



***Town and Country Planning Association
Incorporated***

Box 312, Collins Street West P.O., Melbourne 8007
Registration no. A0031095J
<http://www.tcpa.org.au/>

To: City of Melbourne

**Re: Town & Country Planning Association Inc. submission to the
*Draft Macaulay Structure Plan Refresh 2020 (July 2020)***

The Town and Country Planning Association (TCPA) advocates integrated planning of land use and transport for ecological sustainability and a healthy living environment. The T CPA is a non-profit public organisation, established in Victoria in 1914, and is independent of any party political organisation.

Please find on the following pages the T CPA's public submission in response to the ***Draft Macaulay Structure Plan Refresh 2020 (July 2020)***.

In preparing this submission, the T CPA has considered proposals and provisions in:

- *Draft Macaulay Structure Plan Refresh 2020 (July 2020)*
- *Outcomes for Macaulay: A Discussion Paper to Inform a Refreshed Structure Plan (November 2019)*
- *Arden Macaulay Structure Plan 2012*
- *Melbourne Planning Scheme*, in particular the provisions of the Planning Policy Framework and the Local Planning Policy Framework

The T CPA notes that the Council proposes to prepare a number of planning scheme amendments once the structure plan is finalised. The T CPA would anticipate participating in public consultation processes and making submissions to those amendments.

Yours faithfully

Peter Hill,
Honorary Secretary, T CPA

15 September 2020

Part One: Introduction

1.2 Vision and Key Moves

Vision

TCPA supports the overall Vision for Macaulay.

Key moves

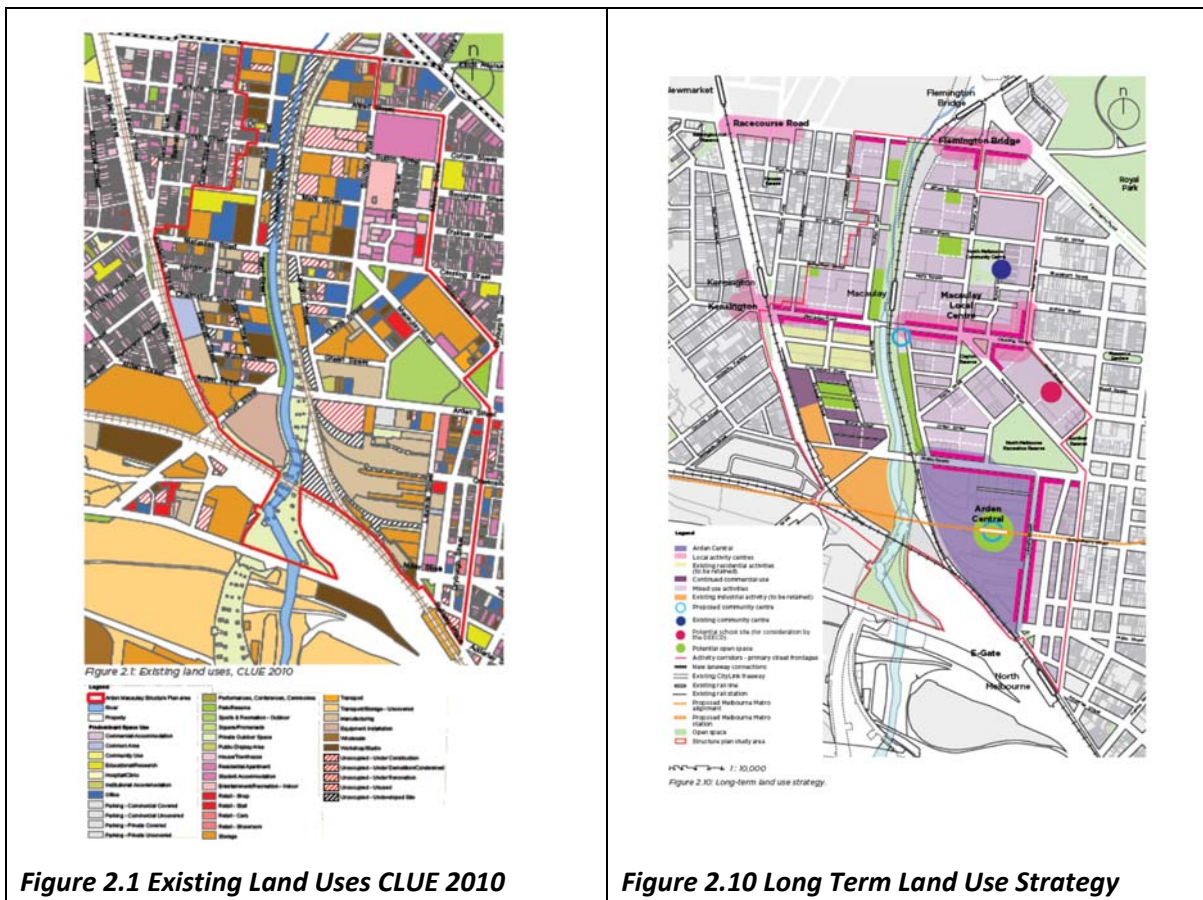
TCPA generally supports the key moves listed, **however there is a significant gap** which T CPA considers needs to be urgently addressed– a long term land use strategy

A new bullet point should be introduced as the leading point under “Key moves”, namely:

- *Provide a long term land use strategy for Macaulay to give context for the development of the four precincts and Macaulay’s connections to adjoining communities.*

While Map 4 on Page 9 proposes seven “key features” for Macaulay, their representation is too vague and does not relate to similar features in adjoining communities or proposed in Arden.

The **Arden Macaulay Structure Plan 2012** contains detail of existing land use patterns (2010) and a long term land use strategy. *Figure 2.1 Existing Land Uses CLUE 2010* (page 22) and *Figure 2.10 Long Term Land Use Strategy* (page 35) below refer.





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The TCPA is concerned that there is not an equivalent discussion of an overall land use strategy in Parts One and Two of the *Draft Macaulay Structure Plan*.

Is it intended that the Council decision processes would rely on a land use strategy that is in a completely different document? If this were the case, it would be a highly risky approach as well as one that would not be easily comprehended by community in general – residents or potential developers.

TCPA considers that:

- A land use strategy should be carried forward (with or without modification) into the Draft Macaulay Structure Plan.
- The status of the *Arden Macaulay Structure Plan 2012* urgently needs to be clarified – certainly by the time of any Planning Scheme Amendment



Part Two: The Framework

GAP: LONG TERM LAND USE STRATEGY

This new section is required to provide the link between a long term land use strategy for Macaulay and the greater detail that should be included for each precinct. It should address objectives for land use and the application of zones and TCPA would suggest provisions for development plans for each precinct via either an Incorporated Plan Overlay (preferred) or a Development Plan Overlay.

- **Incorporated Plan Overlay** can be useful where some form of plan is required to specify requirements over the development of an area and it is necessary for the plan to be incorporated in to the planning scheme.
- **Development Plan Overlay** is useful where some form of plan is required to specify requirements over the development of an area and it is not necessary for the plan to be incorporated in the planning scheme.

2.1 DENSITY AND BUILT FORM

Objective 1 – New density and built form controls will ensure that development is responsive to local context and character.

The TCPA generally support these proposals.

The design recommendation “To provide for fine grain adaptable tenancies within the lower levels of buildings” is very important, as commercial businesses’ floor space requirements can change much over time, corresponding to change trends in commercial and other activities over time. Buildings should be capable of being repurposed for different types of businesses or even changing between residential and commercial uses. Internal walls that can be removed or shifted with relatively little disruption and no change or disruption to the “load” structures would be beneficial for repurposing of uses.

Objective 2 – Ensure high quality building design in flood prone areas.

TCPA considers that this objective needs to be expanded to respond to issues raised in the related text. Perhaps something along these lines:

- Ensure high quality building design in flood prone areas ***that responds to impacts of extreme weather events in the Moonee Ponds Creek catchment and that provides safe access and egress to the Macaulay precincts and developments at all times.***

Objective 3 – Improve the climate change adaptation and mitigation performance of new and existing buildings.

The TCPA considers that the planning design strategy should recognise the different levels of resilience and sustainability opportunities at each site, and maximise opportunities for climate change adaptation and mitigation. For example:

- compare thermal effectiveness of rooftop “greening” and use of solar light reflective materials; and using urban green space for air-cleaning at each site. The use of “green walls” on multistorey buildings can reduce the heat radiation from the building (see [Central Park Sydney](#)); or
- promote thermal efficiency using the internationally accepted [Green Star Rating System](#)



There is a potential conflict emerging between the goal of minimising urban heat island impacts by “greening” of roofs, and the goal of maximising use of renewable energy (solar) harvested as electricity, space heating (hydroponics) and in potable water heating.

Solar photovoltaic (PV) panels require maximum roof areas with unrestricted direct-line access from the northern half of the sky, without overshadowing. Solar PV panels are also highly absorptive of solar radiation, thus heat capture. Typically, more than 80% of the insolation received by PV panels is converted to free heat, with less than 20% converted to electricity. The free heat must be removed by air cooling, otherwise the electrical efficiency will fall with increased PV temperature. NREL data shows that current PV research has yielded solar PV helio-electrical efficiencies as high as 45% (ref: Wikipedia)

Objective 4 – Recognise and celebrate the valued history, cultural values and character of Macaulay.

TCPA supports this objective.

Objective 5 – Ensure design excellence is achieved for key strategic sites in Macaulay.

TCPA supports this objective.

To further emphasise the need for excellence, the statement “Design excellence ensures that buildings on key strategic sites in Macaulay demonstrate an exceptional standard of innovation and creativity” should be extended to read:

- “Design excellence ensures that buildings on key strategic sites in Macaulay demonstrate an exceptional standard of innovation and creativity **while maintaining excellence in building and site functionality**”.

2.2 ACTIVITIES AND USES

Objective 6 – Support mixed use development to facilitate a range of business and employment opportunities.

TCPA generally supports this objective.

TCPA comment referring to design recommendations (Objective 1) is also relevant here, as commercial businesses’ floor space requirements can change much over time, corresponding to change trends in commercial and other activities over time. Buildings should be capable of being repurposed for different types of businesses or even changing between residential and commercial uses. Internal walls that can be removed or shifted with relatively little disruption and no change or disruption to the “load” structures would be beneficial for repurposing of uses.

Can the requirement for adaptable structural design be broadened, especially if the stated aim is building longevity of 100 years?

The proposed use of a Special Use Zone is not generally supported by the TCPA as it lacks the general transparency of other zones. It does not give the public a real sense of the residential character with some business uses of the precincts. See further comments for each precinct.



Objective 7 – Strengthen existing local activity centres in Macaulay.

The Structure Plan needs to consider the opportunities from and benefits of its proposals for adjoining areas to the west. It is one thing to consider links to the CBD, Parkville NEIC and local activity centres within the precinct, but this should be in the context of other local activity centres particularly centres on the west side of Kensington Railway Station and along Racecourse Road.

TCPA would like to see land set aside in Boundary Precinct to create a town square, fronted by shops at ground level with residences above, suitable for holding a small market, and for outdoor dining.

Objective 8 – Ensure adequate provision and good access to community infrastructure within and around Macaulay.

TCPA is concerned that there is no mention of provision for children's playgrounds, other than in the Buncle Street Reserve. These should be integrated with housing areas.

There is no mention of skate parks. A skate park could be constructed beneath Citylink (ideally in conjunction with a pedestrian crossing of the Upfield railway line).

Could land be set aside for community gardens, (for growing food) in addition to the Buncle Street garden?

Above comments are also relevant to Objective 13.

Objective 9 – Help deliver affordable and diverse housing in Macaulay.

TCPA proposes that some residential land be set aside for sale to “self-build” groups to build affordable housing by a collaborative development model (see this [Property Collectives](#) link for examples of such developments, including two in North and West Melbourne).

This would result in a high standard of housing at an affordable price, without subsidy. “

- Arms-length” developers are not involved.
- Collaborative building involves the buyers in the design, specification and location of the development: similar to co-housing, but with less commitment to shared facilities and social living.

Proposals for facilitating the construction of housing for rent (social housing) should also allow for development of share-housing for tenancies (i.e. unrelated persons or households).

2.3 MOVEMENT AND ACCESS

Objective 10 – Prioritise active transport by designing streets that are safe and accessible for people walking and riding bikes.

TCPA generally support this objective, but notes that:

- For safety and attractiveness to users, cycling and walking paths should be physically separate from each other. What we are saying is that the streets should be safe enough for cyclists to ride on the road and for pedestrians to walk on the footpaths. The only exception would be that very young children should be allowed to ride on the footpath until they are competent cyclists. This is most easily implemented by having low speed limits.

Possible “safe” separated sharing of the same Active Transport Corridor Space beside the Moonee Moonee Ponds



Landscaping the Active Transport Corridor Space beside the Moonee Moonee Ponds

- Wind impact diagrams are rarely included in redevelopment or renewal projects in Melbourne. The proposed predominantly north-south street orientation in Macaulay coincides almost exactly with predominant wind patterns for Melbourne. This can create wind tunnel effects and building-generated wind turbulence that reduces comfort for pedestrians and cyclists moving around the precinct. New streets and laneways in Macaulay should be oriented and landscaped to mitigate against these effects. The Bureau of Meteorology publishes wind roses for locations around Australia. Annual and seasonal wind roses for 9:00am and 3:00pm are available at: http://www.bom.gov.au/climate/averages/wind/selection_map.shtml

Objective 11 – Advocate for, and help deliver, public transport that meets the needs of the Macaulay population.

TCPA supports this objective.

Objective 12 – Improve car parking requirements to support a less car dependent transport system.

TCPA generally supports this objective, but would recommend research be undertaken into the prospective changes in travel patterns, both by car and by public transport, and also in parking demand patterns, that would result from the widespread use of autonomous vehicles, say, in a decade from now. This could be both a longer term risk and also beneficial opportunity to better allocate public and road space.



2.4 STREETS AND SPACES

Objective 13 – Create a network of high quality open spaces in Macaulay

TCPA supports this objective. Refer also to TCPA commentary for Objective 8.

TCPA urges the Council to take inspiration from cities globally, particularly Venice, Amsterdam and Copenhagen. All three have a presence of water and a predominance of walking and cycling.

- Pedestrian lane-ways, small and large public spaces (Venice);
- Bicycle infrastructure (Amsterdam and Copenhagen);
- Pedestrian shopping streets (Copenhagen); and
- Canal-front properties (all three).

A suggestion is for a pedestrian spine running from Racecourse Road to Arden station, intersecting a town square (as previously proposed under Objective 7) in the Boundary precinct.

- No vehicles other than emergency vehicles would be allowed in the square.
- The spine would make use of the proposed new north-south streets, staggered at intersecting east-west streets in the manner of Degraives St and Centre Place/Centreway Arcade at Flinders Lane, so that each spine segment is closed visually by a building in the crossing street (e.g. Majorca building in Flinders Lane opposite Degraives Street).
- Height limit of four storeys for buildings abutting pedestrian spine.
- Bicycles and vehicular traffic on parallel roads behind buildings on either side of pedestrian spine.

The proposed square could be the location for public facilities such as library, meeting hall and cinema.

Objective 14 – Create high quality green streets including a network of new streets on larger land holdings.

TCPA supports this objective. Refer also to TCPA commentary for Objective 15

Objective 15 – Ensure Integrated Water Management is incorporated into Macaulay to support a resilient and liveable neighbourhood.

TCPA supports this objective.

Consider two physical modes of rainwater sourcing and transfer to beneficial uses.

- Rainwater from building roofs is typically much less contaminated than rainwater flowing from public pavements. Thus, consider planning rules and development of drainage infrastructure that would harvest rainwater from buildings, allowing direct:
 - flow into underground tanks within property land lots, then into storage caverns or ornamental ponds, from which it can be used for irrigation and street cleaning, etc., and the excess water would flow into existing natural waterways; and/or
 - use for watering a rooftop garden, vertical green wall or ground-level garden beds within the property.

These initiatives would contribute to mitigation of flooding of Moonee Ponds Creek.

- The second rainwater source could be road and pathway runoffs, which could be used for street cleaning or irrigation of public lands, depending on its levels of contamination.

Objective 16 – Enhance the Moonee Ponds Creek to become a thriving corridor that connects the community.

TCPA supports this objective.



Part Three: Places

COMMENTS APPLYING TO ALL PRECINCTS

The vision for the precincts

TCPA supports the vision statements for each precinct. However, the statements need to be complemented by a land use plan for each precinct that can inform the adoption of the various zones and overlays applied, noting that T CPA is not supportive of the use of a Special Use Zone.

Density and built form

TCPA supports the density and built form statements for each precinct.

However, the structure plan needs to ensure building design does not create building generated wind turbulence effects

Activities and Uses

TCPA supports in part the activities and uses statements for each precinct. However, there seems to be no justification for using a Special Use Zone versus retaining the existing zones with appropriate overlays. (See also previous comment regarding the need for an overall land use strategy)

Movement and access

TCPA supports the movement and access statements for each precinct. However, the structure plan needs to address street orientation to avoid creating wind tunnel effects in north south streets, particularly important for walking and cycling.

Streets and Spaces

TCPA supports the streets and spaces statements for each precinct. However, the structure plan needs to address street orientation to avoid creating wind tunnel effects in north south streets

PARTICULAR PRECINCT COMMENTS

3.1 – Boundary Precinct

No additional comments

3.2 – Melrose Precinct

Activities and Uses

Need to clarify whether there is any intention by the Victorian Government to relocate the Public Records Office to another metropolitan or regional Victoria location.

3.3 – Chelmsford Precinct

No additional comments

3.4 – Stubbs Precinct

No additional comments



Part Four: Making It Happen

4.1 THE STATUTORY FRAMEWORK

State and Regional Planning Policy

In recognition of the need to integrate land use and transport planning, *Clause 18 Transport* of the Planning Policy Framework should be included as directly relevant to Macaulay.

4.2 INFRASTRUCTURE PLANNING

No comment from TCPA

4.3 ENSURING GOOD DESIGN

Achieving high quality design

In recognition of the need to integrate land use and transport planning, include specific mention of infrastructure and transport engineers and planners, along with the other architecture and planning professionals already listed.

4.4 IMPLEMENTING THE ACTIONS

Planning Scheme Amendment

Of the 72 actions, 16 relate to amendments to the Melbourne Planning Scheme, 12 of which are listed as “Short Term” for the next three years. The Council needs to arrive at and publish a staging and content of those amendments. If all elements are attempted to be included in only one amendment, there is a risk that the structure plan may not be implemented. It is noted that the Arden Macaulay Structure Plan (2012) has never been implemented in the Planning Scheme.