



Submission from Save Dully Action Group on the Draft Medium Density Design Guide and Explanation of Intended Effect for the new Medium Density Housing Code

Dear Sir-Madam –

The Save Dully group welcomes the ability to comment on the Draft Medium Density Housing Code and Design Guide. We are a residents' group based at Dulwich Hill, in Sydney's inner-west.

General objection

The Save Dully group understands the need to introduce different density forms to meet the growing housing needs of Sydney's population, including medium density housing.

However, it does not believe the Draft Medium Density Housing Code and Design Guide is the correct way to go about doing this.

The code and guide represent very blunt planning instruments which do not adequately take into account local character and circumstances. In the case of Dulwich Hill, this means the high likelihood of development being approved which does not enough regard to the historic architecture in the suburb.

In particular, it is likely to introduce contemporary terrace housing across the suburb, when traditionally the suburb has to date had very limited examples of this housing. Dulwich Hill was predominantly developed as a Federation housing suburb (even when terrace housing was continued to be constructed in other parts of Sydney). Dulwich Hill has largely retained this detached housing character.

What's more, our concern is that this code will preclude the community from having its say on the design on this housing, when applications are lodged. We believe this is important, given that there could be unusual aspects of neighbouring lots which should be considered in any development assessment process.

While the Save Dully group is not in the City of Canterbury-Bankstown, it does agree with the statements from the City of Canterbury-Bankstown below in regard to the code and guide. The council has stated that:

- The proposed development controls will result in medium density housing that is incompatible with the prevailing low density character and amenity of the suburban neighbourhoods.

- Complying development does not take into consideration the unique characteristics and issues within various suburbs and is not designed to customise solutions to address potential impacts.
- Private certifiers are not qualified to assess the architectural merits of medium density housing to ensure it meets community expectations, particularly in the suburban neighbourhoods of the city.
- Complying development does not provide the community with the opportunity to comment on medium density housing proposals in the same way as development applications.
- The Draft Medium Density Housing Code does not recognise current state and local strategic planning.
- The Draft Code also preempts the Draft District Plans prepared by the Greater Sydney Commission, in particular the requirement for councils to prepare local housing strategies to identify the best positions for medium density housing in the city.

In summary, we believe that our urban neighbourhoods are too precious to allow complicated medium density development to be subject to the approval of private certifiers, without any ability for local residents to have their say and without an appropriate merit assessment process which considers local circumstances.

The Save Dully group believes the correct approach to support additional medium density housing would be to:

- Require councils to examine this issue and set aside areas for such housing, after considering local circumstances and character; and
- Require applications for such housing to continue to be assessed as development applications, so residents can have their say about applications before construction and for the detailed design of the proposed dwellings to be properly examined.

We believe such an approach will lead to improved housing supply while at the same time help better protect local character.

Parking provisions

We also point out that we find the provisions relating to car parking for terrace homes quite confusing. As you would be aware, parking impacts can be a sensitive issue in an inner-city suburb such as Dulwich Hill.

The draft provisions say:

“Where parking is provided above ground, at least one car space is to be provided per dwelling.

63. [Development applications only] Car parking is to be provided at the rate required for a multi-dwelling housing within a Development Control Plan that applies to the land.

If there is no rate in a DCP - 1 space is to be provided per dwelling”

The above provision raises the possibility that, if parking is not provided above ground, and the application proceeds as complying development, then no parking needs to be provided at all.

We find this to be a peculiar proposition which is likely to lead to a major increase in demand on on-street parking and is at odds with the balanced approach to off-street parking development in our council's current development control plan.

It is preferable to make all development to comply with the council development control plan for carparking.

Separately, it is our understanding that the Inner-West Council currently places a condition on the approval of new medium-density housing, stating that residents will not be eligible for on-street parking permits. We understand that this type of condition is also common place among other local councils.

We don't see a reference to such a condition in the code and guide and believe it should be introduced to make it abundantly clear to new owners and occupiers of new dwellings that they are not eligible for on-street permits, thereby constraining car use.

We hope the above comments have been of assistance.

Yours Sincerely –

Jessica D'Arienzo
Spokesperson
Save Dully Action Group