

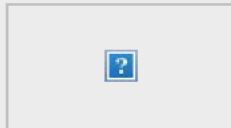
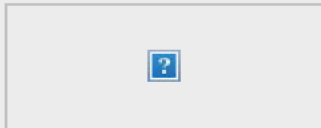
From:



[Redacted]

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[Redacted] VPA acknowledges the Traditional Owners of Country throughout Victoria and pay our respects to them, their Elders past and present.

*My personal commitment is to plan for great places that are welcoming and inclusive of all people.*

**From:** contact@engage.vic.gov.au <contact@engage.vic.gov.au>

**Sent:** Monday, 11 October 2021 5:06 PM

**To:** amendments <amendments@vpa.vic.gov.au>

**Subject:** Making a submission Form Submission



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**First name**

Janet

**Last name**

Graham

**Postcode**

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# **Submission to the Victorian Planning Authority on the Arden Structure Plan September 2021**

## **Introduction**

As expressed by Lord Mayor Sally Capp, the City of Melbourne (CoM) hopes Arden will be “a high-quality and climate-adapted globally competitive neighbourhood and innovation district” and that the Arden Structure Plan will set benchmarks and deliver something really special.

Those aspirations are shared by many in the community. This mainly brownfield site offers a wonderful opportunity to create a self-contained but connected suburb that could be an exemplar for future planning, not just in Melbourne or Australia but also globally.

The City of Melbourne has, however, identified a number of aspects of the revised Structure Plan that fall short of CoM expectations and dilute some of the plan’s original vision. One change that affects a number of aspects is the substitution of mandatory controls with discretionary controls. Planning in Melbourne suffers from applications for developments that far exceed ‘discretionary’ limits, and they often succeed, to the great detriment of the city’s aesthetics, environment and livability.

I would not like to see Arden become a ‘Mini-Me’ of Melbourne’s CBD.

Below are some general comments on items of particular interest to me and some further suggestions of my own.

## **Population and density**

The CoM has noted that the target of 15,000 residents in Arden remains the same despite the area of developable land being reduced by the necessary allocation of large spaces to flood mitigation and stormwater management, as well as constraints on building above the new station and Metro rail tunnels because of the nature of the soil. I share the CoM’s concern that this will put pressure on development goals and could serve to reduce open space and the planned planting of thousands of trees intended to manage heat and improve amenity.

The increased density could undermine the great work that has gone into designing a suburb with arguably human-scale heights (see below), streets wide enough to let in the sun, and civic spaces that encourage outdoor activities. It could also compromise the plan for 34,000 jobs in Arden. To avoid these negative outcomes, controls need to be strengthened, including more restrictive and mandatory Floor Area Ratios (FARs). The current FARs are of a discretionary nature and allow heights that are too great. The CoM does not believe the Special Use Zone adequately supports employment floor space.

Why does the residential population have to be so large? The population of North Melbourne, a much bigger spatial area, is about the same (14,940 in the 2016 Census). The obsession with constant growth, often equated with ‘progress’, is at the root of many poor development decisions. It also makes the task of addressing climate change much harder.

On the subject of heights, my preference would be for no buildings higher than 15 storeys.

## **Sustainable building design**

The CoM maintains that the proposed local policy approach does not provide sufficient statutory support to achieve the desired zero carbon operation by 2030, and depends on the implementation mechanism used to require Green Star ratings. This is another case where mandatory objectives are required.

A 6-star or 7-star Green Star rating is a good goal, and that should be applied across all building types — commercial, private residential and ‘affordable’ and public housing. Our top architects should be able to come up with good designs that make use of correct orientation for cross-ventilation and materials that provide good insulation and save energy use, at little more cost than poorer designs. Housing should be attractive, diverse and easy to maintain.

Strategy 11.3, which encourages “all new buildings to be 100 per cent electric and facilitate access to renewable energy sources”, is excellent.

### **Affordable housing**

It was pleasing to learn of the State Government’s commitment to increase the affordable housing target from 6 per cent to at least 10 per cent of all housing on government land. However, while the Department of Transport’s letter of 1 October 2021 refers to working with Homes Victoria to create opportunities for “social, affordable and key worker housing”, there appears to be no reference here, or in the Arden Structure Plan, to public housing.

### **Public housing**

With a large part of the Structure Plan area in government hands, I believe Arden is ideally situated for the State Government to devote a substantial portion of land to genuine public housing and stop the trend to outsource social housing to community housing organisations. Public housing is a much better option than community housing for people on low incomes, or with health issues, for many reasons, some being:

- rents are limited to 25 per cent of tenants’ income, whereas private community housing organisations can charge up to 30 per cent;
- community housing organisations may make additional charges for maintenance and other services;
- tenure is more secure in public housing; tenants cannot be evicted on a whim, whereas community housing organisations can remove tenants perceived as ‘difficult’ or choose ‘easier’ applicants in the first place; and
- with community housing, there is no guarantee that the housing organisation will continue to be the owner or manager of the property, or that it will not sell the property to another owner/manager or for another purpose, leaving the tenant without a home.

Postwar Victoria had a proud record of building public housing but Victoria now has the smallest percentage of public housing of all Australian states, and Arden presents an opportunity to rectify that dubious record. Public housing would exemplify the expressed ambition for Arden to be an inclusive and equitable place to live.

The aspirations for other forms of affordable housing are commendable, but I believe the overall target should be 20 or 30 per cent rather than 10 per cent.

### **A circular economy**

The strategies under Objective 13 are great and have my full support.

### **Active transport**

These plans look good as far as they go. Safe cycling and pedestrian paths are essential to give the suburb a ‘community’ and connected feel. The site lends itself to new bus routes that could link Arden to Errol Street and nearby suburbs such as Fitzroy and Collingwood not serviced by the new Metro rail line.

I assume the ‘high capacity public transport’ is the proposed tram extension along Spencer Street. This is a good objective, although it looks as if the route runs through Railway Place and Miller Street Reserve, which would destroy that little park and the skatepark. That skatepark is not very good, however, and a better one could be built in one of Arden’s open spaces.

### **Celebrating water**

As North and West Melbourne’s main waterway, everything possible should be done to turn Moonee Ponds Creek from a degraded drain to a wonderful feature. The Friends of Moonee Ponds Creek and Melbourne Water have done much to improve it with numerous plantings,

but realisation of the Moonee Ponds Creek Strategic Opportunities Plan could do much more. I feel the plan is over-ambitious, though. The Arden flood management strategy is also essential to protect the new suburb from likely floods.

The problem of the Upfield railway line running along the riparian zone has been identified. The tracks form a barrier between the creek and the stormwater management open space. Has any thought been given to elevating the railway line to Flemington Bridge Station?

### **Community infrastructure**

I suggest the inclusion in the Planning Scheme of a multifunctional hall to be used for community activities like basketball, netball and yoga classes in good times, which could be easily adapted to a vaccination centre or refuge for homeless people in times of need.

### **Schools**

North and West Melburnians welcome the commitment to build a much-needed government primary school in Arden. Perhaps space should be set aside for two primary schools. The growing population also needs a new secondary school, but I understand one is planned for Macaulay that may suffice.

### **Let's make Arden a self-powered 'village'**

Other contributors to the consultation process have suggested that Arden establish its own power sources through solar and wind technology and distribution through a local grid. I'm not sure about the feasibility of harnessing wind in such a confined area, but I believe a solar farm could be built on government land. With the huge advances in this technology, and the mandatory installation of solar panels on every new building, Arden should be able to produce enough energy to be completely self-sustaining — and even export power to neighbouring suburbs.

### **Some other suggestions to achieve sustainability and utilise innovation**

- Use recycled and upcycled materials in construction, particularly salvaged bricks and cross-laminated timber in lower levels of buildings. This will also satisfy the objective of referencing the site's industrial past and reflect the design of the new Arden station.
- Use recycled glass as a substitute for sand (a diminishing resource) in building materials and roads.
- Try the recent innovation of embedding photovoltaic solar particles into roads to add to the communal power generation — and possibly power the new tramline.
- Use zero-emission (or close to) cement in concrete. Conventional manufacture of cement is a huge producer of greenhouse gas emissions. Think-tank Beyond Zero Emissions has done excellent research on this, with information on emission-free raw materials available locally and low-energy manufacturing processes.

With innovations like these, I believe a zero net emissions target for Arden should be achievable by 2030.

### **In conclusion**

None of this will happen unless it is mandated in the Planning Scheme. Local policies do not mandate controls; they only guide decision-making. Zones and overlays can prescribe mandatory or discretionary controls.

**Janet Graham**  
**11 October 2021**