



The Carlton Residents Association Inc.

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The coordinator, Local Policy
Strategic Planning
City of Melbourne
GPO Box1603
Melbourne, Vic. 3001

Dear Sir/ Madam,

Re: Submission - Amendment C162 To the Melbourne Planning Scheme

Carlton Residents Association understands the objectives of the Strategic Statement and is in general agreement with the land use and development proposed but not with out reservations which relate to the following.

1. Boundaries of Designated Areas

Most of Carlton has been designated as either “Stable” or “Ongoing Change” and as such these areas will not be subjected to new structural plans with the attendant consultation processes. So CRA believes that it is important to confer appropriate protection on sensitive areas at the Strategic level, rather than rely on lower levels of the Planning Scheme for reasons outlined below.

Although development in both “Stable” and “Ongoing Change” areas are theoretically subject to the planning controls within the other sections of the Planning Scheme, we know from past experience that relevant controls at this level are often challenged and regularly overturned and as a consequence, cannot guarantee the protection intended.

The specific areas of concern are, firstly the east side of Rathdowne Street between Victoria and Gratton Streets, principally because of the impact on the World Heritage listed Royal Exhibition Building environs and secondly, the Level 1 streetscape of Drummond Street between Victoria and Gratton Streets.

In the case of Drummond Street, there may be a mix of uses, but the built form is one of Melbourne’s most coherent intact Victorian streetscapes and over the last 20 years, the residential occupancies in this section of Drummond Street have increased from approximately 35 to in excess of 200 with the a proportionate reduction in other uses. This surely meets the criteria for the “Stable” classification as stated in C162. Clause.21.02

It is CRA's contention that the "stable" designation confers a higher degree of protection, even if only by perception.

As a corollary, the "Ongoing Change" designation encourages the perception that less stringent planning controls may be encountered, thereby attracting inappropriate and contentious proposals.

It is CRA's contention that this south - east precinct of Carlton should be classified as "Stable" to avoid poor planning outcomes in the future.

2.Student Accommodation

We note that further strategic work is envisaged in this area, we believe that this is important and overdue. Up till now, there appears to have been an ad hoc approach to their approval, construction and their reuse in the longer term. There are numerous examples of developments around the municipality, which have resulted in outcomes less than desirable.

Because Student accommodation is purpose built with limited reuse potential, the current and projected supply and demand equations need to be reviewed as does the policy on reuse or attempted resale into the conventional "dwelling" market, as witnessed recently with some of the early developments. (refer University College and 117-121 Bouverie Street)

3. Traffic

(1) The Strategic Statement acknowledges the impact of the proposed "Westgate Alternative", however it ignores the existing traffic generated by the Eastern Freeway discharging into and traversing through this municipality. This is a long standing problem which worsens daily and has been further exacerbated by the opening of Eastlink. Surely this should be acknowledged in planning at this level.

(2) The philosophies relating to transport espoused in "Future Melbourne Community Plan" (refer C162 Clause 21.03 – Overview) appear to have been faithfully transposed into the new Strategic Strategy with one obvious exception.

"a city with improved motor traffic flow and smarter, more efficient private motor use; and"

The omission of reference to improved traffic flow is probably intended, but surely there is an inconsistency in philosophy when the Strategic Strategy claims, as the objective under clause 21.03-5 Freight Transport,

"To reduce the amenity and environmental impacts of road based service delivery and waste vehicles."

To ignore the worsening traffic flow of non - freight vehicles is a recipe for degraded amenity and environment. The intended measures to reduce car use will at best contain the growth, a real reduction is unlikely and so is an improvement in amenity.

CRA believes that improved traffic flow for all traffic should still be a priority along side the improvements in public transport, cycling and walking for the sake of improved amenity and environment.

4. Housing

We at CRA are disappointed with the Council's proposed policy relating to the redevelopment of Public Housing Estates.

It is stated that the Council will support the retention of existing numbers of dwellings (refer clause 21.06-2 Residential) rather than seeking an increase in numbers.

The State Government's recent redevelopment exercises have seen a serious loss of public assets for little or no net gain in the number of public / social housing places. CRA believes that this is lost opportunity.

Our State Government can be naive when negotiating PPP agreements with commercially astute developers and all too frequently the community does not reap the full potential from the transaction. We believe that there have been instances where the Government could have leveraged the deal to produce an increase in community housing and with additional pressure from the Council and the electorate, may be the will in future.

Warren Green
CRA Committee