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**Subject:** Making a submission Form Submission  
**Date:** Monday, 11 October 2021 2:10:22 PM



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Peter

**Last name**

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# ***Town and Country Planning Association Incorporated***

Box 312, Collins Street West P.O., Melbourne 8007  
Registration no. A0031095J  
<http://www.tcpa.org.au/>

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11 October 2021

Victorian Planning Authority  
C/- Arden Precinct  
Level 25, 35 Collins Street  
MELBOURNE VIC 3000

Dear Sir

**Re: Town & Country Planning Association Inc. submission to the  
*Melbourne Planning Scheme Amendment C407melb - Arden Structure Plan*  
(August 2021)**

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The Town and Country Planning Association Inc. (TCPA) is pleased to make this submission to proposed Amendment C407melb to the Melbourne Planning Scheme, which proposes to implement the *Arden Structure Plan* (August 2021).

The Town and Country Planning Association (TCPA) advocates integrated planning of land use and transport for ecological sustainability and a healthy living environment. The TCPA is a non-profit public organisation, established in Victoria in 1914, and is independent of any party political organisation.

In preparing this submission, the TCPA has considered proposals and provisions in:

- Our previous detailed submission to the draft *Arden Structure Plan* (June 2020) lodged on-line on 23 August 2020.
- *Arden Macaulay Structure Plan 2012*
- *Melbourne Planning Scheme*, in particular the provisions of the Planning Policy Framework and the Local Planning Policy Framework

Please find attached the TCPA's to *Amendment C407melb - Arden Structure Plan* (August 2021). Our submission focusses on the objectives and strategies contained in the structure plan. For convenience, the attachment presents a table that:

- Compares the 2020 and 2021 version of the structure plan; and
- Includes our comments from 2020, most of which remain relevant, with updated comments having regard to the 2021 version of the structure plan.

## **General comments**

It is disappointing to see that very little, if any, of our ideas made it through to the 2021 version.

Objectives appear not to have been cross checked for consistency between each other, their strategies and even with other strategies across the City of Melbourne. For example, as we note "Arts" has been relegated from a "sector" (i.e. a profession or industry) in Objective

2 to a "community" activity in Objective 25) and would even to conflict with the council's preference for an Arts hub in the CBD.

Climate targets have been watered down and no longer read as targets. There is even a reference to "aspirations"!

There seems to be not a lot of new green space for 15,000 people in the precinct. It is hard to clearly make out how much is new (other than new colour green).

- Some of the major streets are now coloured green and it would appear that these "green" streets are counted in the overall green space.  
How usable are these? – pathways and green canopy and cars?
- Is there a workable green space per resident?

**Panel or Standing Advisory Committee presentation**

TCPA wishes to make further detailed submissions to an Independent Panel or Standing Advisory Committee as part of the amendment process. We estimate a time slot of approximately 30 minutes to present our submissions.

Once again, the TCPA is grateful for the opportunity to respond in this process. We look forward to our on-going participation in this process.

Yours faithfully



Peter Hill,

TCPA





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<b>Transforming Arden</b>			
<p><b>Objective 1</b></p> <p>Celebrate, protect and interpret Aboriginal cultural values and heritage in the planning, design and curation of Arden.</p> <p>Formerly <b>Objective 3</b></p>	<p><b>Strategy 1.1</b></p> <p>Plan for the inclusion of spaces in community facilities for sharing Aboriginal history, culture and values associated with the area and for supporting Aboriginal business.</p> <p><b>Strategy 1.2</b></p> <p>Support the recognition and interpretation of the Aboriginal cultural values and heritage in Arden through ongoing consultation and collaboration with Traditional Custodians and engagement with the development industry and other stakeholders.</p> <p><b>Strategy 1.3</b></p> <p>Explore opportunities to reveal the history of Arden as a rich and water-based ecology, source of food and place of meeting through design, planting and curated programs. In particular, collaborate with the Traditional Custodians and local community to recognise this through the design of key spaces including the Arden North integrated stormwater management open space.</p> <p><b>Strategy 1.4</b></p> <p>Restore and nurture the local natural environment through indigenous planting and land management practices developed in collaboration with Traditional Custodians.</p> <p><b>Strategy 1.5</b></p> <p>Create opportunities to embed Aboriginal language, design and names in streets, parks and public buildings in consultation with Traditional Custodians.</p> <p><b>Strategy 1.6</b></p> <p>Identify opportunities for inclusive and social procurement policies and skills development for Aboriginal people in delivering Arden.</p>	<p>Strategies renumbered accordingly. The following formerly read:</p> <p><b>Strategy 1.1</b></p> <p>Plan for a new arts, cultural and community hub in Arden North to provide spaces for sharing Aboriginal history, culture and values associated with the area and for supporting Aboriginal business.</p> <p><b>Strategy 1.2</b></p> <p>Support the recognition and interpretation of the Aboriginal cultural values and heritage in Arden through engagement with the development industry and other stakeholders and in ongoing consultation and collaboration with Traditional Custodians.</p> <p><b>Strategy 1.3</b></p> <p>Explore opportunities to reveal the history of Arden as a rich and watery ecology, source of food and place of meeting through design, planting and curated programs. In particular, collaborate with the Traditional Custodians and local community to recognise this through the design of key spaces including the Arden North integrated stormwater management open space.</p>	



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<p><u>Objective 2</u></p> <p>Create the conditions that attract and retain global talent in the life-sciences, education, health and digital technology sectors and foster interaction, collaboration and knowledge sharing between enterprise, government and education.</p> <p>Formerly <u>Objective 1</u></p>	<p><u>Strategy 2.1</u></p> <p>Facilitate the development of anchor enterprises and industry facilities early in Arden's development to showcase innovation, create jobs in the precinct and attract ancillary businesses and industries.</p> <p><u>Strategy 2.2</u></p> <p>Support the delivery of innovation facilities in the Arden Central – Innovation sub-precinct to provide affordable space for innovation and technology labs and co-working and collaboration spaces, complemented by presentation and seminar spaces for sharing, exhibiting and commercialising work.</p> <p><u>Strategy 2.3</u></p> <p>Support the delivery of world-class and networked facilities and equipment throughout the precinct, such as laboratories and high-speed internet, to provide the tools for innovation, attract global talent and facilitate formal and informal collaboration and knowledge sharing.</p> <p><u>Strategy 2.4</u></p> <p>Explore private and public delivery models for affordable workspaces for creative and innovation industries. This includes delivering creative spaces, presentation spaces and co-working and collaboration spaces available on a variety of tenures and price-points to support Arden's future businesses, and will form an essential part of the curation and delivery strategy.</p> <p><u>Strategy 2.5</u></p> <p>Monitor and measure success against the factors driving the success of innovation precincts in Figure 15.</p>	<p>Strategies renumbered to reflect Objective number.</p> <p>The following strategies formerly read:</p> <p><u>Strategy 2.2</u></p> <p>Establish an innovation hub in the heart of Arden that includes affordable space for innovation and technology labs, artists' and makers' studios and co-working spaces, complemented by presentation and seminar spaces for sharing, exhibiting and commercialising work.</p> <p><u>Strategy 2.4</u></p> <p>Explore private and public delivery models for affordable workspaces for arts, creative and innovation industries necessary for the desired economic activity. This includes delivering workshops and artists' studios, presentation spaces and co-working and collaboration spaces available on a variety of tenures and price-points to support Arden's future businesses.</p>	<p>"Arts" has been relegated from a "sector" (i.e. a profession or industry) in Objective 2 to a "community" activity in Objective 25 (Strategies 25.2 and 25.5).</p> <ul style="list-style-type: none"> <li>• This relegation implies that professions such as architecture, landscape architecture, urban design and industrial design would not be anticipated in Arden. This seems to be an unnecessary narrowing of the range of professions accommodated.</li> <li>• In relation to this, we note that the City of Melbourne has been very keen to retain professional artists in the city centre, as in the Nicholas building in Swanston Street, for example, which was recently put on the market. This might be seen as the Arden precinct as the arts hub over the council's preference for the CBD!</li> </ul>



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<p><u>Objective 3</u></p> <p>Deliver a highly liveable, mixed use precinct of Melbourne that aspires to accommodate approximately 34,000 jobs and around 15,000 residents with innovation at its heart.</p> <p>Formerly <b>Objective 2</b></p>	<p><u>Strategy 3.1</u></p> <p>Facilitate use and development of land in Arden to deliver on the aspiration of approximately 34,000 jobs and around 15,000 residents in the precinct.</p> <p><u>Strategy 3.2</u></p> <p>Prepare planning controls to deliver the land use framework for Arden to implement the sub-precinct land use visions.</p>	<p>Strategies renumbered to reflect Objective number. The following strategies formerly read:</p> <p><u>Strategy 3.1</u></p> <ul style="list-style-type: none"> <li>Provide an urban structure that aspires to accommodate approximately 34,000 jobs and around 15,000 residents and caters for a broad range of building types and floor spaces for the many different uses that will comprise the future of Arden.</li> </ul> <p><u>Strategy 3.2</u></p> <ul style="list-style-type: none"> <li>Provide appropriate planning controls and policy to attract the identified jobs mix and unlock Arden's potential for innovation.</li> </ul>	<p>While the draft structure plan excludes the land of the Port of Melbourne, it is worth noting that the <i>Port Development Strategy 2035 Vision</i> (Port of Melbourne Corporation, 2009) is a reference document in Clause 18.03 of all planning schemes and requires consideration in planning decisions.</p> <p><i>Port Development Strategy (Draft 2019)</i>  <a href="https://www.portofmelbourne.com/facilities-development/port-development-strategy/">https://www.portofmelbourne.com/facilities-development/port-development-strategy/</a></p> <p>The Port of Melbourne commenced consultation on its 30-year <i>2050 Port Development Strategy</i> with release of a discussion paper for public feedback in August 2018. The release of the <i>Draft 2050 Port Development Strategy</i> (2050 PDS) for a 4-week public consultation followed on 12 November 2019. According to the Port's website submissions and feedback are currently being reviewed in preparation of the final 2050 PDS to be released in early 2020.</p> <p>The 2050 PDS includes a number of existing and proposed initiatives which should be acknowledged in the structure plan for their connection to or influence on Arden, particularly:</p> <ul style="list-style-type: none"> <li>Environmental responsibilities under Victorian and Commonwealth legislation (Page 45)</li> <li>Upgrading Swanson Dock East and West berths</li> <li>Port Rail Transformation Project for rail infrastructure to Swanson Dock and Appleton Dock (Page 51)</li> <li>Responding to climate change and sea level rise. (Page 65)</li> <li>Protecting and enhancing the local environment themes Urban design and landscaping; Hydrology, water quality and sedimentation; Climate change; and Commitment to local communities. (Page 67)</li> </ul>



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			<ul style="list-style-type: none"> <li>Expansion of area covered by the Port of Melbourne Environmental Significance Overlay (ESO) to ensure safeguarding and protection of the Port's operations from the encroachment of sensitive uses. (Pages 69 and 70)</li> <li>Sustainability at Port of Melbourne (Pages 71-72) <ul style="list-style-type: none"> <li>See also <i>Port of Melbourne Sustainability Report</i> (2018), in particular the plans on Preserving our heritage and Port Heritage Trail (Page 13)  <a href="https://www.portofmelbourne.com/news-publications/publications/sustainability-at-port-of-melbourne/">https://www.portofmelbourne.com/news-publications/publications/sustainability-at-port-of-melbourne/</a></li> </ul> </li> </ul> <p>On finalisation it would be anticipated that the reference to the <i>Port Development Strategy 2035 Vision</i> in planning schemes will be replaced by reference to the 2050 PDS.</p>
<u>Designing a distinctive place</u>			
<u>Objective 4</u> Create a new urban structure for Arden that incorporates a high-quality network of connected streets and open spaces that help support a varied and walkable block structure  Objective formerly read <ul style="list-style-type: none"> <li>Deliver a new urban structure for Arden that incorporates a high-quality network of connected streets and open spaces that help support a varied and walkable block structure.</li> </ul>	<u>Strategy 4.1</u> Deliver Arden's renewal in general accordance with the future urban structure shown on Plan 2.	Strategy 4.1 formerly read: <ul style="list-style-type: none"> <li>Deliver Arden's renewal in general accordance with the spatial plan as per Figure 21 to deliver exemplary urban design, a mix of block sizes and a broad range of building types</li> </ul>	It is often the case with renewal projects that the planning seems to presume existing development has responded to the project's underlying geology. The structure plan proposes a complete change of development in the southern half of the precinct.  There is no evidence that the structure plan has considered the underlying geology and soil structures that may in fact constrain the nature of buildings in the area, particular for the taller multi storey buildings.  Objective 4, Strategy 4.1. Building heights. (Plan 3 pp.34-35), and Objective 5: VPA is maintaining its high-rise building heights strategy.



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<p><u>Objective 5</u></p> <p>Introduce density and built form controls that help transform Arden into a world-leading urban renewal precinct and innovation precinct while celebrating the precinct's existing assets and surrounding neighbourhoods.</p>	<p><u>Strategy 5.1</u></p> <p>Implement built form controls in the planning scheme that respond to key design recommendations, including:</p> <ul style="list-style-type: none"> <li>• Heights</li> <li>• Street wall heights</li> <li>• Setbacks (street frontage)</li> <li>• Setbacks (side and rear)</li> <li>• Building separation</li> <li>• Floor area ratios</li> <li>• Laneways and through block links</li> <li>• Active street frontages</li> <li>• Weather protection</li> <li>• Traffic conflict frontages</li> <li>• Solar protection</li> <li>• Wind control.</li> </ul> <p><u>Strategy 5.2 [NEW]</u></p> <p>Apply built form controls in Arden as shown on Plan 3</p>	<p>Strategy 5.1 formerly read:</p> <ul style="list-style-type: none"> <li>• Prepare an Arden Design Guide and planning scheme amendment to implement the relevant strategies of the plan. This will implement the design recommendations, floor area ratio controls and built form controls</li> </ul>	<p>Objective 4, Strategy 4.1. Building heights. (Plan 3 pp.34-35), and Objective 5:</p> <p>The new wording is a bit more comprehensive. However, VPA is maintaining its high-rise building heights strategy.</p>



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<p><u>Objective 6</u></p> <p>Recognise and celebrate the valued built form heritage and character of Arden.</p>	<p><u>Strategy 6.1</u></p> <p>Protect and enhance heritage features of the precinct which are identified in the Melbourne Planning Scheme as being of significance.</p> <p><u>Strategy 6.2</u></p> <p>Plan for heritage buildings to be incorporated sensitively into new development, supporting adaptive re-use where the design is of a high quality and reflects the heritage elements of the site and surrounds.</p>	<p>Unchanged</p>	<p>While the draft structure plan excludes the land of the Port of Melbourne, it is worth noting that the <i>Port Development Strategy 2035 Vision</i> (Port of Melbourne Corporation, 2009) is a reference document in Clause 18.03 of all planning schemes.</p> <p><i>Port Development Strategy (Draft 2019)</i>  <a href="https://www.portofmelbourne.com/facilities-development/port-development-strategy/">https://www.portofmelbourne.com/facilities-development/port-development-strategy/</a></p> <p>The Port of Melbourne commenced consultation on its 30-year <i>2050 Port Development Strategy</i> with release of a discussion paper for public feedback in August 2018. The release of the <i>Draft 2050 Port Development Strategy</i> (2050 PDS) for a 4-week public consultation followed on 12 November 2019. According to the Port's website submissions and feedback are currently being reviewed in preparation of the final 2050 PDS to be released in early 2020.</p> <p>The 2050 PDS includes a number of existing and proposed initiatives which should be acknowledged in the structure plan, particularly:</p> <ul style="list-style-type: none"> <li>• Environmental responsibilities under Victorian and Commonwealth legislation (Page 45)</li> <li>• Upgrading Swanson Dock East and West berths</li> <li>• Port Rail Transformation Project for rail infrastructure to Swanson Dock and Appleton Dock (Page 51)</li> <li>• Responding to climate change and sea level rise. (Page 65)</li> <li>• Protecting and enhancing the local environment themes Urban design and landscaping; Hydrology, water quality and sedimentation; Climate change; and Commitment to local communities. (Page 67)</li> <li>• Expansion of area covered by the Port of Melbourne Environmental Significance Overlay (ESO) to ensure safeguarding and protection of the Port's operations from the encroachment of sensitive uses. (Pages 69 and 70)</li> <li>• Sustainability at Port of Melbourne (Pages 71-72) <ul style="list-style-type: none"> <li>– See also <i>Port of Melbourne Sustainability Report</i> (2018), in particular the plans on Preserving our heritage and Port Heritage Trail (Page 13)  <a href="https://www.portofmelbourne.com/news-publications/publications/sustainability-at-port-of-melbourne/">https://www.portofmelbourne.com/news-publications/publications/sustainability-at-port-of-melbourne/</a></li> </ul> </li> </ul> <p><b>Objective 6 and its strategies: 30-year 2050 Port Development Strategy is not mentioned or addressed.</b></p>



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<p><u>Objective 7</u></p> <p>Encourage buildings that remain adaptable as uses change over time.</p>	<p><u>Strategy 7.1</u></p> <p>Require that any new above-ground car parking facilities can be adapted to future habitable buildings for other uses, including internal layouts, adequate floor to ceiling heights and avoidance of sloping or excessively deep floorplates which preclude future use.</p> <p><u>Strategy 7.2</u></p> <p>Require that highly specific building configurations, such as student accommodation and hotels, use structural design systems which enable conversion to other uses should needs change over time.</p> <p><u>Strategy 7.3</u></p> <p>Require that commercial buildings be designed to enable subdivision of floorplates into smaller tenancies over time through the placement and configuration of cores, atria and other elements in response to evolving workplace patterns.</p> <p><u>Strategy 7.4</u></p> <p>Require the design all buildings to exceed minimum required life expectancies and aim for at least 100 years of structural performance (considering future climate scenarios) with a higher expected turnover of interior fit-out.</p>	<p>Strategy 7.1 formerly read:</p> <ul style="list-style-type: none"> <li>Require that any new car parking facilities can be adapted to future habitable buildings for other uses, including internal layouts, adequate floor to ceiling heights and avoidance of sloping or excessively deep floorplates which preclude future use.</li> </ul> <p>Strategy 7.4 formerly read:</p> <ul style="list-style-type: none"> <li>Design all buildings to exceed minimum required life expectancies and aim for at least 100 years of structural performance (considering future climate scenarios) with a higher expected turnover of interior fit-out.</li> </ul>	<p>This and these strategies need to be seen to interact with Objective 29 – also see related TCPA comments</p> <p><u>Strategies</u></p> <p>This appears to be applied to specific building types e.g. student housing and hotels, and less to privately owned dwellings/apartments.</p> <p>One of the big positives of the sustainable led design of the Nightingale developments is that individual apartment can be reconfigured for changing uses e.g. allow parents to cohabit (and not just parents).</p> <ul style="list-style-type: none"> <li>Can the requirement for adaptable structural design be broadened, especially if the stated aim is building longevity of 100 years?</li> </ul>



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<p><u>Objective 8</u></p> <p>Ensure design excellence is achieved within Arden.</p> <p>Objective formerly read:</p> <ul style="list-style-type: none"> <li>Ensure design excellence is achieved for key strategic sites within Arden.</li> </ul>	<p><u>Strategy 8.1</u></p> <p>Encourage exemplary design excellence as supported, where appropriate, through either a design competition or design review panel</p> <p><u>Strategy 8.2</u></p> <p>Prepare guidelines to inform design excellence competitions in Arden.</p> <p><u>Strategy 8.3</u></p> <p>Work with the Office of the Victorian Government Architect to strengthen the quality of design review of projects within Arden, either through the Victorian Design Review panel process or through a new design review panel.</p>	<p>Strategy 8.1 formerly read:</p> <ul style="list-style-type: none"> <li>Require strategic sites to deliver design excellence through either a design competition or design review panel.</li> </ul>	<p><u>GAP: Microclimate considerations.</u></p> <p>Microclimate impacts and influences on the precinct appear not to have been addressed for the precinct.</p> <ul style="list-style-type: none"> <li>For example, the TCPA has noted that wind impact diagrams are rarely included in redevelopment or renewal projects in Melbourne. The proposed predominantly north-south street orientation in Arden coincides almost exactly with predominant wind patterns for Melbourne. This can create wind tunnel effects and building-generated wind turbulence that reduces comfort for pedestrians moving around the precinct. New streets in Arden should be oriented to mitigate against these effects, perhaps reflecting the existing street orientations in and adjoining the northern and south-eastern parts of Arden.</li> </ul> <p>The Bureau of Meteorology publishes wind roses for locations around Australia. Annual and seasonal wind roses for 9:00am and 3:00pm are available at:  <a href="http://www.bom.gov.au/climate/averages/wind/selection_map.shtml">http://www.bom.gov.au/climate/averages/wind/selection_map.shtml</a></p> <ul style="list-style-type: none"> <li>See also comments under Objective 9</li> </ul> <p><u>Proposed Guidelines</u></p> <p>We also recommend solar shadowing analyses in the planning layout for siting and physical profiles of buildings, especially tall buildings. Consider summer and winter solstices shadowing (winter is most significant), and also shadowing at the equinoxes as per the Planning Act regulations.</p> <p><b>Objective 8 and strategies: VPA additions – solar and microclimatic phenomena have been addressed (pp.40, 41).</b></p> <p><b>Are the recommendations sufficient in their formulae?</b></p>



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<p><b>Embedding sustainable change</b></p> <p><u>Objective 9</u></p> <p>Establish strong environmental governance in Arden that provides certainty, accountability and transparency to achieve the precinct's net-zero carbon target by 2040.</p> <p>Objective formerly read:</p> <ul style="list-style-type: none"> <li>Establish strong environmental governance in Arden that provides certainty, accountability and transparency to achieve the precinct's net-zero carbon target.</li> </ul>	<p><u>Strategy 9.1</u></p> <p>Require developments to prepare an operational management plan encompassing energy, transport, water, waste and climate resilience.</p> <p><u>Strategy 9.2</u></p> <p>Investigate requirements for annual public disclosure of energy operating performance of all developments. This may be extended to water, transport and waste over time.</p> <p><u>Strategy 9.3</u></p> <p>Identify a delivery and operation governance model to facilitate achievement of Arden's sustainability aspirations.</p>	<p>Strategy 9.1 formerly read:</p> <ul style="list-style-type: none"> <li>Require large developments to prepare an operational management plan encompassing energy, transport, water, waste and climate resilience.</li> </ul> <p>Strategy 9.3 formerly read:</p> <ul style="list-style-type: none"> <li>Embed emissions reduction targets within development agreements and leasing arrangements to ensure outcomes</li> </ul> <p>New 9.3 is decidedly vague, which only adds to TCPA's previous concerns.</p>	<p>The impacts and influences of surrounding land uses and activities on the precinct appear not to have been addressed for Arden. The known impacts of noise, lighting and emissions from both rail corridors, the North Melbourne railyards, the Dynon Freight Terminal and the Port of Melbourne need to be addressed by these proposed "management plans".</p> <p>TCPA has supported a number of students undertaking their Masters of Engineering. In recent years, their research projects have considered the impacts of changes in air quality at local levels on walking environments at various locations across metropolitan area and in the City of Melbourne. Their findings included:</p> <ul style="list-style-type: none"> <li>There are low-cost monitors being used in the community, by people who care about air composition and their physical and mental health, particularly Asthma sufferers</li> <li>Thermal comfort mapping, including shade in public spaces and road reserves at Arden, would be worthwhile modelling for various urban form variations. I have yet to see such output put in the public domain by the City of Melbourne.</li> </ul> <p>TCPA can introduce the Arden planning team to these now-graduated students.</p> <p><u>Strategy 9.3</u></p> <p>In addition to embedding emission targets, there is probably a need to include additional targets. What others would be effective? Consider monitoring and establishing targets around microclimatic elements.</p> <p>2040 target added to objective. Probably reasonable given the 20 year development timeframe for the precinct. However, there is no plan to effectively achieve net-zero emissions before 2051 or even specify the necessary steps between now and then. With many scientists now promoting the urgency of clear action by 2030, this needs to be an urgent priority.</p>



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<p><u>Objective 10</u></p> <p>Facilitate the delivery of precinct-scale infrastructure and centralised facilities that makes achieving building scale targets easier.</p>	<p><u>Strategy 10.1</u></p> <p>Facilitate a mechanism to enable developments to procure 100 per cent renewable energy. Explore opportunities for energy procurement to also address the energy needs of surrounding neighbourhoods.</p> <p><u>Strategy 10.2</u></p> <p>Facilitate and encourage the centralisation and sharing of waste and freight management locations to reduce freight and waste vehicle emissions.</p> <p><u>Strategy 10.3</u></p> <p>Require a commitment to precinct organics collection or alternative processing solution by City of Melbourne or other private operator.</p> <p><u>Strategy 10.4</u></p> <p>Deliver precinct infrastructure commensurate with the fossil fuel-free ambitions for the majority of precinct and uses to support net zero carbon emission ambitions.</p>	<p>The following strategies formerly read:</p> <p><u>Strategy 10.1</u></p> <ul style="list-style-type: none"> <li>Facilitate a mechanism to procure a power purchase agreement to power the precinct with 100 per cent renewable energy. Opportunities exist for this agreement to also address the energy needs of surrounding neighbourhoods.</li> </ul> <p><u>Strategy 10.2</u></p> <ul style="list-style-type: none"> <li>Facilitate the delivery of centralised or shared freight and waste management sites to reduce freight and services vehicle trips inside the precinct and better manage waste.</li> </ul> <p><u>Strategy 10.3</u></p> <ul style="list-style-type: none"> <li>Require a commitment to precinct organics collection by the City of Melbourne or alternative private operator.</li> </ul> <p><u>Strategy 10.4</u></p> <ul style="list-style-type: none"> <li>Deliver precinct infrastructure commensurate with the fossil fuel-free ambitions for the majority of precinct land uses.</li> </ul>	<p><u>Strategy 10.2</u></p> <p>Paradoxically, the delivery of centralised or shared freight sites do not reduce freight vehicle trips. In fact, they add one extra trips for any delivery to the ultimate customer – one trip to collect the item from that pick-up point and take it to its final destination (the last kilometre). It may well be that final trip could be by walking or cycling, but that shouldn't be assumed.</p> <p>From real observation by TCPA members who reside in the City of Melbourne, building and close environs are not being designed to allow for drop-offs (either people who may have disabilities, or just older, or even young babies) or larger goods. This could be internally within buildings, or outside buildings. Events happen, like COVID-19, that prevent external delivery services. Even if outsourced these delivery sites may need to be closer to end point.</p> <p><b>Objective 10 and strategies: VPA unchanged.</b></p> <p><b>Freight traffic logistics issue raised by TCPA not addressed.</b></p>



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<p><u>Objective 11</u></p> <p>Embed sustainable living and building practices in planning and built form controls.</p>	<p><u>Strategy 11.1</u></p> <p>Require all new buildings to connect to precinct sustainability infrastructure that is available or planned at time of project completion.</p> <p><u>Strategy 11.2</u></p> <p>Require all new buildings to achieve world-leading sustainability performance as part of the Planning Scheme Amendment to implement the Arden Structure Plan. This may include 6 Star Green Star rating for larger buildings and 70 per cent Built Environment Sustainability Scorecard rating for smaller buildings, NABERS ratings, or equivalent rating under comparable or updated systems.</p> <p><u>Strategy 11.3</u></p> <p>Encourage all new buildings to be 100 per cent electric and facilitate access to renewable energy sources.</p>	<p>The following strategies formerly read:</p> <p><u>Strategy 11.1</u></p> <ul style="list-style-type: none"> <li>Require all new buildings to connect to precinct sustainability infrastructure (such as a third pipe system) if it is available at the time of development.</li> </ul> <p><u>Strategy 11.2</u></p> <ul style="list-style-type: none"> <li>Require all new buildings to achieve world-leading sustainability performance (such as 6 Star Green Star Design &amp; As Built rating for larger buildings and 70% Built Environment Sustainability Scorecard rating for smaller buildings, or equivalent rating under comparable or updated systems).</li> </ul> <p><u>Strategy 11.3</u></p> <ul style="list-style-type: none"> <li>Require all new buildings to be 100 per cent electric (with exception to essential life science buildings where need is sufficiently justified).</li> </ul>	<p><u>Strategy 11.2</u></p> <p>Case studies: sustainable development Barangaroo, Sydney. We believe that Barangaroo is not a suitable model for Arden.</p> <ul style="list-style-type: none"> <li>Five-star rating for residential buildings is not good by present-day standards. For example, Nightingale residential developments in Melbourne achieved a 7.5 star rating.</li> <li>We also suggest that Barangaroo building heights are far too high for Arden.</li> <li>Looking at the drawings provided, it reminds one of how Docklands was approached and, in part Fishermans Bend, namely designed (by developers in effect) and resulted in minimal open/green spaces. There are now having issues with “retrofitting” these spaces.</li> <li>The hectares in new green spaces appears insufficient for 15,000 people.</li> <li>A case study for Centennial Park planning in Sydney would be worth considering, as it seems to be very sympathetic to the parklands environment.</li> </ul> <p><u>Strategy 11.3</u></p> <p>The requirement for all electric buildings could be seen to discriminate against cuisines that rely on gas cookers – particularly Asian cooking. It would be better to specify land use classes to which the requirement would apply – e.g. dwellings, offices, warehousing or storage.</p>
<p><u>Objective 12</u></p> <p>Measure the performance of the precinct, its buildings and its occupants and be able to adapt to changes in climate, lifestyle and technology in the future.</p>	<p><u>Strategy 12.1</u></p> <p>Design buildings with flexibility to accommodate current and future building-and precinct-scale technologies and infrastructure that contribute to the precinct’s net-zero carbon emission target, minimise potable water use and waste generation and improve operational costs.</p> <p><u>Strategy 12.2</u></p> <p>Establish a robust monitoring and evaluation program across the precinct that will enable performance to be evaluated and approaches to be adapted.</p>	<p>Strategy 12.1 formerly read:</p> <ul style="list-style-type: none"> <li>Require buildings to maximise flexibility to integrate current and future energy technologies and precinct infrastructure.</li> </ul>	<p>This objective should</p> <ul style="list-style-type: none"> <li>be applied to public transport within Arden as well.</li> </ul> <p>Add reference to carbon emissions to be consistent with Objective 9.</p>



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<p><u>Objective 13</u></p> <p>Minimise waste production, optimise reuse and recycling and encourage a circular economy in Arden.</p> <p>Objective formerly read:</p> <ul style="list-style-type: none"> <li>Minimise waste production and water use, optimise reuse and recycling and encourage a circular economy in Arden.</li> </ul>	<p><u>Strategy 13.1</u></p> <p>Require all new developments to meet the City of Melbourne's waste management guidelines.</p> <p><u>Strategy 13.2</u></p> <p>Require all new developments to respond to an Arden precinct wide waste management plan prepared by the City of Melbourne.</p> <p><u>Strategy 13.3</u></p> <p>Minimise the use of virgin materials and embodied emissions from materials used by encouraging in all buildings and capital works that excess or waste materials are kept to a minimum and that materials have recycled content; are non-harmful and locally sourced; are from renewable and/or low-embodied emissions feedstocks or production where possible; or can be composted, recycled and reused.</p>	<p>The following strategies formerly read:</p> <p><u>Strategy 13.2</u></p> <ul style="list-style-type: none"> <li>Require all new developments to respond to a precinct wide waste management design.</li> </ul> <p><u>Strategy 13.3</u></p> <ul style="list-style-type: none"> <li>Minimise the use of virgin materials, maximise the recycled content of materials and increase the recycling of materials in the construction phase of new buildings.</li> </ul>	<p>TCPA assumes that the City of Melbourne Waste Management guidelines will be new ones and in line with circular economy principles. If linked to current guidelines, then outcomes for Arden may not be achieved.</p> <ul style="list-style-type: none"> <li>To provide clarity, the council guidelines should be referred to by title and date.</li> </ul> <p>One of the problems with current/new buildings &amp; operational plans is that the waste management/recycling facilities are inadequate in terms of space and equipment for initial sort/recycling (where residents take sensible responsibility). These requirements will also change in the longer term.</p> <p><b>Objective 13 and strategies: VPA has upgraded 13 to comprehend a circular economy, especially strategy 13.3</b></p>
<p><u>Objective 14</u></p> <p>Mitigate the urban heat island effect in the design and delivery of the public realm and private developments with desired urban greening outcomes and standards.</p> <p>Objective formerly read:</p> <ul style="list-style-type: none"> <li>Mitigate the urban heat island effect in the design and delivery of the public realm and private developments accordant with desired urban greening outcomes and standards</li> </ul>	<p><u>Strategy 14.1</u></p> <p>Design the public realm to provide urban cooling benefits through shading, planting and integrated water management for cooling and irrigation effects.</p> <p><u>Strategy 14.2</u></p> <p>Require all new buildings to use materials that minimise the urban heat island effect with a standard that at least 75 per cent of total project site areas should comprise of building or landscaping elements that increase the solar reflectance of the site.</p> <p><u>Strategy 14.3</u></p> <p>Prepare planning controls that require all new buildings to meet a standard of 40 per cent total surface area as green cover (green wall, rooftop, canopy and understorey planting, native and indigenous planting or maximises adjacent public realm cooling benefits), or an equivalent Green Factor tool score of 0.55 and consistent with Better Apartments Standards, 2021.</p>	<p>Strategy 14.3 formerly read:</p> <ul style="list-style-type: none"> <li>Require all new buildings to meet a standard of 40 per cent total site area as green cover comprising canopy and understorey planting, native and indigenous planting or maximises adjacent public realm cooling benefits, or an equivalent Green Factor tool score of 0.55.</li> </ul>	<p>The structure plan only addresses the Urban Heat Island (UHI) effects from a metropolitan perspective.</p> <p>As noted under Objective 9, TCPA has supported research projects addressing UHI effects at a local level. These findings would be useful for consideration in Arden.</p> <p><b>Objective 14 and strategies: The Objective statement has been greatly extended, with more specifics about UHI</b></p>



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<b>Prioritising active transport</b>			
<u>Objective 15</u> Provide space for high capacity public transport capable options connecting Arden into the expanding central city.	<u>Strategy 15.1</u> Facilitate the potential future delivery of high capacity public transport capable corridors along Laurens Street, Fogarty Street, Henderson Street and Boundary Road (south of Macaulay Road). <u>Strategy 15.2</u> Facilitate improvements to local bus services to improve connections between Arden, key interchanges and surrounding suburbs. <u>Strategy 15.3</u> Explore opportunities to reopen the northern access to North Melbourne Station for a more convenient and direct link to Arden.	The following strategies formerly read: <u>Strategy 15.1</u> <ul style="list-style-type: none"> <li>Provide space to allow for the potential future delivery of high capacity public transport capable corridors along Laurens Street, Fogarty Street, Henderson Street and Boundary Road (south of Macaulay Road).</li> </ul> <u>Strategy 15.2</u> <ul style="list-style-type: none"> <li>Implement improvements to local bus services to improve connections between Arden and surrounding suburbs in the short term.</li> </ul> <u>Strategy 15.3</u> <ul style="list-style-type: none"> <li>Explore opportunities to reopen the northern entrance to North Melbourne Station for a more convenient and direct link to Arden.</li> </ul>	This objective is too narrow. It needs to address connections with other NEICs and activity centres where complementary businesses or organisations may be located, particularly, Sunshine, Footscray and Fishermans Bend. The strategies should also address: <ul style="list-style-type: none"> <li>Emerging energy technologies for buses – electric or hydrogen powered vehicles.</li> </ul> The roles of both Arden and North Melbourne stations providing connections to the NEICs and activity centres noted above.  <b>Objective 15 and strategies:</b> <ul style="list-style-type: none"> <li>The objective has been widened to refer to the West Melbourne Structure Plan, and more detail on service route connections. No mention of zero emissions buses.</li> <li>There is no indication of how the provision of high capacity public transport will be timed with or triggered to meet the development staging across the precinct. The risk of delaying this until some vague future is the significant disruption that will be inflicted on those new communities.</li> <li>There is no indication of likely cross-sectional design of the key roads that are designated for those corridors.</li> </ul>



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<p><u>Objective 16</u></p> <p>Provide safe, direct and connected protected cycling routes through and to the precinct.</p>	<p><u>Strategy 16.1</u></p> <p>Facilitate the delivery of the Strategic Cycling Corridor along Arden Street and proposed additions to the SCC network along Queensberry Street, Langford Street and Laurens Street.</p> <p><u>Strategy 16.2</u></p> <p>Facilitate delivery of a dense network of protected local cycling corridors on Fogarty Street, Henderson Street, Boundary Road (south of Macaulay Road), Macaulay Road and Victoria Street to complement the proposed Strategic Cycling Corridors and provide bicycle access to destinations within the precinct.</p> <p><u>Strategy 16.3</u></p> <p>Facilitate safer intersections for bike riding by adopting designs which continue bicycle lanes up to and through intersections and provide physical separation for people riding bikes as shown on Plan 4.</p>	<p>The following strategies formerly read:</p> <p><u>Strategy 16.1</u></p> <ul style="list-style-type: none"> <li>Deliver Strategic Cycling Corridors along Arden Street, Queensberry Street, Langford Street and Laurens Street.</li> </ul> <p><u>Strategy 16.2</u></p> <ul style="list-style-type: none"> <li>Deliver a dense network of local feeder bike lanes to complement the Strategic Cycling Corridors and provide access for bicycles to destinations within the precinct, including the proposed government primary school, community hubs and innovation hub.</li> </ul> <p><u>Strategy 16.3</u></p> <ul style="list-style-type: none"> <li>Deliver safer intersections for bike riding by adopting designs which continue bicycle lanes up to and through intersections and provide physical separation for cyclists.</li> </ul>	<p><u>Strategy 16.2</u></p> <p>This needs to be divided into 2 separate strategies and reworded (highlighted) as follows:</p> <ol style="list-style-type: none"> <li>Deliver a dense network of local feeder bike lanes to complement the Strategic Cycling Corridors</li> <li><b>Provide bicycle access to and infrastructure at</b> destinations within the precinct, including the proposed government primary school, community hubs and innovation hub</li> </ol> <p>It is important that bicycle parking and secure storage is available at the destinations – especially schools and other hubs where people may spend some length of time.</p> <p><b>Objective 16 and strategies: The objective now has a lot more detail, e.g. four strategic cycling corridors. Looks OK</b></p>



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<p><u>Objective 17</u></p> <p>New and existing streets will be pedestrian-friendly and provide comfortable, green links between open spaces and public transport routes and enhance the quality of the public realm.</p>	<p><u>Strategy 17.1</u></p> <p>Facilitate a network of permeable streets and pedestrian links through the precinct for walking and cycling that are considerate of safety and convenience and provide direct access to and from key destinations.</p> <p><u>Strategy 17.2</u></p> <p>Facilitate delivery of activated pedestrian-priority zones that provide shared space for pedestrians and slow-moving cyclists and managed access for service and emergency vehicles as shown on Plan 4.</p> <p><u>Strategy 17.3</u></p> <p>Deliver streetscape improvements to Queensberry Street and Fogarty Street to support their role as urban boulevards and overland flow paths</p> <p><u>Strategy 17.4</u></p> <p>Encourage the consolidation of servicing facilities and alternative freight delivery models within the precinct to reduce the number of vehicles entering and circulating.</p> <p><u>Strategy 17.5</u></p> <p>Facilitate activation of ground floors around open spaces and key pedestrian routes to maximise personal safety and security through the use of Crime Prevention Through Environment Design principles.</p> <p><u>Strategy 17.6</u></p> <p>Ensure all current and future traffic signals prioritise walking and cycling and facilitate public transport movements.</p> <p><u>Strategy 17.7</u></p> <p>Review and update speed limits in line with Arden's principles for movement.</p>	<p>The following strategies formerly read:</p> <p><u>Strategy 17.1</u></p> <ul style="list-style-type: none"> <li>Create walkable streets in Arden with many routes, crossings and through-block links that improve permeability and draw people into new spaces, consistent with block sizes outlined in the <i>Central Melbourne Design Guide</i>.</li> </ul> <p><u>Strategy 17.2</u></p> <ul style="list-style-type: none"> <li>Create activated pedestrian-priority zones that provide shared space for pedestrians and slow moving cyclists and service and emergency vehicles.</li> </ul> <p><u>Strategy 17.3</u></p> <ul style="list-style-type: none"> <li>Deliver streetscape improvements to Queensberry Street and Fogarty Street to support their role as urban boulevards</li> </ul> <p><u>Strategy 17.4</u></p> <ul style="list-style-type: none"> <li>Deliver public realm and urban greening improvements along the western edge of the Arden precinct to connect North Melbourne Station and Macaulay Station via a new green link.</li> </ul> <p><u>Strategy 17.5</u></p> <ul style="list-style-type: none"> <li>Explore opportunities to integrate water sensitive urban design into streets and green links.</li> </ul> <p><u>Strategy 17.6</u></p> <ul style="list-style-type: none"> <li>Explore opportunities to deliver centralised freight distribution and waste collection hubs to reduce the number of service vehicles entering the precinct.</li> </ul> <p><u>Strategy 17.7</u></p> <ul style="list-style-type: none"> <li>Maximise personal safety and security through activation of ground floors around open spaces and key pedestrian routes and the use of Crime Prevention Through Environmental Design (CPTED) principles.</li> </ul>	<p>TCPA comments under Objectives 8 and 9 apply to this objective as well.</p> <p>TCPA has long advocated for a proper, planned separation of pedestrians and cyclists. This objective and these strategies need to recognise the amenity and safety benefits of managing safe separation even in shared spaces.</p> <p><u>Strategy 17.4</u></p> <p>The public realm improvements need to consider how adjacent buildings face green spaces to benefit occupants' amenity.</p> <p><u>Strategy 17.5</u></p> <p>See comments under Objective 10, Strategy 10.2.</p> <p><u>Strategy 17.7</u></p> <p>Make particular mention of the western boundary of Arden and Upfield rail corridors.</p> <p><b>The objective now has a lot more detail about access corridors, including roads. However, the objective and its strategies suggest that pedestrians and (slow moving) cyclists will share the “active transport” lanes.</b></p>



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<p><u>Objective 18</u></p> <p>Minimise the impact of car parking and associated vehicular movements through Arden.</p>	<p><u>Strategy 18.1</u></p> <p>Prepare planning controls that direct the ongoing supply and location of car parking to achieve the 10 per cent mode share target for private vehicles, car parking principles (see <i>Arden's principles for movement and parking</i> on page 59), public realm and sustainability objectives for the precinct including consolidated parking facilities.</p> <p><u>Strategy 18.2</u></p> <p>Ensure appropriate parking provision for different user groups at key destinations, including pick-up/drop-off spaces, disabled parking, and loading and service bays.</p> <p><u>Strategy 18.3</u></p> <p>Facilitate the ongoing supply and location of bicycle, motorbike and scooter parking within developments to minimise footpath obstructions and prioritise for pedestrians.</p> <p><u>Strategy 18.4</u></p> <p>Facilitate future detailed design and planning for the provision of public bicycle parking in accordance with the principles for movement and parking to achieve the minimum mode share targets of 30 per cent walking and cycling trips and ensure footpaths are obstacle free and prioritised for pedestrians.</p> <p><u>Strategy 18.5</u></p> <p>Support shared transport schemes such as shared vehicles, e-bike and e-scooters to be delivered through private development and within the public realm in locations where it is readily accessible.</p>	<p>The following strategies formerly read:</p> <p><u>Strategy 18.1</u></p> <ul style="list-style-type: none"> <li>Prepare a <i>Vehicle Circulation and Precinct Parking Plan</i> which caps the supply of parking and directs parking into dedicated off-street parking hubs. This will be based on the principles outlined overleaf.</li> </ul> <p><u>Strategy 18.2</u></p> <ul style="list-style-type: none"> <li>Ensure that appropriate parking is provided for disabled access at key destinations throughout the precinct.</li> </ul> <p><u>Strategy 18.3</u></p> <ul style="list-style-type: none"> <li>Provide appropriate bicycle, motorbike and scooter parking within private developments to enable footpaths to be free from impediments.</li> </ul> <p><u>Strategy 18.4</u></p> <ul style="list-style-type: none"> <li>Support shared transport schemes such as shared vehicles, e-bikes and e-scooters through private development and within the public realm in locations where it is readily accessible.</li> </ul> <p><u>Strategy 18.5</u></p> <ul style="list-style-type: none"> <li>Support the flexible use of parking spaces within buildings and on the street.</li> </ul>	<p><u>Strategy 18.2</u></p> <p>Include disabled parking in residential buildings.</p> <p><u>Strategy 18.3</u></p> <p>Include key community hubs and stations.</p> <p><b>The objective now has a lot more detailed content.</b></p> <p><b>Strategy 18.2 mentions disabled parking. But TCPA's advice to "Include key community hubs and stations" is not included. Arden's principles for movement and parking section has been greatly enhanced with detailed points of objective. Looks OK.</b></p>



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<b><u>Celebrating water</u></b>  <u>Objective 19</u> Safely manage the risk of flooding to future development of Arden through innovative and creative flood management solutions in the natural landscape and built environment.	<u>Strategy 19.1</u> Deliver the precinct-wide flood management strategy for Arden. <u>Strategy 19.2</u> Provide guidance on how development can achieve flood responsive design and good urban design outcomes that facilitates safety, equitable access and universal design. <u>Strategy 19.3</u> Facilitate integration of water sensitive urban design into streets and green links including along the Fogarty Street and Queensberry Street urban boulevards and Arden Street. <u>Strategy 19.4</u> Provide for access to the public realm and positively respond to any necessary level changes that are required for drainage purposes between development and the public realm.	The following strategies formerly read: <u>Strategy 19.1</u> <ul style="list-style-type: none"> <li>Implement the precinct-wide flood management strategy for Arden (shown in Plan 10).</li> </ul> <u>Strategy 19.2</u> <ul style="list-style-type: none"> <li>Manage flooding risk where residual flooding exceeds safe levels through planning controls and guidance to deliver development safe from flooding, achieves good quality urban design outcomes and is equitably accessible.</li> </ul> <u>Strategy 19.3</u> <ul style="list-style-type: none"> <li>Investigate opportunities for the integration of water sensitive urban design in streets and open spaces to provide for passive irrigation of street trees and provide urban greening.</li> </ul> <u>Strategy 19.4</u> <ul style="list-style-type: none"> <li>Provide for universal access to the whole of the public realm and positively respond to any necessary level changes that are required for drainage purposes between development and the public realm</li> </ul>	The strategies need to address stormwater impacts and management measures to ensure water quality in the Moonee Ponds Creek is not prejudiced by development in Arden  Reference is made to Melbourne Water's flood management strategy, and comprehends the impacts on Moonee Ponds Creek, but from upstream districts. Still a central rainwater treatment plant



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<p><b><u>Objective 20</u></b></p> <p>Provide access to high-quality alternative water to be used in buildings and to irrigate open spaces.</p> <p>Objective formerly read:</p> <ul style="list-style-type: none"> <li>Establish an alternative water system across Arden that provides access to high-quality alternative water to be used in buildings and to irrigate open spaces.</li> </ul>	<p><b><u>Strategy 20.1</u></b></p> <p>Support the delivery of an alternative water treatment plant and associated third-pipe infrastructure to provide alternative water as a substitute for potable water for toilet flushing, laundry and irrigation across all public and private development in Arden Central and Arden North.</p> <p><b><u>Strategy 20.2</u></b></p> <p>Identify an appropriate location for an alternative water treatment plant (approximately 800sqm) and storage tank (approximately 800sqm) for Arden in the Arden Central – Innovation and Arden Central – Mixed-use sub-precincts.</p> <p><b><u>Strategy 20.3</u></b></p> <p>Design buildings to capture rainwater to improve stormwater quality and create an alternative water resource</p>	<p>The following strategies formerly read:</p> <p><b><u>Strategy 20.1</u></b></p> <ul style="list-style-type: none"> <li>Support the delivery of an alternative water treatment plant and associated third-pipe infrastructure to provide recycled water as a substitute for potable water for toilet flushing, laundry and irrigation across all public and private development in Arden Central.</li> </ul> <p><b><u>Strategy 20.2</u></b></p> <ul style="list-style-type: none"> <li>Identify an appropriate location for an alternative water treatment plant (approximately 2,000 square metres) and storage tank (approximately 2,500 square metres) for the Arden precinct through master planning of Arden Central.</li> </ul> <p><b><u>Strategy 20.3</u></b></p> <ul style="list-style-type: none"> <li>Design buildings to capture rainwater to minimise flooding, improve stormwater quality and create an alternative water resource</li> </ul>	<p><b><u>Strategy 20.2</u></b></p> <p>It may be better to have a number of smaller storage tanks across Arden, rather than relying on a single storage.</p> <p><b><u>Additional Strategy</u></b></p> <p>Need to consider all sources of flooding from the Moonee Ponds Creek, in particular, those upstream. The precinct (particularly existing low-lying areas already subject to an LSIO overlay) needs to be able to protect itself from the creek’s floodwaters during extreme events.</p> <p>For example, design to include landscaped levees.</p> <p><b>Objective 20 and strategies: Major changes and additions.</b>  <b>Why has the “system” disappeared from the objective?</b></p>



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<b>Creating diverse open spaces</b>			
<p><u>Objective 21</u></p> <p>Provide generous, well-designed and accessible open spaces that are diverse and flexible to meet the needs of Arden’s evolving community and visitors to the precinct.</p>	<p><u>Strategy 21.1</u></p> <p>Preserve opportunities for connecting spaces with the Moonee Ponds Creek by providing additional integrated stormwater management open space along the precinct western edge.</p> <p><u>Strategy 21.2</u></p> <p>Deliver the Capital City Open Space in Arden Central, integrated with the neighbourhood park and the Arden Station entrance.</p> <p><u>Strategy 21.3</u></p> <p>Deliver new open space for active recreation within integrated stormwater management open spaces in Arden North that combines the ability to safely serve a stormwater function in extreme rainfall events and be future-proofed for active recreation.</p> <p><u>Strategy 21.4</u></p> <p>Deliver a linear park along Munster Terrace and a shared path along its western edge to create green links and walking tracks.</p> <p><u>Strategy 21.5</u></p> <p>Deliver public realm and urban greening improvements along the western edge of the Arden precinct to connect North Melbourne Station and Macaulay Station via a new green link.</p> <p><u>Strategy 21.6</u></p> <p>Facilitate the provision of public open space throughout the precinct to support the needs of workers, residents and visitors.</p> <p><u>Strategy 21.7</u></p> <p>Explore opportunities to enhance existing open space assets.</p> <p><u>Strategy 21.8</u></p> <p>Collaborate across Victorian Government, local government and water authorities to realise the open space and recreational aspirations of the Moonee Ponds Creek Strategic Opportunities Plan</p>	<p>The following strategies formerly read:</p> <p><u>Strategy 21.1</u></p> <p>Deliver a new 1.6 hectare open space in Arden Central comprising a Capital City open space and a neighbourhood open space to align with the City of Melbourne’s <i>Open Space Strategy</i>. This will be delivered early to complement the opening of Arden Station.</p> <p><u>Strategy 21.2</u></p> <p>Deliver 5.9 hectares of new integrated stormwater management open space for informal recreation in Arden North that is able to safely serve a stormwater function in extreme rainfall events.</p> <p><u>Strategy 21.3</u></p> <p>Deliver a linear park along Munster Terrace and a shared path along the western edge to create green links and walking tracks.</p> <p><u>Strategy 21.4</u></p> <p>Preserve opportunities for connecting spaces with the Moonee Ponds Creek by providing additional integrated stormwater management open space along the precinct western edge.</p> <p><u>Strategy 21.5</u></p> <p>Coordinate open space contributions to deliver open spaces throughout the precinct to ensure residents, workers and visitors have access to these spaces within an easy 300m walk.</p> <p><u>Strategy 21.6</u></p> <p>Explore opportunities to enhance existing open space assets.</p> <p><u>Strategy 21.7</u></p> <p>Collaborate across Victorian Government, local government and water authorities to realise the open space and recreational aspirations of the <i>Moonee Ponds Creek Strategic Opportunities Plan</i> for Arden</p>	<p><u>Strategy 21.2</u></p> <p>Need to consider all sources of flooding from the Moonee Ponds Creek, in particular, those upstream. The precinct (particularly existing low-lying areas already subject to an LSIO overlay) needs to be able to protect itself from the creek’s floodwaters during extreme events.</p> <ul style="list-style-type: none"> <li>For example, design to include landscaped levees.</li> </ul> <p>There seems to be not a lot of new green space for 15,000 people in the precinct. It is hard to clearly make out how much is new (other than new colour green).</p> <ul style="list-style-type: none"> <li>Some of the major streets are now coloured green and it would appear that these “green” streets are counted in the overall green space. How usable are these? – pathways and green canopy and cars?</li> <li>Is there a workable green space per resident?</li> </ul> <p>It would be more useful to have had open space budget that clearly assigned green spaces by purpose, that is:</p> <ul style="list-style-type: none"> <li>Active Recreation</li> <li>Passive recreation</li> <li>Visual amenity</li> <li>Stormwater</li> <li>Median strips</li> <li>Pathways</li> <li>Shade for people and for cars</li> </ul> <p>Doing so would give a sense of future useable spaces.</p>



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<u>Objective 22</u> Establish design excellence and design objectives for streets, open spaces and development interfaces to ensure the public realm works as a seamless, integrated and continuous space for people.	<u>Strategy 22.1</u> Encourage new spaces to build on Arden's identity by integrating and enhancing existing assets of Arden's character and public realm including industrial character, the Moonee Ponds Creek cultural heritage, and existing mature planting throughout the precinct. <u>Strategy 22.2</u> Encourage new spaces to build Arden's identity by Limit vehicle carriageways and on-street car parking next to open spaces in order to increase their usability, connectivity and safety. <u>Strategy 22.3</u> Expand urban forest through streetscape designs that provide ample space for street trees and people movement. A target of 40 per cent canopy coverage should be achieved in the public realm over time.	The following strategies formerly read: <u>Strategy 22.1</u> Develop a design charter to guide the detailed design of public spaces and development interfaces. <u>Strategy 22.2</u> Encourage new spaces to build Arden's identity by integrating and enhancing existing assets of Arden's character and public realm including industrial character and existing mature planting. <u>Strategy 22.3</u> Limit carriageways and on-street car parking next to open spaces in order to increase their usability, connectivity and safety. <u>Strategy 22.4</u> Expand the urban forest through streetscape designs that provide ample space for street trees and people movement. A target of 40 per cent canopy coverage should be achieved in the public realm over time	Need a strategy to consider how development integrates with all open spaces. The western boundary areas and Upfield rail corridor need more attention.



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<b>Accommodating diverse communities</b>  <u>Objective 23</u> Facilitate inclusive, well-designed, sustainable and accessible housing, with at least six per cent of all new housing in the precinct being affordable for very low to moderate income households and delivered as social and affordable housing or shared equity.	<u>Strategy 23.1</u> Support and encourage the provision of six per cent affordable housing in new developments to be delivered at 50 percent (or alternative method of the equivalent value) discount to a registered housing association. <u>Strategy 23.2</u> Require that up to 25 per cent of new housing be made available as affordable housing where City of Melbourne-owned land is redeveloped. <u>Strategy 23.3</u> Encourage additional affordable and social housing provision on all types of land to achieve goals. <u>Strategy 23.4</u> Require that at least five per cent of all private housing be universally accessible, to encourage assisted living and help residents age in place. <u>Strategy 23.5</u> Facilitate a diversity of sizes of residential accommodation for all types of households.	The following strategies formerly read: <u>Strategy 23.1</u> Establish affordable housing guidelines for Arden that provide clarity and certainty regarding the amount of housing required and the means of calculating it, the type and design quality of housing to be provided, and the process for how it will be provided. <u>Strategy 23.2</u> Require at least six per cent of new residential development be delivered through mechanisms such as community housing or shared equity. <u>Strategy 23.3</u> Require that up to 25 per cent of new housing be made available as affordable housing where City of Melbourne-owned land is redeveloped. <u>Strategy 23.4</u> Incentivise additional affordable and social housing provision on all types of land to achieve goals. <u>Strategy 23.5</u> Require that at least 10 per cent of all properties in government-led developments be prioritised for first home buyers through the Victorian Government's <i>Homes for Victorians</i> (2017) initiative. <u>Strategy 23.6</u> Require that at least five per cent of all private housing be universally accessible, to encourage assisted living and help residents age in place. <u>Strategy 23.7</u> Ensure that planning controls deliver a diversity of sizes of residential accommodation for all types of households.	<u>Strategy 23.2</u> With a target residential population of 15,000, and the average household size in Melbourne being 2.7, approximately 5,500 dwellings will be required, which happens to be the <i>current</i> shortfall of affordable rental accommodation in the City of Melbourne. We question whether 6% social housing is making a sufficient contribution to the city's current shortfall. Are 2.0 hectares of unrestricted, unencumbered open space sufficient for a resident population of 15,000? <u>Strategy 23.3</u> This target needs a minimum base line. The implication is that up to 25% affordable housing would be welcomed, but "up to 25%" can mean zero, so why not set an ambitious minimum of (say) 20%? <u>Strategy 23.5</u> What happens if (when?) the <i>Homes for Victorians</i> (2017) initiative is discontinued. The strategy needs to articulate the particular aspects of such a program/s into the future.



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<u>Investing in community infrastructure</u>			
<u>Objective 24</u> Deliver educational facilities to meet the anticipated demographic demand.  Formerly <b>Objective 25</b>	<u>Strategy 24.1</u> Support the development of the proposed government primary school within Arden Central to serve the needs of the current and future Arden community and surrounding areas.  <u>Strategy 24.2</u> Support development of the proposed government secondary school in the North Melbourne/Macaulay area to serve the needs of the current and future Arden community and surrounding areas.  <u>Strategy 24.3</u> Ensure schools in Arden are innovatively planned and delivered to be in proximity to or co-located with complementary services and spaces, including recreational spaces, activity centres, public transport services, kindergartens and early learning centres.	<u>Strategy 24.3</u> formerly read: <ul style="list-style-type: none"> <li>Ensure schools in Arden are innovatively planned and delivered to be located in proximity to or collocated with complementary services and spaces, including recreational spaces, activity centres, public transport services, kindergartens and early learning centres</li> </ul>	The objective and strategies do not seem to account for future private educational facilities or organisations.



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<p><u>Objective 25</u></p> <p>Ensure timely delivery of high-quality, accessible and integrated community infrastructure to meet the needs of existing and future residents, workers and visitors.</p> <p>Formerly <u>Objective 24</u></p>	<p><u>Strategy 25.1</u></p> <p>Facilitate the delivery of a family and community hub in the Arden Central – Mixed-use sub-precinct to serve the needs of the Arden community.</p> <p><u>Strategy 25.2</u></p> <p>Facilitate the delivery of an arts, cultural and community hub in Arden Central – Innovation sub-precinct to serve the needs of the Arden community</p> <p><u>Strategy 25.3</u></p> <p>Explore opportunities to upgrade and expand the North Melbourne Recreation Reserve to serve the needs of the Arden community and surrounding areas.</p> <p><u>Strategy 25.4</u></p> <p>Provide future active recreation including a sports pavilion, playing surface with lighting, playground and outdoor fitness equipment on the integrated stormwater management open space in the Arden North – Mixed-use sub-precinct.</p> <p><u>Strategy 25.5</u></p> <p>Provide diverse and adaptable community facilities to serve the changing needs of people over time, and are beneficial, supportive and appropriate for people with special needs, including families, the ageing and elderly population, people with disabilities and those with different cultural and social needs.</p> <p><u>Strategy 25.6</u></p> <p>Facilitate the delivery of creative space by private providers including live/work artist studios, gallery spaces, rehearsal and performance spaces, and creative workshops.</p> <p><u>Strategy 25.7</u></p> <p>Support and facilitate the delivery of aged care and long day childcare facilities by private providers, in addition to the aged and childcare services provided within public community hubs.</p>	<p>The following strategies formerly read:</p> <p><u>Strategy 25.1</u></p> <p>Deliver an innovation hub in Arden Central to serve the needs of the Arden innovation and creative community and surrounding areas.</p> <p><u>Strategy 25.2</u></p> <p>Deliver a family and community hub in Arden Central to serve the needs of the Arden community.</p> <p><u>Strategy 25.3</u></p> <p>Deliver an arts, cultural and community hub in Arden North to serve the needs of the Arden community.</p> <p><u>Strategy 25.4</u></p> <p>Explore opportunities to upgrade and expand the North Melbourne Recreation Reserve to serve the needs of the Arden community and surrounding areas.</p> <p><u>Strategy 25.5</u></p> <p>Co-locate proposed community facilities, proposed government schools and sports facilities described in Plan 12 to maximise access and deliver opportunities through sharing complementary infrastructure.</p> <p><u>Strategy 25.6</u></p> <p>Provide community facilities that are diverse and adaptable to serve the changing needs of people over time, and beneficial, supportive and appropriate for people with special needs, including families, the ageing and elderly population, people with disabilities and those with different cultural and social needs.</p> <p><u>Strategy 25.7</u></p> <p>Support and facilitate the delivery of creative space by private providers including live/work artist studios, gallery spaces, rehearsal and performance spaces, and creative workshops, in addition to services provided within public community hubs.</p> <p><u>Strategy 25.8</u></p> <p>Support and facilitate the delivery of aged care and long day childcare facilities by private providers, in addition to the aged and childcare services provided within public community hubs.</p>	<p><u>Strategy 25.4</u></p> <p>What is meant by upgrading the reserve “to serve the needs of the Arden community and surrounding areas”? Need to be specific about the needs.</p> <p><u>Strategy 25.6</u></p> <p>The wording seems to imply that the ageing and elderly will not exist in the early stages of renewal.</p> <p><u>Strategy 25.7</u></p> <p>Need to address co-working spaces for businesses and organisations that may temporarily need serve or consult to more permanent businesses n Arden.</p> <p>"Arts" has been relegated from a "sector" (i.e. a profession or industry) in Objective 2 to a "community" activity in Objective 25 (Strategies 25.2 and 25.5).</p> <ul style="list-style-type: none"> <li>• This relegation implies that professions such as architecture, landscape architecture, urban design and industrial design would not be anticipated in Arden. This seems to be an unnecessary narrowing of the range of professions accommodated.</li> <li>• In relation to this, we note that the City of Melbourne has been very keen to retain professional artists in the city centre, as in the Nicholas building in Swanston Street, for example, which was recently put on the market. This might be seen as the Arden precinct as the arts hub over the council's preference for the CBD!</li> </ul>



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<u>Delivering Arden</u>			
<u>Objective 26</u> Ensure coordinated and collaborative staging of development on government owned land around the new Arden Station to effectively respond to existing conditions and ongoing business requirements and create a safe and vibrant place upon opening of the station.	<u>Strategy 26.1</u> Develop an agreed precinct governance model with stakeholders to provide a sound framework for ongoing decision-making. <u>Strategy 26.2</u> Establish a delivery strategy that outlines whole of precinct development coordination, staging and timing. This will include a strategy for government landholdings, an approach to working with the private development sector, and set out a coordinated approach to the delivery of key infrastructure items. <u>Strategy 26.3</u> Establish an application referrals and assessment process to ensure development outcomes are consistent with the objectives of the Arden Vision and Structure Plan.	The following strategies formerly read: <u>Strategy 26.2</u> <ul style="list-style-type: none"> <li>Establish a delivery strategy that outlines precinct development coordination, staging and timing. This will include a strategy for government landholdings, an approach to working with the private development sector, and set out a coordinated approach to the delivery of key infrastructure items.</li> </ul> <u>Strategy 26.4 [NOW DELETED]</u> <ul style="list-style-type: none"> <li>Collaborate with the Metro Tunnel Project and project partners to deliver construction phase and legacy phase projects as outlined in the Metro Tunnel Creative Strategy</li> </ul>	The needs to be a strategy that ensures that road-based public transport operations and facilities are properly integrated with the station precincts, including both Arden and North Melbourne. Notwithstanding, some strategies that are aimed at community innovation and recreation, the Plan appears to lack community-centric principles to the (more detailed) planning, transition and evolving nature of Arden precinct, and hence its delivery. Given the nature of the world's and Melbourne's current situation, there is need for solutions to be locally appropriate i.e. based on real need and local commitment.
<u>Objective 27</u> Ensure that early activation and place shaping activities are delivered alongside early precinct development and in readiness for the Arden station opening, and that long-term planning, development and service delivery are considered early in the life of the precinct to create a distinct sense of place and a vibrant and interesting early precinct experience and ensure the long term success of the precinct.	<u>Strategy 27.1</u> Develop an Arden Place and Resilience Plan that responds to the area's unique identity and conditions and identifies, coordinates and communicates opportunities for early place creation and place-making activities and longer-term resilience-building initiatives to foster a strong sense of place and community identity and build sustained economic, social and environmental resilience, including adaptation to climate change	The following strategies formerly read: <u>Strategy 27.1</u> <ul style="list-style-type: none"> <li>Develop an Arden Place Plan that identifies, coordinates and communicates opportunities for early place creation and place-making activities that foster a strong sense of place and community identity.</li> </ul>	Comments in respect of Objective 26 are also relevant to staging of place-shaping activities. <u>Proposed Arden rail station precinct</u> A very attractive station building. However, a major criticism is that, as described in the draft plan, it will just be a "public transport building". The station precinct could well benefit if the building itself could be designed (enlarged if appropriate) to accommodate relevant "convenience" services businesses (convenience store and supermarkets for grocery shopping, cafes and restaurants and prepared-meals-to-go kitchens) at the "break-of-journey". This works well in Southern Cross and Melbourne Central stations and is a common practice at metro rail stations in Japanese and European cities and even in some USA cities (e.g. San Francisco Market Street BART station). Additional text in the objective, but it does not read well – i.e. not a S.M.A.R.T. objective. It needs to be broken down into separate objectives



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<p><u>Objective 28</u></p> <p>Ensure that new development responds to surrounding conditions including the transmission pressure gas pipelines and is not unduly impacted by noise, vibration and electromagnetic impacts from the adjacent railway corridor, elevated roadway and Metro Tunnel Project.</p>	<p><u>Strategy 28.1</u></p> <p>Manage the impacts of noise and vibration in the precinct by ensuring development includes appropriate attenuation measures.</p> <p><u>Strategy 28.2</u></p> <p>Manage the introduction of sensitive uses into the precinct coordinated with the transition of industry with adverse amenity impacts s.</p> <p><u>Strategy 28.3</u></p> <p>Design public spaces to be shielded from adverse amenity through considering the placement of vegetation, siting, type and composition of buildings and other mitigation strategies.</p> <p><u>Strategy 28.4</u></p> <p>Manage the impacts of the gas pipeline running beneath the precinct, including referral of applications to the relevant gas authority.</p> <p><u>Strategy 28.5</u></p> <p>Require EMI-sensitive uses to address impacts when in proximity to the railway corridor, the Metro Tunnel or other EMI-emitting sources.</p>	<p>The following strategies formerly read:</p> <p><u>Strategy 28.1</u></p> <ul style="list-style-type: none"> <li>Require noise-sensitive uses (such as apartments) to include noise and vibration attenuation measures when in proximity to the railway corridor and elevated freeway and address EMI in the case of the Metro Tunnel Project.</li> </ul> <p><u>Strategy 28.2</u></p> <ul style="list-style-type: none"> <li>Design buildings to ensure that new sensitive land uses located near noise, vibration and, in the case of the Metro Tunnel Project, EMI-emitting uses demonstrate that development is designed and constructed to achieve recommended amenity targets.</li> </ul> <p><u>Strategy 28.3</u></p> <ul style="list-style-type: none"> <li>Protect key public spaces in the precinct by shielding them from significant noise, vibration and, in the case of the Metro Tunnel Project, EMI sources through planned placement of vegetation, buildings and other mitigation strategies.</li> </ul> <p><u>Strategy 28.4</u></p> <ul style="list-style-type: none"> <li>Ensure permit applications within the measurement length of transmission pressure gas pipelines appropriately respond to manage the potential risk.</li> </ul> <p><u>Strategy 28.5</u></p> <ul style="list-style-type: none"> <li>Establish a referral process with relevant gas authorities to assess the permit applications.</li> </ul>	<p>The objective and strategies seem to omit consideration of air, noise and lighting impacts from:</p> <ul style="list-style-type: none"> <li>The Port of Melbourne's 24/7 operations</li> <li>Dynon Freight Terminal precinct operations (which can be 24/7)</li> <li>Upfield rail corridor</li> <li>Rail operations through North Melbourne station and the North Melbourne railyards</li> </ul> <p>Complaints about the Port and freight terminal operations have been well documented and had plenty of media coverage over the years. It is incumbent on new development to consider impacts beyond the immediate Arden boundaries.</p>



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<p><u>Objective 29</u></p> <p>Make Arden adaptable to change while managing the impacts of existing uses that need to transition from the precinct.</p>	<p><u>Strategy 29.1</u></p> <p>Plan for industries with amenity buffers to manage the staged transition of these uses away from the precinct, to support the Arden Vision, including application of a Buffer Area Overlay where appropriate.</p> <p><u>Strategy 29.2</u></p> <p>Manage the risk of potential land contamination through a staged environmental site assessment process where appropriate.</p> <p><u>Strategy 29.3</u></p> <p>Apply the Environmental Audit Overlay to land that is demonstrated to have a high potential for contamination to ensure appropriate remediation or management occurs.</p>	<p>The following strategies formerly read:</p> <p><u>Strategy 29.1</u></p> <ul style="list-style-type: none"> <li>Plan for the transition of incompatible existing industries by working with business owners to understand the potential impacts to business and to future use and development in Arden.</li> </ul> <p><u>Strategy 29.2</u></p> <ul style="list-style-type: none"> <li>Facilitate, where practical, a staged environmental assessment process to evaluate the suitability of sites for proposed development.</li> </ul> <p><u>Strategy 29.3</u></p> <ul style="list-style-type: none"> <li>Require that the Environmental Audit Overlay be applied as part of the Planning Scheme Amendment over sites that are potentially contaminated to ensure that appropriate site remediation occurs prior to development.</li> </ul> <p><u>Strategy 29.4</u></p> <ul style="list-style-type: none"> <li>Require new development in areas identified as being potentially contaminated to undertake further environmental assessment to determine whether potential sources of contamination are present and site remediation is required.</li> </ul> <p><u>Strategy 29.5</u></p> <ul style="list-style-type: none"> <li>Require new development of sensitive land uses to demonstrate building design and construction practices that manage the potential adverse amenity impacts from industrial uses.</li> </ul>	<p>Those incompatible industries are not identified and nor is any timeframe. Experience shows that the process can take many years. It will be important that any transition plan account for removal priorities and assistance as well as management of the precinct in the interim.</p> <p>A serious question is what existing industries will have to move, or else close down.</p> <p>The economic and employment impacts must be estimated prior to commitment to detailed planning regulation drafting and land-use and structure design.</p> <p>A one-on-one approach is needed to assess each industrial enterprise's options to move, given that, either by planning regulation, or else due to expected rises in the land values and their associated tax and rating levels, many existing industrial businesses will be driven out. But to where? Existing businesses should not be left to "die on the vine".</p> <p>An opportunity here could be to analyse and plan for allocation of parcels of land elsewhere in metropolitan Melbourne best suited to and economically feasible for relocating these industrial businesses.</p> <p>Land suitability should address land costs, access to freight transport routes, service infrastructure, proximity to home addresses of their employees (changes in commuting distances and travel modes), and synergies between any existing Arden industries.</p> <p>Given that the Arden (and Macaulay) restructurings are government-driven, is it appropriate for state and federal governments to facilitate some tax and municipal rates reductions for relocating the industrial businesses, so as to offset the costs of relocation?</p>



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<u>Objective 30</u> Provide critical infrastructure and utility services in a coordinated manner to support the planned development.	<u>Strategy 30.1</u> Collaborate across government agencies to maximise delivery efficiencies and community benefit and enable timely urban renewal by pursuing the coordinated programming, funding and delivery of infrastructure identified in the precinct infrastructure plan.	The following strategies formerly read: <u>Strategy 30.1</u> Prepare a precinct infrastructure plan to support public and private investment decision making and to achieve the development outcomes sought by this structure plan. <u>Strategy 30.2</u> Collaborate across government agencies to maximise delivery efficiencies and community benefit and enable timely urban renewal by pursuing the coordinated programming, funding and delivery of infrastructure identified in the precinct infrastructure plan.	While a precinct infrastructure plan has been prepared, public transport within the precinct not included in the i plan despite their long lead times in planning and delivery
<u>Objective 31</u> Provide for the timely and coordinated funding and delivery of public open space, transport upgrades and community and social infrastructure to meet the needs of the new community.	<u>Strategy 31.1</u> Implement the Arden Precinct Infrastructure Plan as per Appendix 2. <u>Strategy 31.2</u> Prepare an Urban Renewal Cost Recovery Scheme for the Arden and Macaulay urban renewal areas in accordance with the Flood Management Strategy. <u>Strategy 31.3</u> Implement the Arden Development Contributions Plan via a Development Contributions Plan Overlay to deliver precinct infrastructure in accordance with the Arden Precinct Infrastructure Plan. <u>Strategy 31.4</u> Facilitate public open space contributions via clause 53.01 to the Melbourne Planning Scheme.	The following strategies formerly read: <u>Strategy 31.1</u> <ul style="list-style-type: none"> <li>Prepare a state infrastructure investment plan outlining the role of government in investing in and facilitating the delivery of key infrastructure and the infrastructure that will be delivered through this plan.</li> </ul> <u>Strategy 31.2</u> <ul style="list-style-type: none"> <li>Prepare a development contributions plan (or equivalent) to contribute funds towards the costs of new infrastructure required as a result of new development in Arden.</li> </ul> <u>Strategy 31.3</u> <ul style="list-style-type: none"> <li>Prepare a Development Services Scheme with Melbourne Water for the Arden and Macaulay urban renewal areas and consult with affected landowners and development industry alongside consultation on the Final Arden Structure Plan and associated planning scheme amendment.</li> </ul>	Need to consider relocation costs/compensation for “incompatible industries”. These costs should be recouped from the Arden development projects.  While a precinct infrastructure plan has been prepared, public transport within the precinct not included in the Appendix 2 plan despite their long lead times in planning and delivery