

**SUBMISSION ON GATEWAY TO THE BAY
INNER MELBOURNE FORESHORE URBAN DESIGN FRAMEWORK**

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High-rise on the foreshore

The central issue raised by the Gateway to the Bay document is whether high-rise towers should be allowed in Port Melbourne and St Kilda in the vicinity of the foreshore.

They should not.

High-rise development in these foreshore locations:

- is contrary to proper planning
- threatens the historic character of the area
- will reduce the amenity of important streetscapes including Bay Street and Beach Streets in Port Melbourne, and The Esplanade in St Kilda
- will reduce amenity for surrounding residents
- will reduce the amenity and attraction of the beach for local residents and visitors
- will set a precedent for tower developments in other locations on the foreshore of Port Phillip Bay.

The fundamental premise of the document appears to be the view that there is a market for high-rise development that needs to be satisfied. The document has an objective '*to create view sharing to the bay from high rise buildings.*'

However these views will be shared by the relatively few Victorians who are able to afford them. The vast majority of Victorians who use and enjoy the foreshore and its surrounds will have their views blocked and their enjoyment diminished by overshadowing and overcrowding.

Contrary to proper planning

High-rise development is not wrong per se. It is just that in this case it is being proposed in the wrong spot. There are many locations in Melbourne that are appropriate for high-rise development and where the demand for views can be met. Apart from the Central Activities District these locations include Southbank, Docklands, St Kilda Road and Queens Road.

Proper planning should encourage high-rise development in these locations where it has already commenced and not start a new market and new expectations in an inappropriate location.

One of the stated objectives of Gateway to the Bay is to bring Melbourne closer to the bay. This is a reasonable aim but it can be achieved by better transport links, better signage and an enhanced foreshore environment rather than by simply building tall buildings near the foreshore and attempting to replicate the Central Activities District.

It is suggested that high density development in Port Melbourne and St Kilda will frame views from the city and define both ends of Beaconsfield Parade. This is a ludicrous suggestion. Most people in the city will not be able to see the buildings in Port Melbourne and St Kilda. The only people who will see these buildings from the city will be the occupants of the upper floors of some CBD towers. There is no explanation given as to why these people need to have their views framed or why both ends of Beaconsfield Parade need to be defined. The so-called 'bookend' landmark buildings might just as well be in Elwood or Brighton as St Kilda.

Tall buildings are not needed to point people in the right direction to find the beach. If there is a problem, improve the signs.

There should be clear height controls for the foreshore which provide certainty for developers, the council and residents. The Gateway document is imprecise and vague. As a result there are likely to be inconsistent decisions made and an increased likelihood of appeals.

The Port Phillip Council has carried out extensive research and consultation in preparing the height controls recommended in Amendment C5. These should be preferred to the ambiguous height control recommendations in Gateway to the Bay.

In my submission, building heights should be no higher than recommended in Amendment C5. There should be clear and unambiguous height controls for the foreshore. The discretion to vary the height limits contained in the council's Amendment C5 should be strictly limited to avoid inconsistency and a plethora of appeals. The vague statements about desired heights in the Gateway document should not be adopted.

It may be appropriate for buildings to be setback and 'stepped' (for example two to three stories at the front and five to six at the back) to retain an open skyline and avoid a canyon effect. There should be sufficient setbacks to ensure unimpeded sunlight to the foreshore, bikepaths and footpaths.

Threatens the historic character of the area

Gateway to the Bay makes a number of sweeping statements about other major cities. There is no analysis of the different histories of the cities. For example, the Boston CBD has always been located at the waterfront. Port Melbourne has historically been a port, and St Kilda a residential and recreational area. It is inappropriate to locate CBD style buildings in such historic locations.

Development of Port Melbourne should maintain and enhance its heritage character as Melbourne's port. Existing heritage buildings should be retained and new development should not be inconsistent with this heritage character. CBD style developments which overshadow and overwhelm the area are inappropriate.

Bay Street is a relatively intact Victorian shopping centre and the heart of historic Port Melbourne. Multi-story buildings have already been proposed for Bay Street which will dominate the street and undermine its Victorian village character.

The area around the Esplanade Hotel in St Kilda is of important historical value. Not only are the buildings and streetscape important, but the area has been one of Melbourne's recreational and cultural centres. Luna Park, the Esplanade Hotel and the Palais should not be dominated by a CBD style building.

Reduction in amenity and attractiveness

Port Melbourne and St Kilda are high amenity residential locations. They are also favoured destinations for people from all over Melbourne and tourists to enjoy the beach and foreshore environment. People also come to enjoy the historic and cultural character of the areas.

They do not come to see tall buildings that they can see in the CBD if they wish. Overshadowing by tall buildings will substantially reduce the amenity of the area and its attractiveness for visitors.

The importance of walking, bike-riding and roller-blading in the vicinity of the foreshore should be emphasised. These activities take place all year round.

Accordingly overshadowing must be considered not only of the beach itself, but also of the nearby streets which people enjoy. Further because of the year round use, overshadowing must be considered in winter.

The area is already extremely popular and there are significant traffic and parking problems, particularly at week-ends. No consideration has been given in the Gateway document to these traffic and parking problems.

There has been widespread opposition to Gateway to the Bay from the Port Melbourne and St Kilda communities based on the reduction in amenity of the area and the threat to its historic character.

Precedent

The Gateway document claims that allowing high-rise in Port Melbourne and St Kilda will reduce the pressure for such development in Albert Park and Middle Park. No evidence is given for this. It might just as well be argued that high-rise residential developments in Port Melbourne and St Kilda will create a market for foreshore sea-views which will put pressure on Albert Park, Middle Park and other Bayside areas for further high-rise accommodation.

It is said that allowing a 'one-off' landmark development in St Kilda on the Esplanade Hotel site will not create a precedent.

However the first tower on the Gold Coast was no doubt 'a landmark'. Once developers have completed the first landmark, they will want to commence another. It will be difficult as a matter of planning law to say 'no' to subsequent high-rise developments if these proposals are allowed to continue.

The foreshore of Port Phillip Bay is a precious asset for all Victorians. Allowing high-rise in Port Melbourne and St Kilda will create a market expectation that high-rise

views will be allowed in other popular locations around the Bay. Once high-rise development as foreshadowed in Gateway to the Bay is allowed, it will be much harder to resist the pressure for similar development in other bayside municipalities, including Hobsons Bay, Geelong, Queenscliff, Bayside, Kingston, Frankston and Mornington Peninsula.