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## **Yarra Climate Action Now (YCAN) Submission: Swan Street Structure Plan - Draft May 2011 (SSSP)**

### **Purpose of this Submission**

The purpose of this submission is to review the SSSP from the viewpoint of its implications for energy use and greenhouse gas emissions. In doing so we wish to highlight links between the draft strategies contained within the plan and pre-existing commitments by Yarra Council in respect of these issues. In addition to the Swan Street Structure Plan Draft (SSSP) we have referred to:

Council Plan 2009-2013 (CP)

City of Yarra Customer Service Guarantee (CSG)

Yarra Environment Strategy: Towards Local Sustainability 2008 - 2020. (YES)

Yarra Environment Strategy: Towards Local Sustainability 2008 - 2020 (Revised) Action Plan (YES rev.)

Yarra Planning Scheme Municipal Strategic Statement (MSS)

### **General Comments**

The Swan Street precinct is a major activity centre that will be subject to considerable change in the coming years. This being the case, and with Yarra Council's laudable environmental and greenhouse goals in mind YCAN believes that the Swan Street precinct presents a major opportunity to showcase best practice in respect of carbon constrained urban design in the context of a dense inner urban mixed residential, commercial, retail and industrial precinct.

Council Plan (p.14) commits council firmly to reducing Yarra's ecological footprint by taking a leadership role which aims for a 25% reduction in green house gases by 2012 and a carbon neutral community by 2020. The YES (p.204, 208-9) reinforces this commitment to environmental sustainability whilst providing some indication of the task facing us by citing:

- Yarra's disproportionately large ecological footprint of 7.44 hectares per person (Australia 6.4 Ha and world's 4<sup>th</sup> largest)

- Yarra's significant greenhouse gas emissions average of 27.4 tonnes per person (Australia 19.7 t)

Further, YES (p.211) states that the challenge is to reduce Yarra's environmental footprint by reducing consumption and increasing efficiency. By councils own survey, the community wants council to lead by example in the area of environmental sustainability (p.212-3). The SSSP is a strategic document with long term implications and YCAN argues that it is an appropriate place to explicitly restate council's commitment to urban sustainability and show our community how that reflects in the strategic precursors to actions that link to councils pre-existing policy commitments.

***YCAN suggest that 1.4 Purpose of the Structure Plan (p.5) be extended to include an additional point:***

- ***Plan and demonstrate council's commitment to reducing Yarra's environmental footprint, GHG emissions and increasing sustainability at an urban scale (as opposed to the building scale implicit in strategy 4.1 p.23)***

We note the appearance in the SSSP of passages and strategies relevant to climate change mitigation and environmental best practice. These occur chiefly, but not exclusively, on page 23 under Objective 5 - To *promote* the integration of ESD initiatives into new development. Strategy 4.1 *Encourages* the incorporation of best practice ESD principles through addressing the ten key environmental categories, which are:

- Indoor environmental quality
- Energy efficiency
- Water resources
- Stormwater management
- Building materials
- Transport
- Waste Management
- Urban Ecology
- Innovation
- Ongoing building and site management

In light of Councils other commitments in respect of these issues we argue strongly that it is inadequate to '*promote*' and '*encourage*' action on these fronts. We believe that Council must '*require*' of developers/designers wishing to take advantage of the opportunities afforded by the Implementation Plan that will eventuate from this process, that they incorporate best practice measures in respect of the above list of goals. If the eventual plan is to be credible in these respects and if Council is to be seen to be fulfilling its commitments this must be made explicit.

***YCAN suggest that Objective 5, To promote the integration of ESD initiatives into new development (p.23) be strengthened by substituting the word promote with showcase and the word encourage in Strategy 4.1 (p.23) with require.***

Despite the comprehensiveness of the ten point check list we find the treatment of environmental and greenhouse related issues throughout the SSSP to be fragmentary and ad-hoc. We find that the implications of several existing environmental and greenhouse emissions mitigation commitments by Council are either not dealt with or not fully acknowledged. We acknowledge that the SSSP is not the same as the Implementation Plan that will result from this process. It might be argued that there is time, and room within the process, to insert other measures later. However we argue that issues of fundamental importance should already be made explicit at this stage.

We note that the process for development of this plan as described by a diagram on p.3 of the SSSP does not make any apparent allowance for community consultation on the Implementation Plan. This we find regrettable as the actual implementation of the goals articulated in the SSSP could easily

undercut the intentions underpinning these goals. We note for example that the distribution of new building could either reinforce or undercut Council's environment and greenhouse related objectives. In this respect we refer to the Urban Design Strategy developed By Rob Adams for the City of Melbourne's urban Design Department, 'Transforming Australian Cities'. In particular we refer to that policies selective densification of urban fabric along and adjacent to public transport networks. This is consistent with carbon constrained cities of the future.

***YCAN suggest that a community consultation and review phase appropriate to the Implementation Plan be added to the Process of Developing the Structure Plan (Figure 1, p.3)***

## **Specific Comments on Part 3: The Structure Plan, Vision and Strategy**

### **Theme 1: Land Use**

Objective 5 - To encourage a diversity of living opportunities and Objective 7 – To promote the effective use of underutilised land lead to changes in neighbourhoods, population numbers and density. A reduction in dependence on private motor transport via proximity of community facilities to residential accommodation is integral to the shift to a carbon-constrained future. The area currently contains 12,000 residences and it is envisaged that this will grow by 2,500 residences within the planned period. Central to the provision of a 'diversity of living opportunities' should be the provision of appropriate local facilities accessible by walking or riding. These include childcare, community health care, aged facilities, neighbourhood houses etc. No mention is made of these in the SSSP and we think it is important to state clearly that any shortcomings in current provision of resident community facilities and the necessary expansion of these to accommodate future residential growth and mix, is integral to the strategy.

***YCAN suggest addition of Strategy 5.6 to Objective 5, Land Use:  
Audit and assess the adequacy of the provision of community facilities to existing and proposed residents and provide necessary facilities identified by this process to ensure that all residences (existing or proposed) are within a reasonable walking or riding distance of appropriate community facilities.***

From the point of view of greenhouse and environmental issues we believe that the location of small, locally based *Waste Transfer Stations* and recycling centres which collect non kerbside material, are highly visible, located within walking distance to shops and residences and feed into council's Clifton Hill facility central to council addressing its existing commitments. In addition we find the location of one or more *composting facilities* to service both residences and local food establishments to be a priority.

***YCAN suggest addition of Objective 9, Land Use:  
To develop a sub-system of locally accessible and highly visible waste transfer stations, recycling and compost centres for use by residents and businesses within walking distance.***

The range of uses and wording of strategies contained in Objective 8 – To provide a range of mixed-use buildings and spaces appears to be inconsistent with Figure 7: Land Use Plan on p.20. Consistently more residential uses and flexibility are suggested in the key in figure 7. Better use of existing land and infrastructure, mixed and flexibility of use in the long term help to promote sustainability and reduce ecological footprint.

***YCAN suggest amending Strategy 8.1 of Objective 8, Land Use to more broadly match the flexibility of uses contained within the legend of figure 7,***

***encouraging residential above offices, residential over large format retail and office and residential over convenience retail, lifestyle and entertainment.***

Local food production reduces food-miles and, as a consequence, the carbon footprint of food production. Shared food gardens strengthen community sense. Community gardens have an important role to play in our shift to a carbon-constrained future. Given the assumption of the SSSP of about 20% growth in the number of residences in the precinct, the fact that the vast majority of this growth would be medium to high density accommodation, the high percentage of existing apartment dwellers and Yarra Council's otherwise commendable support for community gardens it is surprising that there is no consideration of this form of public land use. We note for example that Council has committed itself to establishing five new community gardens by 2012 (YES Revised Action Plan p.36) Although the SSSP will not be implemented by 2012 we argue that the SSSP should seek to establish one or more community gardens in this precinct. As far as this Structure Plan is concerned we believe that this shortcoming should be remedied by inclusion of strategies similar to those below probably again under Theme1 Objective 7: to promote the effective use of underutilized land. (p19)

***YCAN suggest addition of Strategy 7.6 to Objective 7, Land Use:  
Provide local, pedestrian accessible community gardening opportunities appropriate for the increased demand resulting from projected residential growth.***

#### **Theme 4: Access and Movement**

As well as health and recreation issues, a reduction in dependence on private motor transport via the promotion of pedestrian and bicycle movement is integral to the shift to a carbon-constrained future. In this connection it is essential that as many existing residences as possible and all new residences are directly connected to the proposed pedestrian/bicycle network. Further, for such a network to function effectively adequate provision of dedicated and where necessary (transport interchanges for example) secure bike parks and/or storage is essential. We commend the idea of an east-west bicycle – pedestrian spine along Lesney Street and emphasize the importance of safe and where possible dedicated connections between this spine and:

- Swan Street shops.
- Residential enclaves.
- Transport interchanges.
- City access bike routes.

***YCAN suggest addition of the following Strategies to Objective 3, Access and Movement:***

##### ***Strategy 3.5***

***Provide where possible and appropriate dedicated, cycle and pedestrian routes to the appropriate community facilities, transport interchanges and shopping to ensure that existing residences are appropriately connected by safe, accessible pathways.***

##### ***Strategy 3.6***

***Ensure that all new commercial and retail properties are accompanied by adequate, and where necessary secure bike parking and storage.***

##### ***Strategy 3.7***

***Ensure that existing transport interchanges educational facilities and commercial and retail properties are accompanied by adequate, and where necessary secure bike parking and storage.***

## **Other items**

Council's CGS item 26 commits to planting a minimum of 750 new street trees each year. YCAN supports this commitment from a climate action perspective (carbon sequestration, heat island effect mitigation etc.) and believes the SSSP would benefit by the addition of a specific strategic commitment to this aim.

Council's CSG, item 35 commits to 5 major separated on road bicycle routes by 2013. As previously stated, YCAN supports the increased use of bicycles from a climate action perspective and believes that the SSSP should aim to identify at least one route where within the plan area where the implementation of this commitment may be possible.

YES (2008) (p.221/20) aims to recover as much waste as possible for recycling, re-use and energy generation. YCAN believes that there may be potential for local Combined Heat and Power (CHP) facility within the plan area and suggests that a Strategy be drafted that includes mention Yarra Energy Foundation and further study which may identify possible locations and feasibility of such a facility.

YES (Revised Action Plan) Area 2, Open Space and Bushland, Item 2.7 commits council to identifying areas for conversion of hard road surface to green landscape. YCAN would support this initiative from a climate action perspective (heat sink, environmental flow etc) and believes that this commitment could be reflected in an additional strategic objective within the SSSP.

YES (Revised Action Plan) Area 2, Open Space and Bushland, Item 2.6 commits council to identifying areas where five new parks could be secured. Further, in the MSS (21.02/5) council notes that Cremorne has almost no public open space. Perhaps there are possibilities for new, innovative open spaces within the plan area and YCAN would support this initiative from a climate action perspective (heat sink, carbon sequestration, environmental flow etc) and believes that this commitment could be reflected in an additional strategic objective within the SSSP.

Given that council is deeply committed to environmental sustainability, a theme that is reflected in numerous council policy documents and sees the need to take a leadership role whilst community wants council to lead by example (YES p. 204, 211-3) YCAN believes that an opportunity exists with the SSSP to showcase and demonstrate local sustainability. Local, highly visible and accessible sustainability demonstration and information centres would further help to raise awareness to both possibilities and action. The introduction an education and advocacy role for local sustainability into the SSSP is another possibility.

There is much in the SSSP that is excellent from a locally sustainable, carbon constrained viewpoint and YCAN congratulate the City of Yarra for their progressive approach to developing a vision for a vibrant, liveable, more efficient and sustainable local neighbourhood. We hope that the climate action points that are made in this submission are appropriate and considered relevant and timely to the process of further developing the Swan Street Structure Plan.

Yours Sincerely

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