

IRG Activity Centre Thematic Working Group “Best Practice” cases:

Comments by Save Our Suburbs, May 2006

INTRODUCTION

Best practice in urban planning and development requires the results of a project to satisfy or meet the needs of all parties involved - not only the developer and the Responsible Authority but also the consumers of the project and local residents affected by its amenity impacts. As well as unit purchasers these include the local community, particularly since the responsible authority is responsible under the Act for ensuring that developments meet the criteria in the Planning Scheme in the interests of the municipality. All the developments being considered by the IRG should be judged accordingly

1 General Comments - IRG & ACTWG Agendas:

It is appropriate for the Minister to promote examples of best practice in relation to “selling” a government policy, but it is even more necessary for any failings of that policy to be addressed. And M2030 is perceived by most of the public (and many planning professionals) to be deficient in the following respects (among others):

- the expanded and integrated metro-wide PT system it was predicated on has not been properly planned yet, let alone budgeted for or implemented. Instead, a tokenistic number of minor “band-aid projects” have been funded while major PT developments that had been on the drawing board (eg the South Morang rail extension) have actually been shelved
- a number of key activity centers have not been chosen for the key criterion of proximity to PT nodes but apparently on other parameters (such as retail floor space and pressure from major developers/site owners), making a mockery of the activity center concept in relation to transport policy
- no extra protection against inappropriate infill development has been instituted for existing residential areas (except the offer of mandatory R3Z height controls which many councils have been advised by industry not to implement). Mandatory height controls are not being allowed for activity centers on the direct advice of the Minister.

IRG agendas should provide for objective, critical on-the-ground feedback to put before the Minister and the Department. It is clear from SOS discussions with the Minister and the Department that neither has an adequate appreciation of the negative aspects of M2030 in practice.

With respect to these issues outlined above, SOS believes that:

- 1 - there should be a moratorium on M2030 until all structure plans are in place and until the expanded and integrated public transport system that the whole strategy is predicated on is at least planned and budgeted for as an urgent priority.
- 2 - all activity centers should be revised to ensure that they are located at mass transit nodes and not just included because of the amount of pre-existing retail floor space.
- 3 - assessment of development applications should be streamlined by a ministerial directive and/or planning act amendments as soon as possible to make Rescode amenity standards and zone and overlay controls mandatory. This, after all, is what the planning instruments were supposed to achieve, particularly from the point of view of long-suffering ratepayers who foot the bill for strategic planning work and expect their council to have some control over their own planning scheme. If such “controls” can be varied at will, there is little point in councils putting much time and effort into developing them.

2 Comments on some “M2030 Best Practice” examples

[NB: Only a few sites have been assessed - SOS is a volunteer organization and does not have the time and resources to do detailed analytical submissions on all aspects of the many issues that need to be addressed]]

(i) Montpelier Gardens, Ashwood (IRG nomination):

“Development of the former Brockhoff factory into medium density living; close to local infrastructure - bus network, the Glen and Chadstone shopping centres, and local parks (encouraging walking). A large number of schools and Monash University close by.”

Category 1. Best contribution to sustainable development – large scale”

CRITICISMS (NB - not an exhaustive list; based on brief site visit & web research)

- car-based development with a single 6-day bus service - the “local” shopping centers cited are both car-based. This level of public transport access applies to most areas in the middle eastern suburbs and is insufficient to provide a realistic convenient mass transit alternative to private cars. This hardly qualifies the site as an ideal example of sustainable development. See PT details below
- very little diversity of housing type & size as required by M2030;
- token minimum space between dwellings which mostly present as terrace houses. This is atypical of the locality and more reflective of much higher density inner city locations;
- inadequate space for spreading crown trees that ARE typical of the locality;
- cheap upper storey construction (rendered polystyrene cladding).

Irrespective of other positive characteristics, these negative ones mean that this project should not be classed as Best Practice.

[Public Transport services:

- bus route 734 east-west along High St, 1km south of site entrance
- bus route 767 along Huntingdale Rd (the only bus that passes the site - north via Elgar Rd and Station St to Box Hill station; south down Huntingdale to Chadstone and finally Southland).

Timetable:

M-F/Box Hill to Southland: 6.40am - 7.15pm, ev.15min at morning and evening peak hour (about 6 buses out of 39) but mostly every 25 - 30 min

M-F/Southland to Box Hill: 6.25am - 6.25pm ev.15min at peak hour (only , mostly every half-hour (NB no services through to BH station until 6.55)

Sat/Box Hill to Southland: 8.30am - 6.00pm ev 30-40 mins

Sat/Southland:to Box Hill: 7.50am - 6.00pm ev 30-40 mins

Sunday - no service

The nearest train station is Jordanville, 1.6km down Huntingdale Rd (Waverley line).

(ii) Hoffman's Brickworks, Dawson St W Brunswick (IRG nomination):

“Conversion of industrial land, former brickworks, into residential development, comprising townhouses and apartments. Close to public transport and local shopping precincts, including Sydney Road and Lygon Street.

Category 1/4. Best contribution to sustainable development
– large scale brown field”

CRITICISMS (NB - not an exhaustive list; based on web research)

The brickworks are a lone reminder of a time when the brick, tile and pottery industry spread an intricate web across Melbourne's northern clay belt from Brunswick to Northcote and Preston. The clay industry shaped the suburb and its community and in turn, Brunswick bricks helped to build the growing metropolis of Melbourne.

The three chimneys have stood as familiar signposts in the local environment for more than a hundred years. The site's three elliptical Hoffman kilns (2 remaining) are testament to the entrepreneurs who first imported new European technology to Australia to industrialise the national brick making industry. The Hoffman stamp is pressed into the bricks of countless buildings throughout metropolitan Melbourne- famous buildings and workers' houses alike. The National Trust classified the site in 1987 and it was subsequently added to the State's heritage register.

The development now surrounding the fenced off kilns and brick pressing shed was originally planned to be mixed use, but it's all housing. Offices have been proposed above the kilns, which would mean permanently subdividing the spaces into strata titled units, destroying the precious interiors that still retain the firing systems, equipment and the worker's notes from the last firings scrawled onto their work boards. The original approval for 175 dwellings has leapt to 246. There is inadequate parking because the new

streets around the kilns and between the houses are very narrow and with cars parked along them, access is difficult. Garbage trucks sometimes can't squeeze through, and residents are concerned about emergency vehicle access as well. Many dwellings are rented, and with each resident each owning a car, the available parking is overloaded. Windows seem to be placed anywhere with no consideration for access to direct sunlight and the designs lack eaves.

The original Development Plan was to be holistic in its approach to the overall design. Currently, the developer is proposing two extra 4-storey buildings – both residential - a major change to the original plan. One building is to replace the entry gatehouse – a small, single storey building that served as the manager's office and was once the centre of site activities. This large new building will obscure the full view of the front kiln on Dawson Street. The other building is now planned to be on a site originally designated as open space, incorporating many services required for the brick-press shed which was to contain an art gallery and interpretation centre.

The developers claim that the whole development is about heritage - yet action to conserve and interpret the significant kilns and brick press shed has been left till last. They are asking Moreland Council to amend the planning scheme to allow a higher density development plan, which the council has declined. Heritage Victoria has yet to make a decision on the demolition of the gatehouse and the impacts of the additional development on the heritage values of the brickworks as a whole.

Crucially, many of the actual occupants of Stage 1 of the development are not happy with the congested nature of the new proposals for the later stages, nor with some of the original construction. Many have been pressured not to object to the new proposal through clauses apparently included in their original purchase contracts - hardly democratic planning procedure in the community interest.

It's worth noting the conclusions of a study done by Essential Economics and AT Cocks Consulting for Moreland Council and the original developer to assess re-use of the site:

“The financial analysis indicated that for each of the use scenarios the cost of the building's adaptation exceeded the value of the end product. A stratum titled commercial office development provided the most viable outcome for the site's use and was recommended as the preferred scenario (even though this also resulted in a negative land value).

However, while the preferred scenario would generate a negative land value, the project would be expected to generate economic benefits for the Moreland community in terms of:

- * providing new opportunities for office location and supporting services;*
- * creating opportunities for new employment generation;*
- * achieving the retention and restoration of a significant heritage building and site for the benefit of the community; and*
- * providing public access to an important feature of State and national heritage significance”*

It's a telling indictment of the current state planning regime that it was not able to foster the most appropriate use of this major strategic and historic site. What is the point of detailed state and local planning policies if they can't deliver outcomes in the community interest?

This development is a classic example of a developer's short-term economic imperative. The facts above indicate that this development is far from best practice.

(iii) Fountain Gate Narre Warren CBD - Structure plan / amendment

[MAV Melbourne 2030 "Beacon Project"]

"Category Best Contribution to Sustainable Development - Large scale;
Best Public Realm / Space Improving Local Accessibility"

CRITICISMS (NB - not an exhaustive list; briefly researched)

"The strength of this strategy is shown in that it has twice been defended successfully at VCAT." That is hardly a recommendation for Best Practice, unless the VCAT judgment found no basis in the appeal grounds. In fact, VCAT was quite critical:

43 Several witnesses commented on the "unusual" use of the Development Plan Overlay in the context of implementing the strategic planning for Fountain Gate Activity Centre....

44 In many respects we would agree that the use of the Development Plan Overlay is not the best VPP tool to use for the structure planning of an activity centre of the size and status of Fountain Gate. Nevertheless, whilst it may not be the most appropriate tool, it is a valid option....

45 There are various shortcomings associated with the Development Plan Overlay when used in a context such as this.... There is always the risk that decisions made about individual applications will have wider implications for the efficacy of the plan as a whole.....

46 There is also a lack of transparency associated with development plans..." The absence of third party rights specific to the Development Plan procedure by which a person's interests may be adversely affected, plus the impact of approval of a Development Plan on a permit application, plus the exemption from third party rights applying to the permit application add up to a need to take great care in the Development Plan approval procedure".

The criticisms above indicate that this strategy of using a Development Plan Overlay for the structure planning of a major activity centre is by definition not Best Practice, so it cannot be argued that the Fountain Gate CBD process should be used as a model for broader application to other suburban centres. This is one of only 2 Principal Activity Centers in Casey and the structure planning for it should have been established via an impeccable process if it were to be considered as Best Practice.

(iv) Doncaster Hill Sustainability Guidelines/ Ecologically Sustainable Development Planning Controls/ Sustainable Urban Village

[MAV Melbourne 2030 “Beacon Project”]

“*Category* - Best Contribution to Sustainable Development - Large scale Clause 21.21 Doncaster Hill Activity Centre Policy and Clause 22.13 Doncaster Hill Activity Centre Sustainability Management Plan”

‘The Doncaster Hill Sustainability Guidelines break new ground by consolidating into one booklet an outline of numerous leading edge techniques that constitute current world best practice in the theory and practice of sustainable design and construction. The Guidelines detail how sustainability can be achieved, demonstrate the benefits of sustainability and the processes that can be adopted by the development sector to achieve better living conditions.

Finalist in the Premier’s Business Sustainability Awards & the Planning Institute of Australia Awards for Excellence in Planning, the Doncaster Hill Strategy epitomises Melbourne 2030”

CRITICISM

Without going into detailed analysis of the contents of the various documents cited, it is sufficient to point out that a major activity center without either mass transit rail or tram services is a contradiction in terms under M2030. If the government is serious about proper implementation of M2030, and the sustainability of activity centers in particular, at the very least a light rail system should be built to connect DST to the city and other mass transit nodes en route where possible.

A crucial side benefit of such infrastructure would be a significant reduction in the huge and growing volume of commuter traffic that clogs Hoddle St and other inner eastern city routes daily as a direct result of traffic flow from and onto the Eastern Freeway.

The Doncaster Hill Activity Centre is a good example of the lack of forward government infrastructure planning and can hardly be classed as best planning practice.

24th May 2006

*Ian Wood
SOS Vice President*