



Amendment C278 – Sunlight to public parks

Name: East Melbourne Group Inc.
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The East Melbourne Group (EMG) would like to make the following submission in response to Amendment C278 which is being proposed by the City of Melbourne (CoM).

EMG is an incorporated body pursuant to the provisions of the Associations Incorporation Act 1981. It was established in 1953 and constituted for the purpose of preserving and protecting the heritage, character and amenity of East Melbourne and Jolimont precincts (EMJ). That corporate objective remains and continues to be one of the overarching goals of EMG and its members. EMG represents over 500 community members of East Melbourne and Jolimont.

The EMG congratulates and supports the CoM on this initiative. It is a positive and proactive response to the significant increase in population since 1999 and the number, density and height of the associated new developments across the municipality. These have resulted in negative externalities for the existing public parks in terms of overshadowing, and the wellbeing and health of the municipality's population. We believe that this amendment will enrich our, and the greater CoM community's future quality and way of life.

The mandatory 'no additional overshadowing' is supported enthusiastically as the discretionary controls applied to date have not been effective. We also support the tightening of the Solstice Test by extending the hours to 10am to 3pm (presently, 11am to 2pm) on 21 June (presently, the equinox).

Improving sunlight policy in East Melbourne

Many of the parks in EMJ are heritage listed. These parks are important not only to the local resident community but also confer significant economic benefits as a tourist attraction. These parks are also used to host many key events throughout the year and host huge numbers of people moving through the suburb en route to the City, the MCG or MOPT. Globally, historic precincts, especially the ones abutting city centres, are appreciated by tourists and residents for their human-scale dimensions offering a rich and accessible experience.

We submit that different considerations could come into play with some of the Type 2 parks in EMJ. Type 2 parks are in areas with height limits over 4 storeys. No additional overshadowing is allowed beyond the existing shadow (from existing buildings and infrastructure) or an 'allowable' shadow (whichever is greater).

We would like to see a review of the street wall or building height nominated in the Melbourne Planning Scheme (MPS) for the streets abutting the heritage listed parks in EMJ, namely the Fitzroy Gardens and Yarra Park. The review should determine if a reduction in the maximum 'allowable building height' would more fully support the objectives of this amendment.

A reduction in the 'allowable height' would further limit the overshadowing from future new developments onto heritage listed parks.

EMJ's unique and distinctive heritage qualities are acknowledged in the MPS and EMJ is recognised as a highly significant heritage precinct. EMJ is noted for the 'human scale' of its built environment. The proposed reduction in the 'allowable height' would minimise overshadowing of the heritage listed parks and protect the low scale nature of EMJ's significant heritage streetscapes and buildings.

Maintaining and enhancing the precincts' built-form as low scale with maximum protection of its parks from overshadowing, would enhance the attractiveness of the heritage precinct to both tourists and locals. It would also offer a richer and more accessible experience.

To discuss any aspect of this submission, please do not hesitate to contact the EMG Planning and Heritage Sub-Committee on 03 9415 7570.

Yours sincerely,



Ian S. Mitchell
President