

SUBMISSION TO:

INQUIRY INTO PUBLIC HOUSING RENEWAL PROGRAM

By the Legal and Social Issues Committee

ATTACHMENT

COMMUNITY ENGAGEMENT / CONSULTATION PROCESS

- The DHHS Public Housing Renewal Program (PHRP) ‘consultation’ process was seriously flawed.
- Both of the June community / neighbourhood sessions were held at times which made attendance for working people difficult, if not impossible.
- The June session that I attended at the Elsternwick primary school was shambolic. Meaningful participation was discouraged and obstructed, as DHHS officers were unable to answer questions or gave contradictory information and note-taking was sporadic, with attendees repeatedly needing to request to have their comments recorded. The resulting DHHS report on the New Street ‘consultations’ is therefore demonstrably selective and incomplete.
- Consecutive sessions held in September and publicised as ‘further consultation sessions’ operated in fact, as information-giving “drop-in” sessions, at which no interactive consultation with community members or affected stakeholders took place. Two of the three sessions were held far from the estate, making attendance by tenants and affected community members difficult. Information provided at these sessions was at best, misleading and at worst, deceptive, with DHHS displaying photographs of buildings and canals in Copenhagen, claiming that the images were indicative of the touted New Street re-development!
- I have spoken with a number of public housing tenants on the New Street public housing estate, who have expressed both confusion and nervousness about the plans for the New Street development, as well as their reticence to make any submission to the Standing Advisory Committee, for fear of retribution if they voice any complaint. As DHHS has done nothing to acknowledge tenants’ fears or to reassure them and has not put in place a process which would facilitate their input to the submission process, the current process could be construed as administratively flawed.

URBAN CONTEXT

- According to SCHEDULE 3 TO CLAUSE 43.04 DEVELOPMENT PLAN OVERLAY Development Plan Requirements, the development must seek to achieve the following objective:

“To integrate with the surrounding area by responding to existing or preferred neighbourhood character, enhancing the public realm and existing networks and delivering ‘good neighbour’ outcomes”.

However, in terms of proposed building heights, the planned development is completely out of step with the existing, low-rise residential character of the neighbourhood. The proposal would more than double the height of the existing New Street public housing units and over-ride local planning schemes and height limits. The design of the proposed development does not complement the surrounding neighbourhood character, which is family-oriented and low-rise residential.

- Principles of good urban design require population density to be highest in areas where services are easily accessed. The New Street site is NOT an Activity Centre and aside from the nearby primary school, offers no services in the immediate vicinity.
- According to SCHEDULE 3 TO CLAUSE 43.04 DEVELOPMENT PLAN OVERLAY Development Plan Requirements, the development must seek to achieve the following objective:

“To foster social connections between residents and the wider community.”

However, the Public Housing Renewal Program as it stands, clearly suffers from a DHHS cookie-cutter approach which fails to consider and respect site-specific communities and conditions. For example, at the New Street site, the proposed interface with neighbouring properties ignores and disrupts the existing, productive relationships, social connections and networks which have been developed over decades, between long-term New Street public housing tenants and neighbouring residents. The proposed site design secludes tenants from their immediate neighbourhood and community, interrupting the established, informal opportunities for personal interactions that occur daily at street-level. More than doubling the density on-site will also negatively impact upon negotiated space, noise and privacy considerations.

- In essence, the proposed zoning is out of character with the existing and preferred character of the neighbourhood. The proposed ‘mixed use’ zone is incompatible with the adjoining residential zone, with limits on the size and number of commercial outlets remaining unspecified in DHHS documentation provided.

IMPACT ON NEIGHBOURHOOD AMENITY: LOSS OF PRIVACY, NOISE POLLUTION, OVER-SHADOWING, LACK OF SAFETY

According to SCHEDULE 3 TO CLAUSE 43.04 DEVELOPMENT PLAN OVERLAY Development Plan Requirements, the development must seek to achieve the following objectives:

“To provide high levels of residential amenity and liveability.”

and

“To create safe buildings and spaces throughout the site.”

However, the proposed interface treatments will – particularly along the north-east facing boundary with neighbouring properties (including my own) – negatively impact upon public amenity by facilitating significant over-looking, surveillance and over-shadowing of neighbouring properties as well as creating unsafe spaces which pose a potential threat to neighbouring homes.

- My home abutts the public housing site at Salisbury Street and my privacy will be severely and unacceptably compromised, if the nine storey tower block proposed to be built at the end of Salisbury Street and so overlooking my property, were to go ahead.
- Additional lighting, noise pollution and disturbance resulting from significantly increasing density on the site, will detrimentally effect neighbouring properties, including my own.
- The DHHS equinox diagrams and the information provided at DHHS ‘drop-in’ sessions, are selective and misleading for stakeholders, as they fail to illustrate the significant over-shadowing of properties to the east (e.g. Salisbury, Airlie, Ebdon, Rusden Streets) and west (Murphy Street and beyond) of the development that will result from the six, eight and nine storey building proposal. I particularly object to the overshadowing that will occur to my property from 3pm.
- The narrow, three metre set-back that is proposed between the public housing development and my property will create a ‘blind’ alley, which poses an unacceptable risk to the security of my property and to my personal safety.

EFFECTS ON OPEN SPACE

According to SCHEDULE 3 TO CLAUSE 43.04 DEVELOPMENT PLAN OVERLAY Development Plan Requirements, the development must seek to achieve the following objectives:

“To provide high levels of residential amenity and liveability.”

and

“To provide landscaping and communal open space that is resilient and enhances the sense of place, sustainability and liveability of the site and local area.”

- According to site plans, the open space currently enjoyed by public tenants will be significantly reduced through loss of vegetable gardens, playground spaces and recreational settings.
- The building heights – more than double the legal limit in Bayside - will destroy public and visual amenity for the users of popular Elsternwick Park.

FLOODING

- DHHS has not addressed the proposed amendments to the Special Building Overlay - based upon the latest Melbourne Water survey - that impacts the site. The proposed New Street development is close to Elster Creek and persistent stormwater management issues on site, mean that the estate carparks regularly flood after heavy rain. The new survey mapping indicates that substantial inundation of the New Street site will occur, in the event of the creek overflowing as it did in 2011, when floodwater inundated the site and was knee-deep in the carparks.
- The reduction of open space (outlined above) and removal of vegetation will reduce permeability of the site, thereby exacerbating the existing flood risk. I am concerned about the impact that the proposed development may have on flooding, including the possible flow-on effects to neighbouring properties, including my own.

TRAFFIC

- Airlie, Salisbury and Brickwood Street are too narrow to accommodate the additional traffic flow that would result from increasing density on the New Street site.
- In addition, the car parking spaces proposed for the new development site are woefully under-estimated and unrealistic. The current allocations (which are almost double those proposed for public tenants in the new development) already prove inadequate, with Airlie, Salisbury and Brickwood Streets severely impacted by overflow parking from the estate.
- Increasing traffic flows will not only increase congestion to and from the estate and at adjacent intersections, but will also impact the safety of school children who routinely use the surrounding streets to access Elsternwick primary school. Children also use Airlie, Salisbury and Brickwood Streets to play, which are currently quiet and safe.
- Service and emergency vehicular access in Airlie and Salisbury Streets will be seriously compromised if traffic flow increases on these effectively single lane access routes to the estate.

- According to SCHEDULE 3 TO CLAUSE 43.04 DEVELOPMENT PLAN OVERLAY Development Plan Requirements, the development must seek to achieve the following objective:

“To prioritise pedestrian and bicycle access within the site.”

However, the planned pedestrian and cyclist tracks are impractical and unsafe interfacing and overlaying as they do, with vehicular traffic.

PUBLIC / PRIVATE HOUSING MIX

- Studies in Australia and overseas have shown Public / Private mix housing developments to be a dismal failure, the Carlton public / private development providing a case in point. One need not imagine why a recent Melbourne University study, commissioned by the State Government and scathingly critical of public / private mix, was never released to the public!

REAL REDUCTION IN PUBLIC HOUSING PLACES UNDER THE RE-DEVELOPMENT

- The claim by DHHS, that the New Street redevelopment will result in a 10% increase in public housing, is at best misleading. A Study prepared by ASR Research Community Planning for DHHS in October 2017, shows that the proposed 10% increase in units at the New Street site, will see a reduction in real terms, of 32% in the number of public tenants actually housed, due to an increase in one and two bedroom apartments and a reduction in family units.
- The above point also illustrates the DHHS promises, that all tenants are free to return to New Street following the re-development ring hollow, as the number of family units will be reduced, leaving existing families no such option.

IN CONCLUSION

I request:

- that the development design be sensitive to neighbourhood context;
- that the interests of those affected by the development are taken into account in assessing the suitability of any proposal or design;
- a significant reduction in building heights to maintain and respect existing neighbourhood character;
- GREATLY increased set-backs;
- a reduction in the proposed density on site, to maintain and respect existing neighbourhood character;
- an increase in the allocated car-parks on site, so as to minimise on-street parking;
- maintenance of interactive spaces for tenants and neighbours at the north-east facing boundary;
- that flood risk and flood overlays on site and adjacent to the site and of the development’s impact on flood levels be addressed and ameliorated;

- clarity regarding who will be the responsible authority for site management and legal redress;
- that public housing land remain in public hands and not be sold or transferred for private development;
- that the site NOT be re-zoned;
- that the site be retained for public and community housing ONLY;
- that Bayside Council be retained as the responsible authority;
- that third-party appeal rights on planning permit applications be protected.