



13 October 2017

Attention: Maree Klein
Planning and Building Branch
Level 3, Council House 2
240 Little Collins Street
Melbourne Vic 3000
Planning@melbourne.vic.gov.au

Dear Maree

Land at: Application for Planning Permit TP-2017-607, 36- 38 The Avenue, Parkville
Purpose: Proposed change of use – Education Centre

The Association is concerned about and strongly objects to the proposed application in relation to the following matters:

1 Encroachment of non-residential uses in residentially zoned land

The subject site is fully located in the General Residential zone (GRZ) under the Melbourne Planning Scheme.

From a planning policy perspective, Clause 21.16-4 Parkville clearly states that encroachment on institutional uses into residential areas is to be 'discouraged' as per the following:

- **Discourage** medical centres and other commercial uses in the residential zones, the stable residential areas of Parkville, except where they serve a local community function and do not cause adverse impacts on residential amenity.
- **Discourage** the encroachment of institutional uses into parkland and residential areas. (emphasis added)

The Association notes that the residential component of this area of Parkville has been increasing with several recent and current developments.

Further this section of Parkville is not identified as a Knowledge precinct as per Figure 3 in Clause 21.08 which is another reason why existing educational uses in non-residential zones adjoining a Residential zone should not be approved to encroach into residentially-zoned areas. In Clause 21.08-5 Knowledge precincts, there are several strategies that are equally applicable to consideration of this application, namely:

Strategy 1.4 Discourage the encroachment of non-residential uses associated with research, education and medical institutions into adjoining Residential Zones and parkland.

Strategy 1.6 Manage the off-site impacts of education and research facilities such as car parking and traffic to protect the character and amenity, (including visual amenity) of adjoining areas.

There is no substantive planning policy basis provided in the planning report (Prepared by Andrew Crack & Associates Pty Ltd dated 25 July 2017) to justify approval of this application in the face of this explicit policy about discouraging encroachment of institutional uses into residential areas. Indeed there are some patently absurd justifications drawn in this report, for example, that the location of the Whitley College library in this location would serve 'local community needs'.

Indeed, the Association questions whether, if approved, the premises would actually be fully used as a Library as proposed (given the current tendency for many post graduate students to almost fully access research material electronically and not to use hard copy libraries) and would 'morph into merely an administrative annex to the Mervyn Himbury Theological Studies Centre located within the GRZ further north along The Avenue.

Further, under Clause 22.14 Discretionary uses in the Neighbourhood and General Residential Zones, the policy basis clearly states the need to restrict the encroachment of incompatible non-residential uses that do not make a specific contribution to the local neighbourhood as follows:

The proximity of the residential areas of the City of Melbourne to the Central City makes these areas attractive for uses that are not focussed on local needs and may not be compatible with residential amenity. To protect these areas, **it is important to restrict the encroachment of incompatible non-residential uses.**

It is also important to acknowledge that there are existing non-residential uses in residential areas which make important contributions to local neighbourhoods. In these instances, the responsibility for management of impacts should fall upon the 'agent of change'.

Similarly, the proposed use arguably cannot be justified under many of the Decision Guidelines for the GRZ set out in Clause 32.08-12.

The proposed opportunistic relocation of this library to this location is completely incompatible with the collective planning policy context in the Planning Scheme to protect residential areas of Parkville from the continued encroachment of institutional uses that do not meet any local community need.

2 Waiver of car parking provision to zero

While the Association is supportive of Council's policies in relation to sustainable transport modes, it considers that the application's proposal to waiver the car parking requirement to zero is unrealistic and unjustified.

Current approaches to planning usually rely on 'evidence-based' responses – in this case, little or no reliable evidence has been provided in relation to the proposed zero car parking for the estimated 20 people maximum who would be on site.

The proposed use, along with the recently approved student accommodation on the adjacent Whitley College side is likely to make unreasonable demands on on-street car parking, essentially externalizing the provision of car parking to the public domain.

Yours faithfully



Helen Weston
Secretary
The Parkville Association Inc

cc Clr Reece, Clr Watts, Clr Wood and Clr Leppart
Ellen Sandel MP