



The Carlton Residents Association Inc.

A0034345G ABN 87 716 923 898
PO Box 1140, Carlton, Victoria, 3053
Tel / Fax 9349 3615
www.carltonresidents.org.au

2 August 2006

Minister for Planning
Attention: Adrian Williams
Planning Panels Victoria
Dept of Sustainability and Environment
PO Box 500
East Melbourne Vic. ,3002

Dear Sir,

Re: Melbourne Planning Scheme Amendment C117 – Carlton Housing Precincts

CRA supports the redevelopment of the three subject sites and the stated objectives of Amendment C117. We do however have concerns regarding the process to date and lack of consideration given to some issues, which are enumerated below.

The City of Melbourne has invested a lot of time and resources in preparing an authoritative and comprehensive submission, much of which addresses issues contained herein. We wish to place on record our endorsement of their submission and congratulate those responsible.

CRA hopes that it receives the respect that it deserves.

Process

Long before the Office of Housing formally announced the redevelopment of these sites, in December 2005, CRA, like other stakeholders, were led to believe that they would be included in a process of consultation, which would lead to the preparation of a development plan for public display.

This did not happen and what we now have is a fait accompli, a development plan which appears to have had as one of its objectives, maximum site coverage/ yield. It is difficult to escape the conclusion that private development concerns have been allowed to prevail over public interests.

Even the MCC, who did have nominal input, offers only qualified support for the plan as exhibited. We at CRA unanimously believe that the process to date has been flawed.

2

This severely limits the outside stakeholders' input to that of "tinkering around the edges". Within that context, we wish to offer the following comments and observations.

Issues lacking consideration

1. Over-development of the respective sites
2. Upgrading of the tower blocks and surrounds
3. The number of public residents that can be accommodated,
4. Better integration of public/ private housing
5. Current crisis in housing affordability
6. Adequate open space of appropriate amenity
7. Adequate and suitably located area for community gardening
8. Space for community services and support agencies
9. Provision for car parking
10. Amenity of adjoining properties and neighbourhoods
11. Appropriate built form for the new buildings

In Elaboration of the Above:

1. There appears to be an unnecessary over-development of the three sites for which the only justification appears to be maximisation of the private component, a product of a highly contentious financial plan.

Based on construction costs published by Rawlinsons (accepted industry authority), it could be argued that the Government's \$50 m cash contribution would be sufficient to achieve the replacement of the outdated walk-up units, without the need to subsidise the private component.

We accept that the inclusion of the private component is justified on the basis of attempting integration of public and private housing, however, with the land content

being supplied free of charge to the private partner, it should be financially viable regardless of the number of private dwellings proposed.

3

2. There is no provision for upgrading of the tower blocks or their surrounds despite general acknowledgement that they constitute a major obstacle to public/ private integration. They will continue to limit future integration long after this or any other proposed development plan has been implemented unless the problem is addressed.

3. The current proposal claims to increase public dwellings. However there is something fundamentally wrong if the number of beds is diminished in the process, regardless of whether the exercise is cost-neutral or whether it costs \$50 m plus a land grant as proposed.

There has to be a better deal available for the prospective tenants on the ever-growing waiting list and for Victorian Taxpayers. Why pay \$50 m plus and accept a suggested reduction of 138 bedrooms (with the loss of however many beds -- 138? 276?). It has been suggested that the mix of bedrooms should re-checked, as there is still demand for three bedroom flats.

4. There are serious doubts regarding the effectiveness of the “integration” formula proposed.

The idea that integration can be achieved simply by inserting private dwellings among public dwellings is simplistic.

Integration is brought about by people, not buildings.

We do not believe that sufficient attention has been given to what is supposedly a fundamental objective of the Departments’ redevelopment policy.

Evidence emerging from the “Kensington Experience” suggests that the private component of the resident population consists primarily of renters. Unfortunately, experience teaches that investor-owners and renters are not as committed to neighbourhood as owner-occupiers

5. There is general acceptance that there is a crisis in housing affordability. Here is an opportunity for the Victorian Government to contribute positively towards the alleviation of the crisis. With a little leverage, a cap on the standard of construction and the sale price of the private dwellings should be possible.

This could see a quantity of affordable housing being made available. A secondary effect could well result in a higher percentage of owner-occupiers with the inherent benefits spelt out in 4 above.

6. The loss of public open space within the estates is estimated to be a staggering 3.5 ha and a lot of the proposed open space will be deprived of sunlight due to over-shadowing by the higher density of 4 to 8 storey buildings, typically built within 6.5 to 12.0 metres of each other. This is going to have a dramatic impact on the general amenity of the estate.

7. The benefits of a communal garden are generally acknowledged. We believe that instead of diminishing the area currently provided, that it should be increased and, just as importantly, be positioned where it will get adequate sunlight. The proposed new site is totally inappropriate for growing fruit and vegetables.

4

8. It has been estimated that the redevelopment as currently proposed will result in an additional 600 residents. Given that there will be something of the order of 600 extra dwellings, this figure for residents is probably an underestimation. But even 600 new residents will severely strain existing on- and off-site services/infrastructure.

We have not seen any evidence that the proposed scheme will make any contribution on this score, other than an inadequate 700 sq m of "space" for onsite community services. MCC has indicated that 2200 sq m would be required for an enlarged childcare and another 900 sq m for a multipurpose community centre.

If the government is serious about improving amenity and well-being for estate residents, there should be provision for on-site accommodation for the local service agencies whose work generally relieves demand on government resources.

There are currently two studies underway, in both of which MCC is intimately involved. Firstly the Ten Year Community Infrastructure Plan and secondly The Carlton Estate Infrastructure Plan in conjunction with the Department of Housing. We believe that any decision regarding the provision of on-site community facilities prior to the release of these findings, would be premature.

9. The provision for resident car parking appears to be about 50% of that considered appropriate for other developments in a Residential 2 Zone.

The demand for on-street parking is already at saturation point in most of Carlton as a consequence of trying to accommodate a 21st century lifestyle in a suburb which was conceived in the 19th Century.

On-street parking for visitors using roads such as Rathdowne, Princes, Lygon, Nicholson, Elgin, Cemetery, and Swanston should not even be a consideration. The future availability of these roads for parking will be determined by constantly changing traffic management measures, as volumes inevitably increase. On-street parking should not be considered as part of the project's core provision.

10. We strenuously repudiate the claim that the proposal incorporates "a range of building designs that reflects the variation generally found throughout neighbourhoods" is refuted. Residential Carlton is predominately a heritage neighbourhood and has little existing stock that could be compared with 4 to 8 storey multi-dwelling complexes proposed.

The 5/6 storey buildings fronting Rathdowne Street are particularly inappropriate as is the 8 storey one on the corner of Elgin/Canning due to their proximity to the one and two storey 19th century residences opposite.

5

11. The built form proposed is problematic in several areas.

In addition to the loss of visual open space, the proposed proximity of the buildings raises the likelihood of sunlighting and privacy issues. This is a product of the over-development mentioned above.

The 6 and 8 storey buildings in Cemetery Road will severely limit the sunlight available to the remainder of the site.

The comments in 10 above, relating to neighbourhood amenity, are also a product of the built form proposed.

Carlton Residents Association seeks permission to appear before the panel to address the issues raised herein.

Yours faithfully,

Warren R. Green

Carlton Residents Association Inc.