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**SUBMISSION TO THE SOCIAL HOUSING RENEWAL STANDING ADVISORY
COMMITTEE ON FLEMINGTON HOUSING ESTATE PLANNING PROPOSALS**

21 July 2017

A. PRECIS OF SUBMISSION

1. This submission is in response to invitations to interested persons or organisations to make a submission to the Social Housing Renewal Standing Advisory Committee (SHRSAC) on the proposed amendments to the Moonee Valley Planning Scheme regarding the Flemington Housing Estate (the Estate).
2. The Association maintains its primary concern that steps are being taken by the government and the Department of Housing and Human Services (DHHS) to redevelop the Estate rapidly without proper analysis, consultation or clear objectives as to what might be achieved. These concerns were outlined in our initial submission to DHHS dated 6 June 2017, a copy of which is attached.
3. Given the proposed significant impact upon the Flemington community, including those who live on the Housing Estate and around, the Association submits that:
 - a) It is fundamental that a Consultative Committee be established, including a broad cross-section of community representatives.
 - b) A Comprehensive Development Plan should be undertaken in an integrated manner after a proper analysis of the site (including the surrounding area), consideration of options for development and an ability for those affected to respond meaningfully to proposals.
4. In terms of the limited terms of reference provided to SHRSAC, the Association submits the following:
 - a) The proposal is not appropriate in light of key strategies including *Home for Victorians* and *Plan Melbourne 2017*.
 - b) The proposal is not appropriate when considered against the objectives of the *Planning and Environment Act 1987* and other relevant provisions of applicable planning schemes.
 - c) The Minister for Planning should not act as Responsible Authority for the development sites.
 - d) The current proposals should be rejected.

B. FLEMINGTON ASSOCIATION'S ROLE

5. The Flemington Association is an incorporated body that primarily represents residents of Flemington (including Travancore and Newmarket). This includes those who live in long- and short-term private and rental accommodation and public and social housing.

6. One of our primary roles is to keep the local community informed of issues and events and provide a forum to exchange information and, when appropriate, take action on behalf of Flemington. Amongst many activities in recent times, our members attended and participated in Flemington Neighbourhood Renewal, set up and maintain the Newmarket Stationeers, conduct heritage talks and tours for local schools and the broader community and regularly contribute to planning proposals for and impacting upon Flemington. Association members work closely with other community groups, local institutions, members of parliament and councils.
7. The Association has an ongoing interest in ensuring good planning outcomes for Flemington and surrounds and in encouraging engagement by the Flemington community in planning issues and decisions.
8. Association members attended the information sessions organised by the consultants engaged by DHHS, including those designated as being for “community leaders” and those open generally to the public. Following this the Association made an initial submission to DHHS on 6 June 2017.
9. In response to this submission, on 20 June 2017, members of the Association met with a DHHS planning officer and consultant who attempted to answer some of our questions. We were advised that a formal response would be provided, but that amendments to the planning scheme had been drafted and would be released soon. The plans were released on 26 June 2017.
10. From 26 June 2017 Association members have attended publicly available information sessions, promoted information and engagement online and otherwise, and sought input from our members and more broadly in the community.
11. Our submission is necessarily constrained by the difficulties in consulting widely in the short time frame provided. The Association cannot speak for all residents of Flemington. This is why we propose a Community Consultative Committee prior to the preparation of a Comprehensive Development Plan.

C. CONCERNS OVER THE CONSULTATION PROCESS

12. The consultation process thus far has been less than satisfactory in terms of meaningful consultation and engagement with the local community. Based on the reports released, it is not clear, precisely what DHHS sought to identify from the initial “information/ consultation” process to assist with their draft *Development Plan Overlay*.
13. Significantly, the “information/consultation process” took place **prior** to the release of the documents relied upon by DHHS (*Homes for Victorians* and *Plan Melbourne 2017*, both released in March 2017).
14. The 4-week “exhibition period” since the *Development Plan Overlay* and supporting documents were released is also unsatisfactory. The plans were initially made available online, with hard copies later made available at specific locations. There were difficulties in accessing the documents, trying to understand them and break them down into a form that would be accessible to residents, many of whom face language, cultural and other issues. Information sessions were belatedly arranged by DHHS and Council, but the information provided was generally very limited in form.
15. The poor consultation is another reason for rejecting the current proposals, particularly when it is proposed to remove appeal rights.

D. SHRSAC'S TERMS OF REFERENCE

16. The SHRSAC's *Terms of Reference* indicate that the purpose of the Committee is to:
 - a) advise on the suitability of new planning proposals prepared by DHHS to facilitate renewal and redevelopment of existing public housing estates to increase the supply of social housing; and
 - b) provide a timely, transparent and consultative process to facilitate the renewal of Victoria's social housing stock.

17. In providing this advice, SHRSAC must consider (and provide a brief written report upon) the following:
 - a) All relevant submissions.
 - b) The appropriateness of the proposal in light of key strategies including *Home for Victorians* and *Plan Melbourne 2017*.
 - c) The appropriateness of the proposal against the objectives of the *Planning and Environment Act 1987* and any other relevant provisions of the planning schemes.
 - d) Whether the Minister for Planning should act as Responsible Authority for the development sites and if this would expedite future planning approvals.
 - e) Whether the proposed changes to the planning scheme and/or planning permits should be approved, subject to any recommended changes.

18. Despite this, by its terms of reference, SHRSAC is prohibited from reviewing or considering the following:
 - a) the increasing demand for 1 and 2-bedroom social housing dwellings;
 - b) the suitability of joint venture partnerships as a delivery model;
 - c) leveraging of under-utilised public land to deliver an increase in social housing;
 - d) the dwelling yields needed to achieve an increase of at least 10% in social housing; and
 - e) the appropriateness of community housing providers to administer the provision of social housing.

19. This creates a fundamental tension for SHRSAC, and uncertainty for those of us affected by the proposals and tasked with preparing submissions. How is SHRSAC to properly consider the "suitability" of the proposals without reviewing and considering the bases relied upon to develop identified precincts of the Estate to maximise return?

20. In determining "suitability", is SHRSAC to determine whether the proposed planning amendments are consistent with general planning objectives or whether they are consistent with increasing supply of social housing? These are two very different questions. It is submitted that the proposals fail on both fronts.

21. Association members are concerned that, while the proposals would clearly assist in generating income for the state government to redevelop and marginally increase social housing in Flemington, they do not adequately meet other planning policies and objectives. The "return" is the provision of only an additional 10% of social housing, a drop in the ocean in light of the scale of the proposal and the likely adverse impact upon surrounding residents, including those in the high-rise.

22. SHRSAC appears to be tasked with assessing a *Development Overlay Plan* against modified criteria given the purpose of the plan to increase and renew social housing. The modified criteria are not clear from the documents on exhibition. There is a lack of

transparency as to what level of compromise is “suitable” (or even acceptable) in order to achieve the stated objective with respect to social housing. This leaves the community in an unacceptable state of uncertainty.

23. It is submitted that it is not reasonable to seek advice from SHRSAC on where the “suitable” balance between these objectives sit, particularly when SHRSAC is prohibited from considering and assessing highly relevant factors, and there is simply insufficient evidence on which to properly assess the value of the land, the amount of land proposed to be converted from public to private use and the cost-benefit analyses from disposing of public land for the stated purpose.
24. The question of what impacts the Flemington community and, more broadly, the Victorian community (now and in the future), must bear for the sake of short-term economic return is not an ordinary planning question. In fact, it is very much at odds with long-term and responsible planning.

E. IGNORED OPPORTUNITIES FOR BETTER REDEVELOPMENT

25. Unfortunately questioning of any aspects of the proposals thus far has often been met with a response that people or groups asking the questions must be hostile to improvements to public or social housing. This is an unfair assessment.
26. The Association has worked with other groups and individuals from our community for many years to try to improve conditions for our residents who live on the Estate. The Association has long identified the walk-ups as being in urgent need for redevelopment or replacement. Association members generally are very supportive of public and social housing in Flemington, improvements to existing housing and, if done appropriately, an increase in public and social housing.
27. However, while redevelopment of this site presents real opportunities, there are also very significant challenges. These include, but are not limited to, the following:
 - a) Any development will need to accommodate the four high-rise towers, which will remain in their existing positions and continue to provide public housing.
 - b) The site is constrained by Citylink and the Moonee Ponds Creek, the busy arterial roads on either side, the nearby low-rise housing (mostly covered by heritage overlay) and Debney’s Park.
 - c) The Estate holds many of our more disadvantaged residents, many of whom speak languages other than English, need support to engage in processes such as this and may find significant change difficult to deal with.
 - d) Flemington has a long-identified lack of open space. Many of our established native trees, supporting much of our bird life, are on the Estate. One of the main assets of the current Estate is its sense of open space.
 - e) There are currently vehicular access restrictions into and out of the site, which have been in place since the Estate was built.
28. Because of these challenges, any redevelopment of the Estate should be undertaken cautiously, with proper analysis of the site and engagement with the local community.
29. The Association understands DHHS and the government might not be striving for the “best case” scenario for the Estate, but it is unacceptable that other options have not been considered. These might, for example, include: a reconfiguration of the Estate to connect better with Flemington Bridge and the proposed mini-neighbourhood there (as part of Arden Macaulay); better utilisation of land that is not ideally located for its

current use; improved road and other access and to create new open spaces for an increasing population.

30. Rather than quickly and intensively seizing an opportunity to develop parcels of land to fund improvements, there should be proper consideration as to how the Estate and its surrounds might be better configured and utilised. For example, the proposals suggest better connectivity with Flemington Bridge and the tram routes by providing better lighting and pathways, when it might be more desirable to have pathways that are adjacent to new buildings of appropriate scale.
31. The Association is not proposing that one option is better than another or that some identified precincts should be developed over others or have higher or lower recommended heights than others. Such examples might not be the best or even desirable outcomes, but it is unfortunate that – because of the apparent haste - they are not even being considered.
32. Instead the community has repeatedly been told that the simple plan of intensively and quickly building private housing, with some social housing, in between existing public housing will provide a net community benefit by bridging social gaps between communities. This ignores some fundamental aspects of our shared experience in Flemington over many decades:
 - a) There are already private residents living side-by-side with public and social housing tenants across much of Flemington. For example, public housing in Princes Street, Norwood Place, Crown Street and other areas, not to mention Victoria Street. There is also social housing and aged care facilities around many areas of Flemington. We are already neighbours. We shop at the same shops and use the same available resources. It is unclear how building high-rise towers in between public high-rise towers will make this a more cohesive community.
 - b) Building a high-rise private tower at the Lombards site next to public high-rise towers did not engender connectivity between communities. In fact, as foreshadowed by the community, the former has become a gated site.
 - c) The Association and others have been engaged for many years in community activities trying to bridge gaps and create more cohesive communities. This includes involvement in Flemington Neighbourhood Renewal, groups and classes conducted at the Community Centre and Neighbourhood Learning Centre and local mentoring programs.
 - d) The Housing Estate and its surrounds include residents from a variety of cultural and other backgrounds. It includes families and older and younger people.
 - e) Residents, and members of the Association, have long campaigned for basic measures to improve safety and amenity in Flemington, particularly on the Estate. Relegation of responsibilities like this to private developers is no assurance that the community's interest will be met.
33. Our experience teaches us that there is no easy, quick-fix solution to improving social connectivity in communities. Bridging social gaps requires the encouragement and involvement of the government and stakeholders. Imposing a plan on a community, without proper consultation or engagement, will not assist in achieving such an aim.
34. There is no reference in the supporting documents to the years of analysis and input during the Flemington Neighbourhood Renewal process or any indication that there has been any assessment of the matters raised during that period. The consultants engaged by DHHS for their initial "consultations" declined repeated offers by the Association to meet with them to share our experiences of Flemington and the Estate.

35. Importantly, without proper analysis and consultation, there is a real loss of an opportunity to redevelop the Estate so that changes might be embraced by the local community. Fostering cohesiveness might be achieved by giving residents a sense of ownership or, at the very least, having meaningful participation in the creation of their neighbourhood. There are plenty of examples of this; one need only look at the development of Lynch's Bridge/Kensington Banks and the Kensington Housing Estate, where in both instances there was real engagement with the community over a reasonable period of time in the planning processes, resulting in neighbourhoods that have retained a sense of community pride.

F. APPROPRIATENESS OF THE PROPOSAL AGAINST "KEY STRATEGIES"

36. The *Terms of Reference* cite *Home for Victorians* and *Plan Melbourne 2017* as being included in the "key strategies" to which regard is to be had by SHRSAC. No other strategies are obviously relied upon by DHHS. However, the proposal seems to arise largely from, or at least be connected to, the *Value Creation and Capture Framework*, released by the Victorian Government in February 2017.
37. Importantly, none of these strategies had been released at the time of the initial consultations with the Association and the community.

Home for Victorians

38. In relying upon *Home for Victorians*, it is presumed that DHHS identifies land on the Estate that does not currently hold built form as being "surplus government land" to be used to increase the supply of social and affordable housing under the Inclusionary Housing pilot program.
39. "Surplus government land" is not defined. Most in the Flemington community would not regard the precincts identified as "surplus". The land might be managed or reconfigured more efficiently, but this does not mean it is suitable for being sold off for built form or used for built form. It is highly valuable land to our community.
40. At the time of building the Estate, including the four high-rise, the amount of open space between the buildings was highlighted as being one of its primary qualities. It remains one of the main assets.
41. Estate residents enjoy the permeability, the views, the greenery, the birdlife and the easy access to the park, public transport, private cars and facilities. Other locals also enjoy many of the same aspects brought to Flemington by the green area. This is not "surplus". It helps make our neighbourhood more liveable.
42. The aspects that make the area more liveable should not be sacrificed to fund replacement of walk-ups that have, despite ongoing community concerns, been sorely neglected over decades.
43. Under *Home for Victorians* (at 2.4), proposals are to be evaluated to make sure they deliver best value for money and the best options for social housing and, in return, developers will get an "appropriate discount on the purchase price of the land". This objective is subject to consideration of whether any part of the site should be retained for open space, either purchased by local council or delivered through open space contributions under the concept plan.

44. No consideration appears to have been given to this under the supporting documents provided, other than the proposed requirement for a minimum of 1,000 square metres of “new” (rather than additional) public space. No evaluation has been made of how much public open space and parkland is to be lost in response to the proposals to provide this “new” space.
45. There is reference to \$30m having been allocated towards Flemington’s Estate to “kick off the first stage of [its] renewal – with a focus on replacing the estate’s 22 ageing low-rise buildings.” However, at 4.2 of *Home for Victorians*, the Flemington Estate is not specified as one of the 9 sites containing public housing properties across Metropolitan Melbourne that will be redeveloped. It is unclear if this means Flemington’s Estate is to be distinguished from the 9 estates.
46. With the other estates, *Home for Victorians* indicates that plans will be developed only with input from residents, communities and other stakeholders, with proposed land uses, scale and types of new residences and recreational spaces to be included. It is unclear why Flemington Estate would be treated differently to other estates. Again it is submitted that proper input should be sought from residents, communities and stakeholders to formulate a comprehensive *Development Plan Overlay* prior to it being considered by SHRSAC.

Plan Melbourne 2017

47. *Plan Melbourne 2017* had not been released at the time of initial consultations with the Association and the community. But the Association was aware of previous planning priorities and objectives and that Flemington-Racecourse Road had been identified as a major activity centre.
48. Our repeated requests for clarification from Moonee Valley City Council and the Victorian Government as to why “Flemington-Racecourse Road” was nominated this way has never been satisfactorily answered (other than that it contains a major arterial road). It was nominated by Council as a “major activity centre” very late for *Melbourne 2030*, with no community consultation.
49. We accept that, for planning considerations, Flemington is an area that has been identified as one that can accommodate housing growth. Flemington is clearly close to the city and has good public transport options.
50. However, the application of the moniker “major activity centre” means we now have a long line of high-rise residential buildings, none of which have activated our local community. These often isolated sites now stretch over almost 2km of Racecourse Road. Most of them are adjacent to low-rise residences that are primarily single-storey Victorian and early 20th century homes.
51. When we are told that Flemington must accept our “fair share” of high-rise, intensive development, there is rarely an explanation as to why neighbouring suburbs have avoided such developments. Arden Macaulay is proposed for intensive development, but even its parameters pale in comparison to proposals like this one. In Arden Macaulay, the highest buildings are proposed in the centre of the activity centres. Flemington is to accommodate them at the periphery, with no sign of additional facilities or resources to support the extra residents.
52. The proposal must be considered in the context of Flemington already being one of the densest residential locations in Melbourne, with neither the resources, facilities, open space nor the capacity for these things, as many other comparable suburbs.

53. Previous planning proposals have been considered in light of anticipated development on the Estate, particularly the replacement of the walk-ups, but there has been no reference – by Council or the state government – of additional intensive towers being proposed between the existing four high-rise. The rationale therefore appears to be driven by maximising financial gain (albeit to support spending on social housing) rather than sound planning policy.
54. Simply slotting in more high-rise, and in fact proposing to place it on every available “precinct” on the Estate, is at odds with many of the other strategies of *Plan Melbourne*.
55. The “liveability” of the Estate currently arises in large part because of its permeability. People who live in the high-rise have views to the ground and beyond and can step out to open spaces, nurturing a sense of openness. This will be dramatically reduced if there is simply more high-rise slotted between each building.
56. It is acknowledged that *Plan Melbourne 2017* identifies the goal to increase the supply of social and affordable housing by utilising government land to deliver additional social housing, streamlining decision-making processes for social housing proposals, strengthening the role of planning in facilitating and delivering the supply of social and affordable housing and creating ways to capture and share value uplift from rezonings. However, it is by no means clear how this is expected to fit in with planning generally.
57. The proposals might “maximise” economic return, and in the short term deliver social housing, but they do not aspire to the best outcomes for the community or Victoria or ensure long-term sustainability.
58. Importantly, *Plan Melbourne* stresses the desire to ensure the city and suburbs also grow more liveable. This means promoting quality design that focuses on people, environment and cultural identity, reflecting the past, present and future of Melbourne and Victoria. There is a clear strategy to develop local parks and green neighbourhoods in collaboration with communities. These factors are not taken into account in the proposals, which aim primarily to intensify built form and maximise profit.
59. *Plan Melbourne* also emphasises the desirability of creating diverse opportunities for communities to participate in planning. In this instance, the Association submits this would be best achieved by a Community Consultative Committee rather than imposing plans on the local community.

G. APPROPRIATENESS OF THE PROPOSAL AGAINST PLANNING OBJECTIVES

60. It is not possible, within the time allocated, to identify all issues arising from the proposals with respect to the *Planning and Environment Act 1987* and objectives under the planning scheme for Moonee Valley City Council.
61. Despite our members having been involved with planning proposals for many years, the Estate has not previously been identified as one that would hold multiple additional high-rise apartments other than a slight increase in the height and capacity of buildings that might replace the walk-ups. It was generally anticipated that there would be an improved interface with Victoria Street and Racecourse Road, with a slight increase in height leading to the high-rise and the opportunity for the creation of more open space and connectivity.

62. It is difficult to envisage a more intensive over-development of the existing “spaces” on the site. Any site that does not contain high-rise has effectively been designated a “precinct” that should contain high-rise buildings. The minimum 20m proposed distance between the high-rise promotes a canyon effect or ghetto environment.
63. Maximising built form on these “spaces” on the site undermines the existing attributes of the spaces between the buildings, only some of which are car parks. The car parks could be reconfigured, or basement and/or other multi-level car parking provided, which does not result in effectively losing all open spaces (other than a designated 1,000sqm).
64. In addition to the over-development, the following concerns have been identified:
 - a) There is no diversity of housing or living environments. The proposals are simply for 1 and 2-bedroom apartments, of which there is already an abundance nearby (in the Lombards and Sienna buildings, 1 Ascot Vale Road and other sites) and others proposed. There is no attempt to use this as an opportunity to improve diversity and choice and provide adaptable housing that will cater for changes in needs.
 - b) There would be a significant loss of open space and amenity, which is of particular importance in Flemington. An opportunity to create more open and recreational space and better link the Estate to existing open space is lost.
 - c) The open space at Debney’s Park will be significantly undermined by the built-form being encouraged virtually to the edge of the park. Users of the park will have little respite from harsh high-rise interfaces other than along Victoria Street.
 - d) Defining public and private spaces undermines the objective of fostering cohesion and reduces the vitality of spaces that are now shared by communities.
 - e) There is no reference to retention of the existing 5 playgrounds on the Estate, the half-basketball court, the cricket nets and other public meeting areas.
 - f) The limited open spaces remaining will be overshadowed. The aim for only 2 hours of natural light in winter for play areas for children and other open spaces is grossly inadequate.
 - g) The proposals do not respect the area or integrate with surrounds other than the 4 existing high-rise towers and the Lombards tower.
 - h) It is difficult to see how the objective to prioritise pedestrian and bicycle access within the site can be reconciled with the anticipated increase in vehicular traffic and the proposed use of new vehicular roads as a thoroughfare. This will also impact on pedestrian and cyclist safety.
 - i) Despite the proposed objective to create “safe spaces”, the proposals undermine safety on the Estate. Suggestions that there will be greater “passive surveillance” due to more high-rise ignores the fact that residents can currently easily look outside their homes. Their sight-lines will be undermined by the intensive development proposed. They will need to walk from their apartments to high-rise parking lots. There will be more sharp corners and nooks to hide in. There are suggestions that there might now be “better lighting”, but who will fund the lighting and ensure its maintenance?
 - j) The proposals will significantly impact on existing vegetation, with many large, established trees proposed to be removed. The objective to attempt to retain trees having “moderate or high” retention value is undermined entirely by the caveat that a tree may be removed if its location significantly affects the feasibility of development of a precinct. Part of the benefit of the existing trees on the Estate is the canopy they provide, which has not been considered. This will be substantially lost.
 - k) The proposal to set back buildings along Racecourse Road more than 6m to protect “existing trees” promotes the loss of the other established trees behind

them. It is also at odds with the traffic reports, which state that the relevant trees need to be cut down to widen Racecourse Road and facilitate the proposed left-hand turn lane required for the additional traffic.

- l) The proposed commercial and retail spaces on the Estate will undermine attempts to encourage activity in the Racecourse Road/Newmarket shopping strip and the proposed centre at Flemington Bridge Station.
- m) Building intensive high-rise, of itself, does not foster social connections between residents and the wider community. This was promised with the nearby ALT Tower, where the mooted shared concerts and events have never taken place, with that open space and proposed connectivity now being locked behind gates.
- n) There has been an entirely inadequate traffic assessment. The proposed vehicular access and entry points to the site will result in significant detriment to nearby local streets, not intended for through-access, which will reduce safety and require funds to ameliorate the unavoidable impacts. The proposed condition that there be two access points on to Victoria Street to “maintain the function of that street” ignores the fact that this is currently not available for most of the vehicles on the Estate and that vehicles using Victoria Street will then spill into other local streets. The proposed restrictions on traffic turning from Holland Court will force even more traffic to use the local streets.

65. In terms of the draft Schedule 8 to the *Development Plan Overlay*, the reference in paragraph 8 of page 10 to the Merri Creek, whilst probably a typographical error, provides little comfort to us that those drafting or considering the document fully appreciate our neighbourhood. It is, of course, the Moonee Ponds Creek.

H. TRANSFERRING CONTROL OF DEBNEY'S PARK TO THE MINISTER FOR PLANNING

66. The Association is of the view that there should be a Comprehensive Development Plan that includes Debney's Park and the Estate. It is only as a matter of historical convenience that the land on which the Estate was built was transferred by the City of Melbourne to the state government to manage for the benefit of DHHS residents, with the parkland remaining owned by Council (later being transferred to Moonee Valley City Council after municipal boundary changes).
67. The Association objects to the removal of rights of objection over the site. This is particularly so when there has been an inadequate consultation process leading up to the preparation of the planning amendments and proposals for the site.
68. The Association objects to the proposed transfer of planning authority over Debney's Park to the state government. Without an overall plan for both sites, there is no identifiable need or benefit to transfer the park to the state government.
69. Our public open space is precious. It took decades of campaigning by residents of Flemington and Kensington to preserve Debney's Park as a recreational space, which it was designated in 1941. Parts of it have since been eaten into and eroded by the building of the Housing Estate and, more recently, the building of Citylink and the widening of Mount Alexander Road (largely to accommodate the ALT Tower).
70. A large part of Debney's Park was proposed to be sacrificed for the building of a new road between Mount Alexander Road and Racecourse Road as part of the East-West Link proposal. Our parkland becomes even more vulnerable in light of the proposals to build high-rise on other open spaces in Flemington, leaving this strip open to be utilised in the future for a road.

I. CONCLUDING COMMENTS

71. While the state government clearly intends to encourage fast-tracking of developments supporting the provision of social housing, it is not appropriate to do so at all cost or without properly considering options or adequately having regard to community input and engagement. Having regard to the matters outlined, it is submitted that the proposed changes should not be approved.
72. Few of the many questions identified by the local community, and raised with DHHS by the Association and others, have been answered. There is insufficient clarity as to what is sought to be achieved, no clear costs-benefits analysis and no clear objective for Flemington or Victoria other than a proposed 10% increase in social housing.
73. DHHS should be encouraged to go back and conduct a proper analysis, engage the community and develop a cohesive, compelling argument for appropriate development. This is most likely to be achieved by a Community Consultative Committee and an integrated plan dealing with all land and considering all available options.