

In reply please quote:

Mr S Moseley Chief Executive Officer Victorian Planning Authority Level 25, 35 Collins Street MELBOURNE VIC 3000

Dear Mr Moseley

Re: Consultation Arden Structure Plan and Amendment C407melb September 2021

I write in response to the formal exhibition of the Arden Structure Plan. We reconfirm our original position, stated in correspondence to the Victorian Planning Authority (VPA) dated 11 August 2020 (Attachment A).

The proposed Catholic primary school identified in our supporting documentation will satisfy future demand for Catholic education from the Parishes of North Melbourne, West Melbourne, Kensington and Melbourne (Bourke Street) when the capacity of the two existing Catholic primary schools will be exceeded by 2031.

In addition to the above we offer the following comments and recommendations on the Arden Structure Plan.

Special Use Zone Schedule 7 (SUZ7) within the Arden Precinct

We support the Section 1 use conditions within SUZ7 that seek to facilitate the introduction of a non-government school within the Arden Precinct and, more specifically, within the Arden Central Innovation Subprecinct.

We seek a consistent application of the use conditions in the *Arden Central Mixed Use Sub-precinct* to the *Arden Central Innovation Sub-precinct*. A consistent approach across both sub-precincts will provide flexibility and greater scope to secure a location for a Catholic school.

We also seek consistent Section 1 use conditions in the SUZ7 for a health facility over the Melbourne Metro Rail Project infrastructure protection as is provided for an education facility. The impact of the current draft conditions is demonstrated in the attached Plan (Attachment B). Providing consistency increases the scope for delivery of a Catholic school in partnership with a health provider.

We recommend that Section 1 use conditions of the SUZ7 not only refer to the Arden Central (Innovation) sub-precinct but also the Arden Central (Mixed Use) sub-precinct.

Clause 21.13-4 Arden Urban Renewal of the Melbourne Planning Scheme

Furthermore, it is submitted that *Clause 21.13-4 Arden Urban Renewal* of the Melbourne Planning Scheme is amended to provide more certainty of delivery of a non-government school within the Arden Central subprecincts. The proposed changes are highlighted below.

The precinct includes four distinct sub-precincts:

Arden Central (Innovation) provides a mix of land uses and aims to facilitate a predominant mix of innovative commercial land uses, including life sciences, health, digital technology, and education uses to support the Parkville NEIC, anchored off the Arden Station and the proposed Hospital as well as complimentary mix of retail uses that activate the street frontages. Residential land uses and a non-government school are supported where they do not compromise the primary commercial function of the precinct and are located at upper levels of buildings.

 Arden Central (Mixed Use) will be the civic heart of the precinct, with a new neighbourhood open space, proposed government primary school, a potential non-government school and community hub. It will be home to new residential developments alongside commercial uses including offices, function centres, medical centres and research centres.

Arden Precinct Structure Plan

The draft Arden Structure Plan does not identify a demonstrated demand for a non-government (Catholic) school within the precinct. As a minimum, a note should be added to state:

Demand for a non-government (Catholic) primary school has been identified for the Arden Precinct.

Arden Precinct Draft Development Contributions Plan, August 2021

Despite the Arden Precinct Draft Development Contributions Plan making reference to the Net Developable area excluding schools and educational facilities (Page 47), it fails to recognise the need for a non-government (Catholic) primary school within the precinct.

If the recommended references to a non-government school, as noted above, are included in the Arden Structure Plan it follows that the following changes should also be included.

Section 2.1.3 Community building projects and **Plan 7 Community Building Projects** identifies community buildings to include the proposed government school and Early learning facilities.

It is submitted that a note is introduced on Plan 7 – Community Building Projects and the supporting table advising that demand for a non-government primary school has also been identified (Pages 22-23).

Table 10 Summary land use budget allocates the land holdings in hectares for transport, community facilities and Open space. 0.70 hectares under "Community facilities" is provided for a *proposed government school* but does not include reference to a non-government school (Page 32).

Include recognition that a non-government primary school is required even if the land take is registered as zero against the non-government school.

Section 3.1 Calculation of projected dwelling (lot) and floor space projections advises that floor space yield is addressed for individual properties. It is recommended that floor space of 5,000 square metres *plus* an area for 16 car parking spaces, based on 3.2 spaces per 1000sqm, of gross floor area is required for the Catholic primary school. This should be noted as the upper limit for the area that should be excluded from developer contributions, if delivered as part of a development proposal.

Schedule 14 to Clause 45.09 Parking Overlay and Clause 52.06 Car Parking Melbourne Planning Scheme
It is understood that the intention of Schedule 14 to Clause 45.09 Parking Overlay is to override the car parking provisions of Clause 52.06 Car Parking within the Melbourne Planning Scheme. This is supported.

To discuss this submission further, please contact

Yours sincerely

Dr Paul Sharkey

(/ 10 / 2021

Attach.

ATTACHMENT A

Arden Structure Plan and Future Catholic schools

CBD – INNER NORTHWEST PARISHES

- North Melbourne
- Kensington
- West Melbourne
- Melbourne (Bourke St)



North Melbourne - Northern region



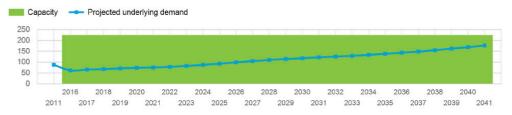
Typology¶

 $The \cdot parish \cdot is \cdot located \cdot in \cdot the \cdot nor thern \cdot suburbs. \cdot The \cdot number \cdot of \cdot school \cdot aged \cdot children \cdot is \cdot expected \cdot to \cdot increase \cdot based \cdot on \cdot significant \cdot inner \cdot in$ city-apartment-development. The Catholic proportion of the local population has decreased moderately between 2006 and 2016resulting from an increase in persons of no religion. The parish has a large proportion of its population born overseas at 2016. The $major \cdot country \cdot of \cdot birth \cdot groups \cdot are \cdot China, \cdot Vietnam \cdot and \cdot United \cdot Kingdom \cdot The \cdot parish \cdot has \cdot a \cdot moderate \cdot proportion \cdot of \cdot households \cdot in \cdot the \cdot parish \cdot has \cdot a \cdot moderate \cdot proportion \cdot of \cdot households \cdot in \cdot the \cdot parish \cdot has \cdot a \cdot moderate \cdot proportion \cdot of \cdot households \cdot in \cdot the \cdot parish \cdot has \cdot a \cdot moderate \cdot proportion \cdot of \cdot households \cdot in \cdot the \cdot parish \cdot has \cdot a \cdot moderate \cdot proportion \cdot of \cdot households \cdot in \cdot the \cdot parish \cdot has \cdot a \cdot moderate \cdot proportion \cdot of \cdot households \cdot in \cdot the \cdot parish \cdot has \cdot a \cdot moderate \cdot proportion \cdot of \cdot households \cdot in \cdot the \cdot parish \cdot has \cdot a \cdot moderate \cdot proportion \cdot of \cdot households \cdot in \cdot the \cdot parish \cdot has \cdot a \cdot moderate \cdot proportion \cdot of \cdot households \cdot in \cdot the \cdot parish \cdot has \cdot a \cdot moderate \cdot proportion \cdot of \cdot households \cdot in \cdot the \cdot parish \cdot has \cdot a \cdot moderate \cdot proportion \cdot of \cdot households \cdot in \cdot the \cdot parish \cdot has \cdot a \cdot moderate \cdot proportion \cdot of \cdot households \cdot in \cdot the \cdot parish \cdot has \cdot a \cdot moderate \cdot proportion \cdot of \cdot households \cdot in \cdot the \cdot parish \cdot parish \cdot parish \cdot has \cdot a \cdot moderate \cdot parish \cdot p$ $highest-income\cdot quartile. \label{the:parish-has-experienced-relative-stability-in-the-number-of-Catholic-primary-school-students-between-label-stability-in-the-number-of-Catholic-primary-school-students-between-label-stability-in-the-number-of-Catholic-primary-school-students-between-label-school-students-between-label-school-school-students-between-label-school$ 2013-and-2018; a-result-of-little-change-in-the-number-of-children-in-the-area. The-parish-currently-has-one-Catholic-primary-schoolwith a capacity of 258 students. In 2018, 29.3% of Catholic primary school students living in the parish were attending a Catholic school-outside-the-parish.¶

	Act	Actual (ABS)			Forecast						
Measure	2006	2011	2016	2018	2021	2026	2031	2036	2041		
Projected underlying	ng demand				Base	d on 2016 inferre	ed sector share				
Primary		88	62	68	75	99	123	144	177		
E1012 *		66	96	114	133	195	252	290	329		
Secondary		60	43	49	53	59	72	98	134		
Capacity											
Primary			225	225	225	225	225	225	225		

^{*}Underlying demand for each Parish has been calculated using a different methodology than for a school catchment. Please refer to the glossary for the definitions of the

PRIMARY UNDERLYING DEMAND BY YEAR, 2016 - 2041



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	Primary s	chools	
ENumber	Name	2018 Enrolments	School capacity
E1012	St Michael's School	156	225

	Proposed sch	ools
School ID	Name	Suggested timing

Priority secondary college access - Note: Diocesan-wide secondary colleges are not included in this list

		Essen	tial Stati	stics for Nor	th Melboui	rne			
	Act	tual (ABS)		Northern		F	orecast		
Measure	2006	2011	2016	2016	2021	2026	2031	2036	204
Religion of total pop	ulation								
Catholic	18%	17%	14%	27%					
No Religion	29%	35%	42%	29%					
Non-Christian	19%	20%	16%	15%					
Orthodox	3%	2%	2%	5%					
Other Christian	0%	0%	0%	0%					
School age bands									
Age 0-4	342	465	520		825	1,010	1,035	1,086	1,37
Age 5	63	71	83		117	167	189	198	24
Age 5-11	385	484	577		777	1,022	1,262	1,481	1,82
Age 12	81	57	78		107	114	159	206	27
Age 12-17	391	419	414		606	669	819	1,114	1,51
Primary sector share									
Catholic	19%	17%	8%	25%					
Government	64%	64%	78%	66%					
Independent	17%	18%	14%	10%					
Secondary sector sha	re								
Catholic	15%	14%	8%	25%					
Government	69%	68%	73%	59%					
Independent	16%	18%	19%	16%					
Catholic Participation	Primary								
Catholic	61%	47%	42%	62%					
Government	39%	53%	58%	34%					
Independent	0%	0%	0%	4%					
Catholic Participation	Secondary								
Catholic	39%	43%	25%	57%					
Government	61%	57%	75%	36%					
Independent	0%	0%	0%	8%					

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Kensington - Northern region



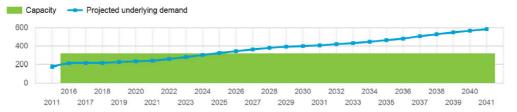
Typology

The parish is located in the north western suburbs. The number of school aged children is expected to increase based on significant inner city apartment development. The Catholic proportion of the local population has decreased significantly between 2006 and 2016 resulting from an increase in overseas born population. The parish has a large proportion of its population born overseas at 2016. The major country of birth groups are China, India and United Kingdom. The parish has a very high proportion of households in the highest income quartile. The parish has experienced an increase in the number of Catholic primary school students between 2013 and 2018; a result of an increase in market share. The parish currently has one Catholic primary school with a capacity of 306 students. In 2018, 7.6% of Catholic primary school students living in the parish were attending a Catholic school outside the parish.

	Act	Actual (ABS)			Forecast						
Measure	2006	2011	2016	2018	2021	2026	2031	2036	2041		
Projected underlyi	ng demand				Base	d on 2016 inferre	ed sector share				
Primary		178	212	216	240	344	409	483	585		
E1088 *		154	205	212	234	338	404	473	566		
Secondary		80	105	123	130	144	210	286	334		
Capacity											
Primary			320	320	320	320	320	320	320		

^{*}Underlying demand for each Parish has been calculated using a different methodology than for a school catchment. Please refer to the glossary for the definitions of the various methodology used.

PRIMARY UNDERLYING DEMAND BY YEAR, 2016 - 2041



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	Primary s	chools	
ENumber	Name	2018 Enrolments	School capacity
E1088	Holy Rosary School	306	320

Simonds Catholic College (B)

Catholic Participation Primary

Catholic Participation Secondary

Catholic

Catholic

Government

Independent

Government Independent

	Proposed sch	ools
School ID	Name	Suggested timing

Priority secondary college access - Note: Diocesan-wide secondary colleges are not included in this list

St Aloysius College (G)

Essential Statistics for Kensington Actual (ABS) Northern Forecast 2021 2006 2011 2016 2016 2026 2031 2036 2041 Measure Religion of total population Catholic 18% 27% 26% 24% No Religion 29% 36% 45% 29% Non-Christian 10% 12% 15% 10% Orthodox 2% 2% 2% 5% Other Christian 0% 0% 0% 0% School age bands Age 0-4 504 681 803 1,334 1,417 1,569 1,846 2,069 122 Age 5 94 150 220 237 283 336 62 Age 5-11 421 500 636 799 1,147 1,362 1,607 1,949 Age 12 33 66 55 93 106 157 188 226 Age 12-17 264 374 326 480 534 775 1,059 1,234 **Primary sector share** Catholic 28% 31% 35% 25% Government 60% 59% 66% 56% Independent 11% 13% 6% 10% Secondary sector share 25% Catholic 16% 28% 25% Government 59% 54% 53% 59% Independent 26% 18% 22% 16%

62%

34%

4%

57%

36%

8%

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24%

5%

68%

23%

9%

Source: School, enrolment and Parish information from CEM, 2018; Small Area Forecast information from .id, 2018; Census data from ABS, 2018.

70%

26%

4%

66%

34%

0%

87%

8%

5%

80%

20%

0%

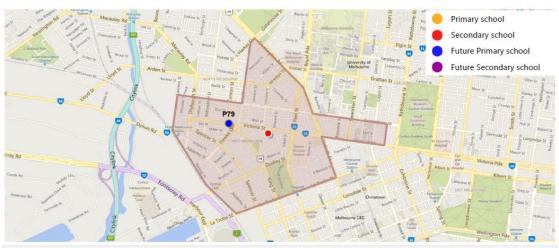
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West Melbourne - Northern region



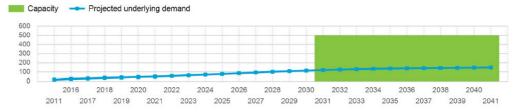
Typology

The parish is located in the north western suburbs. The number of school aged children is expected to increase based on significant inner city apartment development. The Catholic proportion of the local population has decreased moderately between 2006 and 2016 resulting from an increase in overseas born population. The parish has a very large proportion of its population born overseas at 2016. The major country of birth groups are China, Malaysia and India. The parish has a moderate proportion of households in the highest income quartile. The parish has experienced an increase in the number of Catholic primary school students between 2013 and 2018; a result of increasing numbers of children in the area. While the parish currently has no Catholic primary school, children have access to St Michael's School, North Melbourne. In 2018, 100% of Catholic primary school students living in the parish were attending a Catholic school outside the parish.

	Act	tual (ABS)				Forecas	st		
Measure	2006	2011	2016	2018	2021	2026	2031	2036	2041
Projected underlyi	ng demand				Base	d on 2016 inferre	ed sector share		
Primary		19	27	39	51	86	121	140	150
Secondary		8	13	16	25	31	45	56	64
Capacity									
Primary			0	0	0	0	500	500	500

*Underlying demand for each Parish has been calculated using a different methodology than for a school catchment. Please refer to the glossary for the definitions of the

PRIMARY UNDERLYING DEMAND BY YEAR, 2016 - 2041



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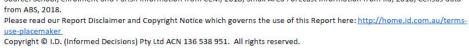
	Prim	ary schools	
ENumber	Name	2018 Enrolments	School capacity

	Proposed schools	
School ID	Name	Suggested timing
P79	West Melbourne	2031

Priority secondary college access - Note: Diocesan-wide secondary colleges are not included in this list

		Essei	ntial Stati	stics for We	st Melbour	ne			
	Act	ual (ABS)		Northern		F	orecast		
Measure	2006	2011	2016	2016	2021	2026	2031	2036	204
Religion of total popu	lation								
Catholic	17%	16%	11%	27%					
No Religion	30%	37%	50%	29%					
Non-Christian	13%	14%	15%	15%					
Orthodox	1%	1%	1%	5%					
Other Christian	0%	0%	0%	0%					
School age bands									
Age 0-4	183	305	511		1,151	1,587	1,845	1,923	1,99
Age 5	27	52	58		122	237	308	328	34
Age 5-11	159	237	352		833	1,394	1,954	2,270	2,42
Age 12	51	57	49		97	153	242	303	34
Age 12-17	299	339	526		1,202	1,479	2,159	2,685	3,08
Primary sector share									
Catholic	12%	9%	6%	25%					
Government	75%	88%	92%	66%					
Independent	13%	3%	1%	10%					
Secondary sector share	•								
Catholic	7%	7%	2%	25%					
Government	63%	64%	77%	59%					
Independent	32%	28%	21%	16%					
Catholic Participation	Primary								
Catholic	27%	49%	17%	62%					
Government	60%	51%	82%	34%					
Independent	13%	0%	1%	4%					
Catholic Participation	Secondary								
Catholic	0%	49%	0%	57%					
Government	78%	24%	74%	36%					
Independent	22%	26%	26%	8%					

Compiled and presented by .id - the population experts www.id.com.au
Source: School, enrolment and Parish information from CEM, 2018; Small Area Forecast information from .id, 2018; Census data







Melbourne - (Bourke St)



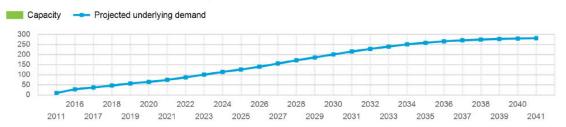
Typology

The parish is located in the central city. The number of school aged children is expected to increase based on significant inner city apartment development. The Catholic proportion of the local population has decreased moderately between 2006 and 2016 resulting from an increase in overseas born population. The parish has a very large proportion of its population born overseas at 2016. The major country of birth groups are China, India and South Korea. The parish has a moderate proportion of households in the highest income quartile. The parish has experienced relative stability in the number of Catholic primary school students between 2013 and 2018; a result of an increase in market share. While the parish currently has no Catholic primary school, children have access to Galilee Regional Catholic Primary School, South Melbourne. In 2018, 100% of Catholic primary school students living in the parish were attending a Catholic school outside the parish.

	Act	tual (ABS)				Forecas	it		
Measure	2006	2011	2016	2018	2021	2026	2031	2036	2041
Projected underlyi	ing demand				Base	d on 2016 inferre	d sector share		
Primary		10	28	47	75	140	216	266	282
Secondary		4	9	29	34	54	63	81	93

^{*}Underlying demand for each Parish has been calculated using a different methodology than for a school catchment. Please refer to the glossary for the definitions of the various methodology used.

PRIMARY UNDERLYING DEMAND BY YEAR, 2016 - 2041



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	Prim	ary schools	
ENumber	Name	2018 Enrolments	School capacity

	Proposed sch	ools
School ID	Name	Suggested timing

Priority secondary college access - Note: Diocesan-wide secondary colleges are not included in this list

	Act	ual (ABS)		Northern		F	orecast		
Measure	2006	2011	2016	2016	2021	2026	2031	2036	2041
Religion of total popu	lation								
Catholic	15%	14%	10%	27%					
No Religion	25%	32%	44%	29%					
Non-Christian	16%	22%	22%	15%					
Orthodox	2%	1%	1%	5%					
Other Christian	0%	0%	0%	0%					
School age bands									
Age 0-4	104	279	624		1,295	2,116	2,661	2,720	2,669
Age 5	11	23	56		152	269	381	426	430
Age 5-11	46	81	143		618	1,153	1,771	2,187	2,315
Age 12	11	14	7		38	91	138	192	232
Age 12-17	131	164	256		1,142	1,836	2,123	2,761	3,153
Primary sector share									
Catholic	7%	13%	12%	25%					
Government	37%	60%	69%	66%					
Independent	48%	27%	19%	10%					

Secondary sector sha	re			
Catholic	7%	14%	9%	25%
Government	35%	48%	56%	59%
Independent	57%	38%	35%	16%
Catholic Participation	Primary			
Catholic	0%	0%	33%	62%
Government	0%	0%	49%	34%
Independent	0%	0%	18%	4%
Catholic Participation	Secondary			
Catholic	0%	67%	44%	57%
Government	0%	0%	56%	36%
Independent	0%	33%	0%	8%

from ABS, 2018.

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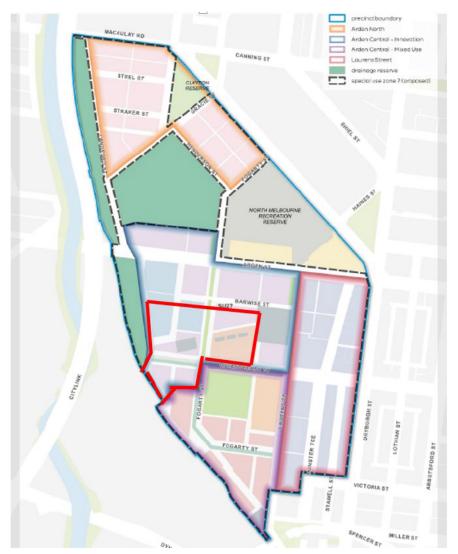
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ATTACHMENT A

Star indicates the general location of St Michael's North

Comparison of area witin the Special Use Zone 7 Arden Central Innovation Centre Suitable for an 'as of right 'school vs an 'as of right co-located school

and hospital



Melbourne STEEL ST CANNING ST STRAKER ST RECREATION RESERVE POGARTY ST

Area permitted for an 'as of right' school

Area permitted for an 'as of right' hospital and school



In reply please quote:

Mr S Moseley Chief Executive Officer Victorian Planning Authority Level 25, 35 Collins Street MELBOURNE VIC 3000

Dear Mr Moseley

RE: Consultation Draft Arden Structure Plan June 2020

I refer to the above matter and offer this submission for your consideration and action.

Catholic Education Strategic Provision Planning within the Arden Precinct

The Melbourne Archdiocese Strategic Provision Plan 2018 identifies the need for a future Catholic primary school within the Arden Precinct - Proposed Catholic Primary School - P79 West Melbourne (2031) (Attachment A).

The proposed Catholic primary school will satisfy future demand for Catholic education from the Parishes of North Melbourne, West Melbourne, Kensington and Melbourne (Bourke Street). The current capacity of the two existing primary schools will be exceeded by 2031.

Catholic Education Provision and the Draft Arden Precinct Plan as Exhibited

Catholic Education Melbourne (CEM) note the emphasis on the importance of education delivery within the Draft Arden Structure Plan. In particular objectives 1, 24 25 and 30, and the respective strategies, make specific reference to the significance of education for the precinct and in some instances place emphasis on *government schools*.

CEM notes that the Draft Arden Structure Plan does not make specific reference to non-government schools. It is appropriate to reference non-government schools and government schools as both sectors are responsible for meeting the educational need of students in Victoria.

Current planning practice in green field growth corridors provides opportunity for the delivery of non-government school infrastructure on Precinct Structure Plans. CEM recommend that reference is made to non-government schools in urban renewal areas, where strategic justification is provided by a provider, after a period of formal consultation.

The designation of non-government schools within Precinct Structure Plans in green field growth corridors has assisted in providing a high level of certainty for the future provision of Catholic schools.

This same approach is requested for urban renewal areas, and in this instance, the Arden Precinct Plan. Formal designation on the Arden Precinct Plan will provide the level of certainty required for CEM to make investment decisions to meet the identified demand for future Catholic school provision.

A summary of the relevant Objectives and Strategies that should be amended in the Arden Precinct Plan that also apply to non-government schools is attached (Attachment B).

Development Contributions

CEM acknowledges that non-government schools are exempt from paying development contributions in the interim Development Control Planning Overlay (DCPO) introduced for the Arden Precinct within the Melbourne Planning Scheme.

This is consistent with the Ministerial Direction on the preparation and content of development contributions plans and suggests an understanding of the significance of the delivery of non-government school infrastructure within the Arden Precinct. To effectively realise the delivery of non-government school sites they should also be identified with a clear designation within Arden Precinct Plan.

Incentives for Developers to deliver desired outcomes within Urban Renewal Areas

Current land values limit the capacity of CEM to purchase land for future Catholic schools in urban renewal areas, such as the Arden Precinct. New models of delivery are required to provide Catholic school infrastructure. Partnerships with developers and landowners are an approach that CEM is exploring and the State Government can facilitate these opportunities with innovative development controls mandated through the Victorian Planning Scheme.

CEM propose an amendment to the Victorian Planning Scheme to ensure the delivery of non-government school infrastructure in urban renewal areas. The planning scheme, if properly adapted, can offer incentives to developers to provide non-residential uses in mixed use urban renewal settings.

The Victorian Planning Authority, with the support of the Department of Environment, Land, Water and Planning (DELWP), should consider, in all future urban renewal and priority precinct areas, a development control that permits floor area ratio or dwelling density uplift bonuses for development proposals that include specified non-residential uses, such as non-government schools. Such an approach would provide greater opportunity for developer and non-government school partnerships.

The introduction of specific controls that provide additional floor area for dwellings, or greater dwelling densities, in return for the delivery of a non-government school would transform the opportunities for developers and non-government school providers to form meaningful partnerships to deliver education facilities in inner urban areas subject to greater densification.

If the status quo is maintained, there will be greater emphasis on State Government to provide for a larger proportion of the education provision required in urban renewal areas.

I urge you to implement the proposals submitted within the Arden Precinct and to consult CEM in similar urban renewal areas to ensure the ongoing delivery of Catholic school infrastructure.

If you require any further information from CEM, please do not hesitate to contact

Yours sincerely

Anneles

Jim Miles

11 / 08 / 2020

Attach.