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**Request to be heard?:** Yes

**Precinct:** General

**Full Name:** Meike Wagenhoff

**Organisation:** No

**Affected property:**

**Attachment 1:** 171215\_submissi

**Attachment 2:**

**Attachment 3:**

**Comments:** see attachment

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Before I raise my concerns in regards to some proposals made in the Fishermans Bend Draft Framework and the associated planning controls of City of Melbourne and City of Port Phillip respectively I would like to praise the quality of work of the Fishermans Bend taskforce managing complex needs of a future community and streamline them into a coherent framework.

These are my concerns:

**1. Densities proposed for Fishermans Bend using FAR and height controls are too high, especially for the precincts Lorimer and Montague ( Sustainability goal 1 - Objective 1.11 )**

- (1) Although I agree applying the FAR and height controls will result in more diversity of the built form I believe the targeted building densities for Lorimer and Montague as outlined in the planning controls will still be too high and the liveability of the precincts will be compromised.

The ratio of 480 residents per hectare in Lorimer (p.72 Fishermans Bend Framework, Population projection for 2050 of 12000 divided by gross precinct size of 25hectares ) and 483 residents per hectare in Montague (p.70 Fishermans Bend Framework, Population projection for 2050 of 20800 divided by gross precinct size of 43hectares ) are distinctively higher than the average ratio for Fishermans Bend of 323 residents per hectares. Compared to other densities in the inner Melbourne areas it exceeds the population projection for 2034 in Southbank and Hoddle Grid by 155-160%. It will be denser than Kowloon, Hong Kong, is today.

A solution may be to reduce the number of dwellings in two precincts, increase the minimum FAR of commercial use and provide a higher FAR for dwellings in Wirraway North which will be fairly close to the train station either in Wirraway or the Employment precinct.

- (2) The FARs have been inflated to deliver enough dwellings for a population of 80000 in 2050 assuming only 75% of all sites have been developed by then (p.77 Fishermans Bend Urban Design Strategy). This decision to inflate the densities today to guarantee the outcome in 2050 leads to two poor outcomes: The densities created in the next three decades exceed the real demand by 25% and the total population in Fishermans Bend once 100% redeveloped - which might be as early as 2050 - is going to be 100,000 residents.

Please advise whether transport and community infrastructure has been assessed for this total population.

I believe the FARs should be monitored and corrected in a regular timeframe of about 5 years using planning approvals measured against the target of 37,400 dwellings by 2050. Landowners need to be made aware that FARs may be corrected (either way) in the future.

- (3) Applying FAUs has been chosen to provide the required communal services, public open space and affordable housing therefore Floor Area Uplifts have to happen to meet the requirements to deliver the new precincts. The total of the increased floor area / building density has not been disclosed nor assumptions made. Depending on the use of the additional floor area (residential or commercial) it may not just increase the building density but the residents per hectare ratio.

Just one example:

Applying the ratio given in the Public Benefit Schedule (p.4 GC81-How to calculate FAU and public benefits Consultation Final) "Eight additional dwellings to each affordable housing unit,

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providing the affordable housing unit mix replicates (size etc) the dwelling mix constructed and delivered for the market by the developer”:

37,400 dwellings to be provided by 2050

at least 6% affordable housing = 2244 dwellings

FAU to provide 6% affordable housing: 2244 times 8 = 17,952 dwellings uplift (48% of the target number of dwellings, additional 40,000 plus residents).

Other public benefits will increase the numbers further.

The density of the built environment in 2050 - even with the assumption only 75% of all sites be redeveloped - will most likely exceed the figures given in the Fishermans Bend Framework by far.

I refer back to point 1.

## **2. Lack of housing diversity ( Sustainability goal 1 - Objective 1.12 )**

(1) Fishermans Bend Framework, p39, Benefits of introducing a density control:

“A tailored FAR scheme will apply to Fishermans Bend to help deliver on the aspirations for the area. It provides for (...) diversity of housing types, including mid-rise apartment developments and design flexibility with a range of design options possible on each side.”

The FAR controls will result in predominantly mid-to high-rise apartment dwellings across all four precincts of Fishermans Bend if developers seek to maximise the yield of their sites. As a result there will be little to no housing diversity in Lorimer and Montague. As current planning applications indicate there may be a second housing type of townhouse provided in the non-core areas of Wirraway and Sandridge but two different typologies do not create diversity. Applying FARs may or may not result in other forms of apartment living, but that will be entirely up to the market.

Unfortunately low-rise apartments (3-4 storeys with 12-24 dwellings) which are one of the most common apartment dwellings across other precincts of City of Port Phillip are not supported by the planning schemes as their yield outcome falls short to townhouses ( loss of net floor area due to shared circulation and services, refer to example on p.21, Fishermans Bend Urban Design Strategy) and there are no other incentives to support this type of small scale and often family friendly, communal living.

I believe the “misalignment between the preferred vision and development patters” (...) “current development pattern are not delivering housing diversity” (p.10 Fishermans Bend Urban Design Strategy) cannot be solved without more regulations.

## **3. Transport - missing public bike and pedestrian path along the Yarra River ( Sustainability goal 1 - Objective 1.3)**

(1) I agree strongly with all transport proposals made.

(2) Even though the State owned land north of the Employment precinct is currently leased to the Port of Melbourne it's future development should have formed part of the Fishermans Bend Vision and Framework. It should be used to connect the public bike and pedestrian paths along Port Phillips Bay eastern shore with the Yarra River trail currently starting north of Lorimer and

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provide more public open space to all five Fishermans Bend precincts including the Employment precinct.

A dedicated bike / pedestrian path along the waterfront is highly desired and preferred to a cycling path along a road with heavy traffic. The new bike path along Lorimer Street, running less than 150m inland of the Yarra River may be avoided.

**4. Community facilities and services - some proposed services are insufficient, the typology of community hubs needs to be carefully considered ( Sustainability goal 3 - Objective 3.1 and 3.2 )**

- (1) The provision of four education and community hubs (primary school) and one education and community hub (secondary school) do not meet the needs of education for the estimated number of children living in Fishermans Bend in 2050 (p.10ff, Fishermans Bend Population & Demographics Paper).

Unfortunately the age groups of the Demographics Paper does not match the common age of students in primary school (5-12years) and secondary school (13-18years). In my assessment I have split the percentage of 10-14year olds, have added half to 5-9year olds to establish the number of primary school students and have added the other half to establish the number of secondary students. The following are the estimated numbers of primary and secondary students living in the four precincts:

Montague	primary students: 1612	secondary students: 1228
Lorimer	primary students: 846	secondary students: 582
Sandridge	primary students: 1650	secondary students: 1237
Wirraway	primary students: 1324	secondary students: 1079

In average Government primary schools in Victoria provide education to around 320 students (Summary statistics for Victorian Schools in July 2017), individual schools may take up to 1300 students. Even doubling the size of an average school to 640 students 8.5 primary schools would be required to meet the demand.

In average Government secondary schools in Victoria provide education to around 950 students (Summary statistics for Victorian Schools in July 2017). Even applying the size of an average school times 150% to 1425 students almost 3 secondary schools would be required to meet the demand.

The number of schools proposed in the Fishermans Bend Framework are insufficient.

- (2) The provision of community hubs to facilitate a range of community services sharing multi-purpose spaces is strongly supported.

I believe there are at least two major challenges to produce a positive outcome:

- to share in- and outdoor school facilities it requires a sensitive approach to protecting and safeguarding children and
- the built form of the hubs have to provide the same level of identification as public stand-alone buildings have within their community (e.g. local libraries, community centres ). I recommend to avoid providing community services in a mixed use development due to the lack of identification (“just another shopfront”).

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## **5. Affordable housing in jeopardy ( Sustainability goal 3 - Objective 3.5 )**

- (1) "At least 6% of all housing in Fishermans Bend is affordable for low to moderate income households" (p.51, Fishermans Bend Framework).

Objective 3.5 (p.55, Fishermans Bend Framework) describes various strategies to deliver 6% affordable housing.

Applying FAUs - as per Strategy 3.5.2 - is a now quantified tool to create incentives for developers to deliver affordable housing in exchange of additional floor area, another "partnership model between government and industry" (p.55, Fishermans Bend Framework) or a "common planning practise to include an opportunity for a developer to increase yield on their site in exchange for the provision of a defined community benefit" (p.23, Fishermans Bend Urban Design Strategy).

Strategy 3.5.5 "Explore the option to collect 'cash-in-lieu' contributions instead of the provision of affordable housing on-site" is a direct response to the unlikelihood of strategy 3.5.2 as developers are usually unwilling to provide affordable housing on-site due to the perceived negative impact this has on the developments marketability.

Clarification: I assume " 'cash-in-lieu' contributions" refer to FAUs: Cash for off-site affordable housing buys additional floor area ?

I believe Strategy 3.5.5 contradicts Council's goal to aim for an inclusive community. Low and moderate income residents should not be isolated / segregated within Fishermans Bend.

The provision for affordable housing depends on the will / yield of the developers and there is no guarantee affordable housing will be provided and - if so - will mix with other dwellings.

The Sustainability goal 3 of an inclusive community may not be achieved.

## **6. Side-and rear setback requirements are not supporting energy efficient design ( Port-Phillip-GC81-43\_02s30)**

- (1) Port Phillip 43.02, Schedule 30, 2:

Build form requirement regarding Walls on side and rear boundaries: "Walls built on or within 200mm of a side or rear boundary must not exceed 6 storeys and 23 metres."

Built form outcome. "Walls on a side or rear boundary must provide for equitable development of adjacent development sites."

I would like to use an approved and built development in our neighbourhood (St Kilda East, corner Inkerman St and Nelson St) as an example of the impact of only a 3.6m high South boundary wall and minimum setbacks of the upper floors has, blocking access to the Northern sun exposure of the adjoining property. Neither of the developments are six storeys high. But even this example shows a lack of boundary wall height restrictions and appropriate minimum setback will cause substandard living / working conditions in the lower floor levels.

The goal "Low carbon community" will not be achieved if ESD principles are impossible to apply to design energy efficient buildings. I ask for minimum setback requirements on at least South boundary walls adjoining private properties similar to ResCode requirements to provide solar access for best practise building design applying ESD principles.

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## **7. Public amenities provided on private land**

Clarification: What are the private rights left on the title after an FAU deal has been struck, say to the public benefit of an public open space on private land ?