



FLEMINGTON ASSOCIATION INCORPORATED

PO Box 509 Flemington Vic 3031
info@flemingtonassociation.org.au
www.flemingtonassociation.org.au
 ABN 29 680 884 811

SUBMISSIONS TO THE STANDING COMMITTEE ON LEGAL AND SOCIAL ISSUES ON THE INQUIRY INTO THE PUBLIC HOUSING RENEWAL PROGRAM

3 November 2017

A. FLEMINGTON ASSOCIATION'S ROLE

1. The Flemington Association welcomes the invitation for public submissions to the Standing Committee on Legal and Social Issues ("Standing Committee") with regard to the parliamentary inquiry into the Victorian Government's Public Housing Renewal Program. Our experience is necessarily limited to the proposals for Flemington.
2. In this respect, the Association made written submissions to the Department of Health and Human Services ("DHHS") on 6 June 2017 and the Social Housing Standing Advisory Committee ("SHSAC") on 21 July 2017. Copies are attached. Association members also attended the SHSAC hearings in October 2017 and gave an oral presentation.
3. The Flemington Association is an incorporated body that primarily acts for 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.
4. 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.
5. 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.

B. OUTLINE OF SUBMISSIONS

6. As outlined above, the Association is only able to comment with respect to the proposals for the renewal of the Housing Estate in Flemington.
7. The Association agrees with the following general propositions:
 - a) The walk-ups in Flemington need to be demolished and replaced with better housing.

- b) There is an opportunity to increase housing density on the Flemington Housing Estate.
 - c) It is beneficial for all to have a more integrated community, including residents from the Housing Estate and other public housing tenants in Flemington.
 - d) Improvements could be made to the Flemington Estate in terms of its configuration.
8. The Association's 2017 *Community Plan* includes the following priority action:
- Advocate for the Flemington Estate to be redeveloped as a mixed-ownership community with a mixture of low, medium and high-rise buildings.
9. Despite holding that position, after consulting residents, the Association has submitted that Amendment C177 to the Planning Scheme (which relates to the proposals for Flemington) should not be implemented *at this time* and *its current form* because of the following:
- a) There has been inadequate community consultation, input and engagement.
 - b) There is no compelling argument for the approach that has been adopted thus far by the DHHS.
 - c) There are real problems with the Development Plan Overlay ("DPO") submitted with Amendment C177 in terms of its utility as a planning tool and its likely adverse impacts on the Flemington community.
10. In terms of the specific issues identified to be considered by the Standing Committee, the Association makes the following submissions.

1. Unclear and inadequate proposed increase in public housing

11. It is still very unclear what is meant by the proposal to increase "public housing" in Flemington by 10%. Attempts to obtain clarification on this have been unsuccessful.
12. Initial references to increased "public housing" appear to have shifted to include increased "social", "affordable" or "accessible" housing or to encourage first home buyers. The Association and others on behalf of Flemington residents have been unsuccessful in obtaining answers from DHHS on precisely what the targets mean and how they are to be measured. Simple questions, such as whether there is proposed to be an increase in the number of units or number of residents or both, cannot be answered.
13. *Homes for Victorians* laments the fact that the "supply of social housing has not kept up with demand, made worse by less low-cost housing in the private rental market."¹ *Plan Melbourne* stresses that there is a pressing need to increase social and affordable housing "including social and affordable housing options in urban renewal developments."²
14. Why is it then that only about 20 extra "social" dwellings (most of which seem to be proposed to be smaller than existing units) are proposed on a redevelopment of this magnitude? Such a trifling increase could be achieved by means that do not result in selling off so much public land, with the consequences that follow, and permitting private development on the scale proposed.

¹ *Homes for Victorians*, page 33.

² *Plan Melbourne 2017-2050*, Outcome 2, page 22.

15. The Association is not alone in being underwhelmed by such a small gain. Moonee Valley City Council (“MVCC”) has proposed that the DPO for Flemington should include a General Requirement of 10% affordable housing on top of the 10% increase in public housing.³ The opportunity should not be missed to investigate possibilities for key worker housing or meeting the needs of a diverse group (aged care, supported access for disabilities etc.) which would help integration.⁴ The project is currently dominated by proposed private dwellings.
16. We note with considerable alarm that public tenancies actually fell at both Kensington and Carlton Estates during the course of their renewals. There appears to be no clear strategy to avoid this happening in Flemington or to measure outcomes.
17. The Association also queries whether proper regard has been given to all available solutions to reduce the waiting list. While creating housing is clearly a priority, there are many other strategies that might be considered other than selling off public land.

2. Proposals do not cater for all demographics with the proposed housing mix

18. The proposals for Flemington do not cater for all demographics. They propose an increase in single-occupancy dwellings rather than encouraging a diverse housing mix. This is despite the fact there is arguably already an oversupply of one-bedroom apartments in the Flemington area.
19. The only argument provided for single-residency units is that there is a perceived need for public/social/affordable housing for women aged over 50. Building such small units does not provide any flexibility for a potentially changing demographic. It is not consistent with long-term planning.
20. The Association supports MVCC’s proposal that the DPO should respond to the opportunity to meet MVCC’s wider choice of dwelling sizes (30% 1 bedroom, 50% 2 bedroom and 20% 3 bedrooms) to meet the projected demographic profile of the site.

3. Adverse effects on current public housing tenants

21. In the case of the current public housing tenants, the proposals for Flemington differ markedly from other estates proposed for renewal in that the majority of tenants (or residents) will remain in the existing 4 high-rise towers.
22. The proposals do not adequately consider the impact on the majority of residents in Flemington who will remain in the high-rise. The Association shares the concerns of residents who lodged submission and who spoke at the SHSAC hearings that they are faced only with additional hardships arising from the proposals, with no discernible benefits.
23. At the SHSAC hearings it was confirmed that there are no plans to upgrade the tower blocks. While there have been some minor refurbishments in recent years, residents in the towers still live in less than desirable conditions. Their ageing apartments are small and far from luxurious. They are stiflingly hot in summer and air-conditioning is not a financial possibility for most residents. Residents share communal laundries with poor ventilation. They deal with faulty lifts, poor security and limited access to public space. None of this will change as a result of the proposals.

³ Submission on behalf of MVCC at SHRSAC, page 23.

⁴ Ibid., page 16.

24. In addition, residents of the existing high-rise will endure years of disruption and change while their apartments remain the same. They will lose much of their open space. They will have to put up with proposed through-traffic that does not currently exist. They will lose ready access to car parks and possibly have less access to car parks than their neighbours. Loss of hours of sunlight will make the apartments more depressing. Submitters have understandably expressed a fear that they will be second-class citizens compared to those in the new social housing apartments. Creating such divisions is the antithesis to trying to encourage social cohesion.
25. The tower residents will also be second-class citizens compared to the private buyers. Experience at other Melbourne renewals shows that developers want private blocks to attract buyers. Buyers want an inner-city apartment close to public transport and facilities. They do not sign up to be part of a social experiment to help or influence others. It is purely a business transaction.
26. Tower residents will lose amenity and could also face the loss of social benefits from estate life. Many of the public housing residents are refugees/immigrants from troubled areas of the world who have to adjust to a completely different way of life in Australia. Others are people who for reasons such as unemployment, single parenthood, disability or poor health find themselves unable to compete in the current housing market.
27. Support is important for many public housing residents: support for new immigrants and refugees from members of their own community; support to learn English; support to become employable; support from fellow residents as they escape their hot apartments and socialise in the open spaces until late on summer evenings. Few private residents have the same needs.
28. Safety is a major concern raised by about 45% of residents who lodged a submission to the SHSAC. Apart from proposals to introduce lighting around Flemington Bridge, no indications have been given as to how safety issues might be addressed in the proposals. Residents instead are justifiably concerned that the loss of open space and sightlines, the introduction of busy through-roads and harsh corners will make the Estate feel less safe.
29. The Association strongly argues that the renewal should not significantly reduce the amenity of existing residents but rather should provide them with tangible improvements to their lives. To do otherwise will only cause justified grievance, disharmony and long-term problems for everyone in the community.

4. Lack of clarity in the allocation of land to public and private housing

30. With the proposals for Flemington, it is not clear which parts of the sites will be allocated between proposed new public and private housing and how this will be done. This gives rise to the Association's concern that any benefits from the proposed sale of public land is impossible to determine given the lack of clarity in how much public land is to be lost.
31. The only aspect that is clear is that DHHS propose to use almost all available open space for housing, with the majority to be occupied by private housing. For the reasons outlined below, the density proposed is unacceptable.
32. The proposals also do not adequately address the issue of integrating communities.

33. The relationships between good health and a sense of community, social interaction and community empowerment are well studied and accepted. Researchers acknowledge the health benefits of connected and strong communities.⁵ Association members work very hard to try to engage all members of our community, but developing a connected and strong community is not easy.
34. One of the underlying principles of the proposed renewal is that, by putting private and public housing together, a more integrated community will naturally develop. The aim is to produce 'tenure blindness'. While an admirable objective, why have no details been provided to show how this will be achieved?
35. It seems that a 'salt and pepper' mix of private and public residents rarely occurs on large estates. Of course, it has been happening for many years on many of Flemington's streets. We already have a diverse mix of private, rental, public and social housing. We have high-rise private apartments and public housing side-by-side.
36. If we look at Carlton Estate, we see public and private areas facing different streets, having separate entrances and parking lots, private gated areas, dividing walls, private access to garden courtyards and separate cafes. At Kensington the public and private buildings are separated by careful landscaping.
37. At the SHSAC hearings, when asked to provide an example of successful "tenure blindness" in a public housing estate, the DHHS planning expert cited Ashwood in Chadstone. Ashwood is a wonderful project but it has no relevance to the situation faced at Flemington. At Ashwood there are only 282 units, all of which are new, and the maximum height is seven storeys. It provides affordable housing for people suffering from housing-related stress, receiving pensions and key workers. It is community housing, not social housing. There are four buildings and all private residents live separately in one of them. What was termed "tenure blind" is the fact that, from the outside, the buildings look very similar.
38. Unfortunately, the renewal will not magically integrate the private and public residents. In fact, the Association is concerned that the renewal will lead to severe loss of amenity for residents in the four remaining towers which could breed resentment and divide the community. With four 1960's towers housing only public housing residents, the Association hopes that ways can be found to fulfil the stated *Design Principle*:
- To balance issues of equity in the successful delivery of private and social housing that is 'tenure blind'.
 - To provide high levels of residential amenity and liveability.
39. But there is no clear strategy to achieve these aims.
40. Any proposal of this scale also needs to consider existing and future community facilities. Assurances are sought that infrastructure will not lag behind the redevelopment of housing. Submissions to the SHRAC stressed the importance of a range of community and recreational facilities to meet the needs of all ages.
41. The current Flemington Community Centre is a well-utilised and well-loved multi-purpose building. It is a community hub, a welcoming meeting place, the venue for many functions and events, the provider of a wide range of classes and activities, a

⁵ Kent and Jalaudin, *Healthy Built Environments Program: A review of the literature*, City Futures Research Centre, Cities Future Research Centre UNSW 2011, page 65.

source of child care and a provider of help with homework along with many other purposes.

42. In the course of the SHSAC hearing, Flemington Community Centre was mentioned repeatedly, with suggestions it might be replaced and moved. There were also suggestions that, once the land owned by DHHS is developed, Council will then consider how to develop the nearby land at Debney's Park. Debney's Park is therefore vulnerable to being used to house a myriad of facilities, including a large Community Centre, additional housing and commercial buildings and potential roads (all of which were identified as possibilities at the SHSAC hearings).
43. The Association submitted at the SHSAC hearings that the proposals should not consider DHHS-owned and Council-owned land separately. To do so is highly artificial. There is a real opportunity to consider all of the publicly-owned land and collaboratively work out the best way of using the land for existing and future residents. This opportunity will potentially be lost.

5. Public condition assessments of the Flemington walk-ups is too late

44. As outlined above, the Association accepts that the walk-ups in Flemington have been permitted to fall into a state of disrepair where refurbishment is not a viable option.
45. The Association has for many years unsuccessfully lobbied for improvements to the walk-ups. The fact that they could be allowed to fall into such disrepair means that the proposed short-term, quick sale of public land to obtain money is of no comfort to the community and certainly provides no guarantee that new accommodation (or the existing four high-rise) will be looked after into the future. There needs to be a more sustainable vision than simply obtaining money from selling off public land.

6. Unjustified increase in density and heights and unacceptable adverse impacts

46. The proposed level of density and heights is not justified having regard to the unavoidable loss of open space, greenery and general amenity for residents.
47. No justification has been given for the desired yield of private and social housing. What is proposed is a radical departure from what we have seen in the rest of Flemington and what we expect from the Arden-Macaulay Precinct and the VRC development. It is more akin to CBD living and justified only on the basis that selling off public land, adjacent to public housing, with intensive private development will create a short-term financial gain for the government.
48. A priority action for the Association is to identify places where high density development can be supported in return for protecting lower scale areas.
49. We recognise that the Estate offers an opportunity for higher density development. However, introducing substantial buildings on six precincts across the Estate will nearly double the Estate's population and destroy the openness that is the Estate's greatest asset. As the submissions to the SHSAC hearing showed, overcrowding and overdevelopment are major issues for Estate residents and the wider community.
50. The Association does not support the scale of the proposed redevelopment with its proposed massing. This does not respond or contribute to the neighbourhood context. The proposed heights and building footprints are excessive.

51. The heights proposed, especially the 20-storey building on Racecourse Road, ignore the context of the site and the Arden-Macaulay Structure Plan applicable to the other side of the road. They present a high-rise, high-density aspect to the wider community, reinforcing the stereotype that public housing is about little boxes in towers. A more diverse range of housing types would help de-segregate the Estate. A 20-storey building is only likely to provide a barrier to the Estate and not support the stated Design Principle 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.”
52. The proposed sacrifice of public space is outlined separately below because of its significance.

7. No basis to remove planning controls

53. There is no clear basis for removing planning controls from MVCC. In fact the hasty approach adopted by DHHS thus far, with inadequate consultation, information-gathering and clear strategy, indicates that protections must remain in place.

8. Concerns over the loss of third party rights

54. The loss of third party rights is particularly concerning given the poor consultation and governance demonstrated thus far in the planning process.

9. Lack of meaningful consultation and transparency

55. The consultation process for the redevelopment of the Estate has been grossly lacking. The first opportunity to provide meaningful input was at the recent SHSAC hearings. This was too late in the process. Detailed documents had already been drafted without any clear information as to how the documents were created.

56. Community consultation should be a vital feature of the planning process. Minister Wynne assured the community that there will be more effective community consultation on planning issues:

“We will keep listening to local people and we will keep working with local communities to ensure that everyone has a fair say and a fair go.”⁶

57. The Association is concerned that the community consultation for the proposed Amendment has fallen far short of that position. There seems to be a difference between appearance and reality.

58. In relation to the Flemington Estate Renewal, the DHHS website states:

Late last year we engaged with the Estate residents and sought their ideas on what they value about the Estate. We used this information to develop a draft sketch plan to show our ideas to renew the Flemington estate and better integrate into the local neighbourhood.

59. In fact, a consulting firm was engaged to solicit some preliminary input from community groups and people who live, work or study in Flemington. As the firm’s report attests,

⁶ *Plan Melbourne 2017-2050*, page 1.

the consultation process was very limited in its scope.⁷ A limited number of residents was asked vague questions not directly addressing the plans for the renewal. There was only scope to provide feedback through the consultants, rather than directly to DHHS officers, but the consultants declined repeated invitations from the Association to meet with them and discuss opportunities and issues.

60. Further “community consultation” involved drop-in information sessions. This again did not amount to genuine consultation, especially as few questions from those attending could be answered. With so little information, no meaningful input could be provided.
61. Correspondence sent to Flemington residents inviting them to attend the information sessions focused only on the replacement of the walk-ups or spoke in vague terms about “redeveloping” the Estate. Properly informing the community would have alerted residents to the reality of the proposed number of new private dwellings, the doubling of the Estate’s population and changes to open space, road and traffic movements and community facilities. This was not done. No graphics were produced on correspondence other than one pamphlet showing 1-2 storey developments. There was no obvious material on display in centres where such information might ordinarily be promoted.
62. We are also concerned that the community consultation process for this renewal seems truncated compared to other renewals. We do not understand the rush.
63. *Homes for Victorians* indicates that, with Public Housing Renewal Program tenants, the consultation process will gain input from residents, communities and other stakeholders on issues such as proposed land uses, scale and types of new residences and recreational spaces. Flemington seems to have been denied the same opportunity.⁸
64. The Kensington Estate renewal included an advisory committee that met over an 11-month period and prepared six Issue Papers, each concerned with a particular aspect of the redevelopment, including integrating private and public housing and conditions for a private sector joint venture, and these papers provided the basis for recommendations for the development strategy of the Estate.⁹
65. Meaningful communication takes time, especially with the challenges faced when interacting with some of the community’s most vulnerable members, many of whom have English as a second language and few of whom have any experience of planning issues. There are many technical documents associated with this application. The manner in which documents and information have been presented makes it very difficult for residents to understand what is being proposed. A better consultation process is needed that allows the people who will be most affected to have real input into the plans.
66. A group of Association members has spent considerable time trying to understand this application. We have discussed it several times with our local MP, our local councillors and with staff from Moonee Valley City Council. We met with a Kensington Association representative who had spent nine years on the Community Liaison Committee of the Kensington Public Housing Estate Renewal. We have worked with the local community legal centre to try to obtain information. Despite the time spent,

⁷ *Flemington Estate Renewal Project: Phase one engagement report*, DHHS (Capire Consulting Group), November 2016.

⁸ *Homes for Victorians*, page 33.

⁹ *Kensington Estate Redevelopment Strategy Final Report*, Perrott Lyon Mathieson, page 5.

and despite the Association having been involved in many planning applications, we feel that we have not fully 'come to grips' with it. One can only imagine what an individual with no planning experience could possibly make of it.

67. Meaningful community consultation obviously has many benefits. Extensive research shows that participation in shaping the built environment fosters a sense of belonging, empowerment and custodianship.¹⁰ The opposite can be true of inadequate consultation. Residents can conclude that consultation is a sham and it is pointless to participate.
68. The Association has sought to be proactive regarding community consultation. As soon as the renewal was announced, we campaigned with our local MP for a community consultation committee to be established. The Association welcomes being invited onto the new Flemington Consultative Committee for the Estate, but it seems that the committee only has a role once decisions have been made about the important issues of land use, built form, landscape and open space, vehicle and pedestrian circulation and car parking rates. While useful, the functions of the committee are limited. The appointment of the Committee was by invitation and it is not clear what process was used to select the members.

10-12. Other matters identified in the terms of reference

69. The Association is not aware of assessments undertaken regarding the identified public housing estates where similar models are envisaged or underway.
70. The lack of research, consultation, supporting documentation, clear targets and ability to measure any outcomes from the proposals are all of significant concern to the Association. Accordingly, the Association supports any attempts to consider best practice models for the provision of public housing from within Australia and overseas and to consider previous housing renewal projects.

13. Unacceptable loss of public space and greenery

71. The loss of public space is of such concern to the Association that it must be dealt with separately.
72. The public space on the Estate could be configured better to maximise its utility but the Association strongly argues that, simply because it does not contain built form, does not mean that the open space on the Estate is "under-utilised". Open space is vital to our community, and particularly to those living in the four existing towers.
73. MVCC has identified Flemington as already 'having an insufficient amount of open space'.¹¹ In the course of the SHSAC hearings, warnings were given about the recent trebling of the population in adjacent Travancore, the expected influx of population from the Arden-Macaulay Precinct and from many other planned developments in the area. The plans for Flemington offer grossly inadequate open space. The proposed podia 'open space' on top of car parks is a very poor substitute for ground level space.
74. Open space is not something easily acquired in an inner city area that has the highest density of population in the municipality and has developers eagerly circling looking for opportunities to build high density housing.

¹⁰ *Healthy Built Environments: A review of the literature* 5.2.2 Cities Future Research Centre UNSW 2011

¹¹ Submission on behalf of MVCC at SHRSAC, page 70.

75. The Association's Community Plan includes the following priority action: Campaign for more open space in Flemington, including the creation of mini-parks.
76. Open space has been a major asset of Flemington Housing Estate. The Association challenges its classification as 'surplus' or 'under-utilised' and sees the current Amendment as an intensive overdevelopment of the site. Submitters stressed that loss of open space and play areas is a significant issue for residents on the Estate and in the wider Flemington community
77. Research shows that green and open spaces are beneficial to our mental, social and physical health and they facilitate contact with nature and with community.¹² It is important that open space is thoughtfully designed. The proposed loss of open space will have an impact on existing and future residents in the Estate and the local area.
78. Unfortunately, it is difficult to calculate the amount of open space that is to be provided and the amount of open space that will actually be useful as the documentation and the expert witnesses have not been able to provide clear answers. Clarification is needed about the number, location, size and layout of the proposed "pocket parks". These appear simply to be grassed areas adjacent to high-rise or roads. How many are to contain playgrounds? Will they be accessible to all residents and members of the wider community? Will being 'well framed by buildings' make them feel closed-in? Will the reduction of solar access make them uninviting? Will they be safe from the proposed increased traffic passing through the Estate to Flemington Hill?
79. Clarification is needed about the proposed 'open space' on top of podia. In particular, issues of usefulness and accessibility need to be addressed. Will they be caged to ensure children's safety? Will only tenants in the particular building have access? Will members of the wider Flemington community have access or is there actually going to be a significant loss of open space to the suburb? Will trees that are the lungs of the suburb be able to be grown there? No examples have been provided of other housing estates where open space has been sacrificed to this extent on the basis of proposed green spaces on top of car parks. If this is a unique experiment, it needs to be investigated properly.
80. Residents in the four towers will suffer most from the changes to open space as it has helped to compensate them for their small apartments without balconies. The playgrounds and open space have served as their 'backyards' and gathering places and provided an escape from their apartments. Generally they are not people who can go on holiday for a change of scenery.
81. In terms of social cohesion, these open spaces are the areas where people on the Estate meet their neighbours.
82. DHHS acknowledges that many public housing tenants will lose their views, one of the most valued features of the tower apartments.¹³ For many, gone will be the feeling of openness as they will stare at another tower block. Gone will be pleasures like watching New Year's evening fireworks, so treasured by many tower residents.
83. The limited remaining open spaces will be more overshadowed. The good solar access currently enjoyed on the Estate will be reduced. The goal of only 2 hours of natural light in winter for play areas for children and other open spaces is grossly

¹² Kent and Jalaudin, op.cit. 5.2.4.

¹³ Sheppard, Urban Design Report, submitted at SHRSAC, page 68.

inadequate. What may meet a planning requirement does not produce the best outcome for families.

84. As outlined above, the uncertainty over the status of Debney's Park is of great concern. Our park has already been the victim of "nibbling". Clarity is needed about what it could mean if the Minister were to become the Responsible Authority.
85. The Association also has concerns about protecting the mature trees on the Estate. These are incredibly valuable and contribute significantly to health and well-being. Apart from their visual appeal, they improve air quality, absorb sound, reduce wind speed and have cooling effects – all benefits that are needed, especially for residents in the four towers. The whole neighbourhood benefits from the trees.
86. Experts at the SHSAC hearing expressed concern about the direct and indirect damage that the redevelopment may do to trees that are to be retained. Some trees will have to be removed. Narrow setbacks are likely to affect tree canopies. Damage is likely to be caused during the construction of buildings and infrastructure, with other trees possibly lost. Others may struggle in the changed conditions. Overdevelopment of the site is very likely to contribute to the loss of trees.
87. Encouraging a greener Flemington is one of the Association's priority actions. As a voluntary group that plants gardens in the neighbourhood, the proposed loss of many mature trees is entirely unacceptable.

14. Problems with a DPO as a planning tool

88. After reluctantly being drawn into many planning applications, and sometimes finding it a confusing and disempowering experience, the Association has included the following priority action in its 2017 Community Plan: Advocate for detailed guidelines to be prepared for key development sites.
89. In the course of SHSAC hearing we heard the DPO controls criticised for their inability to provide a clear picture; inaccessibility; lack of detail; lack of evidence and inability to quantify amounts. We also heard expert witnesses disagree about what should or should not be included. It was pointed out that a draft development plan would have been a useful accompanying document. The conceptual phase of the renewal has been discouraging for residents.
90. Having watched developments in our area change quite radically after being approved, residents want more certainty and more protection. Too many aspects of the plan are indicative or unclear. The DPO has been very challenging for residents who want more detailed planning prior to the approval of a development plan at the planning permit stage.
91. We note that Plan Melbourne states that DPOs have been criticised for not being 'sufficiently robust'. New planning provisions or tools to deliver social and affordable housing are to be developed in consultation with the community-housing sector, the residential-development industry and local government.¹⁴ Consideration should be given to waiting for a more helpful planning tool.

¹⁴ *Plan Melbourne 2017-2050*, Outcome 2, 2.3.3.

C. CONCLUDING COMMENTS

93. As outlined at the beginning of this submission, the Association supports redevelopment of the Flemington Housing Estate, including an increase in density. The Association welcomes initiatives to improve and expand public housing.
94. However, for the reasons outlined above, the Association is extremely concerned that the processes currently employed by DHHS are not likely to achieve discernible long-term benefits and are in fact likely to result in many adverse outcomes for Flemington residents, especially the majority of public housing residents.
95. We are keen to work with others, including the DHHS and Council, to ensure good planning outcomes for Flemington. Working together, this should be possible.
96. We urge the Standing Committee to consider actions that would improve processes for extending and improving public housing and achieving a positive outcome for Flemington. This includes, but is not limited to, the following:
 - Ensuring that there is proper engagement with the community so that there can be a sense of ownership over and pride in the project and its results.
 - Limiting the extent of development proposed and protecting liveability for existing and future residents in terms of their access to and enjoyment of public open space, greenery and facilities.
 - Acknowledging that space on the Flemington Estate that is not built upon is not “under-utilised” space and that open space is vital to the well-being of residents, whether in social, public or private housing.
 - Encouraging a planning process that is transparent and accessible and supported by rigorous analysis and innovative proposals looking at how all publicly-owned land might be best used.
 - Setting clear targets that can be assessed now and into the future.