



PO Box 1195 South Melbourne VIC 3205

Phone: 03 9028 2774

ABN 58 986 783 321 Cert. of Inc. A0036364B

info@southbankresidents.com.au

www.southbankresidents.com.au

10 August 2018

Melbourne Planning Scheme Amendment C308 Submission

It is with pleasure that we make this submission on behalf of our individual members and member buildings of the **Southbank Owners Corporation Network (SOCN)** which is a part of the Southbank Residents Association (SRA) membership.

Member buildings who are represented by this submission are listed below, 21 buildings representing some 6823 lots or roughly 13,000 residents:

Mainpoint (350 Lots) – 241 City Rd, Southbank
The Sentinel (277 Lots) – 88 Kavanagh St, Southbank
Yarra Condos (143 Lots) – 38 Kavanagh St, Southbank
The Guild (317 Lots)– 152 Sturt St, Southbank
Southpoint (185 Lots) – 22 Kavanagh St, Southbank
Freshwater Place (532 Lots) – 1 Freshwater Place
WRAP Apartments (309 Lots) – 135 City Rd, Southbank
Gallery Tower (178 Lots) – 33 City Rd, Southbank
Southside Tower (148 Lots) – 221 Sturt St, Southbank
Habitat Apartments (150 Lots) – 58 Clarke St, Southbank
The Summit (200 Lots) – 163 City Rd, Southbank
Southbank Royale (147 Lots) – 102 Wells Street, Southbank
The Bank Apartments (906 Lots) – 269 City Road, Southbank
Southbank Condos (187 Lots) – 88 Southbank Boulevard, Southbank
City and Melbourne Towers (633 Lots) – 171-185 City Road, Southbank
Prima Tower (1294 Lots) – 35 Queensbridge Street, Southbank
Southside Gardens (92 Lots) – 106 Southbank Boulevard, Southbank
Vue Grande (323 Lots) – 63 Whiteman Street, Southbank
Centurion (191 Lots) – 83 Whiteman Street, Southbank
Victoria Tower (261 Lots) – 100 Kavanagh Street, Southbank

Background

SRA commends the City of Melbourne for engaging with the Minister for the Department of Environment, Land, Water and Planning (DELWP) and taking the initiative to review the urban design of Southbank and the central city through the proposed C308 Amendment to the Melbourne Planning



Scheme. In the past 5-10 years, developments in Southbank have had little respect for the impact of poor design on streetscapes and residential amenity and we hope this Amendment will see a vast change and improvement to urban planning.

SRA whole-heartedly sees the benefit such an Amendment can make in our neighbourhood to the extent that we engaged the services of professional planning consultant, Rob Milner, from 10 Consulting Group, who also advised us on Amendment C270. SRA held a community forum to hear from Mr Milner the positives and negatives of the proposed Amendment to help shape our perspective. We see this submission as an opportunity to influence the future design and get some control back into our planning to provide for the current and future residents of Southbank.

Our community forum was well received, and the attached report is the outcome of that which is endorsed by SRA as our views.

We believe that C308 will certainly provide an improvement to the current outcomes in Southbank.

SRA wishes to further support the panel process by presenting in that forum. In the meantime, please refer to the attached report from our consultant and accept this as our collective community view.

Kind Regards

A handwritten signature in black ink, appearing to read "Tony Penna", with a long horizontal stroke extending to the right.

Tony Penna
President
Southbank Residents Association

Advice

Prepared for:	Southbank Residents Association
Prepared By:	Robert Milner
Date:	10 th August 2018
Subject:	Amendment C308 Melbourne Planning Scheme

Purpose

This advice addresses the merits of Amendment C308 to the *Melbourne Planning Scheme* as it might impact of the interests the Southbank Residents Association.

Subject to the following considerations it is recommended that the Association should endorse the Amendment as a necessary and important initiative by Council to ensure that the urban structure and built form of Southbank and the larger CAD are progressively enhanced in a manner that protects and enhances the liveability of the central city.

The amendment has been considered in the context of the outcomes of Amendment C270 and the following commentary has regard to the relationship between the different controls.

Integrated review of design and development controls

The Design and Development Overlay is an appropriate tool to give effect to the proposed design guidelines and it is acknowledged that the new provisions replace the existing 1st schedule to the DDO.

However there is a growing need to more effectively integrate and rationalise all the Design and Development Overlays that apply to the Special Character and General Development Areas so the built form provisions in the two areas are read as a complete, integrated and holistic statement.

The need for such an outcome is made particularly stark when the proposed *Building Mass* considerations of DDO1 are read in conjunction with the built form provisions addressing height and setbacks in DDO2 and DDO10.

The provisions of the three DDOs all address the same subject (built form), from a different perspective. Read in isolation, aspects of DDO1 addressing building mass, appear too generalised, until regard is given to the greater prescription of DDO2 and DDO10.

It is accepted that such a restructure and rewrite exceeds the scope of the current amendment but the Association should ask that Council commit to such as a further improvement, as a matter of priority.

Generality

While acknowledging that the *Central Melbourne Design Guide* provides some examples of desirable and inappropriate practice there is concern that some sections of the guidelines, for instance the *Design Requirements* addressing *Building Mass*, are too generalised.

In the hands of good designers the outcomes could be acceptable but there is such scope for interpretation in the generalised language that it will prove difficult to be clear and consistent when acceptable or high quality outcomes have been achieved.

It is recommended that either more precise requirements be advanced in the DDO or more fulsome guidelines be provided in the Design Guide.

Urban structure

The design outcomes sought by Table 1: *Urban structure* - are to be commended, but concern is held for their fair, orderly and equitable delivery.

The extent of redevelopment in Southbank is such that some important opportunities to secure a mid block connection have already been lost by recent redevelopments.

In essence the *Design Requirements* seek to secure new midblock connections at approximately 70 metre centres that are 6 metres wide, open to the sky and lined by active frontages. As relevant they should extend any proximate existing lane or connection.

The public benefits that might attract a floor area uplift, as a result of C270 and which are detailed in the publication *How to calculate floor area and public benefits* include open areas and laneways, that do not meet the specification of proposed DDO1.

It is necessary to establish whether the design requirements of DDO1 will attract floor area uplifts and that the specification for the uplift, as detailed in DDO1, is included in the above publication replacing the more generalised requirement.

Because there is no agreed urban design framework indicating the preferred location for specific mid block connections there is a potential for compromised and haphazard outcomes.

The ability to secure the mid block connections will be driven by the market and the location, order and timing within which land is brought forward for potential redevelopment.

In some cases the securing of the desired link may be frustrated because the land is not brought forward for development.

Alternatively a midblock link may be secured on a piece of land only for that approval not to proceed. In the meantime the requirement to secure that link on adjoining land might be omitted because the parties believed it would be secured on the neighbouring land.

As a consequence no connection may be secured or alternatively multiple connections are secured on adjoining land in the hope that one project will proceed.

There is a concern that the theory underpinning the *Requirement* may not be effectively delivered in practice.

The planning outcome would be better served by specifying where the important links should be located. Securing that connection by development contributions from all development in Southbank might provide better equitability and assurance about the outcome.

Building program and sleeving

The theoretical basis and design outcome intended by the mandatory requirements to sleeve upper level car parking by active uses is endorsed.

This outcome may be achievable upon larger sites, with generous dimensions but larger sites with suitable dimensions is not an assured outcome in Southbank.

Before this mandatory provision is included in the planning scheme the Association should be assured the Planning Authority that the desired outcome has been modelled on a number of different sites and found to be a realistic and practical requirement.

Design quality

While accepting that some larger site redevelopments have resulted in unimaginative architecture, a number of smaller redevelopment sites have tended to replicate similar floor plates and presentations.

This leads to questioning the appropriateness of requiring multiple architectural firms be employed to achieve diversity of forms and typologies on larger sites. There are examples where diverse architectural practices have worked together to deliver excellence, but it is not assured. The planning controls should emphasise the preferred outcome rather than also dictate the methodology for its delivery.