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Friends of Moonee Ponds Creek Inc

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To ensure the preservation, restoration, environment protection and ecologically sensitive development and maintenance of the Moonee Ponds Creek and adjoining catchment areas.

ARDEN STRUCTURE PLAN & DRAFT PLANNING SCHEME AMENDMENT C407

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SUBMISSION

The Friends of Moonee Ponds Creek (FoMPC) has a long-standing interest in the whole of the Moonee Ponds Creek, from its source in Melbourne's north at Greenvale, to its junction with the Yarra River at Docklands. The Friends interest covers the natural features of the Creek and also the many strategies and policies of State and Local Governments, agencies and communities that impact on the Creek corridor.

The Arden Structure Plan (Aug 2021) is one such strategic document. The Structure Plan and accompanying draft Planning Scheme Amendment C407 covers the urban renewal precinct bounded by the Moonee Ponds Creek, Macaulay Rd, Dryburgh St and Dynon rail lines, North Melbourne. The area is predominantly industrial land, much of it flood prone. It is proposed to be a high density commercial and residential area with its focal point the new Melbourne Metro Arden Station. Arden will cater for 34,000 workers and 15,000 residents.

The Moonee Ponds Creek is seen as an important part of the open space network for Arden: Strategy 21.8 states:

"Collaborate across Victorian Government, local government and water authorities to realise the open space and recreational aspirations of the Moonee Ponds Creek Strategic Opportunities Plan"

The Moonee Ponds Creek is also seen as an important part for managing floods: Strategy 21.1 states:

"Preserve opportunities for connecting spaces with the Moonee Ponds Creek by providing additional integrated stormwater management open space along the precinct western edge."

In considering the Arden Structure plans, the FoMPC will comment in particular on:

- Moonee Ponds Creek open space
- Stormwater management
- Built form density

Moonee Ponds Creek Open Space

As stated above, the Arden Structure Plan links with the City of Melbourne's Strategic Opportunities Plan 2019. The Strategic Opportunities Plan proposes significant increases in open space along the waterway corridor from Racecourse Road towards Dynon Rd and further south. The Arden precinct abuts the stretch between Macaulay Rd Bridge and the Dynon rail lines. The "opportunities"/proposals will involve significant hydrological impacts and requirements. It is understood that Melbourne Water and consultants Engeny are currently working on these, but in medium-longer time frames.

The role of the Moonee Ponds Creek waterway open space in relation to Arden should be protected and enhanced, see excerpt from the Structure Plan:

Planning for the Moonee Ponds Creek

The Moonee Ponds Creek has a significant role as a major natural connector between several communities located along the creek. By providing better connectivity to Arden and the surrounding communities, the creek can become a recreational asset integral to the precinct's identity.

The VPA was directed to prepare the *Moonee Ponds Creek Implementation Plan* on behalf of the Victorian Government, recognising the complex challenges affecting the realisation of the vision of the waterway to become a thriving corridor that supports the liveability and resilience of the city.

The *Moonee Ponds Creek Implementation Plan* is an initiative funded by the West Gate Tunnel Project as a recommendation of the project's *Inquiry and Advisory Committee Report* (October 2017) which assessed the project's *Environmental Effects Statement*.

The VPA has prepared this plan in collaboration with the City of Melbourne.

The plan summarises the key challenges that have stifled efforts to revitalise the creek, assesses each of the projects identified in the *Moonee Ponds Creek Strategic Opportunities Plan* by the City of Melbourne and recommends a proposed model for implementation of these projects.

The plan maps out the path forward for the Victorian Government and council, to guide investment and coordinate delivery that supports the long-term transformation of the Moonee Ponds Creek within Melbourne's central city. This will restore the ecological, cultural and recreational values of the creek and contribute to Melbourne's liveability and climate resilience.

The FoMPC believes the Moonee Ponds Creek changes should be considered for implementation in shorter time frames so as to be co-ordinated with development in Arden. We do not want to see the Creek waterway and open space compromised by future complications relating to a rapidly 'developed' Arden.

Stormwater management in Arden is very much linked with flood management in Arden and the Moonee Ponds Creek is the end point for both.

One of the Strategic Opportunities Plan proposals to address flood plain storage in the Creek corridor is W8: *"to investigate constructing culverts under levees to re-engage flood plain storage and improve use of western creek berms to improve open space"* along the Bent St bank (Kensington Embankment) on the western side of the Creek.

Another Strategic Opportunities Plan proposal, is endorsed in the Arden Structure Plan under **Plan 5 – Arden's flood management strategy**:

- *Stormwater safely collected behind levees during storm events*
- *Levees raised and extended to afford additional protection and prevent overtopping.*

The Melbourne Water/Engeny Arden Macaulay Precinct Flood Management Strategy (26/8/21) report suggests up to 1m increases in the height of existing levees.

The FoMPC strongly opposes constructing culverts under levees and extending and increasing the heights of levees that would involve the destruction of existing, established

vegetated embankments (Bent St/Kensington Embankment; see photograph below) or the recognised Remnant River Red Gums along the western Racecourse Rd to Macaulay Rd stretch and the eastern section below Arden St. We oppose the inclusion in the **Arden Structure Plan** of such destructive measures, and specifically in the **Precinct Infrastructure plan** for raising and extending levees (Appendix 2, item 74). We believe alternative flood management measures that do not destroy these established areas of vegetation should be sought.



It is noted in the Engeny report (26/8/21) that re-constructing the Macaulay, Arden and rail bridges across the Creek could serve to mitigate to a large extent increases in levee bank heights. It should also be noted that the Macaulay Bridge and Arden Bridge, as John Monash designed bridges, have heritage significance.

The Structure Plan's **Creating Open Spaces – open space design** cites the Strategic Opportunities Plan OS3 to *“support an expanded creek environs”* and B5 *“Moonee Ponds Creek forest and native vegetation restoration”*. It is questioned that pre-European settlement vegetation along the Moonee Ponds Creek ‘chain of ponds’ would have been a “forest”.

Stormwater Management

Two major integrated stormwater management open space areas are proposed in the Arden Structure Plan – the present CityWide depot area and along Langford Street, with extension south of Arden St, along the Upfield railway line.

cont.



The Friends of Moonee Ponds Creek welcomes the addition of innovative, creative stormwater management that allows water to positively contribute to what is a high density built form precinct. Ecological regeneration and biodiversity are added benefits to recreational amenity for these open space areas.

Storm/flood water from within and beyond the precinct (cf Plan 5 above) will be stored in the proposed integrated stormwater areas. BUT, unless the existing significant LITTER and pollutant problems in stormwater are addressed in building the integrated stormwater management open space areas, they will become unsightly, unhealthy areas reminiscent of the West Melbourne Swamp!

Nowhere in Arden Structure Plan is litter management mentioned as part of the integrated stormwater management areas. How are the existing and upgraded stormwater drainage systems going to capture litter? If Gross Pollutant Traps are installed, how effective will they be, given high flow events allow litter to flow over current designs? What support will the Arden Structure Plan call for in litter prevention measures and legislation? How will polluted stormwater be managed?

These shortcomings in the Structure Plan's proposals for integrated stormwater management open spaces, their recreational amenity and ecology and biodiversity must be addressed.

Built Form Density

The Friends of Moonee Ponds Creek is concerned that Arden will be 'overdeveloped' because the proposed built form and planning scheme controls have been found to be inadequate to ensure a high quality, well designed and sustainable new precinct of Melbourne.

We reference the comprehensive assessment undertaken by the City of Melbourne on the Arden Structure Plan and draft planning scheme AmC407:

<https://www.melbourne.vic.gov.au/about-council/committees-meetings/meeting-archive/MeetingAgendaItemAttachments/958/17014/OCT21%20FMC1%20AGENDA%20ITEM%206.2%20Public.pdf>

The Friends of Moonee Ponds Creek supports the above assessment and Council's Arden Planning Package submission.

oOo



John Kavanagh



Friends of Moonee Ponds Creek Inc

11 October 2021