WEST MELBOURNE STRUCTURE PLAN 2018
PLANNING FOR SUSTAINABLE GROWTH IN A DISTINCT NEIGHBOURHOOD
1.1 PLAN STRUCTURE

Planning for West Melbourne

The West Melbourne Structure Plan (the plan) has been developed using a place based approach - identifying five distinct places in West Melbourne, each with its own character and qualities. This approach allows the vision for West Melbourne to be translated into separate visions for each of the five places.

These five places are referred to as Spencer, Flagstaff, Adderley, Station Precinct and Historic Hilltop (see figure 1.1 below).

The study area outlined for the new West Melbourne Structure Plan covers a different area to the 2005 plan which included parts of North Melbourne and West Melbourne. The area classified as the ‘industrial’ part of West Melbourne (west of the railway yards all the way to the Maribyrnong River) is not included in the study area.

The format of the structure plan

Part one: Introduction explores the context of West Melbourne, the drivers of change and the structure plan process.

Part two: The framework details the objectives and actions for the whole of West Melbourne.

Part three: Places applies the framework objectives and actions to the five places identified in West Melbourne.

Part four: Making it happen explains the implementation process that enables the objectives and actions of the plan to be realised.

Figure 1.1: A map of West Melbourne showing the study area and five places identified in the plan.
Well-designed, sustainable development, supported by infrastructure

- New density and built form controls will ensure that development responds to the vision and design objectives for each area (see Objective 1, page 39).
- These new controls will include maximum floor area ratios and preferred maximum building heights to ensure a contextual response and diversity of buildings types (see Objective 1, page 39).
- An established development capacity will give greater certainty for future density and population to determine infrastructure requirements.
- The structure plan supports the 11 metre mandatory height limit in the General Residential Zone area in West Melbourne, following a review by the Victorian Government.
- A six per cent affordable housing target could help deliver around 200 affordable dwellings in West Melbourne (see Objective 8, page 61).

Supporting a mix of uses

- Rezoning of some areas to a Special Use Zone (or equivalent) will help support a genuine mix of uses in West Melbourne (see Objective 4, page 51).
- Minimum employment floorspace requirements are included in the floor area ratio controls to support a greater mix of commercial/retail uses in West Melbourne (see Objective 4, page 51).
- Employment floorspace requirements will help to deliver the projected 10,000 jobs in West Melbourne by 2036.
The benefits of floor area ratio controls in West Melbourne are that they:

- Respond better to the varying characteristics of specific sites in West Melbourne compared to the blanket height controls which have no relationship to the size of a site or existing character.
- Provide a clear and consistent measure to support efficient decision making.
- Ensure that the future development of a site is proportionate to its size.
- Deliver a range of different building typologies, rather than just developing each site to its maximum allowed height.
- Provide greater certainty about the level of population growth to occur in West Melbourne to determine the need for supporting infrastructure such as open space, public transport, services and community facilities.
- Set realistic and clear expectations about the potential development yield on each site.
- Enable flexibility for an architect to design buildings within the built form envelope of the floor area ratio control (and the accompanying built form controls) to better respond to the varied characteristics and context of each site.
- Can support additional benefits to an area, such as new laneways, retention of heritage buildings and additional open space, by allowing flexibility for how the floor area ratio is achieved on each site, without reducing the total amount of development on a site.
- Improve the amenity of streets and spaces in West Melbourne and help ensure they are comfortable, attractive and welcoming places.
- Can be used to set minimum floor areas for non-residential uses to help deliver commercial and retail development and support West Melbourne retaining its mix of uses (see Objective 4 on page 31).

Comparing the floor area ratio controls

Floor area ratios are used in many cities across the world, including in Melbourne's central city, Sydney, Hong Kong, New York and Vancouver. The floor area ratio figure is a balance between promoting a suitable scale of development and adding positively to the amenity and character of an area.

The proposed floor area ratios for West Melbourne range from 3.3 to 6.1. This range will allow a variety of building typologies to be delivered, including mid-rise, perimeter, courtyard and some well-designed towers in appropriate locations.

The proposed floor area ratios are comparable to those in other cities, including Barcelona (an floor area ratio of 2.65:1), New York (a standard floor area ratio of 4.1 in a zoning district comparable to West Melbourne), Vancouver (a base floor area ratio of 3.1 in Downtown South which can increase to 5.1 if greater than 60 per cent of a development is social housing) and Sydney (Green Square, with a floor area ratio range of 2.16-6.55:1).

The floor area ratio's proposed in West Melbourne give a density range of around 150-350 dwellings per hectare, or around 250-500 persons per hectare, which is comparable with Barcelona at around 360 persons per hectare, Manhattan Island in New York at 300-600 persons per hectare and the Transforming Australian Cities report which recommended a density range of 180-400 persons per hectare (Victorian Department of Transport and City of Melbourne, 2009).

Testing the floor area ratio controls

The floor area ratios for Flagstaff, Spencer, Adderley and Station Precinct have been set through an iterative process of commercial and architectural testing and through a review and understanding of density controls in other cities. The proposed floor area ratios for Flagstaff, Spencer, Adderley and Station Precinct are shown in figure 2.5 on page 44.

Independent feasibility testing by SGS Economics and Planning has identified that, based on average land values in the area, development is likely to be feasible using the proposed floor area ratios for each area. Various sensitivity tests were also applied, which involved lowering land values, increasing sale prices and requirements for affordable housing (see Objective 7 on page 87) and development contributions (see Objective 18 on page 80). The modest changes to the findings as a result of the various sensitivity tests suggest the findings of the base feasibility analysis are robust.

Independent built form control testing by Breathe Architecture has identified that the proposed floor area ratio controls, accompanied by the built form controls, help to achieve commercially deliverable, well-designed buildings that achieve the proposed design recommendations.
<table>
<thead>
<tr>
<th>EXISTING CONTROL</th>
<th>PROPOSED floor area ratio* AND HEIGHT CONTROLS</th>
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<tbody>
<tr>
<td></td>
<td>All floor area ratio controls are proposed to be mandatory and all height controls are proposed to be preferred maximum (discretionary) in the planning scheme amendment.</td>
</tr>
<tr>
<td>DDO28 (Station Precinct)</td>
<td>• Maximum building height 5 storeys (preferred maximum)</td>
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<td>• Maximum floor area ratio of 5:1</td>
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<td>• Preferred maximum building height 8 storeys</td>
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<td>New DDO (Spencer)</td>
<td>• Maximum building height 4 storeys (preferred maximum)</td>
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<td></td>
<td>• Maximum floor area ratio of 4:1</td>
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<tr>
<td></td>
<td>• Preferred maximum building height of 10 storeys fronting Dudley Street</td>
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<td></td>
<td>• Preferred maximum building height of 8 storeys fronting Spencer Street and King Street</td>
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<td></td>
<td>• Preferred maximum building height of 6 storeys elsewhere</td>
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<tr>
<td>DDO29 (Adderley)</td>
<td>• Maximum building height 4 storeys (preferred maximum)</td>
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<td>• Maximum floor area ratio of 3:1</td>
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<td>• Preferred maximum building height of 4 storeys</td>
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<td></td>
<td>• Preferred maximum building height of 6 storeys fronting Adderley Street between Hawke Street and Dudley Street</td>
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<tr>
<td>DDO32 (parts of Station Precinct, Adderley and Historic Hilltop)</td>
<td>• Maximum building height 14 metres (mandatory)</td>
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<td>• No change from existing</td>
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<tr>
<td>DDO33 (Flagstaff)</td>
<td>• Maximum building height 40 metres (around 12 storeys) (preferred maximum)</td>
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<td></td>
<td>• Maximum floor area ratio of 6:1</td>
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<td></td>
<td>• Preferred maximum building height 16 storeys</td>
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<td></td>
<td>• Minimum front, side and rear setbacks above podiums of 6 metres (mandatory)</td>
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<tr>
<td>DDO31/34 (parts of Historic Hilltop)</td>
<td>• Maximum building height 10.5 metres (mandatory)</td>
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<td></td>
<td>• No change from existing</td>
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<tr>
<td>General Residential Zone (parts of Historic Hilltop and Adderley)</td>
<td>• Maximum building height 11 metres (mandatory)**</td>
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<td></td>
<td>• No change from existing</td>
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* Floor area ratio means the gross floor area above ground of all buildings on a site, including all enclosed areas, services, lifts, car stackers and covered balconies, divided by the site area. Voids associated with lifts, car stackers and similar service elements should be considered as multiple floors of the same height as adjacent floors or 3.0 metres if there is no adjacent floor. Gross Floor Area is 'The total floor area of a building, measured from the outside of external walls' as defined as a General Term in the planning scheme. The floor area ratio control in Spencer, Flagstaff, Adderley and Station Precinct includes a specific requirement for a proportion of development for retail/commercial uses (see Objective 4 on page 51).

** The maximum building height in the General Residential Zone was introduced by the Victorian Government when the reformed residential zones were introduced to the Victoria Planning Provisions and all planning schemes by Amendment VCT30 on 27 March 2017.

Figure 2.5: Proposed changes to the Design and Development Overlays in West Melbourne.
The loss of activities to alternative locations (or their loss entirely) could damage Melbourne’s competitiveness and productivity and impact West Melbourne’s local vitality.

Why is this proposed?

The Mixed Use Zone (MU2), which currently applies to a significant part of West Melbourne, is failing to deliver a genuine mix of uses and has largely accommodated residential development.

The growth of employment in the inner city, along with broader forces of gentrification, has also meant that West Melbourne’s profile as an amenable inner city residential location has grown. The neighbourhood is close to a number of metropolitan scale assets, including major hospitals, universities, public transport and retail and hospitality clusters. This has generated increasing pressure for conversion of commercial areas in to residential.

The uniqueness of the location means that the current mix of floor space and character provide unique conditions for employment uses that might not otherwise locate in the central city region.

The significantly higher sale or rental price available to developers for residential developments compared to commercial is a challenge in inner city renewal locations such as West Melbourne, with residential developments ‘pricing out’ employment and economic uses. Residential uses provide the highest financial return in the current market.

This has been reflected in a 25 per cent decrease in job numbers in West Melbourne over the past 10 years. A range of jobs, including warehousing, manufacturing and logistics industries and finance and insurance jobs have moved out of the area and have been replaced with residential development.

The conversion of large floor plate commercial activity to residential development, and in particular the subdivision of lots on strata title, results in a fragmentation of ownership which is very difficult to reverse. This means that once a site has transitioned to residential it is very unlikely to revert to other uses, and in effect the opportunity for future changes of use has been lost.

While the application of the mixed use zone was intended to support a genuine mix of uses, there is now a significant risk in losing employment activity from West Melbourne and not being able to deliver the required employment floorspace and job growth in West Melbourne if it remains with its current zoning.

It is proposed to use the Special Use Zone (or an equivalent) as it is considered that there is no appropriate combination of other currently available planning zones, overlays and local policies to give effect to the desired objective to support mixed use development to facilitate a range of business and employment opportunities within this specific location.

Helping to attract businesses in West Melbourne

Additions to local policy referring to West Melbourne’s economic role and advocacy programs to encourage the retention of existing building stock (see Objective 3) can also help support small creative, innovative and entrepreneurial businesses through the retention of lower rent spaces and a diversity of floor spaces and types.

Issues about limited accessibility to retail and hospitality services, currently reinforced by the absence of a main street environment, and concerns about access to active transport infrastructure were raised by a number of businesses and stakeholders in West Melbourne. Other objectives and actions in the structure plan, such as street greening and developing a high street environment and local centre along Spencer Street will help improve the overall amenity of West Melbourne and thereby the attractiveness of the precinct to a range of businesses.

### ACTIONS

#### DELIVER

**Included in Action 1:** Rezone some Mixed Use Zone areas to a Special Use Zone to deliver a true mix of uses (see figure 2.11).

**Included in Action 1:** Require a proportion of the proposed floor area ratio to be allocated to a non-residential (commercial and retail) use,

- A floor area ratio of 1.1 in Spencer, Station Precinct and Flagstaff,
- A floor area ratio of 0.5 in Adderley.

#### PARTNER

**Action 10:** Help to connect small cultural and creative organisations and businesses to potential development sites.
Objective 7: Help deliver affordable housing in West Melbourne

Affordable housing is required in West Melbourne to help provide housing for low and moderate income households within close proximity to transport and wide range of jobs.

The Victorian Government seeks to strengthen the role of planning in delivering affordable housing with its release of Plan Melbourne 2017-2050 and Homes for Victorians.

Plan Melbourne strives to strengthen the role of planning to facilitate and deliver the supply of social and affordable housing (Policy 2.3.3) and to facilitate an increased percentage of new housing in established areas to create a city of 20 minute neighbourhoods close to existing services, jobs and public transport (Policy 2.1.2).

The Homes for Victorians strategy strengthens the Victorian Government's position by stipulating various initiatives and budget commitments to address affordable housing.

In June 2017, the Minister for Planning introduced the Planning and Building Legislation Amendment (Affordable Housing and Other Matters) Bill (the Bill) to the Victorian Parliament making amendments to the Planning and Environment Act 1987 (the Act) with the stated intention of facilitating affordable housing supply. The reforms will come into operation on 1 June 2018. These changes are intended to give developers, the community and local councils certainty about how a voluntary contributions scheme will be applied to support the development of land for affordable housing.

According to the 2011 Census, 10 per cent of all Victorian households are in one of the following categories:

- Various forms of homelessness
- On low incomes and in serious rental stress
- Living in social housing,

Typically, subsidised rents for eligible households (as defined by each housing provider) are calculated to not exceed 30 per cent of gross income or 75 per cent of market rent (Housing Registrar, Information Sheet, May 2017).

In the City of Melbourne, supply alone is not delivering the desired housing mix and social diversity in our communities. There is a need to facilitate the provision of affordable housing.

To increase the number of affordable housing units in the municipality, our Housing Strategy sets a goal to 'help provide at least 1721 affordable homes (subsidised) for low and moderate income earners by 2021'.

Why is this proposed?

West Melbourne's proximity to universities, the medical precinct, markets, retail and entertainment centres, tourism, and arts and cultural activities make it an ideal location for people who work in these industries on low to moderate incomes to live. Affordable housing an important component to support these types of jobs.

As well as its location, West Melbourne's established community services, access to transport and existing job opportunities make it an ideal location for affordable housing. Similar cities all over the world, including Sydney, Vancouver and London, have similar, but often stronger, planning requirements for affordable housing.

Feasibility analysis has determined that 6 per cent of the residential component of new developments can be delivered for affordable housing in Flagstaff, Spencer and Station Precinct (Economics and Employment Study Part 2, SGS Economics and Planning, 2017).

The affordable housing delivered in West Melbourne should be provided in perpetuity with the assets transferred at no cost to a Registered Affordable Housing Association or provider and secured by a Section 173 Agreement.

The feasibility of providing affordable housing increases further when testing with a 10 per cent increase in sales revenues when compared to today's figures. This is considered likely over the lifetime of the structure plan given that objectives will improve the quality of streets and spaces in West Melbourne, and therefore add value to developments. This is acknowledged in the report which states:

'Should potential revenues from new development increase over the next 10-15 years, development feasibility across the precinct will improve'.


This objective to help deliver affordable housing would provide around 200 affordable homes and contribute to Goal 1 in the City of Melbourne's Housing Strategy.
If, after considering the current market conditions and a site's particular characteristics, concerns exist about the viability of providing affordable housing, applicants will need to prove why the affordable housing is unable to be delivered. This could consist of a more rigorous 'open book' approach to demonstrate their concerns and/or submit a detailed viability report (which could be analysed by an independent third party at the cost of the applicant) to show that providing affordable housing is not viable for a particular site.

The role of community housing providers in taking on and managing this housing is crucial to the success of delivering affordable housing in West Melbourne. The City of Melbourne can play a lead role in facilitating partnerships between developers and housing providers to help support the delivery of appropriate, well-designed affordable housing.

**Actions**

**Deliver**

*Included in Action 1: Applic...* (full text truncated)

**Partner**

*Action 13: Facilitate and strengthen the partnership between community housing providers and the development industry.*

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**An example of delivering inner city affordable housing**

A mix of private and affordable housing is provided in this 59 unit development in Gipps Street, Abbotsford on the site of a boot factory. The development won the Best Affordable Development award in 2013 by the Urban Development Institute of Australia and provides a model for similar scale and mixed tenure housing in West Melbourne, close to a range of jobs including key workers in medical profession.

*Image: 205 Gipps Street, Abbotsford © Emma Cross photographer*
West Melbourne Structure Plan
Design Review Report – 18 October 2017

On the 18th 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.
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 un inventive 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
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
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.
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
Principal Adviser, Urban Design and Architecture
Office of the Victorian Government Architect