



3 November 2017

Emma Appleton, Manager Urban Strategy  
City of Melbourne  
Council House 1, 200 Little Collins Street  
Melbourne, VIC 3000

Dear Ms Appleton

**West Melbourne Structure Plan - Design Review October 2017**

Thank you for requesting a review of the West Melbourne Structure Plan by the Victorian Design Review Panel.

The Office of the Victorian Government Architect's views, which are based on discussion and correspondence with the City of Melbourne in September and October 2017, a site visit on 12 October 2017 and the Victorian Design Review Panel discussion are as per the following report.

If you require further clarification, please contact our office on 9651 6583 to discuss.

Yours sincerely,

Sophie Patitsas  
Principal Adviser, Urban Design and Architecture  
Office of the Victorian Government Architect

cc: Adam Mills, City of Melbourne  
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**Panel Members**

The VDRP members who attended the design review session were Sophie Patitsas (chair), Helen Day Simon McPherson, Kim Roberts and Stuart Harrison.

**Confidentiality**

The advice contained in this letter and attached report is offered in confidence.

The OVGA reserves the right to make its views known should the views contained in this letter be made public in whole or in part (either accurately or inaccurately). If you do not require the OVGA's views to be kept confidential, please contact the OVGA on 9651 6256. The OVGA request the report is issued in full in every instance.

Please note that the OVGA is subject to the Victorian Freedom of Information Act, 1982 (FOI). The OVGA handles requests for information according to the provisions of the Act, and its decisions under the Act are subject to challenge. Where this letter is copied to the relevant local planning authority and other agencies, those bodies are subject to FOI and may release information requested irrespective of the OVGA's wishes.



# VICTORIAN DESIGN REVIEW PANEL

West Melbourne Structure Plan

October 2017

## West Melbourne Structure Plan

### Design Review Report – 18 October 2017

On the 18<sup>th</sup> October the Victorian Design Review Panel reviewed the West Melbourne Structure Plan (Draft for Engagement, July-August 2017). We thank the City of Melbourne for requesting a design review of this important strategic document, and for their site tour, comprehensive briefing, presentation and participation in the review process.

The draft structure plan sets out an overarching vision and strategic direction for West Melbourne, informing desired built form and land use outcomes plus public realm and streetscape improvements. We understand that the final structure plan will be presented to Council in December 2017. This timing provides an opportunity for critical review and feedback on the West Melbourne Structure Plan before planning policy embedding its recommendations is developed.

We congratulate the City of Melbourne on pursuing a robust and design-led approach to the strategic planning of this important precinct. The draft structure plan articulates an alternative vision and place-based approach to urban renewal. It prioritises innovative models of densification that work hard to reinforce and extend the diversity and character of the area whilst generating new and alternative built form possibilities. The plan is underpinned by a series of background studies on character, heritage, built form, economics and employment, parking, transport and access. We commend the City of Melbourne on their rigour of this work and the genuine engagement with the community and stakeholders in developing the draft structure plan.

The vision for the draft structure plan states that *‘West Melbourne will play a complementary role to the more intensive areas of development which will surround it into the future. It will retain its identity, diverse areas of character and mix of uses as it evolves’*. The draft structure plan identifies five places in West Melbourne: Flagstaff, Adderley, Spencer, Historic Hilltop and the Station Precinct as important contributors to the identity and diversity of the precinct as a whole. The plan also includes a series of open space and streetscape improvements and better walking and cycling connections. Spencer Street will be transformed from a transport corridor to a local high street, with a potential tram extension.

The City has explored a range of planning mechanisms and tools to deliver on the vision of maintaining and evolving identity and diversity. The proposed rezoning of some areas to Special Use Zone aims to deliver a mix of uses and affordable housing. Contextually responsive built form controls will incorporate a combination of floor area ratio controls and discretionary height controls. The City is also considering options to exclude the floor area of heritage and other identified character buildings from the floor area ratio calculations as a way of incentivising the full retention in volume, rather than just the facade of these buildings. The City are also looking at excluding basement car parking from floor area ratios (FAR) calculations, consistent with the central city controls.

The following comments provide a summary overview of the Victorian Design Review Panel response to the key directions and initiatives outlined above.

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### **The Vision for West Melbourne**

There is an implicit understanding in the draft vision that West Melbourne needs to provide a counterpoint to surrounding areas experiencing development pressure. There is an opportunity for the City of Melbourne to step up on the broader policy and metropolitan scale definition of the vision in this regard. The positioning and strategic rationale underpinning the vision needs to be clearly stated and argued - that there is a good and legitimate argument for a different type of place to exist and evolve within this inner city context.

We support the City's position around the complementary role of the area. There is no formal designation at a state level for urban renewal or growth in West Melbourne with Plan Melbourne providing little specific guidance about the area in this regard. There would be great value in being quite explicit and definitive about this position and bringing forward the evidence base around the area's inherent values and point of difference to clarify and strengthen the message. A broader scale map or diagram communicating this as a strategic design concept demonstrating West Melbourne's contextual relationship to surrounding areas as that of an evolving and complex area of respite, relief and special character would be quite powerful and is encouraged.

The 'bones' of the structure plan should be reflected in the vision so there can be no question of 'value-engineering' this out as it is translated into planning controls. It has to be self-evident that a clear and robust vision for West Melbourne has been developed and underpinned by fact-based design thinking. Given we have already seen the emergence of low quality, conventional development in West Melbourne, encouraging and testing using a different model and leading with this vision is important.

There is increasing weight on the specific intentions around vision statements in the planning panel process and this needs to be robust. There needs to be clear articulation of why particular character areas have thus been defined and their specific role in amplifying the broader vision around diversity. The West Melbourne Urban Character Analysis by Claire Scott Planning (June 2017) is seen as highly valuable work that informs this understanding. There is an opportunity here to introduce the concept of culture to the discussion. We acknowledge that work from the character study has been drawn on however we recommend that further content be brought forward, teased out and articulated more strongly within the vision and framework.

### **The Framework and Implementation**

#### ***Density and built form – floor area ratio controls and built form controls***

Certainty regarding scale was noted by the City of Melbourne as a key issue in public consultation. As part of a suite of controls we consider that the floor area ratios (FARs) are robust and we support their use. As a blunt instrument FARs which can lead to a variety of outcomes are better than blanket height limits, which can lead to predictable and uninventive results. Given the mandatory nature of the FAR and the clear direction around a strong street wall relationship, the maximum building heights may be considered superfluous. However, it was noted that there is potential for a consolidated site size where the FAR may enable significantly scaled development on larger sites. As such, the use of maximum building heights as a protection against these outliers is supported.

Consideration should be given to the consistency of the proposed built form controls between precincts. The difference is sometimes marginal and sometimes heightened in the draft structure plan. How do the proposed built form controls play out on the streetscape? There is a

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need for contextual information and modelling on a range of sites and streets to avoid 'cliffs' of marked difference in built form between precincts. We also consider that the definition of precincts could be clarified and consolidated and could tie into FARs.

Street wall heights are one of the most important mechanisms for maintaining the user experience and amenity on streetscapes. Street wall heights in the draft structure plan range between 3 and 10 storeys. This variation doesn't give a clear message about how the streetscape relationship works. While many existing street widths are generous, the relationship between built form and streetscape will change with the greening and streetscape works planned. We would like to understand the rationale for the proposed controls and see an option for a more conservative approach that results in the character and public environment that is wanted in this area. While concerns were raised that street wall heights will be sheer on small sites, it may be that the floor area ratio approach will result in smaller form on small sites by definition.

We considered the effect of the proposal to exclude basement car parking from FAR calculations, in order to be consistent with the central city. The benefit of including car parking in the FAR calculation is that it would discourage car parking and therefore developers would choose the higher value use. We acknowledge that a market transition is required. In any period of transition however there is a perception risk that above ground car parking is being encouraged.

### ***Density and built form – incentivising diversity and character***

The challenge here is to develop tools and policy for West Melbourne that embrace change but retain aspects of character. The policy framework must be strong enough to defend and protect the character and also allow for an evolving and contemporary character. We question the detail of how buildings of valued character are defined and protected in a policy and statutory sense. Is the 0.5 or 1.0 FAR incentive enough to protect these valued character buildings? There is a policy gap between heritage, and contributory buildings that inform the character and therefore the vision. The interesting gritty character of Stanley Street for example is not necessarily captured by heritage controls. How would modelling play out in a street like this and how would character controls interplay with this? What infill development is appropriate given the preferred character? Again, the Urban Character Analysis work may be helpful in informing further work and providing definition around this issue. The panel tabled a few options here: there may be scope in policy mechanisms to modify or mediate between typical heritage policy; it may be possible to establish qualities and values to character via selective heritage; and the Special Use Zone may also be useful in this regard.

We note that site by site testing of built form controls has been primarily on new build and some smaller footprint character buildings. We recommend that built form testing should be undertaken on large footprint re-use sites to demonstrate the volume advantage for heritage or character sites. It is likely that with the exclusion of heritage floor area in FAR calculations, a few sites will be pushed over the discretionary height limit. A possible unintended consequence of this control is the introduction of a greater impact on heritage buildings with a larger built form available on a heritage site than for a new build on the neighbouring site. This strengthens the justification for further modelling on character sites. The heritage model shown assumes a small heritage or contributory building on a large site. We would like to see testing and modelling of a full site coverage character building such as a warehouse to test the impact of the excluded volume on the overall form. There is real opportunity in augmenting the City's advocacy and

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negotiating position by building and testing the economic case and value proposition for protection of heritage and character buildings.

We see a link between diversity of plot size and character in West Melbourne. To maintain character you must not only protect built form and streetscape but also plot size, materiality and mix. The consolidation of sites in West Melbourne is a risk that was identified in the Urban Character Analysis document. More work needs to go into how to address this in a policy sense to support high quality built form a contemporary way that does not stifle innovation while maintaining character on consolidated sites. If consolidation takes place, is it possible to retain a sense of the footprint in the contemporary intervention? A further risk is if large developments avoid addressing the structure plan by going through the Ministerial approval process. If enough developments use this approach then it becomes a condition which threatens the vision of the structure plan.

With considerable change and development pressure in this area, it is anticipated that despite the ambition for diversity, some character areas will still be lost. Dan Dubowitz's Cultural Master Planning techniques in the UK are a relevant reference. He brings the community along in documenting this incremental cultural change in tandem with civic works and development in an area.

### ***Activities, uses and infrastructure - Special Use Zone***

We support the City of Melbourne's aspirations for a true mix of uses, connected to the vision, building the employment and proportion of affordable housing and the protection of character. Successfully identifying planning mechanisms and tools that will help deliver on this ambition will be central to realising this vision. The Special Use Zone (SUZ) may be appropriate in this regard. The observation was made that SUZs have typically been used in Melbourne in places of less value and significance - this application of SUZ would be a pilot for this area of Melbourne. We recommend that the City obtain expert planning advice on the translation of the structure plan aspirations and application of SUZ. If SUZ is the best tool then it should be tested for unintended consequences - how might it get exploited? How can the structure plan successfully address this? We note that the desire for genuine mixed use is also linked to character. Again, this reinforces the importance of robustly bringing forward and articulating the findings of the Urban Character Analysis within the structure plan.

We suggest that the specific wording of the action in the structure plan which requires applicants 'to *consider* 6% affordable housing on development sites' (action 7.1 draft West Melbourne Structure Plan) requires more potency in terms of mandating outcomes. If there is a strong will on the city's part to deliver on this objective the wording of the action needs to be bolder and more robust.

### ***Streets and spaces***

We commend the level of analysis that informed the concept plans for Spencer Street with detailed sections, and staged plans. While we understand the proposed implementation plan and timing of work was contingent on the West Gate Tunnel project, we consider that bringing ideas about the value of 'place' to the forefront is critical in catalysing change and setting the scene. If the City of Melbourne is serious and confident about Spencer Street as a local street, it should bring forward capital works and partnerships as a stronger statement of intent.

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We also recommend that consideration is given to improving connections to Flagstaff Gardens, given the lack of public space in West Melbourne and the importance of this asset as one of the great public open spaces in the city. Strengthening connections both to the gardens and beyond, to Queen Victoria Market is highly encouraged.

We acknowledge that Caring for Country principles are thoughtfully reflected in the structure plan with initiatives such as potential places names, an economic hub and festival. We urge the team to explore the opportunity for these principles to be further strengthened and embedded in the plan. The landscape in particular would benefit from this focus.

We note that the City of Melbourne is undertaking other reviews of policies such as the Urban Design Policy Outside the Capital City Zone and encourage close collaboration, consistency in approach and integration of key initiatives and concepts. We support the design-led and evidence based approach to the strategic planning challenges at play in this area and see this as setting a standard for similar challenges across the municipality and in other transition and urban renewal areas across Melbourne.

Thank you for the opportunity to review this important strategic project for the City of Melbourne - we look forward to seeing the final plan and observing the translation of key concepts and ideas into the planning scheme amendment.



**Sophie Patitsas**  
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**Office of the Victorian Government Architect**