# SUBMISSION TO THE HONOURABLE MR R WYNNE MP - MINISTER FOR PLANNING BY THE FOLLOWING INNER CITY RESIDENT GROUPS ON 2 JULY 2015

Melbourne South Yarra Resident Group Inc Flemington Association Inc North and West Melbourne Association Inc Carlton Residents Association Inc East Melbourne Group Inc Parkville Association Inc

#### Residential zoning - heritage protection - "Keeping it Liveable"

- 1. The protection from inappropriate development in the remaining heritage areas particularly in the inner suburbs is essential if Melbourne is to be a special and desirable place to live and visit because:
  - (a) they represent the architectural, social and cultural history and character of this city;
  - (b) they contribute in a major way to the diversity of housing stock in the inner suburbs,
  - (c) they bring visitors to the city, and
  - (d) without protection in these few areas that history and those benefits will be lost forever.

#### **Labor Party policy**

We are delighted that the policies of the Victorian Branch of the Labor Party (see
 Attachment 1) support the view taken by these inner city residents as expressed in
 this submission.

#### **Shortcomings of the Guy model**

- 3. While many of the changes implemented by the previous government (in particular the introduction of the Neighbourhood Residential Zone (**NRZ**)) provided protection not previously available (such as a mandatory height limit and limit of two dwellings per lot), there were many shortcomings including the following.
  - (a) Failing to provide the means to protect historic precincts and sub-precincts, e.g. both sides of streets that need to be protected and viewed in their entirety in order to identify their heritage importance and character.
  - (b) While recognising the importance of mandatory height limits it only regulates residential building and <u>not</u> non-residential building. To be effective it must regulate **all** building.
  - (c) Preserving building heights in some General Residential Zone (**GRZ**) areas and elsewhere as "preferred" just creates uncertainty and argument. Instead there should be mandatory or recommended heights to be exceeded only under clearly defined conditions and with a cap.

- (d) Failing altogether to include Mixed Use Zones (such as large parts of North and West Melbourne, Carlton and Jolimont) in the new regulatory regime creates numerous difficulties.
- (e) Failing to require Statements of Significance to be prepared for all precincts and sub-precincts (an invaluable heritage tool) and requiring them to be included in the Planning Scheme.
- (f) Not restricting multi-storey apartment towers to designated growth areas and not removing or limiting the ministerial "calling in" or other powers to change that.

#### Resident's major concerns

- 4. The three things that could cause most argument, cost and concern to our residents are:
  - (a) the excessive height and scale of new buildings;
  - (b) their failure to take into account the character of the neighbourhood; and
  - (c) the inconsistencies and conflict between heritage overlays, DDO's and zones that make it impossible to understand what outcome is intended. There must be some clarity and priority given.

#### Residential growth

- 5. Neither the City of Melbourne nor any of the suburbs represented should have any additional areas zoned Residential Growth as the City of Melbourne has already accepted much more than its fair share of residential growth as evidenced by the following.
  - (a) The City of Melbourne is already making a massive contribution to the supply of new housing in the Hoddle Grid, Southbank and Docklands and significant additional growth is already projected for City North, Arden-Macaulay and E-Gate.
  - (b) The City of Melbourne has calculated that:
    - (i) the population of the City of Melbourne (inner suburbs) will reach 229,739 by 2035, an 83% increase over 2015; and
    - (ii) the number of private dwellings will almost double during that time from the current 68,638 to 137,433.
  - (c) the attached survey by BIS Shrapnel published on 19 March 2015 (Attachment 2) demonstrates that between 1 June 2011 and the end of 2014, 23,579 high rise apartments were approved in Melbourne CBD, Docklands, Southbank and North Melbourne.
- 6. The emphasis must now be on protecting the character and liveability of these areas.

#### Provision of open space and community infrastructure

7. The existing and projected significant residential growth in the City of Melbourne must not take place without commensurate increases in the provision of quality open space and community facilities and infrastructure.

- 8. If the City of Melbourne is to be a liveable city and healthy place for the growing number of residents and visitors the following steps should be taken to increase and protect open space.
  - (a) Increase the developer contribution in accordance with Planning Scheme Amendment C209 currently with the Minister for approval.
  - (b) Ensure that developments such as Fisherman's Bend and E-Gate incorporate from the outset appropriate open space and community infrastructure as part of the planning process.
  - (c) Even with the increased developer contribution Council will be unable to purchase the essential larger open spaces and accordingly government <u>must</u> contribute by setting aside such land owned but no longer used by government.

#### Protection of existing open space

9. Not only must additional open space be set aside but the open space we already have (such as Yarra Park and Woodlands Historic Park) must be protected and should be sacrosanct. Unlike previous governments who were content to take a large part of Royal Park for the East West Tunnel and Fawkner Park for the Metro Rail Tunnel we urge the new government to not make the same mistake and ensure the public open space is protected at all costs.

#### **Reform of the City of Melbourne**

- 10. Because the Melbourne City Council plays such an important role in determining what is built and where, if heritage (rather than development) in the inner suburbs is to be given the attention it deserves the following changes are essential.
  - (a) Change the votes given to residents and business to make it more equitable.
  - (b) Improve the control and transparency of political donations.

The existing procedures favour business and developers in particular and have resulted in poor decisions by Council that make Labor's plan to "keep Melbourne liveable" a great deal more difficult to achieve.

#### **Further consultation**

11. The inner city resident groups represented thank you for this opportunity to talk and would appreciate being included in future government deliberations on these issues in particular the review of zoning.

15 June 2015

#### **ATTACHMENT 1**

## **Labor Platform 2014**

#### **Our Values**

"Victorians want to maintain their standard of living and leave behind a clean and healthy world for their children and grandchildren. This means finding ways to protect our heritage and our history when planning major projects and services to support future growth."

#### **Planning**

"Labor understands the importance of conserving Victoria's natural, cultural and heritage environments and recognises the need to maintain and develop equity, diversity and community in all planning outcomes."

"This (Coalition Government's) developer-driven approach to urban renewal and accommodating population growth has cut community input from decision-making and runs the risk of resulting in disconnected, infrastructure-deficient residential ghettos."

Melbourne as a World Leading Capital City

"The Coalition Government continues to favour major road developments through inner-city residential areas and parks, and inappropriate, out-of-scale high-density developments. This is destroying the livability, heritage values and character of the built environment."

Labor understands the need to improve coordination between heritage protections and development guidelines for sustainable development that protects and improves urban character and amenity."

Natural Environment and Urban Open Spaces

"Labor will ensure that existing open spaces, parklands and wildlife corridors are protected from urban encroachment, while continuing to develop these assets throughout Melbourne and regional Victoria, particularly in areas experiencing growth."

"Labor will:

Ensure surplus public land is considered for community use".

11 June 2015

#### **ATTACHMENT 2**

### High-rise apartments creep into Melbourne's middle suburbs

Christina Zhou Published: March 19, 2015 - 5:31PM

Melbourne's inner city isn't the only area bracing for a surge of new apartments as high-rise creep into the suburbs.

BIS Shrapnel research based on Australian Bureau of Statistics data shows there has been a jump in approvals for high-density dwellings (at least four storeys) in suburbs including Brunswick East, St Kilda and Armadale.

Medium and high-density dwelling approvals 10 to 15 kilometres from the CBD are also up 31 per cent on the 10-year average.

BIS Shrapnel's associate director, Kim Hawtrey, warns there will be an oversupply of 15,000 attached multiresidential dwellings in Victoria by June 2016, with most of the impact to be felt in Melbourne.

While apartment prices in these suburbs may not necessarily go backwards, there could be softening growth prospects.

"There is an acute problem in the inner Melbourne suburbs of Docklands, Southbank and Melbourne CBD," he says "We expect a correction in the inner parts of Melbourne...and we expect a softening in the middle and outer rings because there will be a ripple effect when you've got an oversupply of these attached dwellings for the city as a whole."

Melbourne - high density (4+) dwelling approvals (Source ABS, BIS Shrapnel)

		Number of approvals				
Region (SA 2)	Distance from CBD (km)	2010/11	2011/12	2012/13	2013/14	cal. 2014
1. Melbourne CBD	0	2799	2246	1276	2418	3335
2. Docklands	2	976	736	205	657	997
3. Southbank	1	1257	1712	207	1241	982
4. North Melbourne	2	553	294	284	644	760
5. Brunswick East	5	18	102	411	179	546
6. St Kilda	5	790	357	74	478	512
7. Armadale	6	0	0	0	26	499
8. Doncaster	14	238	57	0	176	481
9. Hawthorn East	7	19	88	30	407	397
10. Preston	9	0	89	28	237	371

The inner market spans the CBD, Southbank, Docklands, St Kilda Road, Queens Road, Carlton, Port Melbourne, St Kilda and South Yarra, where there have been large volumes of large scale and high-rise developments.

While the effect may not be immediate, Mr Hawtrey says Melbourne could see an "overhang" of apartments in 18 months time.

Melbourne - Other dwelling approvals (Source ABS, BIS Shrapnel)

Distance from CBD	10 year average	2014	% Change
0-4 km	7040	8012	14%
5-10 km	4794	6018	26%
10-15km	3898	5119	31%
15-20km	2013	2553	27%
20-30 km	2189	2592	18%
30-40km	735	777	6%
40km +	803	908	13%
Total	21473	25979	21%

BIS Shrapnel's Angie Zigomanis says apartment prices in the inner city could drop by 10 per cent in next three years.

Surrounding areas are expected to experience the ripple effect as the inner-city rental market tips into oversupply and rents are lowered to remain competitive.

Mr Zigomanis says as tenants look for more affordable accommodation, there may be a trend to move closer to the CBD where it is likely to become cheaper.