



INNER WEST COUNCIL

Draft Local Housing Strategy - Public Exhibition

Engagement Outcomes Report

Summary

Council engaged the Inner West community on the draft Local Housing Strategy (the Strategy) via the engagement platform, Your Say Inner West (YSIW).

The Strategy was on public exhibition from 24 June to 28 July 2019. During this period, there were 23 exhibition events comprising of public drop-in information sessions and information pop-ups. 823 people were informed about the Strategy through these engagement methods. There were also presentations made to the Inner West Planning and Heritage Local Democracy Group and Housing and Affordability Advisory Committee.

There were 2,630 visits on the YSIW website. Council received 170 individual and organisational responses. Respondents were predominantly local residents.

The submission form required participants to state their level of support for the housing vision, planning directions for housing in relation to social infrastructure, location of housing within transport hubs and centres, investigation locations for new housing, housing typology needed in the Local Government Area (LGA), and methods required to increase affordable housing.

A majority of respondents agreed with the housing vision and the Strategy's focus on locating housing around existing centres and public transport nodes. A majority of respondents agreed that population growth needs to be supported by additional social and transport infrastructure. More respondents disagreed with the statement that Inner West should provide housing capacity to meet the projected population growth.

A majority of respondents desired more medium density housing, affordable housing, and housing for aged persons. A majority of responses supported working with industry and affordable housing providers to encourage innovation in building design and delivery models for affordable housing, providing a minimum requirement for affordable housing across the LGA and not just to up zoned areas, and reviewing Council's Affordable Housing Policy to provide the maximum feasible amount of affordable housing.

Background

Inner West Council is developing its Local Housing Strategy for the Local Government Area.

It is anticipated that an additional 20,000 dwellings will be needed by 2036 to house the forecast population growth of Inner West Council. New housing must be in the right places to meet demand for different housing types, tenure, price points, preferred locations and design. In terms of dwelling numbers, the Strategy identifies that Inner West currently has capacity to meet demand for the next 10 years. However, as we approach that capacity limit we begin to run out of appropriately zoned land to meet the diversity of housing types required.

The Strategy recommends that new homes be located in areas that are well-served by public transport and services, while avoiding areas with significant constraints (hazards, heritage considerations, poor transport accessibility and low access to open space).

Housing affordability continues to be an issue facing the Inner West and Greater Sydney as a whole. Over 6,400 Inner West households (8.7% of total households) are in housing stress (ABS, 2016). There is also an estimated 1,762 homeless people in Inner West. A 'do nothing' approach is expected to increase the affordable housing gap to 10.4% by 2036. The Housing Strategy recommends planning and non-planning mechanisms to reduce the gap between affordable housing demand and supply.

Engagement Methods

Engagement was undertaken via the following methods:

- Your Say Inner West project page
- Public drop-in information sessions
- Information pop-ups
- Local Democracy Group Presentations

Promotion

The public exhibition was promoted via:

- Your Say Inner West project page
- Council's website
- Social media
- Email to identified groups

All promotion collateral directed people to the online submission form on Your Say Inner West (YSIW).

Engagement outcomes

The following section analyses the responses to the survey, and comments from 160 individual responses and 18 responses from organisations.

Who did we hear from?

Figure 1 below indicates that the majority of respondents (99.3%) were from Inner West LGA. The majority of respondents were from Dulwich Hill, Marrickville, Lewisham and Croydon.

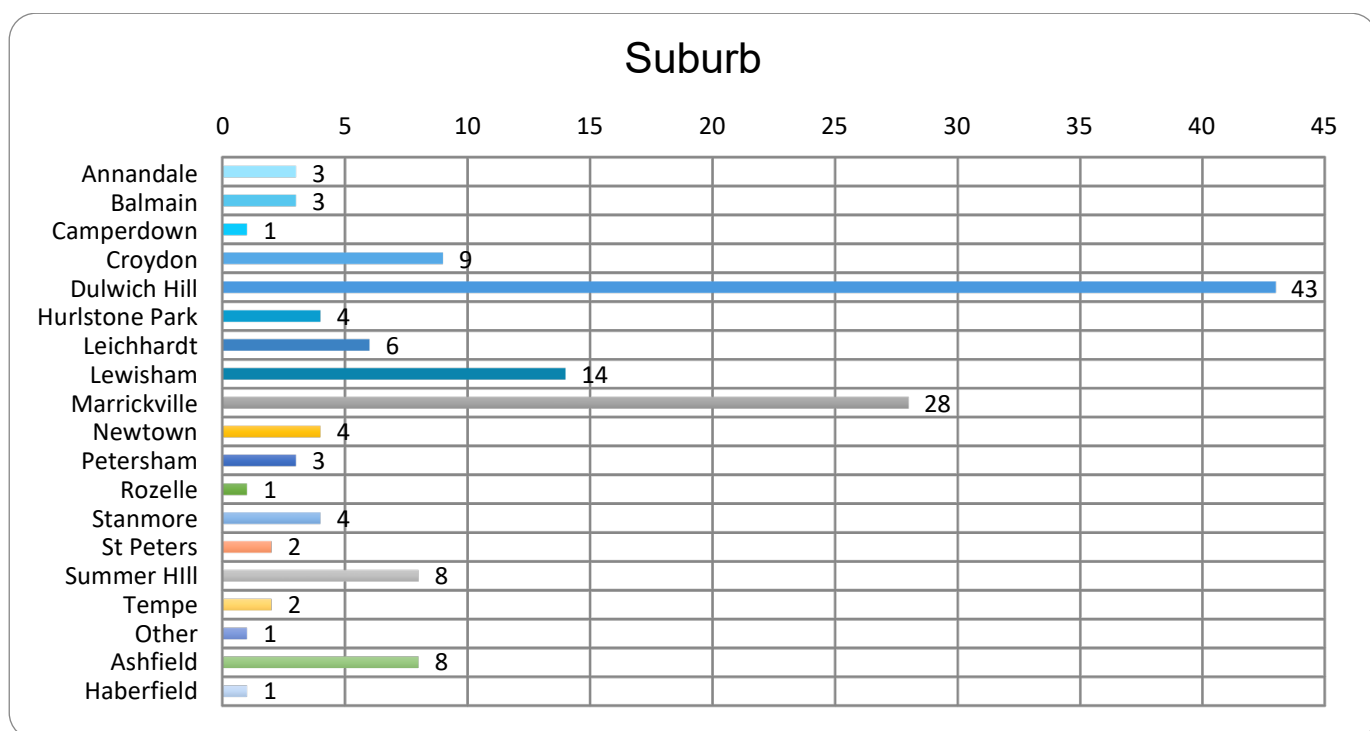


Figure 1: Respondents' place of residence (number of responses)

Individual Responses

The following section summarises the individual responses received by Council. 144 individuals responses were provided through yoursay.innerwest.nsw.gov.au and 16 individuals emailed their comments.

Q1. The draft Housing Strategy includes a vision and guiding principles (see Executive Summary page iii). To what extent do you agree with this vision and the associated principles?

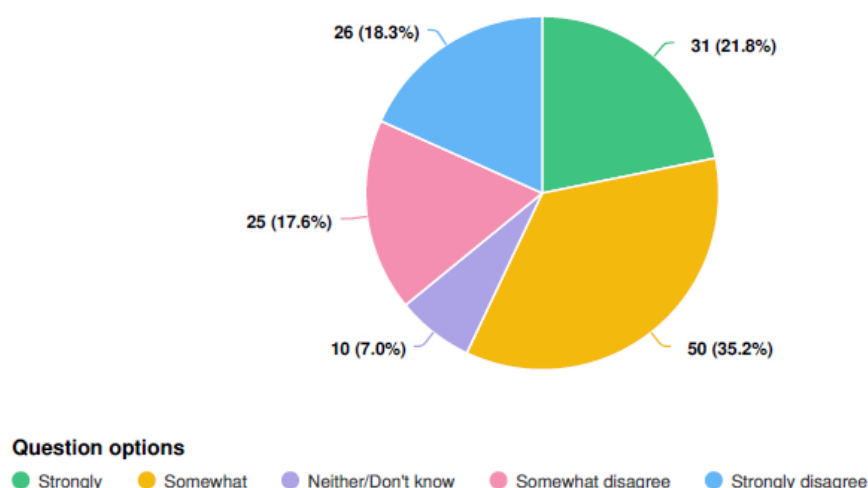
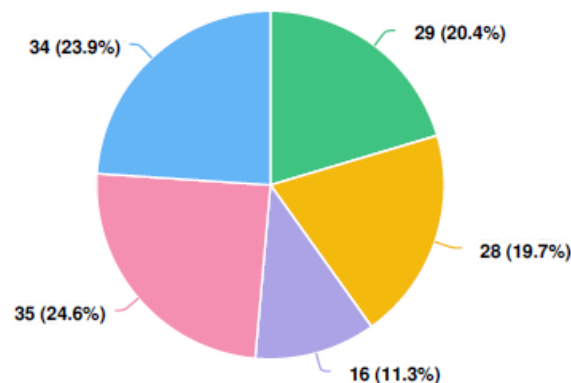


Figure 2: Responses to level of support for the Housing Vision

Figure 2 demonstrates that 57% of respondents supported the Strategy's housing vision. Of these, 35.2% 'somewhat' supported the vision, and 21.8% of respondents 'strongly' supported the vision. 35.9% of respondents objected to the housing vision.

Q2. The draft Housing Strategy proposes sufficient dwellings to meet our forecast population growth rate of one percent per year. This means providing enough new housing for 2,080 people per year or around 1,000 dwellings per year. To what extent do you agree with this strategy?



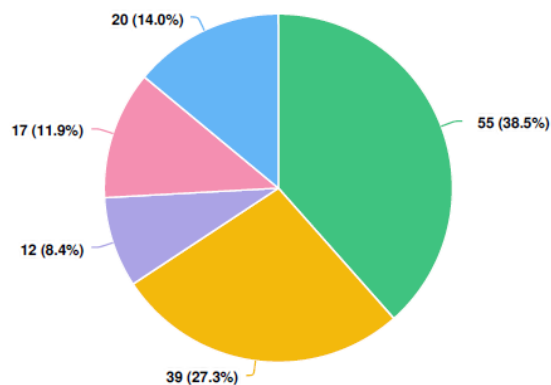
Question options

Strongly Somewhat Neither/Don't know Somewhat disagree Strongly disagree

Figure 3: Responses to level of support for the proposed housing growth in the LGA

Figure 3 demonstrates that more respondents (48.5%) disagreed with the Local Housing Strategy's objective in providing housing capacity to meet Inner West's projected population growth. However, a significant amount of responses (40.1%) also agreed with this strategy, and 11.3% of respondents were uncertain.

Q3. The draft Housing Strategy proposes to support population growth with additional social and transport infrastructure. To what extent do you agree?



Question options

Strongly Somewhat Neither/Don't know Somewhat disagree Strongly disagree

Figure 4: Responses to level of support for the Strategy's planning direction to support population growth with social and transport infrastructure.

Figure 4 demonstrates that a clear majority (65.8%) of respondents supported the Strategy's planning direction in supporting population growth with additional social and transport infrastructure. Of these, 38.5% 'strongly' supported the above strategy, and 27.3% of respondents 'somewhat' supported the above strategy.

Q4. To meet the population growth rate the draft Housing Strategy proposes to focus dwelling growth in and around existing town centres, and along transport corridors such as Parramatta Road, train and light rail lines. To what extent do you agree with this strategy?

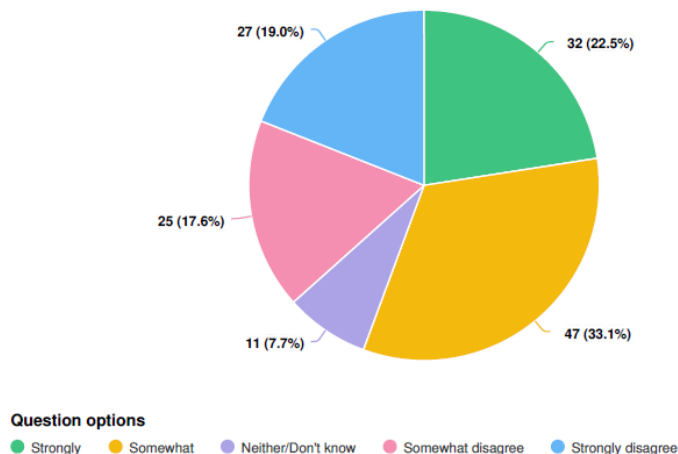


Figure 5: Responses to level of support for the Strategy's proposal to focus housing growth around existing town centres and transport corridors

Figure 5 demonstrates that 55.6% of respondents supported the Strategy's focus in locating additional housing around existing town centres and transport corridors. Of these, 22.5% 'strongly' supported the above strategy, and 33.1% of respondents 'somewhat' supported above strategy. 36.6% also opposed the above strategy.

Q5. The draft Housing Strategy considers the spread of housing growth across the investigation areas (extent of growth shown as green columns). Do you think the growth should be:

- Concentrated in fewer centres
- Is about right
- More spread out through the LGA?

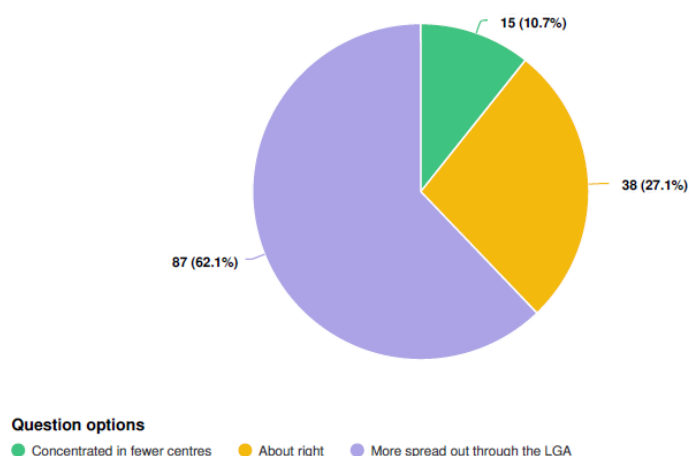


Figure 6: Responses to level of support for the Strategy's seven key projects

Figure 6 demonstrates a majority of support for housing 'to be more spread out throughout the LGA', at 62.1% of responses. 27.1% of respondents felt that the locations of housing growth as proposed in the Strategy 'is about right', while 10.7% of respondents felt that housing should be 'concentrated in fewer centres'.

The free text accompanying the responses that housing should be, 'More spread out through the LGA' was analysed. 53% of these responses raised concern and/or objection to any form of new housing being investigated in their local area. It is therefore likely that the responses to this survey question related more to the desire for no change in their own neighbourhood than to a belief that housing should be more spread out.

Q6. What types of dwellings would you like to see more of in the Inner West? (select all boxes that apply)

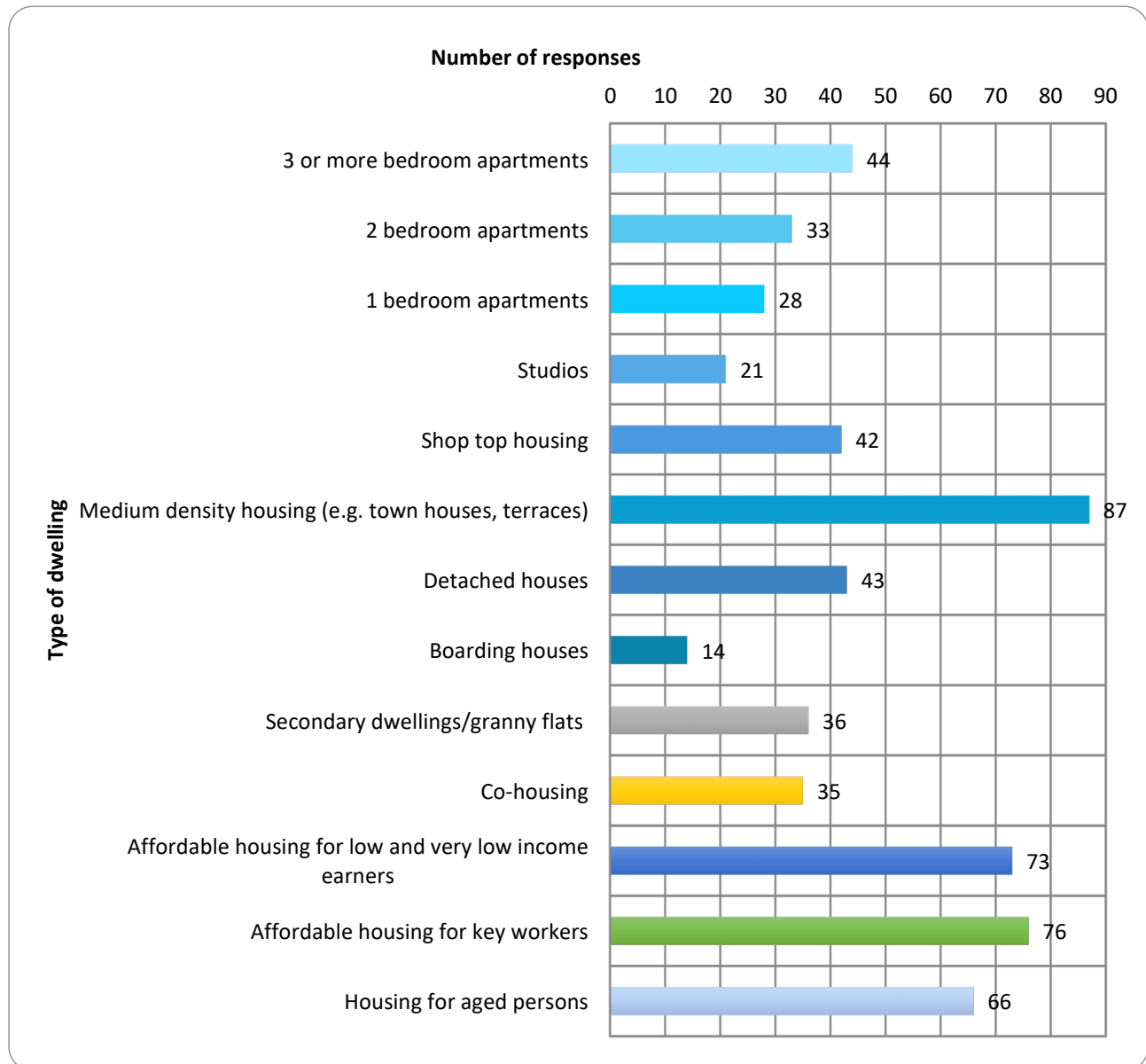


Figure 6: Number of responses to 'What type of dwellings would you like to see more of in the Inner West?'

The top 5 responses for housing typologies people would like to see more of in the Inner West were:

- Medium density (63%)
- Affordable Housing for Key Workers (55%)
- Affordable Housing for very low and low income earners (53%)
- Housing for Ages Persons (48%)
- 3 or more bedroom apartments (32%)

Q7. The Inner West has a growing gap in affordable housing for very low, low and moderate income households experience housing stress. More needs to be done to address this growing gap. Which of these actions would you like to see Council implement in order to address this issue? Mark all that apply.

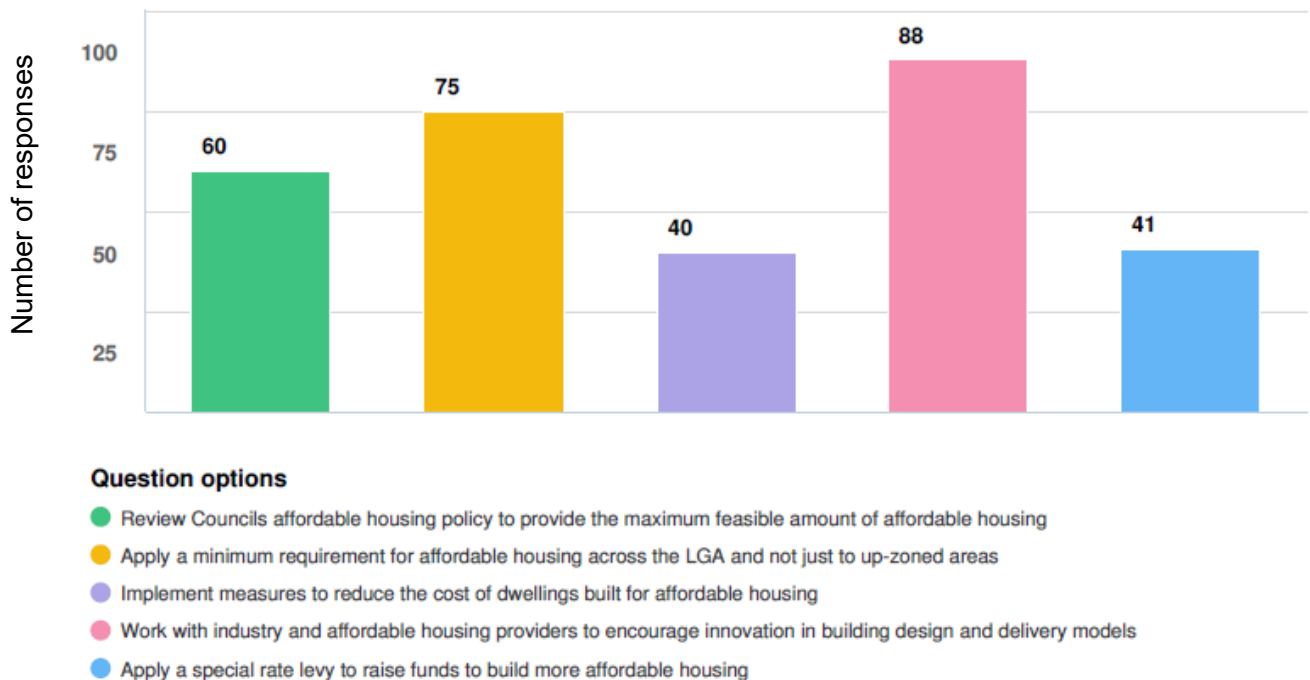


Figure 7: Number of responses to the methods that Council should commit to for the delivery of affordable housing

The top 3 responses for the mechanisms that respondents consider are important to delivering affordable housing are:

- Work with industry and affordable housing providers to encourage innovation in building design and delivery models - 64% of responses chose this method
- Apply a minimum requirement for affordable housing across the LGA and not just to up-zoned areas - 54% of responses chose this method
- Review Councils affordable housing policy to provide the maximum feasible amount of affordable housing - 43% of responses chose this method

Summary of individual comments

Question 8 of the survey enabled comments to be provided by respondents in free text. The comments were analysed according to key themes/topics. The top 5 key/themes topics are provided below. All summarised comments from individuals are provided in **Appendix 1** to this report.

1) Concern over the potential loss of heritage and character

Nineteen (11.9%) responses contained comments which raised concern over the loss of character and heritage from overdevelopment. Individuals stated that Inner West needs to do more to protect places and buildings that contain significant heritage and character. Many comments raised the need to do a fine grain heritage review of Marrickville and Dulwich Hill.

2) Concern that additional housing will adversely impact on social and community infrastructure

Eighteen (11.3%) responses raised concern that existing social and community infrastructure such as schools, parks and public transport will not be able to adequately service the needs of the future population. A number of comments stated that population and housing growth needs to be at sustainable levels and that planning needs to be undertaken to ensure social and community infrastructure can meet the demand of the population in the future.

3) Support for more social and affordable housing

Thirteen (8.1%) responses contained comments that supported the provision of more affordable and social housing in the LGA. A number of comments include the need for planning controls that make Boarding Houses affordable, the importance of protecting existing affordable housing and support for more community housing providers to manage affordable dwellings.

4) General support for the Local Housing Strategy

Eleven (6.9%) responses contained comments that showed general support for the Local Housing Strategy. Individuals stated that new housing will bring investment toward public infrastructure in town centres, agreed with the Strategy's general principles of balancing heritage, more housing and being socially inclusive, and commented that the Strategy delivers on the Community Strategic Plan's 2036 vision.

5) Concern over vehicular congestion and parking problems

Ten (6.3%) responses contained comments that raised concern that additional housing will contribute to vehicular congestion and parking problems in the LGA. Certain areas were raised as having congestions problems, such as Parramatta Road, Marrickville and Dulwich Hill.

Other matters – Submissions on individual sites

Twenty-Six (26) individual submissions sought amendments to planning controls to accommodate additional housing on specific sites.

Comments received from organisations

Twenty (20) submissions were received by organisations on the Local Housing Strategy. The organisation responses were from:

- St Vincent de Paul Society
- Australian Research Council - Urban Cultural Policy and the Changing Dynamics of Cultural Production
- Marrickville Residents Action Group and Sydenham to Bankstown Alliance
- Marrickville Chamber of Commerce
- Shelter NSW
- Bayside Council
- Save Marrickville
- Burwood and District Heritage Society
- Macken Planning Solutions
- Bridge Housing
- Sydney Airport
- University of Wollongong
- St George Community Housing
- Save Grove Street Residents Group
- Housing and Affordability Advisory Committee
- Inner West Environment Group
- Urbis
- Mecone
- GAT & Associates Pty Ltd
- LGBTIQ Working Group

Organisations that provided submissions on behalf of individual land owners were counted as 'individual' submissions rather than 'organisation' submissions.

The comments were analysed according to key themes/topics. The top 5 key/themes topics are provided below. All summarised comments from organisations are provided in **Appendix 2** of this report.

1) General support for the Strategy's measures to deliver affordable housing

Five (5) organisations made comments that supported the Strategy's vision and proposed planning and non-planning mechanisms for investigation to deliver affordable housing. A few comments supported the minimum-required 15% of new dwellings to be affordable dwellings.

2) Need for Council to work with Community Housing Providers (CHPs) to deliver affordable housing

Three (3) organisations made specific comments that supported the Strategy's aim to work with CHPs to deliver affordable housing. 3 CHPs specifically stated their intention to work with Council to investigate opportunities for delivering affordable housing, including on public land.

3) Support the retention of industrial land

Three (3) organisations made comments that supported the Strategy's retention of industrial land. Comments included an expression of support for excluding Sydenham industrial land from consideration for housing to support the local economy and operations at Sydney Airport.

4) Affordable Housing in perpetuity

Comments were raised from two (2) organisations that Council should advocate for State Government to ensure that affordable dwellings delivered through the State Environmental Planning Policy (Affordable Rental Housing) 2009 should be affordable in perpetuity, rather than just a minimum of 10 years.

5) Increasing requirements for Silver and Gold/Platinum dwellings under the 'Liveable Housing Design Guidelines'

Two (2) organisations made a suggestion that the Strategy should require that all new residential development be required to meet 'Silver Level' under the Liveable Housing Design Guidelines (LHDG), allowing 'visitability' of dwellings for people with mobility issues. Comments also stated that a proportion of residential development should be required to achieve the gold or platinum level of the LHDG.

Appendix 1: Summary of comments from individuals

No. of sub's	Topic	Summary of Comments raised in submissions
19	Concern over loss of heritage and character from overdevelopment. Inner West Council needs to protect the places and buildings that contain significant heritage and character.	<ul style="list-style-type: none"> • More housing can destroy heritage and character, we need a more considered approach to design. • Preference for 2-3 storey duplexes to integrate with the character of Inner West. • Too many heritage buildings have been torn down. • The strategy fails to acknowledge the value of workers cottages in Dulwich Hill. • Any additional housing in Croydon should be medium density to address the surrounding HCA. • We also need to include preservation of historic buildings built prior to 1939 to save as many of the Victorian Villas, Federation cottages & terraces & inter war free standing houses. • The draft housing strategy conflicts with the heritage conservation area along David St Marrickville and indeed the whole of the area from Livingstone Road up to Wardell Road. In this area and throughout Marrickville there are fine functioning suburban housing stock worthy of preservation and enhancement of heritage protection. • We need more conservation areas, particularly in the old Marrickville Council LGA where heritage and character were not as valued as in Leichhardt. • There needs to be appreciation of heritage value in all areas, including Petersham and Marrickville. • Fine grain heritage analysis of Dulwich Hill and Marrickville is required to protect heritage and character.
18	Additional housing in the LGA will adversely impact on social and community infrastructure	<ul style="list-style-type: none"> • Concern that development will cause undue pressure on social and community infrastructure, including schools, transport and parks. • Meeting housing targets should not be at the expense of social services and transport. • Concern that gas lines won't be able to service increasing population. • Growth needs to be limited to sustainable levels. • Support for additional housing in Inner West subject to supporting hospitals and childcare. • New development will place pressure on drainage and waste water systems. • Open Space is required to meet population growth. • Concern about ability for schools to accommodate population growth.
13	Support for affordable and social housing	<ul style="list-style-type: none"> • Affordable housing should be provided within close proximity to public transport. • Housing for very low and low income earners should be spread throughout the LGA. • The affordable housing rates on 15% of new development, and 30% of new development on government land should be strictly applied. • Controls need to be developed to make boarding houses affordable. • Better protect existing affordable housing and look for opportunities to deliver additional affordable housing. • Inner West Council should support temporary/emergency shelters/accommodation, for example, for domestic

No. of sub's	Topic	Summary of Comments raised in submissions
		<p>violence victims.</p> <ul style="list-style-type: none"> • Support for increased Council rates for affordable housing. • There needs to be discussion between delivering affordable housing via the private market and built form outcomes that may result from this process. • Council also needs to take into account the provision of workers' accommodation. • Support boarding houses to be managed by affordable housing providers to improve their affordability.
11	General support for the Local housing strategy	<ul style="list-style-type: none"> • Increased housing as proposed is supportable. • The Local Housing strategy is well thought out and addresses the CSP 2036 vision. • The Local Housing Strategy is well researched and has taken into consideration the concerns of local residents. • Agree with general principles, especially balancing heritage, more housing and being socially inclusive. • Overall, the strategy of the draft housing strategy is sound, in that it does recognise what the Inner West community has said, notwithstanding that Council should listen to further community input regarding specific precincts and areas. • General support for the housing vision. • New housing will bring investment in public infrastructure in town centres. • Density also creates more vibrancy and life.
10	Additional housing will contribute to vehicular congestion and parking problems	<ul style="list-style-type: none"> • New development will contribute to congestion problems. • Marrickville Streets are already choked with traffic. • New apartments do not have enough car parking which adds to the parking problem. • Parking and traffic congestion has become a huge issue as I live in Marrickville. • Concern about parking and road congestion on Parramatta Rd from additional housing in the area.
10	Public transport capacity cannot service increased population	<ul style="list-style-type: none"> • Currently the Inner West Light Rail is struggling to meet passenger demand. Increased housing density will exacerbate this problem. • Light rail is standing room only when it reaches Arlington. • The light rail is already operating beyond capacity in peak periods. • Concern for capacity of Inner West light rail to support additional housing in Waratah Mills and Arlington
9	Concern for ecological impacts from new housing	<ul style="list-style-type: none"> • The Housing Strategy does not talk enough about mitigating adverse impacts of additional housing on the natural environment. • There should be higher sustainability requirements mandated, for example, new dwellings should be connected to gas. • Habitat corridors must be maintained and increased. • The housing strategy doesn't appear to adequately consider our gazetted biodiversity area and endangered local bandicoot species • The section on Arlington and Waratah Mills - Fails to take into account the Greenway as a constraint

No. of sub's	Topic	Summary of Comments raised in submissions
		(habitat/biodiversity corridor and bike boulevard). <ul style="list-style-type: none"> • Support for planning provisions to reduce urban heat island effect
5	Improved environmental performance for houses and ecologically sustainable housing	<ul style="list-style-type: none"> • Support increased BASIX requirements and other mechanisms to improve environmental performance, such as targets for zero carbon housing. • Solar energy with battery powered electricity like Tesla batteries, should be encouraged in all new dwellings with incentives. • Homes can be more comfortable and use less electricity/water for very small initial investment. • Homes need to be EV ready. • We need to address the heat island effect. • Support for electric vehicle charging infrastructure.
8	Additional housing will negatively impact the aesthetic and amenity of the urban area	<ul style="list-style-type: none"> • Concern for apartments causing 'windswept' areas and new 'ghettos'. • No more overdevelopment, it will be visually unappealing. • High rise towers are not suited to Inner West. • Concern that future built form will be poor quality .
4	Support for retaining industrial land	<ul style="list-style-type: none"> • Fully support retention of Industrial/Employments lands at Sydenham and Carrington Rd.
3	Support for housing that provides for families	<ul style="list-style-type: none"> • Too many units are being built that do not provide for families. We need more 2 and 3 bedroom houses to cater for families. • Families need open space.
3	Object to increased Affordable Housing	<ul style="list-style-type: none"> • Residents should not subsidise affordable housing.
2	Accommodate new housing in industrial lands	<ul style="list-style-type: none"> • Unit development should be limited to industrial brownfield sites.
2	Prioritise good internal amenity	<ul style="list-style-type: none"> • New housing need to prioritise access to sun, trees and green spaces
1	Utilise heritage items to deliver higher densities	<ul style="list-style-type: none"> • Heritage items should be allowed to deliver high density and develop their site to their maximum potential
1	Housing growth should exceed 1% population growth p.a.	<ul style="list-style-type: none"> • We should be growing our housing stock much faster than 1% per year, given Sydney as a whole has a population growth of closer to 1.7% and we have some of the best amenity in the city.
1	Support for no car parking in new	<ul style="list-style-type: none"> • Inner West should be more walkable and no parking for new housing developments will encourage more people to walk and use public transport

No. of sub's	Topic	Summary of Comments raised in submissions
	housing close to public transport	
2	Support for diverse housing	<ul style="list-style-type: none"> Support for partnerships to implement diverse housing typologies
1	Understanding for housing requirements of Indigenous People	<ul style="list-style-type: none"> We need to better understand Aboriginal people's lifestyle and needs and maintain their heritage and culture.
3	Question the need to accommodate population growth	<ul style="list-style-type: none"> Questions the need for extra dwellings when there are many empty apartment rentals.
2	Need to emphasise people and creativity in the Inner West	<ul style="list-style-type: none"> The employment analysis did not refer to arts employees.
1	Support for universal housing	<ul style="list-style-type: none"> There should be mandatory accessible housing for disabled and aged persons.
1	The Housing Strategy is too vague	<ul style="list-style-type: none"> It is difficult to assess as is vague - when plans are more specific they need opportunity for stakeholders/community to comment
1	Retain urban Services to support the population.	<ul style="list-style-type: none"> The Parramatta Road Corridor cannot simply be housing a few shops and cafes. There will also be a need for mechanics, tyre retail etc.
5	Miscellaneous	<ul style="list-style-type: none"> More parking permits for local residents LEP controls are required to prevent the amalgamation of smaller shops. Dislike of existing apartments in Dulwich Hill, including Arlington Grove Put a pollution tax on WestConnex. Concern about the actions of Certifiers in following due process of builders to adhere to development consent conditions. Urban Design Advice should be provided for new housing.
1	Support for medium density housing	<ul style="list-style-type: none"> Whilst it is acknowledged we need to increase housing density to cope with population growth it should be limited to medium rise of one to five storeys
1	Support for housing to be spread more throughout the LGA	<ul style="list-style-type: none"> It seems illogical to centre new housing around the existing transport hubs if a new network is being put in. Spread it around so that the denser housing isn't just putting more pressure on existing neighbourhoods
7	Object to additional housing in Arlington	<ul style="list-style-type: none"> Green space is over utilised. The area is already congested.

No. of sub's	Topic	Summary of Comments raised in submissions
		<ul style="list-style-type: none"> • There are many homes, while not deemed 'heritage' are in fact lovely older homes with significant character, which would be destroyed by overly large and unsympathetic development • The infrastructure, land space and amenities cannot support what has been added in the past 5 years. • The area has small block sizes which inhibits orderly redevelopment. • Local character and heritage will be eroded. • Increased traffic will make it unsafe for pedestrians, while the Light Rail is full. • Fear of loss of solar access and 'rat runs'.
8	Object to additional housing in Dulwich Hill	<ul style="list-style-type: none"> • Light rail and recreational facilities are at capacity. • Development will increase pressure on roads and parking. • There are small lot sizes. • There are areas with high quality housing stock and character, mature trees and vegetation. • There is lack of open space.
4	Support for additional housing in Lewisham	<ul style="list-style-type: none"> • More development similar to McGill Street between Parramatta Road and Railway Terrace along Old Canterbury Road will improve the aesthetic of the area.
1	Object to the extent of housing proposed in Marrickville	<ul style="list-style-type: none"> • The proposal for Marrickville is similar to the original state government proposals, provoking strong resident objection.
1	Arlington Section Typo	<ul style="list-style-type: none"> • The section on Arlington refers to Waratah Mills LR station (Page 144)
1	Waratah Mills typo	<ul style="list-style-type: none"> • Page 144, Table 32, fifth row, replace 'Waratah Mills' with 'Arlington'
1	Impacts on open space as a result of additional housing	<ul style="list-style-type: none"> • Our parks are already full and the council's 2018 Recreational Needs study found Dulwich Hill currently has 4.5m2 of open space per person, compared with the benchmark provision of 13.3m2 of open space per person across the LGA.
1	Support for additional housing in Taverners Hill	<ul style="list-style-type: none"> • This is a strong strategy that addresses the needs of the community. There is an opportunity to increase density and improve design and amenities to this area.
1	Additional housing on the Princes Highway	<ul style="list-style-type: none"> • Consideration should be given to how additional housing should be developed along the Princess Highway.
1	Support for additional housing in Marrickville	<ul style="list-style-type: none"> • I strongly suggest to have higher rise apartment in Marrickville area. We also want to live close to transport and shops.
2	Support housing in the Bays precinct	<ul style="list-style-type: none"> • Density should be contained to the current industrial zones of the Bays Precinct.
1	Sensitive infill housing in Waratah Mills	<ul style="list-style-type: none"> • We support the idea of sensitive infill to meet population growth and provide for social housing however this should be done in a way that does not change the existing character of the area

No. of sub's	Topic	Summary of Comments raised in submissions
1	Concern for additional housing in Croydon	<ul style="list-style-type: none"> • Potential Flooding is a significant constraint. • Existing affordable housing in Croydon Station may be adversely impacted. • Additional development north and south of Croydon Station is constrained due to small lot sizes, ownership of land by Pymble Lady's College. • Sensitive urban design outcomes are required. • Croydon's HCAs need to be protected. Edwin Street North Business Zone is an important heritage conservation area that needs to be carefully managed. • There are traffic and pedestrian circulation constraints.
1	Support for additional housing in certain areas	<p>Housing should be considered in the following locations:</p> <ul style="list-style-type: none"> • New Canterbury Road • Carrington Road • Tempe • Sydenham • Annandale • Stanmore • Lilyfeld • Victoria Road • Marrickville Road • Land within 400m of Leichhardt North Light Rail Station • Summer Hill • Balmain • Annandale • Haberfield
1	Allow 8 - 12 storeys on Parramatta Road.	<ul style="list-style-type: none"> • These heights will be sufficient to support businesses on Parramatta Road.
1	Include all land within 400m of Leichhardt North Light Rail Station	<ul style="list-style-type: none"> • The Strategy should include all land within 400m of Leichhardt North Tram Station, and not simply 'Lilyfield West' and 'Leichhardt North'
1	Return social housing in certain areas Council Carparks Mort Bay and Elliot Street Precinct to parklands	<p>The following areas should be considered for social housing:</p> <ul style="list-style-type: none"> • Mort Bay • Elliot Street Precinct • Seaview Street Carpark

Appendix 2: Summary of comments from organisations

No. of submissions	Topic	Key comments
6	Affordable housing	<ul style="list-style-type: none"> • Supportive of measures to deliver more affordable housing in our LGA and for committing to include these in an updated affordable housing policy and LEP • Strong support for the acknowledgement of the pressures faced by low and very low income households and measures included in the study to address this. Maintain the current target of 15% of new housing as affordable housing following review of Affordable Housing Policy. • Strong support for planning and non-planning solutions to affordable housing • Commendation for the considerable focus given to the issue of affordable housing in the LGA • Support for advocacy by IWC to State and Federal Government for investment in affordable housing. • Urging council to mandate the adoption of an affordable housing target of 15% of the total floor space of all new residential developments on private lands and 30% of total floor space on any state-owned land. • Qualified support for Action 3F - Investigate and/or trial innovative design and delivery options to achieve increased affordability (such as build-to-rent, micro apartments, the Nightingale model) • Explore alternative mechanisms to deliver affordable housing such as new format typologies such as Build-to-rent, and small lot housing (example provided) and reduce parking reductions • Support co-housing
3	Partnering with local community housing providers	<ul style="list-style-type: none"> • St Vincent de Paul Society is engaged in building more than 500 social and affordable housing properties across NSW and would be open to speaking with Council about opportunities to support the delivery of affordable housing in Inner West • Bridge Housing requests to be involved in developing IWC's Affordable Housing Policies • Give priority to Community Housing Providers to develop rezoned land
3	Retention of industrial land	<ul style="list-style-type: none"> • Support exclusion of Sydenham industrial and urban services land from housing to support local economy and Sydney Airport. • Any growth in Carrington Road could put additional pressure on Bayside LGA's local infrastructure. Consultation would be needed with Bayside Council for any changes to the planning controls in this area. • Full support offered for the elimination of industrial lands, including Carrington Rd, as opportunity sites. Protecting industrial lands in Inner West critical strategic imperative for Sydney as a whole.
2	Affordable Housing in perpetuity	<ul style="list-style-type: none"> • These affordable houses should be available in perpetuity (rather than a set period e.g. 10 years) to ensure that the affordable housing option will remain forever.
2	Change to Action 2A -	Suggest addition using reference to the levels of the Liveable Housing Design Guidelines (LHGD)

No. of submissions	Topic	Key comments
	<i>Incorporate the principles of universal design in a proportion of new housing</i>	from Liveable Housing Australia: 1. That all new apartment development achieves the silver level of the LHDG, allowing 'visitability' of dwellings for people with mobility issues 2. That a proportion of all apartment development achieves the gold or platinum level of the LHDG
2	Additional housing at Marrickville Station Investigation area	<ul style="list-style-type: none"> • Supportive of additional housing growth in this area from 2019 + • Marrickville is one of the least constrained areas in the LGA and can accommodate significantly more housing than currently proposed
2	Over-reliance on new housing within existing zoned land	<ul style="list-style-type: none"> • There is little evidence that land under existing planning controls will accommodate additional housing to the extent assumed. • Overstated capacity to achieve preliminary dwelling projects for the next five years
1	Geographical expansion of affordable housing contributions	<ul style="list-style-type: none"> • Supportive of Council advocating for expansion of affordable housing contributions scheme to be applied across the whole LGA
1	Supportive of design and construction innovations to lower housing costs.	<ul style="list-style-type: none"> • Acknowledgement of potential to lower construction costs through design and construction innovations as a positive, the society will not support lower quality or reduced energy efficiency in housing
1	Data outlining the extent of the loss of industrial lands	<ul style="list-style-type: none"> • Data from a forthcoming report provided in the submission regarding spatial analysis to ascertain the loss of industrial land in inner Sydney since 2011
1	Suggestions for expanded ground floor uses - shop top housing	<ul style="list-style-type: none"> • Recommendation for the housing strategy to anticipate future changing demand for retail space and allow for low impact uses such as creative spaces, community facilities and small scale manufacturing to be permissible beneath shop-top housing developments
1	Heritage protection in former Marrickville LGA	<ul style="list-style-type: none"> • General comment about the lack of HCA coverage in former Marrickville LGA and lack of protection offered under the Complying Development SEPP for buildings not covered by HCA
1	Consider B2 land uses at Marrickville Station investigation area	<ul style="list-style-type: none"> • Request to ensure that this area includes all B2 zoned land within the Marrickville town centre and that this area is included in any future place based strategies in the wider area
1	Request additional housing at Illawarra and Marrickville Roads	<ul style="list-style-type: none"> • Request for the housing strategy to provide housing to support local business (B2 zone) incorporating Illawarra Road and Marrickville Road in addition to Marrickville Station. Request for the extension of shop top housing along Illawarra and Marrickville Roads.
1	Reduce parking rates	<ul style="list-style-type: none"> • Request for the consideration of the affordable housing benefits of housing in the Marrickville town centre with no car parking.
1	Change housing typology at Marrickville town centre	<ul style="list-style-type: none"> • Request for reference to typology for this area 'medium rise shop top housing' to be amended to include 'high rise shop top housing'.
1	Change to Action 2F	<ul style="list-style-type: none"> • <i>2F Consider whether or not to apply contributions to development types Council want to facilitate</i>

No. of submissions	Topic	Key comments
		<ul style="list-style-type: none"> – <i>such as secondary dwellings and affordable housing</i> • Amend Action 2F to state that unless exceptional circumstances, s7.11 contributions will not be applied to social and affordable housing developments delivered and managed by Community Housing Providers.
1	Support for Action 5A	<ul style="list-style-type: none"> • <i>5A Advocate for a state policy guidance and more statutory force relating to the public domain</i> • Support and request for involvement in discussions
1	Change to Implementation, monitoring and compliance -	<ul style="list-style-type: none"> • Suggested additional performance indicators <ul style="list-style-type: none"> -Decrease in proportion of residents of the LGA in housing stress -Decrease in unmet affordable housing need -Increase in proportion/number of dwellings in the area that are affordable to people on low to moderate incomes
1	Housing constraints mapping	<ul style="list-style-type: none"> • Supports housing constraints mapping
1	Clarify the future of housing in Tempe.	<ul style="list-style-type: none"> • There is no future vision for Tempe. Bayside Council would appreciate additional information about future density and infrastructure in this location.
1	Growth in Marrickville	<ul style="list-style-type: none"> • Acknowledgement that Marrickville has been identified as an area for medium to long term growth due to major infrastructure improvements such as Metro South West.
1	Vacant shop fronts	<ul style="list-style-type: none"> • Concerned re vacant shop fronts (under shop-top housing) along Illawarra and Marrickville Roads
1	Academic research findings support increase in 3-4 bedroom apartments	<ul style="list-style-type: none"> • Suggested mandating of 3 - 4 bedroom apartments in new developments to accommodate families. Increased apartment sizes. Increased soundproofing requirements. Increased provision of open space
1	Marrickville not a town centre	<ul style="list-style-type: none"> • Save Marrickville feels that the term 'urban village' better suits Marrickville than 'town centre'.
1	Concern about housing in Marrickville	<ul style="list-style-type: none"> • Concern that Marrickville will have to accommodate a share of additional dwellings forecast in IWC.
1	Request for council to undertake work to establish additional HCAs, particularly around Marrickville station	<ul style="list-style-type: none"> • Save Marrickville would request to exclude areas of established single dwelling residential streets in near proximity to Marrickville Station from mass redevelopment.
1	Croydon Station	<ul style="list-style-type: none"> • Concern over the identification of Croydon Station as an area with significant opportunity for up-zoning in relation to flooding, impacts on heritage and character and traffic
1	Concerns over lack of promotion of the exhibition of the draft housing strategy	<ul style="list-style-type: none"> • This <i>Inner West Housing Strategy</i> proposal was not well advertised to the people of Croydon and I only heard about it through the local 'grape vine' which is very unsatisfactory given the major implications involved.
1	Support for a considered and	<ul style="list-style-type: none"> • The focus on providing new housing around transit nodes is strongly supported.

No. of submissions	Topic	Key comments
	well researched strategy	
1	Belief that current housing targets will be increased by DPIE in the near future	<ul style="list-style-type: none"> Marrickville Council LGA is the only LGA in metropolitan Sydney to have experienced a decrease in population since 1985. It is entirely probable that the next round of housing targets will seek to rectify this. (Request for council to pre-empt this?)
1	Suggestion that Council is too dependent on State led planned precincts	<ul style="list-style-type: none"> Council should consider pre-empting any further state led interventions by pursuing their own precinct wide rezoning's in consultation with the local community.
1	Lower parking requirements and flexibility	<ul style="list-style-type: none"> The former Marrickville Councils' Design Review Panel has already undertaken early work exploring unbundling of parking from residential tenancy. This should be pursued in this Strategy.
1	Reduce minimum lot size requirements	<ul style="list-style-type: none"> Council should consider removing minimum lot requirements from the LEP as Sydney City Council has done.
1	Consider commercial zoning around Camperdown Precinct	<ul style="list-style-type: none"> Council's strategy seems to be suggesting retaining employment lands adjacent to Camperdown Health and Education Precinct as IN2 Light Industrial. This highly constrained precinct is desperate for more appropriately zoned land to support its growth, in particular zoned land that permits commercial development, not heavy industry or bulky goods retail.
1	Investigation areas will not be sufficient to deliver required affordable housing	<ul style="list-style-type: none"> Bridge Housing acknowledges the rationale of the investigation areas but we are concerned that the sites identified may not be sufficient to deliver the 570 affordable dwellings required each year.
1	Additional opportunities for investigation as potential sites to deliver social and affordable housing - based on Bridge Housing's existing social/affordable housing assets within these locations	<ul style="list-style-type: none"> It is recommended these opportunities are investigated as part of the LHS given the immediate potential and desire to deliver social and affordable housing in these locations. Bridge Housing seeks to discuss the specific properties with Council in more detail. <ul style="list-style-type: none"> o Dulwich Hill o Taverners Hill o Camperdown o Marrickville o Leichhardt, and o Kings Bay
1	Additional suggested areas for (collaboration on?) the delivery of affordable housing	<ul style="list-style-type: none"> Leichhardt South and North Petersham Arlington Waratah Mills Ashfield, and Croydon <p>It is recommended these opportunities are investigated as part of the LHS given the immediate</p>

No. of submissions	Topic	Key comments
		potential and desire to deliver social and affordable housing in these locations. Bridge Housing seeks to discuss the specific properties with Council in more detail.
1	Strong support affordability actions in the <i>Local Housing Strategy</i> for	<p>Support for the following actions relating to housing affordability:</p> <ul style="list-style-type: none"> • Action 3A -Finalise the review of the Affordable Housing Policy, which has a current target of 15% of new housing as Affordable Housing • Action 3B -Advocate to NSW Government for amendments to the SEPP • Action 3C - Position Council to respond to future affordable housing policy changes • Action 3D - Investigate opportunities for affordable, seniors and student housing as part of the Marrickville Metro redevelopment • Action 3E - Investigate opportunities for the delivery of social and affordable housing in the Lilyfield priority area through redevelopment of existing social housing • 'Investigate and evaluate the opportunity for an affordable housing rates levy under the Local Government Act' • Action 3H -Maintain and build partnerships with CHPs to investigate opportunities for joint ventures or opportunities on low-cost sites • 'Consider opportunities to promote partnerships between industry, CHPs and private landlords to increase affordable rental stock in the Inner West' • 'Identify mechanisms for delivering affordable rental housing through the planning system and/or by leveraging other opportunities available to the council such as partnering with registered community housing providers to redevelop council owned land
1	Level of engagement with community and stakeholders, including Sydney Airport	<ul style="list-style-type: none"> • Submissions acknowledged Council's high level of engagement with Sydney Airport in the preparation of the Strategy.
1	Administrative edit	<ul style="list-style-type: none"> • 1.1.1, pp. 4 and 5 (and elsewhere). Sydney Airport's Master Plan 2039 was approved by the Australian Government on 28 March 2019. References to "Draft Sydney Airport Master Plan 2039" can therefore be amended accordingly to delete the word "Draft".
1	Administrative edit	<ul style="list-style-type: none"> • 6.2.1, p 104. The second point in part 3 refers to Local Planning Direction 3.5, and notes that it had been recently amended to apparently allow residential development in areas above the ANEF25 contour. AS2021-2015 identifies such areas as being unsuitable for new residential development. Sydney Airport was advised by the NSW Department of Planning, Industry and Environment recently that the direction will be amended to clarify that allowing new housing in such aircraft noise affected areas was not intended. The timeframe for the making of this amendment is not known.
1	Administrative edit	<ul style="list-style-type: none"> • 6.2.1, p 104. It would be appropriate to make reference to Sydney Airport's prescribed airspace

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		as a potential constraint on the height of proposed new development.
1	Retain industrial zoned employment lands near Airport	<ul style="list-style-type: none"> Submissions supported the Strategy's directions in protecting employment lands around Sydney Airport.
1	Investigate levying of up-zoning to help fund affordable housing	<ul style="list-style-type: none"> Uplift in zoning and re-zoning of sufficient land in the LGA to facilitate an increase in the supply of general housing from which to apply levies for affordable housing will need to be further explored by Council.
1	Allow affordable housing to be located in Industrially zoned land	<ul style="list-style-type: none"> SGCH supports allowing affordable housing to be delivered in appropriately located Industrial zoned land to increase affordable housing supply. This model has been implemented in the Southern Employment Zones by the City of Sydney without loss of strategic value of the land for employment.
1	Support target of 15% of housing in up-zoned areas to be affordable, only where this won't affect the viability	<ul style="list-style-type: none"> In the preparation of Council's new LEP, including the selection of areas for inclusionary zoning, IWC should consult with community housing providers and the development industry to ensure the rezoning will be sufficiently viable to deliver the target of up to 15% affordable housing.
1	Support for the approach taken in former Ashfield LEP towards height bonuses	<ul style="list-style-type: none"> The former Ashfield Council's LEP has a well-developed framework for height bonuses in certain areas where minimum requirements of affordable housing are provided. This framework has minimal impact on adjoining sites as the bonus applies only in built-up areas of the town centre. These areas are well-served by facilities, are close to jobs and transport and are ideally located for residents of affordable housing. IWC should amend its LEP to apply similar bonuses as apply in ALEP (Clause 4.3A) to all B4 and B2 zoned areas within 800 metres of train stations and town centres.
1	Support for inclusion of robust VPA framework	<ul style="list-style-type: none"> SGCH supports the development of a robust VPA framework and recommends IWC consult community housing providers and the development industry on a model that is economically viable to achieve an increase in supply of affordable housing.
1	Reduce minimum development standards	<ul style="list-style-type: none"> IWC should consult with the community housing providers with development projects to understand which development standards should be altered to make the supply of affordable housing economically viable, and then incorporate them in the planning frameworks and LHS.
1	Request to consult with IWC	<ul style="list-style-type: none"> IWC should consult with community housing providers such as SGCH on the demand and typology of affordable housing accommodation in the LGA, and the most effective methods of achieving them. Invite suitably qualified community housing providers to discuss building standards and construction innovations that can be incorporated to make projects more viable and increase supply
1	Methodology is flawed in relation to housing targets and supply	<ul style="list-style-type: none"> Housing supply only factors in Dwelling approvals and construction activity, not dwelling completions. The housing supply forecast is therefore overestimated as not every dwelling approval results in a completion.

No. of submissions	Topic	Key comments
1	Loss of buildings of historical and architectural merit	<ul style="list-style-type: none"> Suggestion that Marrickville (Council) should be penalised for having fewer heritage areas than other council areas
1	The Study fails to respect our history, culture and character.	<ul style="list-style-type: none"> By putting large high rise and medium development in the midst on one and two story dwellings, the population increase destroys the very nature of these low rise streets which are some distance from the shops and main roads and which makes them special and places we love to live in.
1	Request for the Greenway to be considered a constraint	<ul style="list-style-type: none"> For instance, placing additional development in and around Waratah Mills could impact on the Greenway biodiversity habitat which runs along either side of the light rail in Weston St, Fred St, Victoria St, Piggott St, Hill St, Grove St, Williams Parade, the Southern end of Denison Rd and the mid-section of Constitution Rd and is an important small bird habitat.
1	Errors in calculating the anticipated number of dwellings in Arlington	<ul style="list-style-type: none"> Table 46 (page 185) lists major developments many of which have been completed and occupied. E.g. 2 Grove St (actual address is 6-24 Grove St), McGill St Lewisham (5 buildings), 429 Canterbury Rd Dulwich Hill, George St Leichardt. Have these dwellings been taken into account in the existing dwellings figures? If not then the anticipated no of dwelling for Arlington is completely wrong. Figure 49 fails to show high rise development in Grove St occupied for over 2 years; medium density apartments in Terry St, occupied for more than 20 years; townhouses on the corner of Windsor and Constitution occupied for over 25 years ago and the block of flats occupied for 30 years.
1	Waratah Mills	<ul style="list-style-type: none"> Disappointed that area south of Waratah Mills is being considered for additional housing capacity
1	Arlington Grove Station	<ul style="list-style-type: none"> Disappointed that area around Arlington Grove Station is being considered for additional housing capacity
1	Grove and Dennison Roads	<ul style="list-style-type: none"> Several areas of Grove and Dennison Rd are designated flood risk areas
1	Errors in calculating the capacity for dwellings in Waratah Mills	<ul style="list-style-type: none"> The Arlington 'current character' analysis refers to Waratah Mills. In addition, the Waratah Mills analysis says the area has both 697 existing dwellings and a capacity for 697 additional dwellings which doesn't look right.
1	Impacts of Airbnb	<ul style="list-style-type: none"> Suggested policy framework be put in place to monitor the effects of Airbnb rentals
1	Include additional housing data and housing trends	<ul style="list-style-type: none"> Also include data relating to trends between 2011 and 2016 especially in relation to: <ul style="list-style-type: none"> • Changes in household income profiles; • Changes in occupational profiles including changes in lower paid and lower skilled occupational groups; • Loss of affordable housing dwellings; • Displacement of very low, low and moderate income households including key workers; and • Decline in social diversity.
1	Issue with accounting for new generation boarding houses in	<ul style="list-style-type: none"> For example, there are media reports of dwellings (particularly in 'new generation' boarding

No. of submissions	Topic	Key comments
	affordable housing supply	house developments) being let at up to \$500 per week, which does not meet the standard indicator of affordability
1	Support co-operatives to increase affordable housing in the LGA	<ul style="list-style-type: none"> The Inner West is home to a number of housing co-operatives. The existence and potential of housing co-operatives need to be recognised in the draft Housing Strategy. Housing co-operatives are a form of affordable housing that delivers choice and control in housing.
1	Establish Affordable Housing Reserve Fund	<ul style="list-style-type: none"> Establishing an Affordable Housing Reserve Fund is consistent with the objectives of Council's adopted Affordable Housing Policy. Reference to the critical need to establish an Affordable Housing Reserve Fund should be included in the draft Housing Strategy.
1	Request to include discussion of housing stress among moderate income households	<ul style="list-style-type: none"> The draft Housing Strategy confines 'housing stress' to very low and low income households only. While this accords with the definition of 'housing stress' it is also instructive to know the percentage of moderate income households living in housing stress or unaffordable housing.
1	Discuss need for emergency housing and more social housing	<ul style="list-style-type: none"> The inclusion of statistics relating to emergency as well as transitional housing in LGA would be useful. Emphasise the need for more social housing funded by the State and Federal Governments, linked to service provision.
1	Addition related to VPAs, affordable housing contributions and calculating 'land value uplift'	<ul style="list-style-type: none"> The new VPA Policy should prioritise affordable housing contributions, preferably in kind rather than in cash. It is crucial that Council's new VPA Policy contains a clear description of the Residual Land Value model for valuing land for redevelopment and that future valuations used in VPA negotiations are based upon this model.
1	Planning concessions related to development of Land and Housing Corporation (LAHC) site	<ul style="list-style-type: none"> The potential for Community Housing Providers to enter into an arrangement with LAHC to redevelop public land for community housing throughout the LGA should be explored in more detail. Council should consider the application of planning concessions to encourage the expansion of social and affordable housing on such sites.
1	Funding mechanisms for affordable housing	<ul style="list-style-type: none"> Funding mechanism in addition to special rate levy is a special budget allocation to increase affordable housing supply
1	Amenity of affordable housing in employment/ industrial lands	<ul style="list-style-type: none"> Consideration should also be given to amenity of dwellings in employment land, particularly in terms of noise and pollution
1	Consider an empty property levy	<ul style="list-style-type: none"> Investigate feasibility of an empty property levy or vacant residential land tax. Councils could work in partnership with the State Government to increase rates for homes that have been vacant for 12 months or more. The Victorian Government has such a tax to help address housing supply.
1	Additional key performance Indicators	<ul style="list-style-type: none"> Seek reference to a range of affordable housing indicators, including targets for the supply of social and affordable rental housing stock in the Inner West and the supply of dwellings in Council's affordable housing portfolio. Reference the KPIs in the adopted Affordable Housing Policy.

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1	Community Land Trusts as a method of providing shared equity	<ul style="list-style-type: none"> While governance models do not affect land or construction costs per se, the Strategy should mention alternative ways of managing housing including through co-operative structures eg. Community Land Trusts, which can provide shared equity with limits on capital gain on re-sale.
1	Investigate the feasibility of Homeshare programs	<ul style="list-style-type: none"> Investigate the feasibility of Council supporting a Homeshare program in the Inner West. Homeshare is where someone with a spare room invites someone in need of affordable housing to live with them, in exchange for an agreed number of hours of help, and/or rent below the market rate.
1	Do not use <i>Apartment Design Guidelines</i> for guidance on the design of public spaces	<ul style="list-style-type: none"> ADG should not extend to the design of public space which is a 'local' consideration and should be dealt with through DCPs and master plans. Alternatively state guidance could be provided through another instrument. The Better Placed policy (and associated sub-policies) by the Government Architect NSW (GANSW) already goes some way to addressing better public domain outcomes.
1	Way to incorporate design excellence objectives and requirements for new housing	<ul style="list-style-type: none"> Developing design guides and/or DCP controls, similar to the <i>Apartment Design Guide</i> provisions, but specific to other housing types; and implementing a design review panel process for all residential housing DAs to provide design advice to Council's planning officers. Incorporate the design measures into the Local Strategic Planning Statement (LSPS).
1	Change in development control provisions to increase densities in lower-rise developments	<ul style="list-style-type: none"> A change in development controls could encourage this form of development by allowing party-wall built-to-street-edge development that is 1-5 storeys in height. This built form could double existing densities whilst being compatible with local character. It frees up space in rear setbacks for deep soil and canopy and could comfortably accommodate additional social and affordable housing dwellings.
1	Why isn't the Greenway considered a constraint to new housing	<ul style="list-style-type: none"> The surrounding streets provide vital small bird habitat and that for insects (populations crashing with climate change) and small reptiles, are a vital part of the biodiversity portion of the Greenway. This is a major flaw in the report.
1	Cultural, historical and spiritual significance of landscapes, sites, waterways, customs and cultures	<ul style="list-style-type: none"> IWEG is concerned that the strategy does not speak to the cultural, historical and spiritual significance of landscapes, sites, waterways, customs and cultures that have come after Traditional owners which had also added richly to what our communities are now.
1	Concerns re accommodating additional housing growth in Lewisham West and Grove St Dulwich Hill.	<ul style="list-style-type: none"> Principle 2: Accommodate housing growth through a range of sensitive infill compatible with heritage values and local character – enabling areas to evolve with respect. How do developments such as Lewisham West and Grove St, DH adhere to these principles? If a gateway process is used, how can we stop these over-dense and often poorly designed apartment blocks?
1	Sustainability in housing standards	<ul style="list-style-type: none"> Housing – all new dwelling in particular must be built to the best environment standards (max solar access, sunlight, no air conditioning, air drying of clothes)

No. of submissions	Topic	Key comments
1	Lacks clarity and direction re priorities in Marrickville town centre for additional housing	<ul style="list-style-type: none"> The Draft Strategy largely focuses on the housing constraints within the precinct with little investigation of the significant opportunities present in the Marrickville Station Neighbourhood