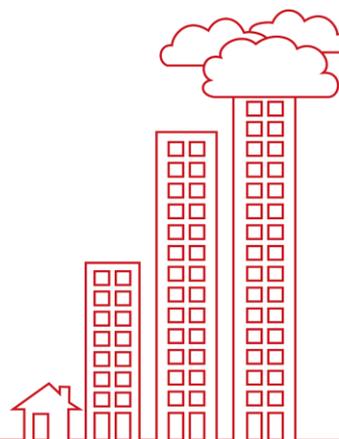


# SAVE MARRICKVILLE

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## **Save Marrickville response to *Our Place Inner West: Draft Local Strategic Planning Statement, September 2019***

### Recommendations

1. Delete the listing of Marrickville centre as a Low Carbon, High Performance Precinct, defined as an “area of greatest change”.
2. Consistently categorise Marrickville as an investigation area for additional housing, and remove out of date references to Transit Oriented Development and Urban Renewal Area covering Marrickville and Dulwich Hill in the LSPS text and graphics.
3. Categorise Marrickville as a Local Centre in LSPS Figure 29 and throughout the LSPS document.
4. A targeted heritage study of the Inner West, including Marrickville, is completed and the LEP and DCP are informed by and protect heritage items.
5. Significant local character of areas including Marrickville are identified and enhanced through LEP and DCP provisions.
6. New building developments in Marrickville should be a maximum of five storeys.
7. Exclude established single dwelling residential streets in near proximity to Marrickville station from mass redevelopment
8. Contain medium density development to an area close to Marrickville station and shops.
9. That affordable housing programs provide housing only to households whose adjustable disposable income is in the bottom 40% of household incomes.
10. That affordable housing programs provide housing which charge rent of no more than 30% of the renting household’s gross income.
11. That affordable housing programs provide permanent and not temporary affordable housing stock.
12. That affordable housing programs be delivered by established community based social housing providers only, and to include social housing providers for people with disability.
13. That Boarding House developments be approved only where they can demonstrate that they will provide affordable housing to households with disposable income in the bottom 40% of adjusted disposable incomes.
14. That new building developments continue to be required to provide parking spaces for each dwelling and workplace, while vehicular transport remains the predominant mode of transport in Sydney.
15. That the Inner West parking framework includes enhanced use of limited time parking zones for non-residents.
16. Retain, protect and increase industrial lands in the Inner West, particularly around the Marrickville and Sydenham areas.

17. Inner West Council to explore with the NSW Government mechanisms to further protect industrial land from pressures to redevelop as residential land, informed by existing overseas models.
18. Amend Figure 30 to better represent the diverse nature of industry in the Carrington Road precinct, to include creative plus many other manufacturing and service industries.

### About Save Marrickville

Save Marrickville is a group of residents taking positive action to ensure that the growth of our suburb is planned properly for our community, the environment and future residents. The key objectives of Save Marrickville include:

- No overdevelopment
- No high rise
- Sympathetic, well designed development and density
- Appropriate and considered transition points
- Preservation of heritage and local character
- Preservation of industrial and employment lands
- Appropriate infrastructure identified and implemented before rezoning
- Affordable housing
- Promotion and preservation of our natural assets and local environment
- Planning control to stay with Council

### Overview

Save Marrickville is keen to provide constructive input to Inner West Council's Local Strategic Planning Statement, and subsequent Comprehensive Local Environment Plan and Development Control Plan. We are also interested to be involved as stakeholders in production of the Marrickville Place Based Study for the Marrickville station precinct.

Our resident group supports the broadly stated planning priorities of the draft LSPS, and wishes to help shape their implementation in the interests of current and future residents. Key areas where our group has significant concern, and has covered in this submission, include:

- Marrickville's status as a centre, and implications for future growth and density
- Employment and industrial lands preservation
- Affordable housing definitions and program design.

### 1. An ecologically sustainable Inner West

Save Marrickville supports the draft LSPS priorities on adapting to climate change, zero emissions, increasing urban forest, clean waterways and zero waste, plus its Blue/Green Grid Strategy.

However, we are very concerned that Marrickville centre is incongruously identified as a Low Carbon, High Performance Precincts. The Eastern City District Plan refers to such precincts as "areas of greatest change" and defines them as:

*"... areas where an increase in total floor area is greater than 100,000 square metres in any contiguous area of 10 or more hectares . . ."* (Draft LPSP p30)

The other three areas identified as Low Carbon, High Performance Precincts in the draft LSPS are appropriate for this category, as they are the "three major growth and transformation areas" in the

LSPS, which are identified by governments and located entirely or partly within the LGA. These three major growth areas are the Camperdown-Ultimo Collaboration Area, the Parramatta Road Corridor Urban Transformation Strategy, and the Bays Precinct (Draft LSPS pp62-63)

Marrickville and other locations in the LGA located on the Bankstown railway line do not fall under the category of major growth area. We appreciate the value of Low Carbon, High Performance precincts, but we do not support Marrickville centre being designated as “an area of greatest change” and being listed under this category. Marrickville’s inclusion under this heading is an anomaly and should be removed in the LSPS on page 23 and Action 2.3 on page 30.

**Recommendation 1:**

Delete the listing of Marrickville centre as a Low Carbon, High Performance Precinct, defined as an “area of greatest change”.

The issue of Marrickville’s status as a centre and implications for future density and development will be addressed further in the next section on neighbourhoods

2. Unique, liveable, networked neighbourhoods

*2.1 Marrickville centre status and future growth*

There is considerable inconsistency in the categorisation of Marrickville centre in the draft LPSP, and Save Marrickville is keen to have Marrickville’s status as a centre correctly and consistently described throughout the document, as this status has fundamental implications for future development and density of the Marrickville Centre. In the draft LSPS text and graphics references to Marrickville as a centre and for possible future development include:

- Local centre (from Eastern City District Plan, Figure 3, p8)
- Transit Oriented Development (from Eastern City District Plan, Figure 3, p8)
- Local Centre/ Urban Hub and Low Carbon Precinct (Figure 10, p21)
- Marrickville centre, and Low Carbon, High Performance Precinct (p23)
- Marrickville town centre, and Low-Carbon, High Performance Precinct which is defined as “area of greatest change” (p30)
- Investigation Areas for Additional Housing, with circle around Marrickville Station signifying Shop-top housing/ Residential flat buildings from 2019 (Figure 23, p39)
- Urban Renewal Area (Eastern City District Plan), with circle around Marrickville station significantly larger than in Figure 23 (Figure 25, p45)
- Centre, regarding transport (Figure 28, p47)
- Centre, regarding Employment and Retails Lands Strategy (p51)
- Town Centre, regarding Retail Centre Hierarchy (Figure 29, p54)

Significantly, Marrickville is not defined as any of the following in the LPSP:

- Strategic Centre equivalent to Burwood CBD or Kogarah CBD (p39)
- Major Centre, equivalent to Ashfield (p21 and p54)
- Major Growth Area, equivalent to the Bays Precinct (pp62-63)

It is important that in the LSPS Marrickville is given consistent status as a centre, as this status may have significant ramifications for future development and density of the area. We have selected Figure 29: Retail Centres Hierachy (p54) as our main reference point regarding status of retail centres.

Marrickville should be categorised as a Local Centre rather than a Town Centre in Figure 29, under a number of key indicators of its status as a centre.

Save Marrickville recognizes that centres such as Marrickville have been identified by Council as investigation areas for additional housing, (Figure 23, p39) through its Local Housing Strategy. It is appropriate that Council leads the process of identifying areas for additional housing, in consultation with the local community.

However it is not correct to label the centres of Marrickville and Dulwich Hill as Transit Oriented Development or Urban Renewal Areas under the Eastern City District Plan. That component of the District Plan was formulated under the previous Sydenham to Bankstown Corridor Urban Renewal Strategy, which has been suspended by the NSW government. Save Marrickville discussions with the office of the NSW Minister for Planning have confirmed that the Sydenham to Bankstown Strategy and therefore that component of the District Plan is no longer current, and that the future status of Marrickville and its future development is to be determined by Inner West Council through its LSPS and LEP process.

Significantly, the LSPS shows that Marrickville is also not one of the Major Growth Areas identified by government. LSPS text and graphics should therefore be amended to remove reference to Marrickville as Transit Oriented Development and an Urban Renewal Area under the District Plan.

Marrickville is not a major retail centre. There is no shopping mall in Marrickville and just one of the major supermarket or retail chains is represented, with Woolworths located a ten minute walk from the centre of Marrickville. Marrickville centre is transforming to provide more entertainment and dining outlets, rather than retail and services.

The principal retail and service centre for the southern part of Inner West LGA is in the “Marrickville Metro” Shopping Mall, located between Sydenham and St Peters Stations, which is driving distance or a bus trip from the centre of Marrickville. Marrickville Metro includes several major supermarkets and retail chains, plus services including Services NSW and NRMA, and has significantly greater patronage and foot traffic than Marrickville centre.

Marrickville Centre remains an area of mainly single storey buildings and up to five storey buildings in the area around Marrickville and Illawarra Roads and Marrickville Station. There are a couple of recent exceptions of building above five storeys, in the Revolution building immediately next to Marrickville Station, and the new Mirvac apartments on the site of the old Marrickville hospital, which was previously a multi-storey building. This predominance of one storey and up to five storey buildings is not clearly shown in Figure 6: Housing types (p13). In the LSPS medium density is shown as no more than two storeys in height and high density is three storeys and higher. (Definitions, p72) Definitions more commonly used are that low density is single dwelling of one and two storeys, while medium density is considered up to five storeys.

Marrickville centre and adjacent streetscapes also have significant heritage value and local character which contribute greatly to their attraction and value of Marrickville as a centre.

Marrickville looks, feels, operates and is best described as an urban village, consistent with being a local centre rather than a major town centre. By virtue of all the above features, Marrickville should be categorised as a Local Centre or urban village rather than a Town Centre, throughout the LSPS.

**Recommendation 2:**

Consistently categorise Marrickville as an investigation area for additional housing, and remove out of date references to Transit Oriented Development and Urban Renewal Area covering Marrickville and Dulwich Hill in the LSPS text and graphics.

**Recommendation 3:**

Categorise Marrickville as a Local Centre in LSPS Figure 29 and throughout the LSPS document.

*2.2 Character and heritage*

Save Marrickville notes the objectives under Planning Priority 6, (p38) including that:

- Heritage values and important character are respected, and
- New housing is delivered in a manner that respects the existing character of local neighbourhoods or is consistent with the identified future desired character for the area.

Save Marrickville supports Action 6.1: Implement the Local Housing Strategy including protecting the heritage and character values of the Inner West, (p40) and in particular outcomes under this action:

- The LEP and DCP are informed by a targeted heritage study for potential new items, and conservation areas.
- Significant local character is identified and implemented through LEP and DCP provisions.

Marrickville includes many buildings and locations which are of significant heritage or historic value, and it is important that a targeted heritage study be completed for Inner West LGA, including Marrickville. Heritage items identified through the heritage study should be protected through strategies in the future LEP and DCP.

In addition, it is important that the unique and significant character of Marrickville's streetscapes and buildings be adequately documented and identified so that this can also be incorporated and reflected in the LEP and DCP. The valuable and diverse character of Marrickville is documented to some degree in the Marrickville Character Study completed by Save Marrickville in 2018. See this document attached.

It is Marrickville's unique character which adds to its value and the experience of residents, and attracts people to live and work in the area. It is vitally important that Marrickville's character be respected and developed in a positive way, and not diminished through poor planning and over-development.

Grove Avenue is just one example of an historic, attractive and much loved street which has a particular character with its combination of single and two storey federation buildings, historic sandstone building, majestic Victorian single terrace, and wide tree lined street. This street is only two blocks from Marrickville station, its heritage values and character have not previously been documented by Council and could be destroyed through blanket rezoning that is not sensitive to the street's character and heritage. Sydney has only a finite amount of Victorian and Federation residential areas, which attract residents and visitors from around Australia and from overseas. Many of these precincts are located in the Inner West, and if lost they cannot be replaced and Sydney would lose one of its greatest assets as a city.

**Recommendation 4:**

A targeted heritage study of the Inner West, including Marrickville, is completed and the LEP and DCP are informed by and protect heritage items.

**Recommendation 5:**

Significant local character of areas including Marrickville are identified and enhanced through LEP and DCP provisions.

**2.3 Future development and density**

As identified above Marrickville is:

- An investigation area for additional housing, but not a major growth area or Transit Oriented Development area under the previous Sydenham to Bankstown Strategy
- A Local Centre or urban village rather than a town centre
- Typically one story buildings with up to five storeys near the local centre
- Rich in streetscapes with rare and valuable heritage and local character.

It is important therefore that future density and development in the Marrickville local centre and around Marrickville station is appropriate to the existing scale and density of buildings, enhances the character of the streetscapes and protects the area's heritage buildings. To achieve this Save Marrickville makes the following recommendations on planning for future development in Marrickville:

**Recommendation 6:**

New building developments in Marrickville should be a maximum of five storeys.

**Recommendation 7:**

Exclude established single dwelling residential streets in near proximity to Marrickville station from mass redevelopment.

**Recommendation 8:**

Contain medium density development to an area close to Marrickville station and shops.

Save Marrickville notes that there will be a future Marrickville Place Based Study which will analyse opportunities and constraints for development of the Marrickville Station precinct, and we are willing to participate as key stakeholders in this process.

**2.4 Affordable housing**

Save Marrickville supports planned outcomes under Action 6.1 relating to affordable housing, including:

- The affordable housing framework is improved
- Affordable housing contribution areas are established at a minimum rate of: 15% in areas of significant uplift; 30% on Government-owned land; provided in perpetuity
- Improve access, affordability of boarding house developments
- Collaborate with external providers of Community Housing and Special Disability Accommodation.

It is important that Council develops a clear and appropriate definition of affordable housing and the target population to be accommodated through this housing.

The most appropriate definition of affordable housing is the "30/40 rule", the commonly used measure in housing research and policy, including through the Australian Housing and Research Institute. Our reference is the AHURI Research and Policy Bulletin Issue 68 February 2006.

Under this definition, affordable housing is where a low income household (defined as having adjustable disposable income in the bottom 40% of households) pays no more than 30% of their household income on housing costs. People who pay more than 30% of their gross household income on housing are defined as being in household stress, with private rental having the greatest proportion of people in housing stress.

It is important to target affordable housing to people who are on low incomes and in housing stress, to ensure that it is provided to those in greatest need of housing support, and have the greatest impact in alleviating housing stress. Note that people experiencing housing stress in the Inner West are diverse and often have a range of needs and characteristics in addition to having low income and high rent. This diversity of need should be reflected in the affordable housing programs funded through SEPP 70 provisions for people on low incomes, to include housing appropriate for people with disability, and housing for people who are aged and frail. These could include home modifications, hostels and a range of aged care options.

Affordable housing programs and providers should also be clearly defined and described in the LSPS, and provide permanent rather than temporary affordable housing stock. Where affordable housing provisions are not well defined or designed, developers will seek to reduce the cost impact, and in doing so provide short term, high rental and poorly targeted programs which do little to support low income people in housing stress. There is a widely held public perception that in Sydney developers often achieve increased density in development approvals, in return for providing one dwelling for one essential worker at 80% of market rent for only a few years.

Similarly, there is a perception that Boarding House developments are increasingly being built to provide high priced studio apartments to people who are not on relatively good incomes.

Save Marrickville makes the following recommendations for Inner West affordable housing programs funded in line with SEPP 70 Guidelines:

**Recommendation 9:**

That affordable housing programs provide housing only to households whose adjustable disposable income is in the bottom 40% of household incomes.

**Recommendation 10:**

That affordable housing programs provide housing which charge rent of no more than 30% of the renting household's gross income.

**Recommendation 11:**

That affordable housing programs provide permanent and not temporary affordable housing stock.

**Recommendation 12:**

That affordable housing programs be delivered by established community based social housing providers only, and to include social housing providers for people with disability.

**Recommendation 13:**

That Boarding House developments be approved only where they can demonstrate that they will provide affordable housing to households with disposable income in the bottom 40% of adjusted disposable incomes.

### 3. Sustainable transport

Save Marrickville supports Planning Priority 8 to provide improved and accessible transport infrastructure. While the following are not covered in detail in the LSPS, Save Marrickville makes the following recommendations:

#### **Recommendation 14:**

That new building developments continue to be required to provide parking spaces for each dwelling and workplace, while vehicular transport remains the predominant mode of transport in Sydney.

#### **Recommendation 15:**

That the Inner West parking framework includes enhanced use of limited time parking zones for non-residents.

### 4. Creative communities and a strong economy

Save Marrickville's detailed response to this theme of the LSPS is contained in our submission on Council's draft *Employment and Retail Lands Strategy*.

For some time Save Marrickville has been concerned with the continuing loss of industrial land from inner-city Sydney. Losing vast tracts of IN1 and IN2 zoned land for uplift and 'urban renewal' places Sydney in a precarious position to support the changing face of employment and the urban services needs of a growing population, as well as the cultural and economic requirements of an important global city.

On a local level, the maintenance and support of industrial land in the inner west stimulates local employment and provides the practical underpinnings of the inner west's identity as a creative and manufacturing precinct – an identity built on a history of manufacturing and productivity.

Save Marrickville supports the draft LSPS's commitment to protect industrial lands. We would also like to see Council, in partnership with the State Government, develop mechanisms to further support industrial landholders and tenants, to mitigate external pressures such as rent increases, flooding and climate change effects, and economic pressures to rezone for residential use.

Cities outside Australia have protected industrial precincts from residential development pressures through a number of government mechanisms, with significant successful models operating in the United States cities of Portland (Oregon) and Chicago.

Save Marrickville is concerned that LPSP Figure 30 (p55) does not accurately represent the diverse nature of industry in the Carrington Road precinct. In this figure the Carrington Rd industrial precinct is currently labelled as only 'C' for 'Creative industries'. Although the precinct does contain many creative industries, which should be recognised, Carrington Road is also an important area for food and cosmetics production (eg. New Directions), auto services (eg. SmashTec), and artisan manufacturing (furniture-making, ceramics). There is a wide range of industry in this area, already generating diverse local jobs, that must be recognised as having a valid place in the Inner West. Moreover, this mix of creative industries, urban services and manufacturing is what contributes to Carrington Road's unique clustering effect, which is important to the area's overall viability.

Our key recommendations under this theme endorse the draft objective regarding industrial land under Planning Priority 9, with additional support to preserve industrial land, and better representation in the LSPS of existing industry in the Carrington Road precinct.

**Recommendation 16:**

Retain, protect and increase industrial lands in the Inner West, particularly around the Marrickville and Sydenham areas.

**Recommendation 17:**

Inner West Council to explore with the NSW Government mechanisms to further protect industrial land from pressures to redevelop as residential land, informed by existing overseas models.

**Recommendation 18:**

Amend Figure 30 to better represent the diverse nature of industry in the Carrington Road precinct, to include creative plus many other manufacturing and service industries.

5. Caring, happy, healthy communities

Save Marrickville supports the LSPS planning priorities under this theme.

6. Progressive local leadership

Save Marrickville supports the LSPS planning priorities under this theme.

**Attachment A:** *Marrickville Character Study. Save Marrickville 2018*