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**Subject:** Making a submission Form Submission  
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## Making a submission Form Submission

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NORTH AND WEST MELBOURNE ASSOCIATION.  
ARDEN PRECINCT SUBMISSION 11 October 2021.

The North and West Melbourne Association (NWMA), and its predecessor, the North Melbourne Association, has for in excess of fifty years, played a leading role in advocacy for sustainable, equitable and quality urban development in its community and nearby suburbs to all levels of government. Whilst the advice of the NWMA has not always been accepted, the work continues.

This submission is based on the established position of the NWMA on these important issues over recent time.

The NWMA is an incorporated association and its affairs are in order with the Department of Consumer Affairs.

The NWMA offers the following in respect to the proposed development in the Arden Precinct and is prepared to continue consultation with the Victorian Government on this very important proposal. The NWMA considers this submission reserves its right to appear at any future panels/hearings on this matter.

1. The proposed buildings, density and heights for the Arden Precinct are considered grossly excessive for this location and should be reviewed. It is clearly an overdevelopment and inappropriate for North/West Melbourne and nearby Kensington. It appears to many that this is just an attempt to emulate a “Docklands” type development in an established mixed use/residential area. “Docklands” is a development contiguous to Melbourne’s CBD, located in an area with little or no relationship to the surrounding districts and with a substantial waterfront setting. For example, it is of concern that a forty level building (discretionary) is proposed for the banks of the Moonee Ponds Creek. As this is a discretionary height limit, it must be understood that a building of possibly seventy/eighty levels could be considered. The building heights throughout the Arden Precinct are of concern and in particular those on the border with the established suburbs of North and West Melbourne. These border heights need to be respectful of the aforementioned established communities. Arden Precinct offers a fantastic opportunity to make a significant and exciting contribution to Melbourne. Let’s not repeat the mistakes of the past.
2. It would appear that this proposal is a lost opportunity to address the serious shortage of affordable, social and public housing in inner Melbourne. The limiting of social housing to “support and encourage” six per cent with a fifty per cent discount is grossly inadequate. It should be mandatory with a requirement for at least twenty five per cent. The limiting of affordable housing to the City of Melbourne owned land is also rejected by the NWMA and should apply to the whole study area. It appears that public housing is not included in the project. This also is rejected and should immediately be reconsidered.

3. Whilst an “active transport” policy is widely supported, the ability to deliver this is of real concern. If it fails, what happens to our community? Also of concern is the major outlet from the West Gate Tunnel Project located immediately to the south of the Arden Precinct study area in Dynon Road. The long-term traffic impacts of the Arden Precinct proposal and the West Gate tunnel project on North/West Melbourne and Kensington do not appear to be adequately addressed in the supporting documentation. This should be included as a matter of urgency.
4. In respect to the question of sufficient open space, concerns are raised. Many of the proposals are great ideas but how they actually will work is unclear. It is important to understand how the “Integrated stormwater management open space” actually functions and what the situation would be in the event of flooding and the subsequent recovery period. It is important to remember that the North Melbourne Recreation Reserve performs a significant regional role far beyond the two km catchment referred to in the documentation. Also, Clayton Reserve has a far wider catchment than the 300m mentioned. This is a positive measure of the success of these facilities. A review of the role of these two facilities is considered necessary. Further, it is important to note that Macaulay Road and Canning Street Reserve and the Railway Place and Miller Street Park identified in the documentation are not actually in the study area and are separated by major high traffic volume roads. More usable open space is considered necessary.
5. The Arden Precinct appears to be making the same old mistake of many other lost opportunities for quality development. Excessive height, massive densities and the destruction of amenity, whilst profitable, are not sustainable in the long term. Good design and sustainable development/densities are the only real options. The inner Melbourne community has been long time supporters of this and excellent examples exist. Height and overdevelopment are not the answers. On the question of density, good examples include the small statistical area around Elm Street, North Melbourne, in close proximity to the study area. Here, based on the Federal Government Census in 2011 and 2016, the number of people increased from 536 to 653, i.e. 22%. In this statistical area, the increase was achieved by infill and moderate development, with no excessive heights. In Kensington, it has been reported that a 40% increase in population has been achieved under similar moderate construction provisions.