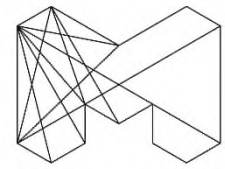


City of Melbourne

City Planning and Infrastructure,
PO Box 1603, Melbourne Vic 3001
Telephone: (03) 9658 9658 Fax: (03) 9650 1026
email: planning@melbourne.vic.gov.au
www.melbourne.vic.gov.au



CITY OF MELBOURNE

OBJECTION TO GRANT OF PLANNING PERMIT

Planning and Environment Act 1987

Is this form for me? This is the form to object to a planning permit application where the City of Melbourne is the decision maker. Please do not use this form to object to Ministerial applications.

Who is objecting?

Name:	Carlton Residents Association Inc.....		
Postal Address:	POB 1140 Carlton Victoria		Postcode: 3053
		
	The following information is not mandatory, but will assist in keeping you informed during the application process.		
Telephone No. (H)	(W)
		(M)
Fax No:	Email Address:	planningcra@gmail.com

Which application do you object to?

What is the permit application number?	TP-2016-259
What is the address of the land?	599-605 Swanston Street, Carlton Victoria 3053.....

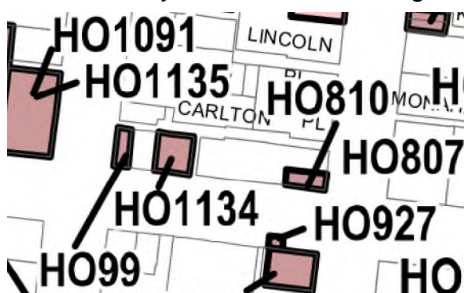
What are the reasons for your objection?

This development proposal

- Does not satisfy key heritage provisions of the MPS, including the heritage objectives and guidelines included within the Design and Development Overlay 61
- Does not satisfy the Loading Bay provisions of the MPS
- Does not satisfy the first provision [1st dot point] of Cl 52.06-3 – Car Parking Permit Requirements. Schedule 1 to the Parking Overlay does not exempt the application of this provision; accordingly, the CRA submits that a permit is required to reduce the number of parking spaces to ZERO
- Does not provide a net community benefit

Heritage Considerations

The City North Heritage Review [Revised 2015] confirmed the heritage significance of the three heritage places on the North side of Queensberry Street between Swanston and Bouverie Streets. All three have been given a C Grading under the City of Melbourne letter grading system.



Apart from the locally significant heritage place on the subject site, at the West end of the site [across from Brompton Place] the Former Paton's Brake Replacement Factory [an Interwar building] is of "representative aesthetic significance as a largely intact Functionalist style building". See image below.



[City North Heritage Review]

The CRA submits that the bulk, form and appearance of the proposed building is NOT “in keeping with the character and appearance of adjacent buildings and the heritage place.” Decision Guidelines at CI 43.01-4

More particularly, the CRA submits that the height of the new building/addition does NOT respect “the character and scale of adjoining buildings and the streetscape”, [Building Height Paragraph at Designing New Buildings and Works or Additions to Existing Buildings at CI 22.05].

Although it is often argued that the development expectations of the City North Growth Area should be privileged over heritage concerns, it must be emphasised that the relevant DDO controls include design objectives and requirements that both acknowledge and address heritage concerns. Schedule 61 to the DDO includes the following Design objective

- To ensure that new buildings respect the rich heritage fabric of the area and that new buildings that adjoin the heritage buildings respect their height, scale, character and proportions.

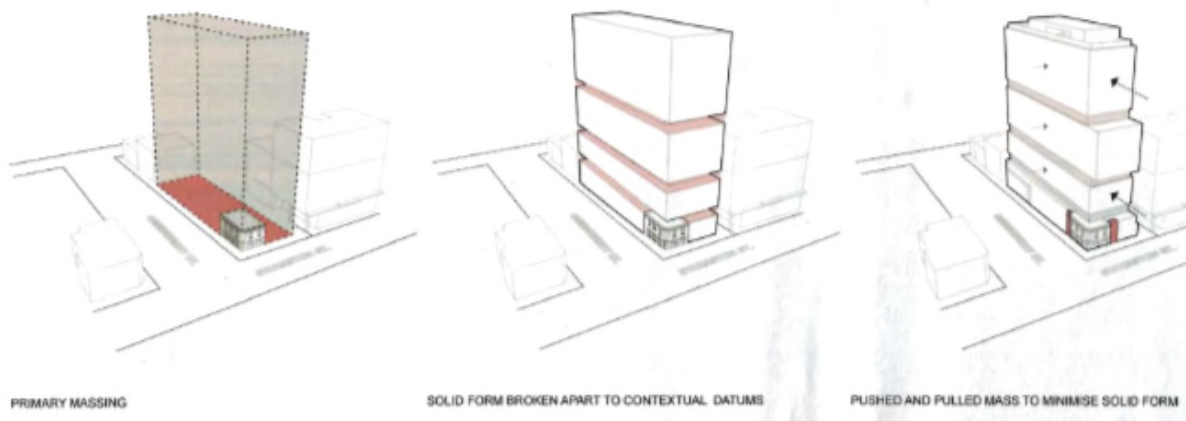
Table 2 of this DDO provides more detailed guidance on this matter

- New buildings should step down in height to adjoining lower scale heritage buildings, and
- New buildings should consider retaining the traditional heritage street wall (as opposed to defining a new higher street wall) where appropriate.

Table 2 – Design Requirements for all DDO Areas

Although the heritage façade height is “referenced” on both the Swanston and Queensberry Street frontages, the CRA submits that much more weight should have been given to the detailed guidance above. Further, the Planning Scheme [at DDO 61 sub area 4.1] does not support a twenty level high envelope [over 60 m above ground at the Swanston Street entry] as the **starting point** for the design response.

While the push and pull strategy [see envelope drawings below] may reduce the impact of the envelope as a whole, the cantilevered section from levels 7 to 11 [that extends within one metre of the Swanston Street site line] will be the dominant element at the south east corner. This would not be a respectful response to the heritage guidelines of the Planning Scheme. The CRA submits that the Applicant’s Design approach is fundamentally flawed.



Loading Bay Concerns [CI 52.07 of Planning Scheme]

The CRA notes that there is one on-street loading bay adjacent to the Queensberry frontage to the development, but that no standing [any time] provisions apply to both the Carlton Place and Brompton Place frontages. Given that there are five separate retail tenancies included in the development, we submit that the applicant should have included at least one off street loading bay.

Further, the Student Housing Policy [CI 22.24-3 of Planning Scheme] includes the following provision:

It is policy to “provide adequate space on the land for loading and unloading vehicles and waste collection”.

While students may not require the use of a loading facility, the same cannot be said for the rubbish collection arrangements. The Council lanes and Carlton Place [to the North of the development] already service the Tune Hotel and the Bouverie Street Fire Station carpark; and, in the future, the new development proposed for 100-102 Bouverie Street will also have car access off these lanes.

To suggest that rubbish trucks can “prop” in a lane/Carlton Place that will also be providing a fire exit, bicycle access and substation access for the **new** development, is quite unrealistic in our view.

Net Community Benefit Concerns

The CRA submits that this development proposal fails to satisfy key heritage, built form and loading bay concerns. Given this assessment, it is relevant to consider whether there are other aspects of the development proposal that could justify the project being approved. In our view, the answer to this question is no.

There are several **other provisions of the Student Housing Policy** that have not been satisfied. More particularly, the project

- Falls well short of the desired benchmarks for the provision of bike spaces, and the area provided for communal outdoor space, and
- Fails to provide car parking for the management and servicing needs of the building. The CRA believes that it is quite unrealistic to assume that specialist maintenance staff will not require access to an onsite car space

Sunlight to Public Spaces [including major pedestrian routes, streets and lanes - Provisions in Table 2 of DDO 61]. It is clear from the shadow diagrams provided by the applicant that the pedestrian pavement on the South side of Queensberry Street would be considerably degraded between the hours of 11 am and 2 pm at the September Equinox. It cannot be concluded that this additional shadowing will not prejudice the amenity of this key pedestrian area.


ESD Considerations. While the development may achieve the relevant Green Star benchmarks, given that the proposal includes minimal rainwater harvesting and onsite energy generation, it will not exemplify a best practice outcome for a major development proposal

For these reasons, the CRA cannot support this proposal.

How will you be affected by this proposal?

The Carlton Residents Association advocates on behalf of its members to

- Support the retention of the heritage assets of the Carlton community and to discourage new developments that fail to respect these assets
- Maintain the quality of the public realm with a focus upon maintaining access to sunlight and sky views, and a pedestrian friendly scale
- Interpret and apply the performance based provisions of the Melbourne Planning Scheme fairly so that the interests of no one party are unfairly privileged over the interests of another party

Signature: 	Date: 20 June 2016
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Please lodge the completed and signed form and all relevant documents to:

Planning Department
City of Melbourne
PO Box 1603
Melbourne VIC 3001

or

planning@melbourne.vic.gov.au

Important notes about the objection to permit application

1. Your objection and the personal information on this form is collected by The City of Melbourne for the purposes of the planning process, as set out in the Planning and Environment Act 1987 (the Act). If you do not provide your name and address, the City of Melbourne will not be able to consider your objection.
2. Your objection will be available at the City of Melbourne office for any person to inspect and copies may be made available on request to any person for the relevant period set out in the Act.
3. You must not submit any personal information or copyright material of third parties without their informed consent. By submitting the material, you agree that the use of the material as detailed above does not breach any third party’s right to privacy and copyright. You can request access to your personal information by contacting the City of Melbourne.