

# PROPOSED REDEVELOPMENT OF THE PORT PHILLIP WOOLLEN MILLS, NELSON PLACE, WILLIAMSTOWN

## Expert Opinion: Recreation, Open Space Needs and Community Consultation

### 1. Qualifications

- i. Phd in Geography, Monash University, Research topic: Assessing the Effectiveness of Urban Recreation Planning, 1979
- ii. Lecturer: full time at Deakin (1970-1983), and Victoria Universities (1992-93) and Sessional Lecturer in recreation planning at Monash University (1983), Melbourne University (1984-94) and Victoria University (1983-1991, and 1995- - present) with all courses covering recreation research, open space planning and recreation planning
- iii. Coordinator, Federally-accredited VET course, Diploma in Management (recreation planning)
- iv. Department of Sport and Recreation, Research, Planning and Policy Unit providing departmental advice to Minister, (1984)
- v. Director, HM Leisure Planning Pty Ltd, private firm providing planning consultancy services to local, State and Federal government, not-for-profit and private agencies on recreation policies, recreation and open space planning and needs studies, feasibility assessments, leisure services pricing and similar, 1985- present. In this capacity I have prepared over 300 reports including studies covering inner city urban renewal sites in NSW; the Sydney Olympic Games site parklands plan; Department of Sport and Recreation feasibility for Melbourne's ice sports centre;
- vi. Author, recreation and open space planning manuals for Tasmanian (2010), South Australian (1987), Victorian (2010, New South Wales (2009) and Queensland governments (1996)
- vii. Awarded Life member, Parks and Leisure Australia, 1997 (national professional body)
- viii. Researched open space provision in Williamstown as far back as 1976.

### 2. Issues of Concern

**2.1 Contradiction of Council policies.** The development proposal directly conflicts with adopted Council policies and as such will exacerbate open space and recreation provision issues which Council policies are attempting to overcome.

To illustrate, the Hobsons Bay Councils Municipal Strategic Statement has a section on Open Space and Environment (clause 21.09). The first 5 objectives stated are specifically relevant to the proposal. They are:

**Objective 1**

To provide adequate open space and continue to develop a variety of open spaces to provide for a range of experiences and leisure opportunities that are accessible for all people.

**Objective 2**

To provide an appropriate quality open space system, by enhancing the diversity of leisure opportunities available throughout the municipality.

**Objective 3**

To ensure that development enhances the environmental and conservation values of open space.

**Objective 4**

Encourage landscaping that enhances the open space areas and surrounding amenity.

**Objective 5**

To protect and conserve the biodiversity of open space and watercourses as habitat for indigenous flora and fauna.

Each objective also has a number of strategies attached to it.

A review of the development proposal in the light of these objectives and the specified strategies indicates that the proposal will:

- a. Not contribute to achieving the objectives, and
- b. Impact detrimentally on the ability to achieve the objectives across the whole southern end of the Williamstown peninsula and the Council overall

Equally, the indicative development proposal for the Former Port Phillip Woollen Mill Site contradicts the previous Hobson's Bay MSS, indicating a long-standing position by the Council. In the previous MSS, Council stated its mission as:

*We will appreciate the aspirations and represent the diverse needs of the people of Hobsons Bay to enable the delivery of positive outcomes and services to meet our Vision.*

That MSS had a somewhat similar section on Open Space, Environment and Conservation and listed nine key objectives:

**Objective 1:** *To provide adequate open space for active recreation to meet the needs of the community and to provide a diverse range of experiences and leisure opportunities.*

**Objective 2:** *To improve the overall quality of the open space system by enhancing the diversity of leisure opportunities available throughout the municipality.*

**Objective 3:** *To provide opportunities for people with special needs to gain access to open space.*

**Objective 4:** *To ensure a co-ordinated and integrated approach to the management and development of open space and watercourses.*

**Objective 5:** *To protect and conserve the environmental significance of open space as habitat for indigenous flora and fauna.*

**Objective 6:** *To ensure that development enhances the environmental and conservation values of open space.*

**Objective 7:** *To create a network of useable open space that caters for a range of leisure needs.*

**Objective 8:** *To foster and encourage landscaping that enhances the open space areas and the surrounding amenity.*

**Objective 9:** *To identify, manage and protect waterways, flood plains and other flood prone areas, and to minimise the impacts of flooding in urban and non-urban areas.*

I have been unable to identify any action by either Council officers or in the developer's indicative proposal which identifies how such objectives will be contributed to by the proposal.

In 2005, Hobsons Bay Council adopted a report, the *City of Hobsons Bay Open Space Plan* (February, 2005, but with individual pages variously dated 19/11/04 and 19/11/05).

In reviewing Council policies in an early section of that Plan, the authors, @leisure, stated:

This Open Space Plan reinforces the need for the new (*and now existing*) MSS to address ... in particular:

- reductions in private open space
- increasing housing densities and the need for additional sites for social and family recreation, (and)
- the interface between mixed use, residential and industrial zones.

Importantly, section 4.3 of the Open Space Plan addresses the issues of planning open spaces, acquiring new open spaces and a developer contribution process, with the latter designed to enhance or acquire open space where there is poor, inappropriate or insufficient provision. Several sections of the report warrant citing and key phrases in these have been underlined to highlight their importance:

Council will aim to maximise the range of types of spaces provided across the municipality and in each neighbourhood, and facilitate the development of functions and setting types not currently present. (p. 87)

Council will utilise a design process that engages local community members and stakeholders in open space planning and design to provide specific benefits and to address local requirements, having regard to flexibility in purpose, shared use, cost, and efficiencies in management. (p. 88)

As a basic minimum, walking, dog walking (on and off leash), cycling, and social family play will be provided as the priority in newly developed residential developments of any density.. (p. 89)

Residents have a need for private open space, public open space in the neighbourhood and district, and regional open space areas for major trails, beaches, water based recreation, botanic gardens, sports for club and association level competition, parks for picnic and more complex play activities or social gathering, community horticulture, memorial, and conservation functions, as well as indoor and more specialised

recreation facilities (places of public recreation and public resort) such as aquatic, leisure and fitness facilities. Based on this range of open space functions, and the landscape settings and activities now expected by residents, Council will seek 10% of land developed for residential use as an open space contribution. (p. 90).

Developers will be required to involve Council in the early design phase of land development to ensure adequate input into the location of public open space. (p. 91)

As the demand for open space will average out to be the same for an individual over their life span, and local open space will be relatively equitably provided for all residential areas in each neighbourhood then the core need for Council to provide open space will only vary where additional compensation is required to offset negative environmental conditions such as visual and noise intrusions, higher densities (potential higher population and pressures on open space), and lack of private open space. (p. 91)

Therefore, the amount an additional dwelling will contribute to the provision of open space should be the same regardless of the size of the development, and therefore, assuming that in most instances residential subdivisions will be small and contributions will be taken as cash, the proportion of the value will be the same for a two-dwelling development as it will be for a twenty-dwelling development. (p. 91)

The priority for recreation will be to purchase any additional land required for a social family recreation space. If there is already an SFR space identified within 400 metres of the development and it has sufficient area (or it is not practical to purchase the required additional land for its expansion), and further development works to enhance opportunity or quality of experiences are required, then the first priority for use of the funds would be on development of that space

Land will be taken as an open space contribution in preference to cash, in the following circumstances:

- where there is a strategically important link required with adjoining open space or other land uses, for presentation or design purposes, buffers, or for a path or trail
- where there is demand for a particular open space function in that location that will serve the development (p. 92).

In keeping with the earlier discussion of Council policies, I have not been able to identify any evidence in the developer's indicative proposal or in Council's response to it which indicate that these issues have been addressed. This is a serious deficiency given the universal recognition of the importance of open space and recreation opportunities to community health, wellbeing and cohesion. Given the local and district deficiencies, the fact that the proposal makes no provision for private open space of any form is entirely inexplicable.

[In a related context it warrants noting that until recently the developer contributions dictated by the application of section 94 of the Environment and Planning Act in NSW amounted to as much as \$34,000 per bedroom in some new high rise residential developments, this figure being derived from an assessment of the expenditure needed to embellish existing community services resources or develop new ones to accommodate the demands of new residents.

It is also important to note that many Victorian Councils still rely on an old formula (or "standard") of providing 4 ha. of open space per 1,000 residents while in NSW the legally-binding figure is 2.13 ha. Application of either of these values to the indicative developer proposal would require allocation of an extensive proportion of the site to open space].

The last of the open space policy issues cited above is of particular relevance in the present context. This is because the @leisure report indicated that Williamstown

"...has relatively small areas of local open space available to serve residential areas, with larger sites located around the foreshore focusing on *visitor* (my emphasis) needs". (p. 71)

and crucially, that

If there is further redevelopment of the area to include housing, *additional open space will be required...* (my emphasis)

Closer to the beach there is a large amount of space for picnicking and play – *used mostly by visitors* (my emphasis). Apart from tennis and croquet facilities, there are only two sports reserves in this neighbourhood, and one is a single playing field (Williamstown Cricket Ground). (p. 71)

As such, the @leisure report adopted by Council identified an existing shortage of open space in Williamstown and a shortage of open spaces that are appropriate to the needs of residents as opposed to visitors. This position will be substantially exacerbated by the large number of additional residents which the indicative development proposal will bring to the Former Port Phillip Woollen Mill Site. This impact will be greater than in most other areas of Hobsons Bay or Williamstown as it is the southern end of the peninsula which is amongst the most poorly served in terms of open space provision.

Importantly, there are essentially no other land resources available in Williamstown to meet open space needs and a case could be put for the Former Port Phillip Woollen Mill Site to be acquired to partially

meet *existing* open space shortfalls.

Finally with regard to the 2005 Open Space Plan, it warrants noting that @leisure and Council have classified Commonwealth Reserve in Nelson Place as serving a *regional* catchment. As such, it is not intended, designed or managed to meet only local community needs. That said, the reserve is presently forced to meet each of local, district and regional needs to a significant extent because of the shortage of alternate venues for local residents; the historic and central position of the reserve in the middle of the Williamstown district and its positioning immediately adjacent to Gem Pier and the tourist boats that arrive there and the regionally-important Nelson Place restaurant and tourist precinct.

By comparison with Commonwealth Reserve, the larger reserve, Point Gellibrand Coastal Heritage Park fronting Steve Bracks Promenade is designated as "Conservation of Cultural Heritage" in the open space plan with this category of land being "dedicated to the protection, or interpretation of indigenous cultural heritage or European settlement". (p. 44) Managed by Parks Victoria as a regional venue, the reserve has a small playground at its south-western end which attracts an almost-exclusively regional visitor market. The remainder of the site is dominated by military entrenchments and former rail siding land and as such is entirely unsuited to local residential play uses or social family recreation space (SFR) as defined by @leisure.

In conclusion with regard to existing Council policies, the indicative development proposal for the Former Port Phillip Woollen Mill Site if proceeded with would substantially undermine achieving those policies while it would put significant pressure on what are already insufficient open space resources and on resources which have use designations not primarily targeted at local residents.

**2.2 Contradiction of Sound Planning Practice.** Five issues warrant mention here. These are:

1. The failure of the indicative development proposal to reflect broadly accepted approaches to and guidelines for new residential development. The GAA, a consortium of metropolitan Melbourne Councils, individual State government departments and a number of professional planning associations have each provided detailed guidelines on effective open space and recreation provision strategies. These appear to have been entirely overlooked by each of the developer and Council with regard to the provision of recreation opportunities for future residents of the former Port Phillip Woollen Mill Site

2. Recent overseas planning experience (eg: UK, Germany) shows a key focus in urban renewal areas on ensuring that the redevelopment process redresses traditional shortages of open spaces and provides new resources of a sufficient scale and of sufficient flexibility such that the needs of new residents can be effectively accommodated. There is no evidence of these issues being considered in the indicative development proposal for the former Woollen Mills site

3. Recreation planning practice. To obtain State government grants, essentially all recreation and open space provision projects in Victoria (and in the majority of other Australian states) have had to be the subject of a comprehensive planning and feasibility study. The stages of such studies are:

- a. Definition of planning objectives and desired outcomes
- b. Assessment of catchment demographics and their provision implications
- c. Review and evaluation of past planning studies and the implications to future needs and provision priorities
- d. Assessment of existing and proposed recreation assets to identify current provision, shortfalls and development opportunities
- e. Government policies review to ensure provision compliance
- f. Community and stakeholder consultations to identify current recreation uses, needs, provision priorities and the beneficial outcomes desired by the community to be serviced
- g. Analysis of the markets and catchments served by the existing resources and the derived adequacy of these resources
- h. Draft plan provision and review with clients and community
- i. Revision of development proposals
- j. Business planning and funding review of development proposals
- k. Draft design development and review, and
- l. Commissioning of design development, tendering and development.

Despite a brief note provided by the developer (see point 5 below), these processes appear to have

been overlooked in the current program of development and review. The present hearings are the first time that the Williamstown community has taken part in this planning process and for which the relevant authority documents and developer documents were made available (ie: as of 21 January 2011). As noted below, some documents were still not available at the closing date for expert opinions of 31 January 2011.

4. Good planning is planning which optimises the input of all stakeholders and of the community at large (and which optimises the beneficial outcomes for all participants). In terms of *inputs*, most local and state government agencies require a four week exhibition and comment period while others extend this to 6-8 weeks depending on the issues being reviewed and the time of the year.

In all my years of work, no agency has ever restricted that period of input to the summer holidays. In fact in many communities today, the floods, the needs of tourism service providers, fruit growers and the like would make that impossible. Effect consultation and submission timing is important to allowing valid inputs and for ensuring transparency. All government agencies I have worked with are aware of this and as such, it is particularly unfortunate that this has occurred with this project when it is so important to the future of the Williamstown community.

5. I have been forwarded a statement on open space prepared by the developer titled "ii. Public realm open space provisions on the site apart from streets and laneways", several sections of which warrant comment. These are:

- a. The statement notes that the proposed plan "does not contain additional areas of public open space within the site beyond the new public realm proposed as new or widened roads, and new public realm pathways with associated landscaping". To argue that road space and verges constitute a substantial and important contribution to open space when the @leisure report, as adopted by Hobsons Bay Council, has identified significant deficiencies of open space in Williamstown cannot be described as anything but laughable. While roadage can contribute to the public domain, I know of no previous instance in 30 years of open space planning across Australia where it has been considered as an alternative to it.
- b. The roadage proposal was considered to be appropriate following "a considered urban context and public open space analysis which highlighted" the existence of "the Point Gellibrand Coastal Heritage Park, the coast, Commonwealth Reserve, Maclean Reserve, Robertson Reserve, and connections to trail networks". Apart from not providing an explanation of the nature and scope of the analysis, the note clearly ignores the earlier argument that the form, purpose and development of both the Point Gellibrand Coastal Heritage Park and Commonwealth Reserve makes them unsuitable for and incapable of meeting the recreational needs of the likely number of new residents which the woollen mills development would generate. Further, it also appears to have overlooked the fact the both the Maclean and Robertson Reserves are used extensively for school purposes throughout the school term (as are sections of the coastal reserve) because of the existing open space shortages) and for junior sports on weekends. As such, they have very little remaining capacity to meet the recreational needs of the possibly more than 1,000 new residents who would occupy the woollen mills site if the present indicative development plan was proceeded with.
- c. The apparent argument that as "Smaller 'pocket parks' are not a common feature of this area" (of Williamstown), it is better to count streets as recreational open space than to provide one or more new parks. Such a strategy belies logic, and
- d. The argument that "any future residential subdivision of the NPV site would provide a substantial public open space contribution which could be utilised to further upgrade surrounding public realm open space". First, there is little "surrounding public realm open space" to "further upgrade" and what exists has largely been developed to its full potential (eg: Commonwealth Reserve); cannot, as a consequence of its purpose, be developed further (eg: Point Gellibrand Coastal Heritage Park), or is already being used to capacity (eg: Maclean and Robertson Reserves).

As such, this statement is considered to be quite unsatisfactory in addressing alternate open space provision strategies.

In conclusion, I have made all the inquiries that I believe are desirable and appropriate with regard to open space provision in association with the indicative development proposal for the former woollen mill site and state that no matters of significance which I regard as relevant have to my knowledge been withheld from the Panel.

However, it should be noted that the preparation of my report has been hampered by the fact that the document [Point Gellibrand Coastal Heritage Park Master Plan, Parks Victoria, July 2003 \(PDF - 1.3MB\)](#) which is referenced on the PPV Website was not available to me. The website provides a false link. I thus request that a copy of this report is emailed to me at [ken.marriott@hmleisureplanning.com](mailto:ken.marriott@hmleisureplanning.com)

Consideration of this document can then be provided at the hearing. An internet search for this document was unsuccessful and as I was overseas until 27<sup>th</sup> January 2011 I have not been able to assess its contents as an input to my professional opinion. That item apart, my review of the indicative development proposal for the former woollen mills site indicates that it suffers from a wide range of major deficiencies and that as such it should not be approved.

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January 30, 2011