

SUBMISSION TO THE PARLIAMENTARY INQUIRY

PUBLIC HOUSING RENEWAL

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INTRODUCTION

I have lived next door to the Brighton Housing Estate for over Twenty years, with a boundary running between Airlie St and Salisbury St separating my property from that section of carpark.

For all of that Twenty years I have been aware of, and frustrated by, the **appalling lack of attention** paid to the Office of Housing flats by successive administrations. In my professional capacity I have worked on numerous occasions, and in a number of capacities, with public/social housing providers and tenants. I understand what good housing policy and good public housing administration looks like. I have not seen it on this estate in all the years I have lived next door, throughout the bulk of which the political party of the proponent Minister has been in power in this State.

Having **ignored repeated warnings**, the government now seeks to impose an ill-conceived planning solution to a problem of governments' own making. The level of mismanagement is astounding given the number of warnings and directions provided to DHHS and the Office of Housing. These have included, *Sustaining Our Assets Policy 2000*, *Sustaining our Housing Assets*, 2004, *Asset Management Accountability Framework*, (Dept of Treasury & Finance, 2016) and Auditor Generals reports in 2012 & 2017. These documents have made multiple and specific warnings about the need to manage State assets according to a whole-of-lifecycle approach that builds renewal, replacement and/or disposal into asset management and budgeting.

To enable its planning solution, DHHS is seeking an **amendment that is not required** to deliver the primary policy outcome. And it is seeking conditions, within that amendment, that **cannot be justified**.

It also seeks to **remove all reasonable levels of transparency** from the planning process through the questionable use of provisions within the Act.

In regard to the unconscionable degree of Ministerial fiat to be exercised by the Minister for Planning, and related lack of transparency, the facts, laid out in Section 1 (following) are damning. They suggest that elements of this scheme may be open to challenge according to Administrative Law, though it is unlikely that the communities who are most directly affected (housing tenants and residents of neighbourhoods of affected sites) will ever be in a position to test that notion. In this regard the Parliamentary Inquiry represents the best opportunity to challenge the inherent unfairness of the structure of the current scheme.

And all for what? The amendment, as envisaged, will corral housing tenants onto a fraction of their current site. It will diminish local amenity and have a dramatic impact on the neighbourhood. It will not lead to more public tenants being housed at the site. In short it will create far more problems than it solves.

A reasonable person, given these facts, might well conclude that the only problem this government is really seeking to solve, is its own—a problem the Auditor General and others have been warning administrations about for years. If this proposal represents the standards that apply to the administration of planning in Victoria then we are, indeed, in a sorry State.

This response comprises 3 sections

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SECTION 1
LACK OF TRANSPARENCY &
THE PERCEPTION OF CONFLICT OF INTEREST AND/OR DUTY
IN THE MECHANISM DESIGNED TO ASSESS
PROPOSALS FOR PUBLIC HOUSING RENEWAL IN BRIGHTON & ELSEWHERE

The facts, laid out below in regard to the Brighton site but similar across all affected sites, speak for themselves, and raise extremely serious questions about the capacity for natural justice to be accorded to parties who are affected by this government's Public Housing Renewal Program.

- Richard Wynne was, until December 2012, Minister for Housing in the Bracks and Brumby Governments for four years. Within 16 months of his Ministership the Auditor General had published the damning 'Access to Public Housing' Report detailing long-term, systemic failures to properly manage the State's public housing assets.
 - Fast forward to 2017 and a number of sites in the same mis-managed Public Housing portfolio, require renewal. These include the Brighton Housing Estate.
 - As the Minister for Planning, Mr Wynne has established a Committee (which sits within his department) to consider and advise him on an extremely interventionist and unconventional planning scheme amendment proposal concocted to overcome the problems created by the previously identified asset management failures.
 - The proponent of the Amendment is the Minister's colleague, the current Minister for Housing who has himself recently been criticised by the Auditor General (2017) for the failure (ongoing) to implement the life-cycle based Asset Management approach to public housing stock identified in March 2012 (and previously in government policy guidelines in 2000 and 2004). If implemented that approach would have substantially mitigated against the budgetary impact of housing asset renewal now.
 - The Committee (The Social Housing Renewal Standing Advisory Committee) is constrained by restrictive Terms of Reference defined by the Minister apparently to limit scrutiny of the rationale for the proposal.
 - The Minister for Planning may, on receipt of his Committee's report, choose to accept or reject any or all of the Committee's recommendations AND may choose not to make the Committee's report public.
 - He may then, once the Committee's formalities have been completed, and regardless of their recommendations, insert himself as the Responsible Authority over this site. If he does so the amendment, as written, dictates that he will become the sole arbiter of any subsequent planning application, removing both the representation of community concerns by Bayside City Council (were they to remain the Responsible Authority) and the access of any affected party to the appeal provisions normally available to persons affected by residential planning issues of this scale and nature.
 - Likewise, concerned parties would have no further mechanism for appealing the Planning Scheme Amendment itself.
 - And, as if the extent of the centralisation of Ministerial power at this site were not already alarming, the wording of the amendment's Development Plan Overlay, if adopted, would provide the Minister with capacity to approve any plan that, without scrutiny, he deemed to be 'generally in accordance' with the amended scheme or to go beyond even that undefined scope, to his 'satisfaction'.
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It is unimaginable that affected parties could have any confidence in such a lop-sided administrative vehicle.

SECTION 2
MISUSE OF THE PLANNING SCHEME
(ie FOR PURPOSES BEYOND THE INTENTION OF THE ACT)
(at the Brighton Estate, but largely applicable on the other estates)

The scope of the Victorian Planning and Environment Act and the provisions that sit within it is defined by the Act itself, as Land Use and Development.

The amendment of the Bayside Planning Scheme in the manner put forward by the proponent would require a misuse of the Planning and Environment Act 1987 because it would rely, almost exclusively, on arguments that are beyond those Land Use and Development parameters (as defined by the Act and as understood in common usage and in practice).

In ascribing an urgent need for the amendment, the proponent is ignoring the unquestionable suitability of existing planning provisions applicable to this site for the delivery of the single key public policy outcome they have identified for this site.

Rightly, the Victorian Planning and Environment Act 1987 recognises the relevance of broader public policy outcomes, including future needs, within the consideration of planning matters. As 10.04 of the Victorian Planning Provisions states: Planning aims to meet these (policy needs) by addressing aspects of economic, environmental and social well-being affected by land use and development.

This makes clear the purpose of this link (between policy and Planning). If a hospital (or a school, or waste facility or whatever) is required within a community and a site is identified that is particularly suitable for that service then the Planning Policy Framework should (and does) accommodate that outcome (being an outcome that is well within the defined scope of both 'Land Use' and 'Development'). There is no questioning the link, in such an instance, between a policy need and the Act facilitating a Land Use and Development pathway for its achievement.

In Brighton the policy need for housing renewal is a given.

That need exists along with both the land upon which it can be achieved (owned already by the Director of Housing) and all the existing planning conditions (under the Bayside Planning Scheme) required to accommodate it.

There is, in short, therefore no Planning impediment to the 'Land Use' and 'Development' required to address the need for public housing renewal.

Are there budgetary challenges in delivering that public housing outcome? Yes—but only in so far as the delivery of any government services costs money.

Should those financial challenges have been mitigated long ago? Of course, and demonstrably. Successive administrations have ignored warnings and failed Victorians in that regard. Most of those administrations in recent years, have been associated with the political party of the proponent.

Is that administrative failure pertinent? Yes and no. Yes, because it has exacerbated the extent of the housing challenge now before the government, and because it colours this government's public housing credentials in a less rosy hue than the one they seek to present now. Hence the overwhelming whiff of political desperation in the current proposal. No, because it doesn't alter the fact that a Planning Scheme Amendment is both unnecessary and an inappropriate vehicle for addressing that challenge.

Is there ever a case for the sale of government-owned land to offset a component of the financing of government services? Yes—this is a normal consideration of governments.

Are there any circumstances in which a strategic sale or exchange of government land assets would justify conspiring to use a Planning Scheme Amendment (regardless of how it was achieved) to inflate the value of land prior to its sale (or transfer in return for services)? Absolutely not. We do not live in Bjelke-Peterson era Queensland. There are standards of public administration and protocols that exist to constrain governments to the extent that their dealings, in all things, should be fair, reasonable and in line with community expectations.

Is an artificial inflation of the value of the New St site an accurate description of what is occurring in this instance? Absolutely and audaciously. A review of residential zones adopted only this year and designed specifically to achieve the objectives of State Planning Policy in an orderly and fair way (and which serves the identified policy need extremely well), is suddenly, according to the proponent, so manifestly inadequate that an amendment to allow a tripling of heights and residential density is urgently required along with the removal of all normally available safeguard measures. That argument simply does not stand scrutiny.

And yet the proponent, in delivering the outcome they have indicated in their wafty sketch plans and diagrams, would provide for fewer social housing tenants than accommodated by the existing design, on a greatly reduced site with much less open space access than public housing tenants have enjoyed on this site since 1961.

Are any of the other peripheral reasons provided by the proponent for the audacious over-reach they have concocted in the name of 'public housing renewal' sound? Not at all.

- The recent review of residential zoning (and the associated rezoning of the subject neighbourhood to General Residential) created a mechanism for the orderly transition within the Planning Scheme to both higher density and a greater diversity of housing stock in this North Brighton neighbourhood and is the appropriate vehicle for achieving both of those outcomes according to the objectives of the Act.
- Neither does the social mix argument put forward by the proponent hold water. In this neighbourhood there is a seamless and unimpeded direct connection between public housing tenants and other residents. As the recent AHURI Policy Brief on the issue points out, *The spatial scale for any consideration of social mix is the neighbourhood (4,000 – 8,000 people), not small-scale public housing developments or individual apartment blocks. This means the spatial allocation of social, affordable and private housing should be considered at the neighbourhood scale, not the project or redevelopment site scale.*¹

The proponent wishes to address the housing site as an island and, in a design sense, to turn its back on the rest of the neighbourhood. This is a counterproductive strategy in a neighbourhood that functions cohesively and harmoniously and in which key spaces (particularly the car parks and adjacent pathways and the small neighbourhood feeder roads) are genuinely shared.

Regardless, any pretence of tenure blindness in the proponent's envisaged public/private utopia would almost certainly be completely undermined by the stated intention to re-house public tenants first, and the market realities of this yield driven model, as has occurred elsewhere.

- The proponent's increasing reliance on an argument that the suggested Planning Scheme Amendment would support a range of non-residential uses is simply wrong in fact as a significant amount of non-residential use can be facilitated within the existing General Residential provisions, covering any activities reasonably imaginable on this site given its constraints (such as its restricted access and the very limited capacity for customer parking etc.)
- When pressed there is an acknowledgement that this scheme is designed to generate funds for housing development elsewhere. But the Department argues, simultaneously, that these sites are perfectly placed for public/social housing. Inappropriate planning outcomes on individual

¹ Australian Housing and Urban Research Institute, *Public housing renewal and social mix Policy brief*, updated Sep 1, 2017, www.ahuri.edu.au/policy/ahuri-briefs/public-housing-renewal-and-social-mix

sites are not justified (and, as outlined above, are a misuse of planning mechanisms) by potential outcomes elsewhere. The social mix/integration argument is the thread upon which DHHS tries to hang the credibility for this notion. The reality is that if these are the best sites for public housing they should not be used as a financial lever. There is no hypothecating legislation to link land sales to new housing. And no credible argument has been put that, if public land sales are the mechanism for funding new housing, then portions of existing housing sites are the best sites to sell to fund the necessary expenditure.

All these additional outcomes, regardless of the weakness of the cases made for them, have been designed and included in the proponent's scheme in support of their case for maximised density (which does not serve a defined policy outcome on this site, or any policy outcome within the appropriate 'land use' and 'development' context) rather than being in support of the primary policy outcome—public housing renewal—which can be achieved without them.

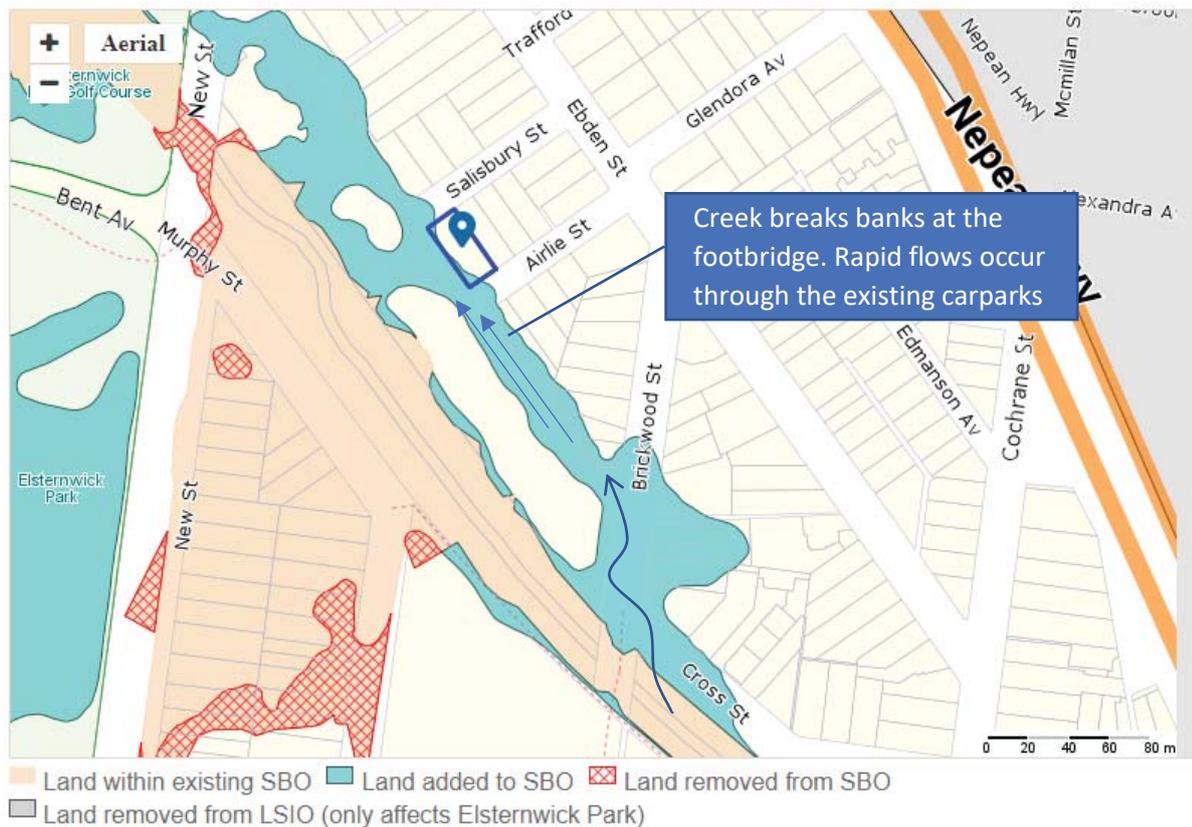
SECTION 3
AN EDITED COPY OF MY SUBMISSION
TO THE STANDING ADVISORY COMMITTEE
CONCERNING THE BRIGHTON SITE

This document is included in part to indicate the lack of rigour at a site specific level and the inadequacy of the DHHS/DELWP ‘cookie cutter’ approach to what are unique planning challenges

BRIGHTON ESTATE RENEWAL: MY SPECIFIC CONCERNS

Impacts on [REDACTED] Brighton that have not been properly considered

- Flood risk: Current plans indicate a three-storey building along the length of the property’s shared boundary with the public housing site. This would be potentially disastrous in the event of another flood event like that which occurred in 2011. The 2011 event confirmed the accuracy of Melbourne Water’s recent mapping and the proposed SBO. The SBO map needs to be understood in terms of rapid flows through the site (see below), rather than representing a slowly rising inundation level. Water rushing through its natural course (primarily the existing carparks) would be diverted directly into the adjacent land by any massing at that point in its flow. I have no confidence, given the lack of engagement with affected property owners to date, that my property interests will be properly considered if the planning scheme is amended as suggested. Flood risk means that any change in the topography and/or built form on the site will materially impact my property and those of a large number of my neighbours.





Elster Creek from Cochrane St, just before it breaks its banks (footbridge and flats in the background)

2. Safety issues raised by proposed boundary treatment: The proposal creates a narrow and undefined zone between [REDACTED] (and other properties on the site's north-east boundary) and the unarticulated three-storey walls of adjacent buildings. This appears to create a poorly designed strip that could encourage uses that would not be consistent with the creation of safe community spaces. The strip needs to be widened so that it can have a defined purpose. The land in question currently functions as part of the well-used pedestrian link through the estate. As a benchmark, a complying mixed-use path with clearance either side, and landscaping (ie to accommodate the identified need for maintaining and replacing trees), could be accommodated within a strip of perhaps 7 or 8 metres, suggesting that this would be a more appropriate width, allowing for the proper articulation of, and a defined use for, the land in question.

A treatment of this nature (noting that topographical details should not be altered in a way that would cause negative impacts) might also be useful in mitigating some of the flood issues on parts of the site, including in regard to the flows through the existing carpark adjacent to [REDACTED]

3. Stormwater Management: Stormwater in the carpark adjacent to [REDACTED] has been problematic for all of the 20 years that I have lived at this location. The drains in this carpark and those either side regularly back up. This is particularly concerning given the identified flood risk from the creek overflowing. There needs to be specific direction within the proposed amendment (I assume this would belong in the DPO) requiring any development to include a comprehensive stormwater management plan that ensures stormwater infrastructure on/beneath the site is upgraded so that it functions reliably and that it is compliant with the Water Sensitive Urban Design provision of the Bayside Planning Scheme.
4. Extent of adjacent built form: The design suggests the possibility of an adjacent building that extends either side of the house at [REDACTED], creating a continuous mass across the length of the block. The impact of any large adjacent building on the streetscapes of Airlie and Salisbury Streets, and the amenity of [REDACTED] should be minimised, at the very least, by limiting any such building so that it cannot extend beyond the limits of the residential building on [REDACTED] (ie in lines at 90° to the fenceline).
5. Overlooking / loss of privacy: the amendment will significantly impact amenity at [REDACTED], including potentially from raised podium-style public spaces created above car parks
6. Overshadowing: the amendment will significantly impact amenity at [REDACTED]
7. Visual Amenity: will be significantly impacted, in particular by the proximity and location of three-storey units adjacent to the boundary and the 9-storey unit overlooking the backyard of [REDACTED]
8. Traffic and parking: Airlie St (to the front, and our main access point) and Salisbury St (rear, secondary entry) are narrow roads already regularly taken up with overflow parking from the estate. The parking provisions indicated are completely inadequate. A tripling or more of the amount of traffic in these small streets will have a major impact on access to [REDACTED]. It will impact the capacity of visitors (including my elderly mother), to access convenient parking. Implications for service vehicle access, emergency vehicles, and impacts on pedestrians and cyclists have not been properly considered.

Impact on diversity

In addition to the above, one of the reasons my family enjoys living in this area is the cultural and social diversity provided, to a large extent, by the presence of public housing (in a suburb not noted, in multicultural Melbourne, for its diversity). Far from delivering greater social/cultural diversity to the area this plan will introduce a large number of new private units and create an imbalance, with new wealthy or securely middle-class residents buying into the Brighton postcode. (We can reasonably anticipate how the private units will be marketed, even though residents of this area don't tend to see themselves as part of 'that' Brighton—the suburb known for Church St fashions, bathing boxes, designer dogs and fake tans.) The proponents of this proposal tout social mix and diversity as drivers but the impact of the proposal will be to demonstrably and irrevocably reduce the social mix of the neighbourhood and increase the potential for housing tenants to feel isolated.

Impacts on the neighbourhood that have not been properly considered

1. General flood risk: See above. Flood risks across the site and impacts of altered topography and built form on neighbouring properties are exacerbated by the extent of the site to be subject to new built form. In addition, the three-metre boundary set back along the residential interface appears to be insufficient to cope with the flows of floodwaters, the bulk of which currently run through the carparks of the estate. Altered flows in this area will have a dramatic impact. Proposed undercover carparks cover much of the site in the current concept. They must not be protected from flood flows by barriers, ramps, walls etc, as any such protections would alter existing flows and affect neighbouring properties. Melbourne Water must be an authority on this site.
2. Overlooking / loss of privacy: will significantly impact amenity of the neighbourhood.
3. Overshadowing: will significantly impact amenity of the neighbourhood.
4. Visual Amenity: across the neighbourhood will be significantly impacted, in particular by the size, proximity and location of units along the identified sensitive residential interface and the 6, 8 and 9-storey units overlooking the site. The visual amenity extends to major impacts on outlooks from Elsternwick Primary School and other properties and points across the creek from the site (including surrounding streets and Elsternwick Park).
5. Traffic and parking: Airlie St, Salisbury St and Brickwood/Cross Streets are narrow roads already regularly taken up with overflow parking from the estate. The parking provisions indicated are completely inadequate. A tripling or more of the amount of traffic in these small streets will have a major impact. Implications for service vehicle access, emergency vehicles, and impacts on pedestrians and cyclists have not been properly considered.
6. Reduced safety mitigation (CPTED): The provision of below podium parking, and the loss of the substantial level of passive surveillance accorded by the current medium density site layout will substantially mitigate against the safety (and the perception of safety) of the site.
7. Design impacts on natural neighbourhood circulation and interaction have not been considered.

Specific Urban Design concerns

1. Covered parking: On this site flood risk dictates that parking be 'at grade'. In order to maximise profits by increasing density on the site the car spaces are to be provided primarily under the building podium. Consequences of this design approach include
 - a reduction in ground level activation of the site
 - a reduction in passive surveillance of, in and around car parks
 - serious concerns about emergency vehicle access to towers (current access is from adjacent car parks)
 - creation of open space areas above ground level with no consideration of the potential for overlooking, by people using that space, directly into neighbouring properties
2. Open space
 - on rooftops: current open space at the site comprises three main elements. The first is a shared entrance/frontage, which is used by the whole community and includes carparking

and the major pedestrian link through the site. Between the outdoor laundries and the units are transitional spaces used by tenants, including for play and informal activities. Finally, there are a range of play, community space and recreation options that might be regarded as providing a backyard function between the flats and the creek. (It says much about the lack of familiarity with the way the site functions that the documents for the amendment present this zone as a frontage). These functions, particularly the distributed play and casual meeting options, are unlikely to be able to be provided in such comfortable informality by rooftop open space. That the current site would benefit from landscaping treatment does not detract from the design advantages offered by the current building layout.

- Other open space usage: Another extremely important, but unacknowledged open space is provided by the quiet hills of the neighbourhood streets. Their use by children in the flats will be severely impacted by greatly increased traffic on those streets.

3. Cycling / Pedestrianisation: Safety issues raised by proposed boundary treatment

4. Density: The amendment, in order to artificially inflate the land value to private investors, is designed to allow the construction of units at a height and density which is:

- completely at odds with the neighbourhood context.
- contrary to the recently adopted Bayside Planning Scheme including a zoning designed to achieve, in a structured way, all the objectives of planning policy as they apply to this neighbourhood.
- not consistent with the development of high-density residential within and around activity centre locations.

Issues concerning the engagement process

- the Community engagement conducted in relation to this site was chaotic and uncoordinated, and lacked rigour having been driven by a predetermined outcome.
- the subsequent report provides little by way of raw or compiled data and completely ignores some data sets
- the report does not reflect the experience of participants in the mid-year community sessions.
- the advertised contact number for queries rang through to a general operational line, and was subsequently of no meaningful use.
- other communications mechanisms have been inadequate. The proponent, (in this instance both DHHS and the Housing Minister's office) have routinely failed to respond to my pertinent questions about this project sent to them as emails, or to those of my neighbours.
- given the design of this renewal program around a financial model that has increased density at its core the lack of any meaningful engagement around desirable built form options for tenants, during the 'Phase 1 Engagement' appears to be more a deliberate omission than an oversight. Density and built form issues, as they affect tenants, should have been included in a meaningful engagement process during this phase.
- the inadequacy of engagement with tenants is also apparent in the design of the Standing Advisory Committee process. It is impossible to believe that tenants, the most affected of all stakeholders, would publicly voice criticisms of the proponent at the same time as they are negotiating relocation with that same Agency. Their voices are therefore almost completely absent from the Committee hearing process. This was always a predictable outcome and should have been anticipated and mitigated in any genuinely consultative, inclusive and fair process.
- in short, the Engagement Report provided should be deemed meaningless and a process of genuine community engagement should be conducted and then considered to ensure that any planning proposal properly accommodates the legitimate concerns of the neighbourhood and its residents (including housing tenants and home owners)

Public policy concerns

1. Public land sale: DHHS should not sell or dispose of this land, which was set aside for public housing. Any notion of a net, long-term public policy benefit from the disposal of a substantial portion of this public asset should be much more closely scrutinised.
2. Marginal public housing benefit: To tout the benefits of the renewal of ageing stock or link it to radical planning measures is disingenuous and should be seen for what it is. DHHS and its predecessors, having mismanaged the public housing portfolio for decades, yet are now seeking to offset costs that should have, long ago been incorporated into operational budgets through a life-cycle based asset management approach (see Auditor Generals Reports into Public Housing).

They wish to do so by capitalising a large part of the estate. In order to maximise income, they have designed a process that artificially inflates the value of the site by removing normal planning constraints and processes.

Yet, in taking this approach, they have projected only a tiny increase (10%) in social housing units, which will be smaller in size than current units on the site. The Auditor General makes clear that the benefits of new housing for tenants, are nothing more than what should reasonably be expected of a properly managed public asset management program given the responsibility of the State as landlord. The delivery of new housing units categorically does not require radical planning intervention. Plainly, what it does require, and what this and earlier administrations lack, is political will, a willingness to prioritise housing, as required, for budget purposes, and competent planning.

Because of the increased density unnecessarily introduced into this process by the financial link to land-sale, the natural benefits of any new housing will be substantially offset by a number of lifestyle and community factors impacting tenants including, but not limited to:

- i. Loss of open space, particularly the backyard-style spaces, play spaces, gardens etc currently located between the units and the creek.
 - ii. Loss of tenant amenity due to the scale of development. In conversation current tenants have expressed a desire not to live in high-rise units or on an estate dominated by high-rise units. The current medium density development, while dilapidated, supports a greater level of community interaction, including natural neighbourhood interactions in and around the flats with the surrounding neighbours.
 - iii. Diminished safety due to reduced passive surveillance and reduced ground-level activation.
 - iv. A shift to public/social housing for tenants seeking smaller units in an area that has no immediately accessible adult support services and in which the only immediately accessible services suggest a better fit would be units for families with children, who are in need of public housing.
 - v. Diminished urban design integration with the broader neighbourhood and community.
 - vi. As a result, a potentially increased sense of social isolation, compounded in the proposed model, in which tenants are likely to find themselves sharing an estate that is disconnected from its neighbourhood (by virtue of design incompatibility and the somewhat bizarre desire to articulate a frontage towards Elster Creek), with social housing and private residents located on different parts of the site (as has occurred elsewhere, and as is structurally likely to occur again given the profit imperative driving the private development component and statements made by DHHS that public housing will be completed before private).
3. Compromised decision-making framework: The convoluted layers of interconnection between policies, documents and processes, that comprises the decision-making framework appears to be as much about disenfranchising anyone from outside the planning profession as it is about achieving good policy outcomes. Having persevered, in order to make this submission, I found myself asking more questions about process than I ever found answers to. Some of these questions, including those raised by the failure to use existing mechanisms to assess the merits of this proposal, left me with a real sense that the decision-making framework was critically flawed, that my capacity, as an interested party, to be heard had been made as complex as possible, and that natural justice played no part in the design of the process.

CONCLUSION

Housing renewal, the capacity for small-scale non-residential use, social mix/integration and a modest increase in density which is consistent with the existing planning scheme can all be achieved within the current General Residential Zone (which can accommodate up to four storeys, given the existing buildings on the site). As such the only reasons for supporting a planning scheme amendment of the nature put forward by the proponent are fundamentally financial and therefore require financial, not planning, intervention (regardless of the planning system's connection to the delivery of policy outcomes).

The current proposal on the Brighton Estate favours expedience over good policy, good urban design, or good planning. This community and its current and future members, whether public tenants or home owners, deserves better.