to Marrickville station which are only 30 metres deep.

Recommendations 2:

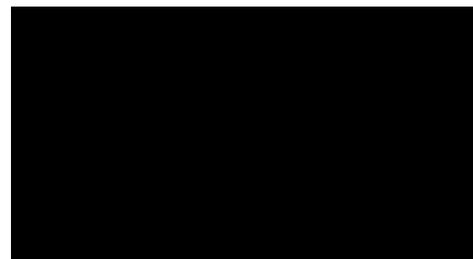
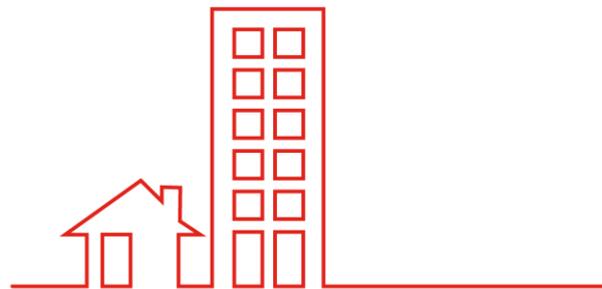
- 2.1 Final approval for developments in the inner west and across Sydney should be developed locally with councils.
- 2.2 Councils should not be mandated by the DoP or the Minister to adhere to unsustainable housing targets or density.
- 2.3 The Sydenham to Bankstown Metro should not go ahead.
- 2.4 Spot rezoning should not be allowed and developers must abide by local LEP's.
- 2.5 Value capture should not be pursued where it causes major character changes to a suburb
- 2.6 Implementation of a precinct wide master plan and statutory framework to ensure privately led rezoning's do not leave poor and uncoordinated planning outcomes

3. Heritage and local character preserved

Save Marrickville agrees with your sentiment on page 48 where you state, "conservation and interpretation of places and values of heritage significance is required to give current and future generations a better understanding of history and peoples past experiences". The Sydenham to Bankstown urban renewal strategy will be highly destructive to our heritage and character filled suburbs. It pushes gross overdevelopment in our communities, while not supporting this development with appropriate infrastructure, which will result in a great loss of amenity.

We would like to see urban renewal appropriately achieved, sensitively and without destruction of the character, heritage and history of our inner-city suburbs. There should be no need to bulldoze whole streets for redevelopment, which will destroy the character of these historical suburbs.

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Marrickville has numerous significant streetscapes and buildings that are a vital part of Sydney's history and to the character of our area, particularly our unique migrant heritage. Marrickville also is home to the industrial Carrington Road district that has many unique buildings including the New Directions Art Deco building and the original General Motors Building that is now at significant risk of being lost to 'renewal'. Carrington Road Industrial Precinct was an important manufacturing hub for the automotive industry in the early 20th century, then armaments in the second world war followed by goods for domestic consumption like lawn mowers, vacuum cleaners and hi-fi equipment and TVs. The goods produced on Carrington Road followed the major trends of the twentieth century, and many of the factory buildings are still in place today including the only remaining General Motors factory in Australia from the 1920s.

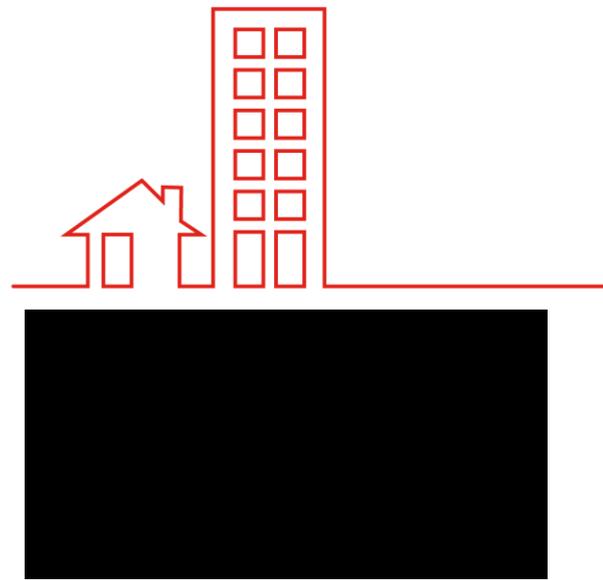
Save Marrickville have applied to the Office of Environment and Heritage for Carrington Road Industrial Precinct to be recognised by a State heritage listing. The precinct is an important site in the State's industrial past as well as for migrants settling in Australia after the second world war.

It is difficult to see how urban renewal will complement and protect these unique spaces without some type of strong direction from the GSC or the Minister. You speak in the plan of the importance of building on local identity, heritage and culture. These can so easily be lost if not given the correct attention and protection – now. Currently, local councils can be circumvented by developers who can go to the DoP or the Land and Environment Council. This is of grave concern to the heritage and character of our suburbs.

Recommendations 3:

- 3.1 A strong direction from GSC on the need to have comprehensive, independent studies conducted on heritage areas that are identified by local residents or councils before rezoning occurs.
- 3.2 Keeping the facades of industrial buildings is not enough – unique interiors should also be protected; heritage value should be assessed and architectural integrity maintained.
- 3.3 Heritage conservation areas need to be assessed and expanded.

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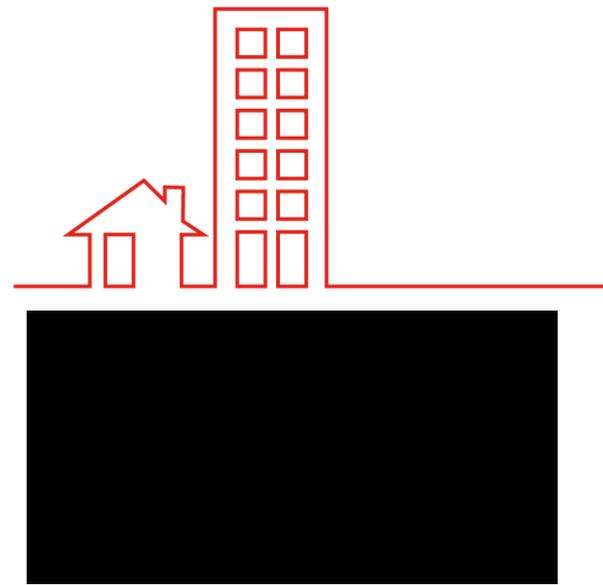
4. Industrial lands and employment preserved

We are heartened to see that the GSC not only wants to encourage more artistic and creative industries but also wants to preserve and grow our industrial economy. We applaud your focus on the need to support a diverse range of small businesses including the creative industries. You note that Greater Sydney is Australia's manufacturing capital and that Marrickville appears (page. 84) to play an important role as one of the largest employers of industrial and urban services. Page 87 notes that "Small inner-city industrial precincts have relatively affordable rents and provide high proportion of urban services jobs for local communities. The value of these precincts should not be underestimated". Action 50 to "Manage industrial land in the Eastern City District by protecting all industrial zoned land from conversion to residential development, including conversion to mixed use zones." is fully supported by Save Marrickville Resident group.

The recent rezoning of a large area of industrial land to residential on Victoria road in Marrickville is inconsistent with your recommendations for industrial lands being protected to service local communities and more broadly - Sydney. Given this has been highlighted as an important area to preserve and promote, we fear your vision is not being adhered to given the current proposal for the 7.8-hectare parcel of industrial land along Carrington Road in Marrickville that has 223 enterprises supplying around 1800 jobs. The suggested rezoning of this land from IN1 and IN2 to residential, commercial and retail will not be in line with maintaining existing local and international trade gateways feeding the city, port botany, the airport and the local community. Forcing these creative and manufacturing industries further away from the city will inhibit good local access and only contribute to greater congestion on our transport system. Please refer to the Made in Marrickville Report for more information. http://www.urbanculturalpolicy.com/wp-content/uploads/2017/08/Made_in_Marrickville_DP170104255-201702.pdf

Manufacturing and particularly creative spaces are not easily 'made' or artificially constructed. They organically grow and strengthen with time. Shutting them down and forcing them to new shiny premises will not work. The development of the Sydenham Area as a creative district does not cater for the needs of those who are in the Carrington Precinct. Losing this industrial area will result in a loss of local jobs and services that feed Sydney.

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Recommendations 4:

- 4.1 No rezoning to occur by DoP or local councils on industrial lands until a full assessment of their use, viability and links to the city and local community are conducted.
- 4.2 Industrial lands should be protected from conversion into residential or other land uses that would hinder their role and function.

5. Infrastructure planned first.

This includes planning for schools, hospitals, community spaces, roads, affordable housing and parks before rezoning. We are deeply concerned that the proposed Metro is driving the proposed rezoning process in the Inner West, particularly Marrickville and along the Sydenham to Bankstown corridor. Given the district plan highlights the need for infrastructure, including open space, identifying 'priority precincts' and urban renewal areas before planning for it seems to be working backwards. Your strategy says we should plan first. Once an area has been identified for urban renewal, the prices for land become prohibitive and the only groups that can afford to purchase the land are developers who have no reason and limited incentive to accommodate for community amenity. **Who will be paying for all this new infrastructure?** Our schools and hospitals are already bursting at the seams. This must be planned for and built now if we want our city to continue to be 'liveable'.

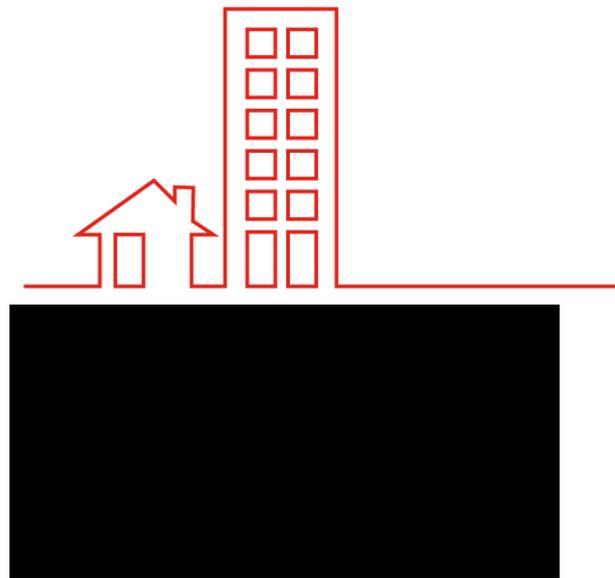
Recommendations 5:

- 5.1 Government needs to identify, plan for and invest in the delivery of affordable housing, public and open spaces, social infrastructure and services before development occurs.
- 5.2 There needs to be some mechanism where developers are obliged to reasonably contribute to each of these elements.

Transport and Roads:

The promotion of improved walking and cycling networks is an important element of a liveable city and Save Marrickville supports this in the GSC strategy given the number of people who already utilise the cycle ways in our area. We hope there will be multiple

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cycle ways developed and the current ones enhanced as more and more people use these paths to commute to work. The cycle ways should be viewed as an important piece of the healthy lifestyle and connected city puzzle; however, they cannot carry this burden and need to be complimented with good public transport and better roads. As raised above, Save Marrickville is opposed to the removal of the Sydenham to Bankstown heavy rail line. We support keeping the Sydenham to Bankstown line in full public ownership and upgrades to the existing infrastructure be implemented.

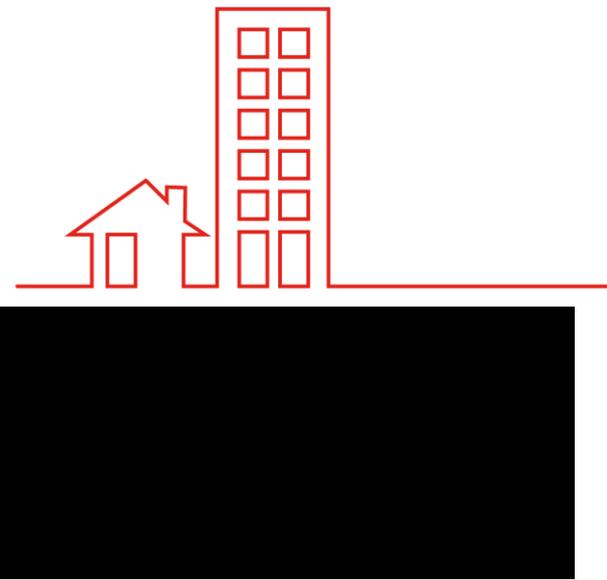
It also appears from the GSC plan that major inner-urban roads and motorways are given priority over public transport. The inner west and particularly Marrickville are already gridlocked at peak hour and the introduction of thousands more residents will exacerbate this dramatically. Also, a recent study commissioned by the Inner West Council has predicted traffic to worsen in the Inner West up to 300% due to WestConnex. The plans for the Metro and the removal of many road bridges and underpasses will also add to the already gridlocked local road network.

Planning for roads needs to be done well before land is rezoned and planned for at a local level in a holistic way. Doing these assessments and plans is expensive and the cost should be borne by the State Government. We also need to be realistic about the fact that people who live in units also own cars; often more than one. How will all these cars be managed on the road and how will their parking needs be met? This must be considered and planned for at a local level in a holistic way.

Recommendations 6:

- 6.1 More public transport needs to be created in areas that do not have access.
- 6.2 Our current heavy rail should be more effectively and efficiently utilised.
- 6.3 Planning for new roads has to occur in a suburb, precinct and city wide coordinated way – State Government must fund this with so many changes proposed.
- 6.4 Planning should integrate the aim of reduced private car dependency and increase the walking and cycling network (with multiple options to reach key areas).

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Schools:

The dramatic increase in population, particularly in the Sydenham to Bankstown Corridor, will require a significant increase in both primary and high schools. An estimate provided by Mr Morris, the Secretary of the Canterbury-Bankstown Teachers Association, noted 5 new high school and more than 10 new primary schools will be required along the named corridor. The Sydenham to Bankstown plan includes only 2 new primary schools, a few upgrades and *investigations only* into one other area. Local schools in the Inner West are already at capacity and under-resourced with the use of demountable class rooms and local parks for recreational space. With the increasing shift towards the public-school system the Government cannot and should not rely on private education.

The 1960s/1970s Wyndham scheme, saw an expansion of public schools to accommodate both population growth and also the automation and need for greater skilled education of the time. A similar expansion is required now, for this population growth, and for the shift to smaller class sizes as education shifts to student centred, 21st century, high technology learning.

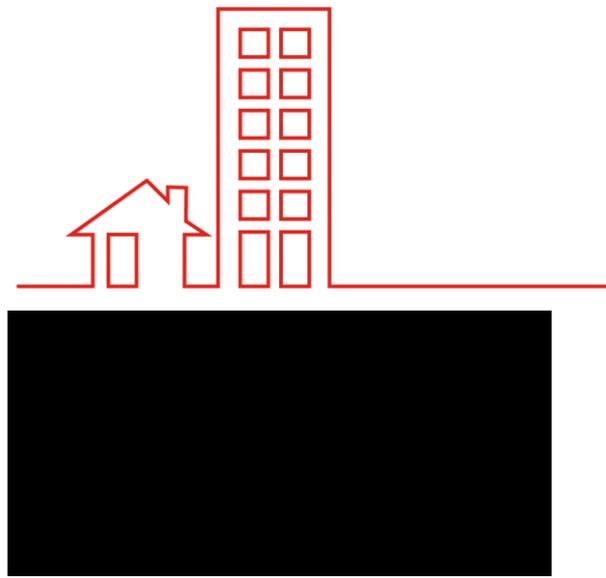
Recommendations 7:

- 7.1 Schools need to be planned and built before land is rezoned.
- 7.2 An audit should be conducted of all school facilities to assess the feasibility of schools being developed as “community hubs” in the Inner West

Open Space:

The GSC plan talks about the need to consider quality, quantity and distribution of open space. Save Marrickville agrees with these points. We **do not accept** that there will be relatively few opportunities to increase the quantity. This point is extremely disappointing given Sydney’s great history to create and showcase our city through our parks and open spaces. Environmental and health benefits of parks and open space are obvious but we also have an economic imperative given the importance of tourism to Sydney. You cannot double the population of Sydney and ignore the need for new open space. You speak of the greater number of children and elderly who must have places to go and spaces to meet – this must include parks and wide green areas that are not overshadowed by high rise buildings. The mental health of our current and future communities depends on getting this

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part of the plan right. On page 104 you note that “high density neighbourhoods also need to have high quality open space within close proximity”. This must not be in pocket or linear form. Children need to run, kick balls, fly kites (in sunshine) and our elderly need to have places to participate or watch these activities; particularly if they are living in high rise! We applaud your initiative to ensure the city is connected with cycle ways, but these have a specific purpose are more and more becoming commuter routes (particularly along the Cook’s River) and are frankly quite dangerous at certain times of the day. You also cannot kick a ball, play cricket or have a picnic on them.

The NSW Government, up until recently, had a strong program to acquire land for open space. This program gave us Sydney Park at St Peters and Mort Park and Ballast Point at Balmain, along with other important land parcels alongside Sydney Harbour.

There is an opportunity now to acquire Canterbury Race Course as 35 hectares of open space. The acquisition of Canterbury race course is specifically supported by the Office of Sport in submission lodged in respond to the Sydenham to Bankstown corridor strategy. Suggesting that more sports will be played inside in the future simply lacks vision.

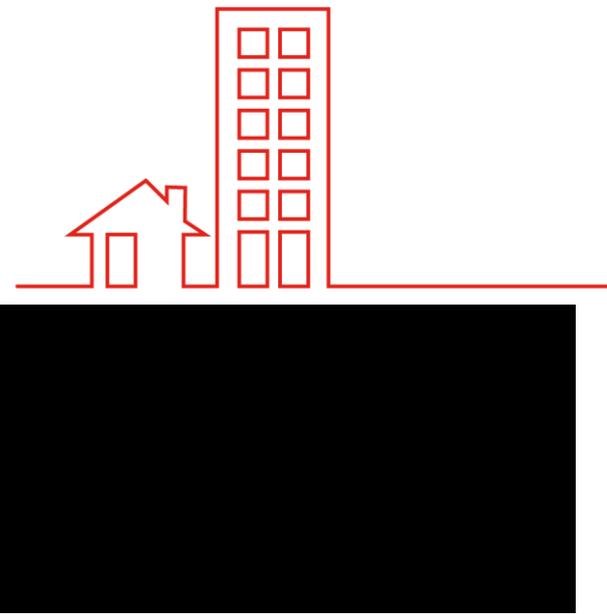
The NSW Teachers Association has raised the particular importance of ensuring there is enough open, expansive green spaces for children. Particularly given there appears to be the inevitability of families increasingly living in high rise housing. It is concerning that the GSC plan notes that “there is limited opportunity to provide additional capacity alongside growth” (pag104).

Mr Morris, the Secretary of the Canterbury-Bankstown Teachers Association noted that the future eyesight of current and future students is at risk if their eyes are not stimulated by more distant views, as evidenced in recent medical studies. Open spaces are needed for active recreation, to address the worrying trend towards overweight children in Australia, to which the inner west and Eastern District area are no exception as noted in ‘the plan’.

Already our local parks are regularly being used by school students as school grounds are at full capacity. Children need sunlight and space to thrive. We cannot set up future generations to be confined at school and in their suburbs.

Many open spaces in Marrickville are “pocket parks” so there is already a deficit of open space in the Inner West. Sporting fields are already in short supply and stretched beyond capacity in the Inner West LGA and local councils are finding it difficult to fund upkeep and maintenance. The desire for open space is not controversial and not negotiable. The GSC

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speaks about community cohesion and healthy lifestyles via access to green spaces (page 11). It is a priority that must be planned for and needs to be supported and have sensible direction from the GSC.

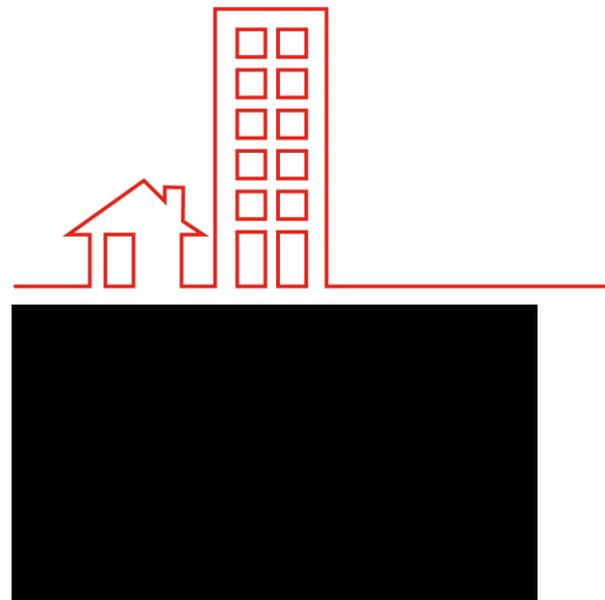
Recommendations 8:

- 8.1 A study needs to be conducted that outlines what the current open space needs are for each area and funding made available to make this happen.
- 8.2 The District Plan should state the need for a Government program to acquire land for open space.
- 8.3 Resumption of housing land to ensure student recreational spaces (e.g. as done for the school ovals at Sir Joseph Banks High School, Revesby and Tempe High School).
- 8.4 Developers to meaningfully contribute usable open spaces that are open to the public, usable for children sports and recreation and not in small pockets or linear configuration.
- 8.5 GSC should not allow linear parks, walk ways or cycle ways to be counted toward 'usable' open space.

Affordable Housing:

It appears that the plan gives little consideration and direction in relation to affordable and social housing. It does not appear that you have proposed any overall numerical targets for the supply of affordable housing. Marrickville is made up of a diverse socio-economic group of people and this diversity adds to the rich tapestry of our suburb. We fear that the 'urban renewal' will price many people who currently rent out of our suburb and close down affordable housing options for them. Increasing supply of high-rise housing does not necessarily improve affordability or housing choice, yet the plan seems to imply that this is so.

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The low 5% affordable housing target in The District Plan is inadequate considering that housing diversity, choice and affordable supply is fundamental to urban renewal in global cities around the world.

The only way to achieve affordable housing, that will address the immediate housing and homelessness crisis will be to mandate a much higher component of all residential development as affordable. Rates of 10-50% are used in other global cities' urban renewal plans.

15% has been mandated as the Inner West Council recommendation for large developments, however a building should not need to be 15 storeys before affordable housing is provided.

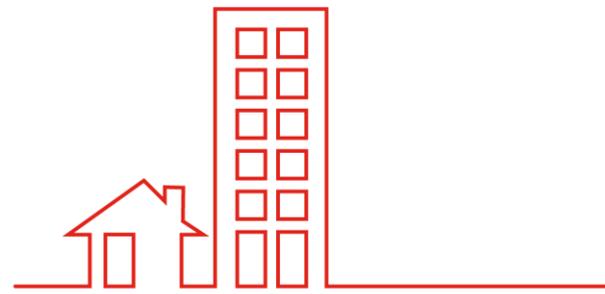
In other global cities urban requirements include capture of 50% of land value uplift as contribution towards public benefits (including affordable housing) in renewal areas rather than the value being directed to a few fortunate landowners.

Under the plan hundreds of affordable rental rooms, units and houses will be bulldozed. It is of great concern that many of the streets targeted for renewal provide affordable housing through boarding houses or older style unit blocks.

The myth that greater supply and more development will provide cheaper housing has been exposed through recent research and is quickly dispelled when looking at current new developments. For example, in the new Mirvac development on the old hospital site, a one-bedroom unit with no car space is \$715k and a two-bedroom unit will fetch over 1 million. Higher rents are also charged in new developments.

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 and the issue of affordable housing and the provision of social housing needs to be addressed, particularly when there are hundreds of people living with a disability in Marrickville alone. We also want to see our aged who have lived in Marrickville for decades, remain here. The plan says this is important but does not give direction on how to ensure it happens.

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Recommendations 9:

- 9.1 Affordable housing targets of 10-15% should be stipulated by the GSC for all districts. Guidelines that ensure fairer access to Affordable Rental Housing.
- 9.2 An inventory of current availability of affordable housing should be made to ensure that there is no net loss.
- 9.3 GSC should commit to implementing measures that will address the affordable housing issue in the Inner West and across Sydney.
- 9.4 There needs to be a diversity of housing made available to the ageing and those living with a disability and these should meet the Liveable Housing standard.