

Uniting – St Andrews Bendigo



Council and Community Consultation Report

Proposed use and development of 73 dwellings at 24 & 26 Myers Street and 96 Mollison Street, Bendigo

December 2023



p +613 9699 7025

admin@bmda.com.au bmda.com.au

04.02 437 St Kilda Road Melbourne VIC 3004

CONTENTS

Uniting – St Andrews Bendigo 1

EXECUTIVE SUMMARY 4

INTRODUCTION 10

1 THE SITE AND PROPOSAL..... 11

1.1 The site and surrounds 11

1.2 The proposal..... 11

2 THE CONSULTATION PROCESS 13

3 AUTHORITY VIEWS AND CONSIDERATION 15

3.1 Greater Bendigo City Council..... 15

3.2 Department of Transport..... 16

3.4 Service Authorities 17

4 COMMUNITY VIEWS AND CONSIDERATION 18

4.1 Drop-in session 18

4.2 Written submissions 19

5 CONCLUSION 32

Attachment 1 – Consultation material 33

Attachment 2 – Local newspaper articles 37

Attachment 3 – Redacted copy of submissions..... 41

EXECUTIVE SUMMARY

Uniting Housing (Uniting) intends to develop 73 homes and associated landscape and works on 24 & 26 Myers Street and 96 Mollison Street, Bendigo.

Before applying for planning permission Uniting Housing consulted on its detailed plans and supporting reports during December 2022 and January 2023. Uniting invited submissions from Council and local parliamentary members, Greater Bendigo City Council, the Department of Transport (now the Department of Transport and Planning), the National Trust and the owners and occupiers of properties within 150m of the site.

The planning proposal was also featured in local newspaper 6 December 2022 and 11 January 2023 (see attachment 2). Project details and documentation was made available on the Uniting Housing website from 5 December 2023. A community drop-in session was held on 7 December. In response to community and council requests, the consultation period was extended to 13 January 2023 – from three to six weeks. *See section 2 for details.*

Council sought several specific changes that Uniting accepted and regarding the December 2023 changes stated it would prefer that the originally proposed external materials be retained – see section 3.1 of this report. The Department of Transport requested that the driveway to 24 Myers Street be removed, and the kerb reinstated which Uniting will complete – detailed at 3.2 of this report. Pre-consultation design changes were undertaken in response to full design review by the Office of the Victorian Government Architect. *See Section 3 of this report for details.*

Uniting received twenty-one submissions from private individuals, companies, and associations. Four of those expressed unreserved support for the proposal. Seventeen submissions expressed concerns with aspects of the development including its scale, height, and potential impacts on car parking.

Within the submissions several points sought detail about the ongoing management of the site and resident issues which are outside the scope of this planning consultation. The potential for these issues to arise are known to Uniting. As a long-standing property and tenancy manager throughout Victoria and Tasmania, Uniting has existing and effective staffing and management regimes in place to address these matters. *See Section 4 for details.*

Uniting has considered all submissions provided in writing and verbally expressed at a hosted drop-in session. The table at Section 4.2 below sets out the relevant planning themes of submissions and provides Uniting's consideration. The key responses to submissions are:

- At the shared boundary with 98 Mollison Street, the side building walls are further setback to improve morning sunlight access and reduce the appearance of building bulk with room for additional boundary landscaping and replacement of the shared boundary fence.

- A reduction in building mass facing Mollison Street by removal of the connecting corridor structure. This creates two separate buildings facing Mollison Street providing increase visibility through the site including to the church and established on-site trees and additional light penetration to the Mollison Street entry.
- Opportunity for further on-street car spaces will be provided through the removal of the driveway and crossover to 24 Myers Street and the narrowing of the new crossover from Mollison Street.
- Parts of both buildings modestly exceeds the height guidance in Greater Bendigo Council's draft Amendment C279. The building heights are highly consistent with amendment C279 which is based on Greater Bendigo City Council's *Bendigo City Centre Plan* (Council adopted in May 2021) as well as recent approvals for hotels on Williamson Street (including one to six levels). No change is proposed to the building height given this highly supportive policy context in this context.
- The proposed building heights are responsive to the site's growing CBD context and are paired with substantial building setbacks from both Myers Street and Mollison Street allowing a significant 'front garden' presentation to both streets. The building heights also preserve the integrity of the St Andrews Church (itself exceeding the C279 height guidance), the community hall and the historic stables by providing more ground level space and much improved access and presentation for these buildings within the site.
- The planning scheme and State and local government policy also provide strong support for affordable housing provision in well serviced locations (Greater Bendigo Planning Scheme, Clause 52.20, Clause 16.01-1S Housing supply and Clause 16.01-2S Housing affordability; *Homes for Victorians* Victorian Government 2017, Victoria's Big Housing Build Program; and Greater Bendigo City Council's *Affordable Housing Action Plan*, adopted September 2021).
- Minor amendments to the development were made and approved in December 2023 to:
 - Update external building materials and colours to allow local materials supply;
 - Change internal-facing roof form from pitch roof to flat;
 - Use a consistent timber fencing treatment throughout the site;
 - An updated driveway and path surface.
 - Increased garden area/reduced path area and hard surfaces.

The December 2023 amended development is shown in the images in this report and reflect the changes made in response to and community feedback and planning and transport authority feedback.

Figure 1 Ground level building and site layout at consultation (top) and after consultation

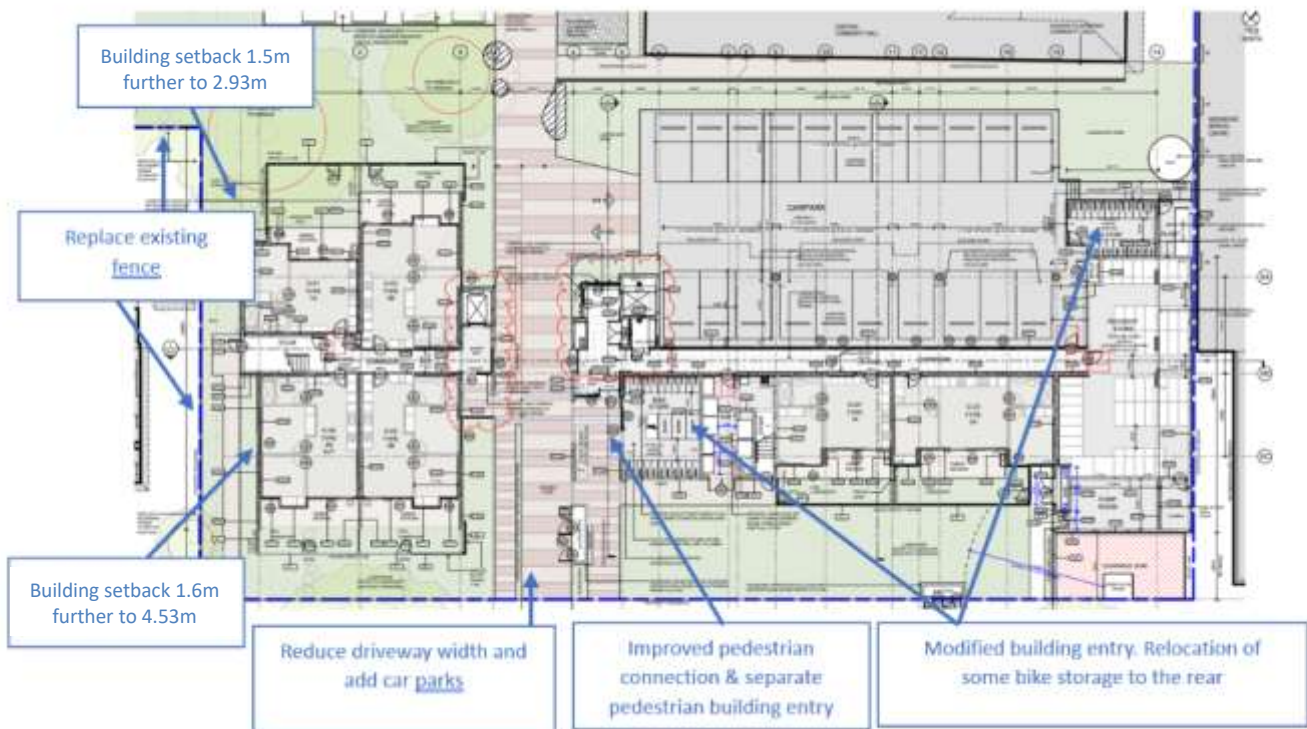


Figure 2 Ground floor presentation to Mollison Street before (top) and after consultation



Figure 3 View to Mollison Street before (top) and after consultation



Figure 4: Post-consultation presentation to Mollison Street without connecting corridors



INTRODUCTION

The report is published in association with Uniting Housing's planning application to develop 73 homes and associated works on 24 & 26 Myers Street and 96 Mollison Street, Bendigo. The application is to be made under Clause 52.20 of the Greater Bendigo Planning Scheme. The consultation requirement under that clause is as follows:

52.20-4

14/07/2022
VC230

Consultation requirements

Before plans, documents and information required under Clause 52.20-5 are submitted:

- Public consultation, and consultation with the relevant municipal council, on the plans, documents and information proposed to be submitted under Clause 52.20-5; and
- A report that summarises the consultation undertaken, feedback received, and explains how the feedback has been considered and responded to, must be completed.

The requirements of Clause 52.20-4 must be undertaken to the satisfaction of the Minister for Planning and may be varied or waived by the Minister for Planning.

This report describes the site and proposal and the consultation process undertaken. The views of commenting authorities and submitters are then considered. The report concludes by noting the proposed changes and key responses to comment and submissions.

To protect the privacy of private submitters, this report references submissions by number as received by Uniting Housing. This report and all original submissions will be provided for review by the Minister for Planning with Uniting Housing's planning application.

1 THE SITE AND PROPOSAL

1.1 The site and surrounds

The subject site is located at 24 & 26 Myers Street and 96 Mollison Street, Bendigo – it comprises seven lots currently zoned Special Use Zone (SUZ), pursuant to Clause 37.01-1 ‘Private Educational or Religious Institutions’ of the Greater Bendigo Planning Scheme. Land for driveway crossing in the Myers and Mollison Streets Road reserves are also affected. The church lot and an historic stables building are in the Heritage Overlay as is the Mollison Street Road reserve.

The overall site has an area of approximately 7,350sqm, with a gentle slope down to Myers Street. The new development will use around 4,929sqm of the site replacing the open-air car park, two dwellings, the games hall, and an amenities block. The community hall, church and stables buildings will be retained and do not form part of any works in the proposal. Adjacent to the site are a council car park, a residential dwelling, and offices. Commercial buildings are located opposite on Myers Street with dwellings and commercial buildings opposite on Mollison Street.



The site’s location in Bendigo’s central business district (CBD) provides excellent access to employment opportunities, social services and community infrastructure like Bendigo Library, Town Hall, Bendigo Community Farmers Market and central city retailing, commercial and recreational services.

1.2 The proposal

Uniting Housing, in collaboration with the Bendigo Axedale Uniting congregation propose to construct two new buildings of between four and five storeys containing 73 community homes. The

proposal supports the objectives outlined in Affordable Housing Action Plan, Bendigo City Centre Plan, and the government's Homes for Victorians in aiming to deliver well located, sustainable, affordable housing. The proposal includes:

- Demolishing the car park (former tennis court) as well as a disused games hall, two dwellings and a toilet block.
- Preserving, amongst other vegetation on site, the stand of gum trees central to the site and replacing the gum tree near Mollison Street with a new Red Box eucalypt and Blackwood trees.
- Construction of two new buildings of four to five storeys containing 73 homes.
- Creating a new direct and open path through the site linking Mollison and Myers Street.
- Landscaping to the Mollison and Myers Streets frontages and within the site.
- 21 car parks and capacity for 76 bikes in two internal lock ups and an outdoor visitor rack.
- Resident storage, building services, an outdoor play and recreation area and solar panels.

2 THE CONSULTATION PROCESS

Uniting Housing:

- made development plans and associated reports available for public viewing on a dedicated web page in accordance with Clause 52.20-4 from Monday 5 December 2022.

2 - 3 December 2022

- Erected (3 December 2022) notices of the consultation on signs on the site frontage of each of the properties at 24 Myers Street, 26 Myers Street, and 96 Mollison Street (see Attachment 1) and taken down at the end of the extended consultation period.
- Hand delivered notices (2 December 2022) to occupiers of land within 150m of the site (see Attachment 1).
- Express posted notices to non-resident owners of land within 150m (arrival 5 December).
- Electronically notified Greater Bendigo City Council, Council officers, local MPs, the Department of Transport (now the Department of Transport and Planning) and the National Trust.

6 December 2022

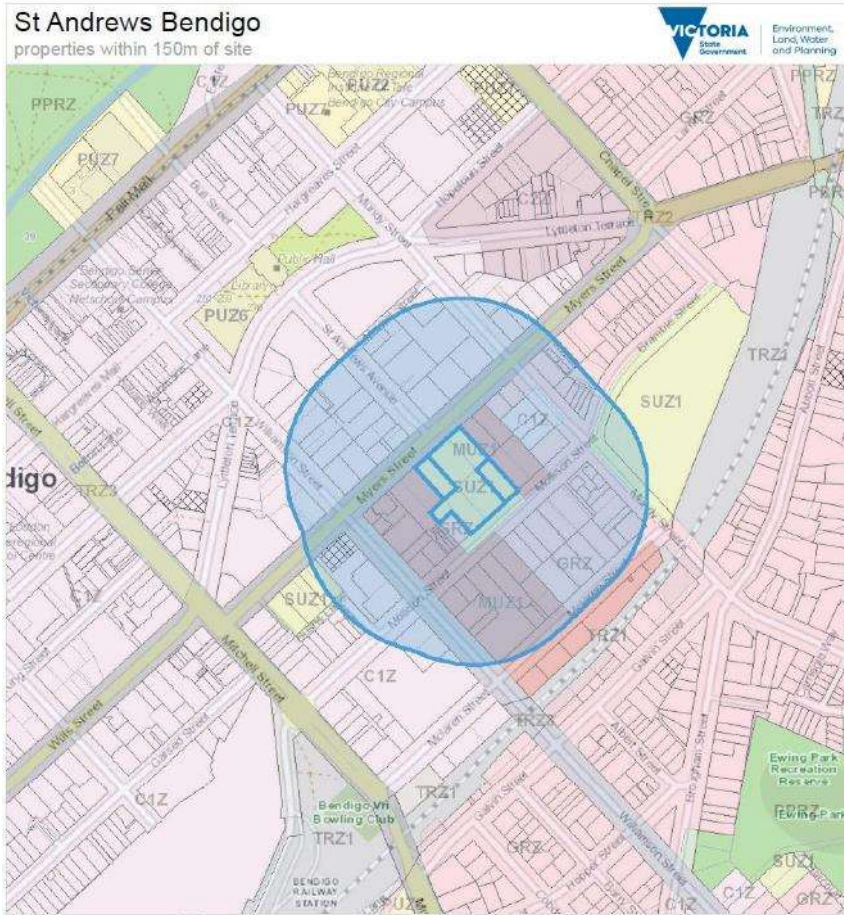
- Article published on the front page of the Bendigo Advertiser detailing the proposal and the consultation process (see Attachment 2).

7 December 2022

Uniting representatives and its architects and town planners hosted a drop in-session at the Uniting Community Hall between 3:30pm and 6:30pm. Letters sent to owners and occupiers invited them to attend the drop-in session.

16 January 2023

- Last public submissions received.



16 January 2023

o Uniting originally sought submissions by 23 December 2023. Requests for more time were responded to and accepted. Uniting’s consultation web page was subsequently updated to allow submissions until 13 January 2023. Actual submissions were received and acknowledged up to 16 January 2023.

3 AUTHORITY VIEWS AND CONSIDERATION

3.1 Greater Bendigo City Council

Council provided broad support for the development via letter of 19 January 2023, noting that earlier comments provided by officers in pre-application meetings had been satisfactorily addressed. Council noted specifically:

- the need to protect public street trees during the construction phase;
- the need to clarify which sustainability measure the building was aiming to achieve;
- Document specific balcony dimensions to allow assessment against planning standards;
- Ensure appropriate fire separation distances are provided from adjoining buildings;
- Providing letter boxes at Mollison Street for building 1 and Myers Street for building 2.
- Ensure that Greenstar certification is completed before the building is occupied.
- An enforceable commitment be provided to solar PVs and battery storage quantities and part of Green Star Certification pathway.
- Clarify whether rainwater to be used for toilets and if so document on plans.
- Clarify whether Apartment Design Guidelines and Liveable Housing Design Guidelines met.
- Avoid air conditioning condensers near bedroom windows where possible.
- Consider lighter external colours to reduce heat absorption.

Uniting Housing agree to:

- Certify the development in accordance with the Green Building Council processes to achieve a 4-star, best-practice Green Star rating. The development will also include:
 - 40kW solar photovoltaic array;
 - An average of 7-star NatHERS, with no dwelling below 6 stars;
 - 100% STORM rating.
- Include in its construction management plan provision for the protection of street trees.
- Detail the balcony dimensions and areas in the dwelling layout plans, with the objective of Clause 52.20-7.10 met, providing functional private open space for residents.
- Comply with the relevant fire standards at the building permit stage, with post-consultation plans removing windows to the stairwell of Building 2 due to fire safety regulations.

- Provide letter boxes at each street front servicing the separate buildings, with the post-consultation plans illustrating this change.

The proposal will achieve the silver level accessible standards for dwellings, in accordance with The Livable Housing Design Guidelines (4th Edition, 2017).

The recommendation to change external cladding colours to reduce heat absorption has been considered but not actioned due to the colour palette being integral to the design outcome.

Greater Bendigo City Council were provided with plans, illustrating the post-consultation changes to the design proposed by Uniting.

Council also reviewed Uniting's December 2023 changes and provide comment before formal submission to the Minister for approval. Council noted its preference for the originally proposed materials to be retained in the design.

3.2 Department of Transport

But for Clause 52.20, the proposed development triggers a referral to the Department of Transport as Myers Street is managed by the Department, and the Head of Transport for Victoria as the proposal contains >60 dwellings. The Department recommended the removal of the crossover to 24 Myers Street and reinstatement of the verge and gutter. Uniting accepts this recommendation and shows those works on the post-consultation development plans.

3.3 Office of Victorian Government Architect / Victorian Design Review Panel

Uniting presented its design to the Victorian Design Review Panel (VDRP) in October 2022 to obtain a professional design peer review before presenting the proposal to the community. The VDRP provided overall support for the concept and site layout while recommending changes to the specific aspect of the design. In response to VDRP recommendations Uniting:

- Replaced three car spaces originally planned within the site adjacent the driveway entry at Mollison Street with a planting area for a Red Box Eucalypt and dedicated pedestrian building entry.
- Moved the main building 1 entry and part of the bike lock up to the centre of the site adjacent to the shared driveway and walk-through, providing a strong address and oversight to this area.
- Moved the building slightly forward to Mollison Street to create more room for landscaping between the car park and community hall.
- Simplified the external appearance of the building by better aligning floorplates across building levels and reducing variation in the roof line.
- Extended the path and landscape area the whole width between the St Andrews Church building and the new Myers Street building to improve the presentation and visibility of the side wall of the church.
- Increased the southwestern building setbacks.

- Move two apartments from the southwestern end of the Mollison Street building to the north-eastern end to reduce the building bulk adjacent 98 Mollison Street and the walk through. An earlier design had apartments forming the 'bridge' facing Mollison Street. The plans forming community consultation replaced these dwellings, with a simple and semi-transparent (windows panels) internal walkway to lighten the presence of the building in this location. Further changes to the design, which have occurred post-consultation, have removed the bridge extending over the vehicle and pedestrian accessway.
- Re-oriented several apartment living areas for better outlook to gardens, sunlight, and privacy.
- Incorporated a second lift into Building 1 due to better service higher occupant numbers in this building

3.4 Service Authorities

A conventional permit application would not require referral to service authorities for this development.

In any event, during 2021 and 2022, RSP Consulting Engineers reviewed authority assets (existing in-ground services) at St. Andrews Church Bendigo. The review provided the views of authorities via a DBYD site enquiry for the land. RSP advised on the siting and connection requirements of authorities. Service levels, siting, and connections to services, have been planned in line with the advice received.

No specific comments on servicing requirements were indicated by Greater Bendigo City Council. Conventional Council drainage, road, rubbish and building permissions will be required and obtained should planning permission be granted.

4 COMMUNITY VIEWS AND CONSIDERATION

4.1 Drop-in session

Uniting Housing estimate between 20 and 30 people attended the 7 December 2023 drop-in session. Around half of attendees hailed from the Bendigo Central-Axedale Uniting Church congregation. Other attendees predominantly identified as residents of the neighbourhood. The following paraphrased comments were recorded at the drop-in session as below:

Appreciative responses from several congregation members that the proposal had progressed.
Landscape to west side of the church should be sealed to protect building against damp/water damage.
What is the energy provision to each apartment in terms of energy saving i.e., electricity or gas?
What cohort of people are intended to be housed in the new homes?
Can the existing Myers Street bus stop near Mundy Street be moved in front of the development?
A large increase in people on the site is proposed – what are the management and security arrangements?
What firms will be carrying out the work? Will it be local firms?
Concern from some neighbours that this was the first public discussion of the proposal.
The building is too high when viewed from Mollison Street. (Discussed in detail at 4.2)
Overshadowing of 98 Mollison Street is too much. (Discussed in detail at 4.2)
There appeared to be insufficient car spaces to cater residents and community hall users. (Discussed in detail at 4.2)

Issues raised not related to the site layout and building design (planning) were discussed at the session with responses including:

- Annotation by the project team as to insulation of the church building from landscape works
- Confirmation that apartments will be supplied with electric power only
- Provision of contact details for the bus stop relocation team at Public Transport Victoria
- Conveying that Uniting’s has existing teams, processes, and procedures in place for site and resident management across all its Victorian and Tasmanian housing sites
- Confirming that the construction contract must be put out to competitive tender but that Uniting’s agreement with Homes Victoria includes contractors abiding by Government procurement rules include a ‘local jobs first’ policy
- Noting that this first public consultation occurred as funding for the project had only recently been confirmed.

4.2 Written submissions

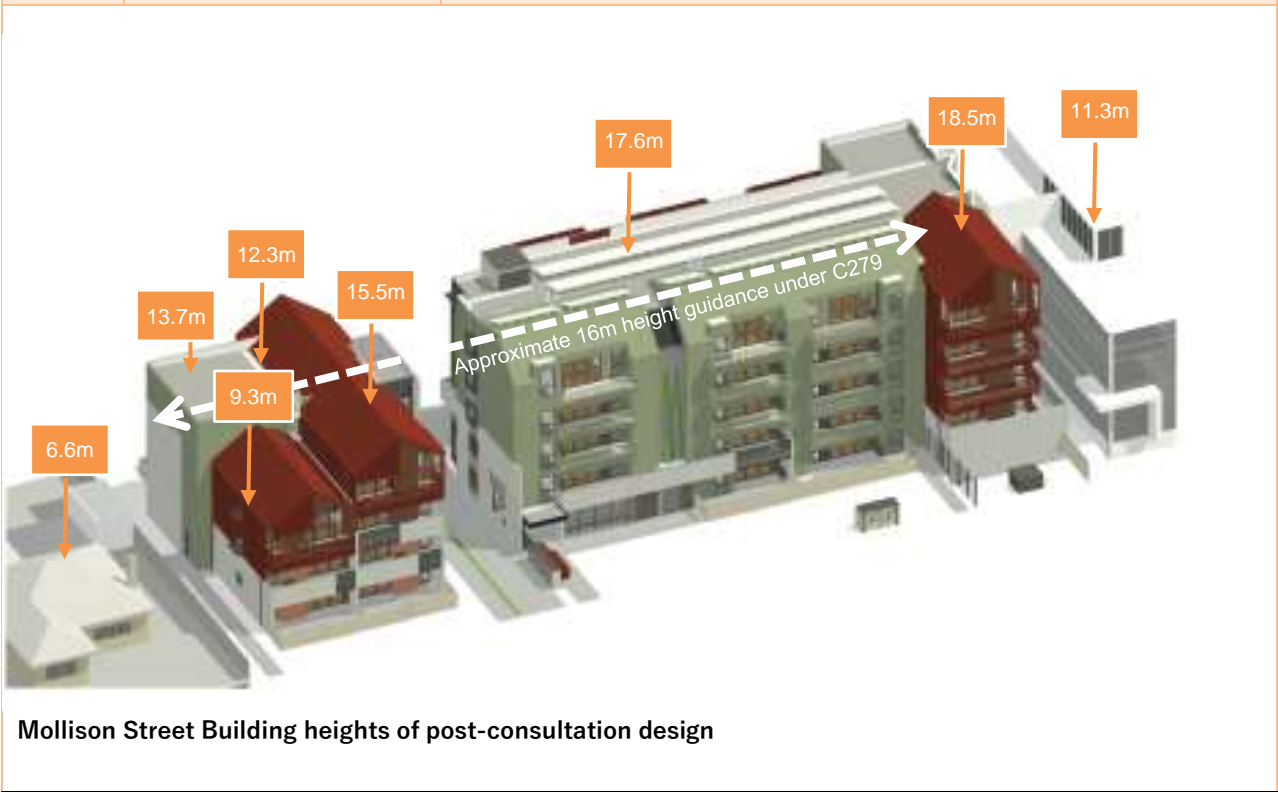
Sub. no	Summary of Submission	Consideration by Uniting Housing
01, 03, 10, 17	Support the reasoning behind the dwellings/ support the provision of community housing in general/ support the provision of community housing in Bendigo.	Noted.
08	Several community members expressed their long-term commitment to the provision of social housing on this site.	Noted.
12	The development should be approved due to its strong support in planning policy.	Noted.
13	Support the provision of new housing for the vulnerable, the increased density and the design.	Noted.
14	Strong support for the land use and the design based on lived experience in, and knowledge of Bendigo.	Noted.
01	The proposed development of these dwellings is unsuitable for the Bendigo CBD and will not aid more investment in the CBD.	<p>Providing additional housing in the Bendigo CBD can offer increased custom and economic activity from residents in this council-designated mixed use/commercial/civic precinct.</p> <p>The management of the site and buildings will generate economic activity and support business activity in the area.</p>

Sub. no	Summary of Submission	Consideration by Uniting Housing
02	The nearby bus stop on Myers Street (near corner of Mundy Street) should be relocated in front of the new development.	Uniting Housing has no specific objection to this proposal. Uniting provided the submitter with contact details of the Department of Transport unit managing bus stop relocation requests.
04, 04a, 04b, 05	The design is not in keeping with the significance of the heritage homes opposite the development and adversely affects the high integrity of the Mollison Street streetscape.	<p>Properties opposite on Mollison Street are in the HO9 heritage precinct. 95 Mollison Street is in the site specific HO200. The subject site is 30m from properties opposite.</p> <p>The site currently presents a non-residential appearance to Mollison Street edged with cyclone fencing. The proposed building will deliver a residential outcome with a managed landscape presentation of between 5m and 9m depth.</p> <p>The building frontage to Mollison Street is highly articulated and takes influence from the style of the five homes opposite through use of colour and highlight gabling referencing the prevailing architecture in the street. The building steps in height from the lower forms to its southwest to the higher form to its northeast.</p> <p>Other factors influencing the design are ensuring the on-site heritage is respected, (the siting of Building 1 and 2 have been informed by engagement with GML heritage) and considered the vistas to and front the site along Myers Street and Mollison Street. The design is consistent with Council and state planning policy seeking increased development in this part of the Bendigo CBD.</p>
04, 04aa, 05, 09, 11, 15, 15a, 16, 17	The design should be lower in height to fit with Bendigo's character and the Mollison Street setting (various heights from 2-4 storeys proposed).	<p><i>Building heights in the planning scheme</i></p> <p>The 15-year-old Design and Development Overlay currently applying at the site contains a non-mandatory preferred building height of 9m. Council's proposed Activity Centre Zone (C279) set out:</p> <ul style="list-style-type: none"> - The land in Precinct 5 'Civic and commercial mixed use' - Non-mandatory height controls with: <ul style="list-style-type: none"> ▪ 12m preferred maximum height either side of church facing Myers St ▪ 16m preferred maximum height along Mollison Street <p>Allowance for 0m setback to Mollison Street.</p> <p>The planning controls applying to this development are located at Clause 52.20 of the Greater Bendigo Planning Scheme. Under this clause building height is to be guided by the site context and the relevant objectives of</p>

Sub. no	Summary of Submission	Consideration by Uniting Housing
		<p>the planning scheme but balanced with the social need to provide additional housing for those in need.</p> <p>Building heights referred to in the existing DDO5 and the proposed ACZ1 (C279) are a 'preferred maximum' and may be exceeded having regard to the overlay or zone objectives and guidelines. The DDO5 was approved into the planning scheme over 15 years ago. The proposed ACZ1 arises from significantly more recent work under the Bendigo City Centre Plan 2020. The later should be considered. The adopted Council report for C279 ACZ notes:</p> <div data-bbox="651 701 1449 981" style="border: 1px solid black; padding: 5px;"> <ul style="list-style-type: none"> • The south-eastern and northern eastern sides of this street block interface with low-rise residences with heritage values, requiring an appropriate scaling of built form, whilst preserving capacity and viability for mixed use development of a relative higher density. The south-western address to the Williamson/Myers Streets intersection is not constrained by heritage places, though new development here should maintain a relative mid-rise of building heights recommended for this side of Myers Street. • Retaining the visual prominence of, and view lines to, the St Andrews Church is important, noting that the primary vista is perpendicular from St Andrews Avenue. • 12m height applied to sites immediately flanking the Church, two of which are associated with the Church itself. Height extended eastwards along Myers Street, wrapping around into part of Mundy Street, in recognition of heritage places. • 16m height applied to sites addressing Mollison Street to enable higher density housing at a mid-rise scale. </div> <p>The draft ACZ guidelines state:</p> <div data-bbox="651 1055 1449 1249" style="border: 1px solid black; padding: 5px;"> <p>Support higher density residential infill development to the rear of the St Andrew's Uniting Church site, and to a preferred maximum building height of 16 metres.</p> <p>Preserve the visual prominence of the St Andrew's Uniting Church with moderated building heights and setbacks to adjacent sites.</p> <p>Create a through-block link for pedestrians between Myers Street and Mollison Street, incorporating part of St Andrew's Uniting Church yard and passing through future housing development at the rear.</p> </div> <p><i>The Mollison Street building</i></p> <p>The development delivers a higher density outcome to the rear of St Andrews Church and parts of the proposed buildings exceed the C179 ACZ discretionary building heights. Facing Mollison Street, the proposed ground floor is at RL 224.7. Heights annotated in the image below are taken from this ground level.</p> <p>The Mollison Street building where it is adjacent 98 Mollison Street (residence) is within the 16m height guidance. The wall facing the street is 12.3m from ground level (RL237.0). The peak of the feature gable is 15.5m from ground level (RL240.2).</p> <p>The Mollison Street building adjacent the medical centre at 84 Mollison Street exceeds the 16m height guidance. The wall height facing the street is 17.6m from ground level (RL242.3). The peak of the feature gable is 18.5 from ground level (RL243.2). The additional 1.6m wall height (or half</p>

Sub. no	Summary of Submission	Consideration by Uniting Housing
		<p>a storey) is relatively modest in the context of a mixed-use neighbourhood with policy support to increase density. The highest forms of the proposal are located adjacent to the medical centre, at 89 Mollison Street which is developed to a height of three storeys and located onto the street boundary.</p> <p>The principal façade of Building 1 is set back from the Mollison Street edge (noting the proposed C279 planning scheme allows building up to the Mollison St boundary) – over 40m from the nearest residences opposite. When combined with the proposed Red Box and Blackwood trees growing between five to ten metres at maturity, and the visual detail of balconies, significant visual relief will be afforded when the building is viewed from Mollison Street.</p> <p>The 2.5m additional height for the gable is at a single point only. The gable reflects a common architectural feature of surrounding homes and commercial buildings and acknowledges the prevailing early twentieth century architectural style of the street.</p> <p>When presenting to Mollison Street, the building contains a significant visual break via the vehicle and pedestrian entry and removal of the bridge element. The break allows views through the site to Myers Street at ground level including views of the community hall, church building and internal recreational spaces.</p> <p><i>The Myers Street building</i></p> <p>The front walls of the Myers Street building are two storeys (visually around 7.5m including the balcony facade above) and four storeys at 13.9m and 15.9m to the gable point. St Andrews Church rises to 12.3m. This mix of heights is located no closer than 8.9m from the church with a new intervening landscape and pathway treatment. The Myers Street building is setback so that it does not compete with the principal façade of St Andrews Church. The staggered street setback at levels 2 and 3, pull the building back from Myers Street so that it does not dominate or overwhelm St Andrews Church.</p> <p>At two apartments wide and four storeys high, the Myers Street building presents as slim and tall at its street frontage. The heritage report on the proposal provides support for the presentation of the building and site</p>

Sub. no	Summary of Submission	Consideration by Uniting Housing
		<p>layout have regard to its adjacency to the heritage listed church, stables, and the Myers St precinct heritage controls.</p> <p>Just as the church’s frontage is made-up of four distinct shapes at different setbacks, so too does the proposed building present a composition of four elements. The ground and first floor are shown at the same setback with the same material. The third and fourth floor introduce new materials and varying setbacks including the introduction of a gable.</p> <p>This technique of reflecting the unique and detailed composition of the church’s frontage, while employing a modern presentation of materials and residentially suitable shapes, provides a suitably respectful presentation to this important city frontage. The design response modulates the building’s façade so that the size, height, and bulk does not visually dominate St Andrews Church as acknowledged in the GML heritage report.</p> <p>The detailed and respectful composition of the new building frontage having regard to the church, and the significant new space between the two building combine to create suitable ongoing visibility and setting for St Andrews Church. The church roof and tower structures will remain as a prominent element of the skyline in this part of Bendigo.</p>



Mollison Street Building heights of post-consultation design

Detail of landscape plan to Mollison Street frontage



Visual relationship between St Andrews Church and new building (St Andrews Avenue/Myers Street)



Sub. no	Summary of Submission	Consideration by Uniting Housing
03, 04, 04a, 04b, 05, 09, 15, 15a, 16, 17	Insufficient car parking is proposed to service the needs of future residents and those using the on-site community facilities.	<p>Parking is proposed below the 0.6 spaces per apartment threshold for assessment under Clause 52.20 of the planning scheme. In private developments 1 space per dwelling is required plus visitor spaces.</p> <p>To understand the actual likely car-use need for this project, Uniting provided an empirical analysis that demonstrates a) walking proximity to goods, services, and transport b) the availability of public parking in the neighbourhood for visitors. The report also asserts that community housing residents are likely to have low car ownership rates. Traffic engineers for the project also researched and considered recorded rates of car ownership for one- and two-bedroom dwellings within the Greater Bendigo area.</p> <p>The proposal also seeks to balance the provision of car parks, which can itself generate more traffic, with open space on the site to ensure the character of the site is not overwhelmed by car parking. The car park is to be sleeved by buildings within the site.</p> <p>Uniting’s traffic report notes that conservative assumption of daily vehicle trips generated by the 21 car parking spaces is acceptable, having a very low impact and expected to be easily absorbed into the surrounding road network.</p> <p>Uniting Housing notes the support provided by the congregation of the St Andrews Church for the proposed development. The congregation are the primary user group of the church, community hall and current informal parking on the site.</p> <p>76 bike spaces are provided to encourage a reduction in car use.</p> <p>One submission suggested a caveat on the land preventing ownership of cars. Such a caveat would be disproportionate in this instance as Uniting will retain full control and management of the site. It is notable that Council policy intends to allow no on-site parking on CBD sites to encourage better design outcomes with fewer expanses of car park.</p>

Sub. no	Summary of Submission	Consideration by Uniting Housing
03, 04, 04a, 04b, 05, 09, 15, 15a, 16, 17	Insufficient car parking is proposed to service the needs of future residents and those using the on-site community facilities.	<p>Uniting Housing will be the owning and managing registered housing agency of the site. Agencies are regulated under Victoria’s Housing Act. The Registrar of Housing oversees performance of agencies including: annual reporting against performance standards and guidelines; and the ability to intervene and require remediation where alerted to performance issues.</p> <p>As a community service organisation of the Uniting Church, Uniting Housing manages over 900 homes in Victoria and Tasmania. Uniting’s established housing support teams are:</p> <ul style="list-style-type: none"> • Housing services team • Community services team • Asset management team <p>These teams provide services including: resident and tenancy needs, security and maintenance, 24 hour property, residential and maintenance contact; drug and alcohol, mental health, employment, aged care and disability support.</p> <p>To complement these services, the Bendigo development will have an on-site tenancy staff member who will provide place management, and community development activities and programs that provide opportunities for residents to connect with one another within the development, with the St Andrews Church congregation and the broader Bendigo community.</p> <p>These services will be tailored to meet the profile and requirements of the new residents who are anticipated to move in by 2025.</p> <p>Uniting is also required to abide by a site specific management plan to the satisfaction of Homes Victoria under its partnership agreement.</p> <p>A planning permission should not seek to duplicate or displace requirements where the parliament has approved another legislative regime to govern a particular issue such as noted above. Given these matters are adequately addressed through other regimes, Uniting does not proposed to duplicate and deal with matters through the planning system.</p>

<p>04, 04a, 04b, 09, 17</p>	<p>The volume of residents on site are likely to produce unacceptable amenity impacts on the existing neighbourhood</p>	<p>The pump room which is capable of noise or air emissions is enclosed within the building. Air conditioner condenser units will be located on individual balconies. Those balconies are oriented either into the site or towards the street with side walls to prevent noise leakage towards adjoining neighbours.</p> <p>Mollison Street, located on the Bendigo CBD edge, is already a reasonably busy mixed-use street with a current mixture of vacant, commercial, community and residential uses. At 30m wide, it is approximately double the width of a conventional residential street giving substantial distance for noise dissipation between residences on either side.</p> <p>There is unlikely to be an appreciable detrimental increase in amenity impacts as the development is residential and provides pedestrian access via both Mollison and Myers Street. The new presentation of the site to Mollison Street will be a significant visual improvement on the current site presentation.</p> <p>The current planning scheme controls and proposed rezoning to the Activity Centre Zone, allow for the development of this site for dwellings. The development of the land for multiple dwellings does not inherently mean that occupants will create residential noise that is unreasonable.</p> <p>All dwellings will be constructed with double glazed windows. Outdoor private space will be provided on balconies set back substantially further from Mollison Street than front gardens and dwellings opposite. In addition, outdoor recreational space is provided centrally within the site to allow for the congregation of children and families.</p> <p>It is not an offence to smoke tobacco on private property. In any event balconies are substantially setback from Mollison Street – with the nearest dwelling opposite to be between 40 and 50m away.</p>
-------------------------------------	---	---

Sub. no	Summary of Submission	Consideration by Uniting Housing
		<p>As noted in submissions, residents will be subject to the same laws as currently apply to Mollison St under the Environment Protection Act.</p>
05, 04aa	<p>There will be unreasonable overshadowing of 98 Mollison Street.</p>	<p>Dwelling windows facing the site from 98 Mollison Street are 4.3m from the shared boundary with roof eaves above. While the planning scheme only requires consideration of north-facing windows within 3m of shared boundary, Uniting has altered its design in response to this submission.</p> <p>The building has been moved 1.4m further away from the shared boundary with 98 Mollison Street. The side wall to the front of the site is now 4.1m from the boundary – 8.4m from windows at 98 Mollison Street. The side wall to the rear of the site, opposite the rear shed at 98 Mollison Street is now 2.9m from the boundary – 7.2m from the nearest window at 98 Mollison Street.</p> <p>New early morning overshadowing will occur to the backyard of 98 Mollison Street between 9am and 11am. Quite a bit of overshadowing already occurs from adjacent trees, on-site outbuildings, and boundary fences. Shadow modelling shows that there will be no new shadowing to the backyard of 98 Mollison Street at 11am at the equinox (the 22 September is the date on which shadowing is required to be modelled in the planning scheme) – red on diagram below is new shadow.</p> <p>Whilst the development will cast new shadows between 9am and 10am at the Spring equinox, this is acceptable considering the site’s location and planning policy aspirations for more intense development on this site. Furthermore, the extent of shadowing at 10am is minimal, the rear yard of 98 Mollison Street will receive approximately 94sqm of sunlight at this time and will be free of new building shadows from 11am onwards.</p>

Sub. no	Summary of Submission	Consideration by Uniting Housing
---------	-----------------------	----------------------------------

Shadowing of post-consultation development – shadowing from the proposal shown red



04aa	<p>the adjacent [98 Mollison St] residential building site has had its future development opportunities significantly impacted in the negative.</p>	<p>The conventional approach to equitable development on redevelopment sites of these proportions is to ensure habitable room windows face towards the street or into the site itself – protecting its own amenity; for a recent exposition of the practice see paras 90–92 of <i>Porta Investments Pty Ltd v Yarra CC</i> [2022] VCAT 336. This is the primary strategy that the Uniting proposal exhibits – of the three habitable room windows near the shared boundary, two are oriented toward the street or within the site.</p> <p>This technique allows maximum flexibility for the location of building on adjacent sites, including up to and on the boundary in accordance with relevant planning standards.</p>
05	<p>Micro-climate impacts of side wall adjacent 98 Mollison Street i.e., radiant heat in summer and reduction in ability to install solar panels.</p>	<p>With Uniting’s proposed changes, a total distance of 7.3m to 8.4m is proposed between 98 Mollison Street and Building 1 – approximately the width of a typical residential street carriageway.</p> <p>Land between the western building wall and the shared boundary with 98 Mollison Street, will be planted with trees and ground covers.</p> <p>Both design techniques will result in little if any reflected heat reaching the dwelling at 98 Mollison Street.</p> <p>The shadowing diagrams provide indicate little if any change to the potential for solar generation on the current dwelling at 98 Mollison Street.</p>

Sub. no	Summary of Submission	Consideration by Uniting Housing
05	Concern with retention of large gum trees in internal open space area due to dropping limbs.	These trees are currently on site and no change is proposed to them as part of this development (except for required pruning to Tree 3 given its adjacency to Building 1). Uniting is obliged to ensure the health and stability of these trees within its site and will continue to do so.
05	High levels of noise generation due to balcony spaces and ability of noise to bounce around the site off new walls.	Uniting will replace its shared rear and side fences with 98 Mollison Street to a minimum 2m following consultation with neighbour.
07	Proposed service structures (power, water) along the Mollison Street frontage may provide places of concealment contrary to crime prevention through design strategies. This is acute at the eastern end of the site noting the design of the adjoining building.	<p>The water meter enclosure is low structure located at the main entryway that is subject to a high level of surveillance.</p> <p>The electricity box at the eastern end of the site is surrounded by a substantial open area that is easily viewable to passers-by. Its situation is similar to a conventional residential fence in a suburban street.</p>
10	Provide streetscape elevations in context and a 3D view in the city centre context before a decision is made.	Renders of the building in context provided a realistic representation of building. Elevation plans for this development are not capable of representing the complex interaction of depth and site dimensions in the development – although they will be presented in the application to the Minister for Planning for technical review.
11	The design should be subject to a design review process.	The proposal was subject to a design review by the Victorian Government Architect. Several design changes were undertaken in accordance with review recommendations.
15, 15a, 16, 17	<p>Not enough open space or green space.</p> <p>Entrance from corridors totally inappropriate for tenants and for those first responders who will have</p>	The development provides open space well in excess of planning standards including retention of significant existing trees and other vegetation.

Sub. no	Summary of Submission	Consideration by Uniting Housing
	to attend when there's an incident;	
15, 15a, 16	<p>We recommend consulting:</p> <p>Elected Councillors and MPs.</p> <p>DFFH, Department of Health and other relevant state agencies.</p> <p>groups working with people needing social housing including Inter-Faith, St Luke's Family Care, Catholic Care, Salvation Army, St Vinnies, and volunteers.</p> <p>Police, repair and maintenance workers, locksmiths, neighbours of existing social housing.</p>	<p>Elected Council and local MPs were directly invited to make submissions at the time of this consultation.</p> <p>Uniting Housing, through its social services arm and its participation in local and community housing forums is in regular contact with other housing and social service providers.</p>

5 CONCLUSION

Strong and informative responses were provided to Uniting Housing's consultation on this important new development proposal for Bendigo. In response to consultation feedback, Uniting Housing has updated its proposal post-consultation and undertaken to:

- Move the building 1.4m further away from the shared boundary with 98 Mollison Street to further reduce overshadowing, and visual bulk impacts.
- Remove the bridge connecting the Mollison Street apartment building. This provides benefit in opening up view-lines and refining the visual appearance of the building. The below render shows the impact of this change.
- Remove the redundant driveway crossings to 24 Myers Street and Mollison Street and reinstate the kerb and footpath providing on-street parking.
- Replace both its side and rear fence with 98 Mollison Street.
- Continue to inform stakeholders of progress on the development including during construction.
- Include in its construction management plan provision for the protection of street trees as informed by the arborist advice undertaken to date.
- Perform its established site, property and resident management obligations and practices as a registered housing provider in Victoria.

Removal of Connecting Bridge



Attachment 1 – Consultation material

Website and published consultation material









<https://www.unitinghousing.org.au/our-developments/st-andrews-bendigo/>



Giving back to the community.

Addressing the need for community

Further information

-  StA Bendigo - Arborist Report.pdf
-  StA Bendigo - architectural drawing set.pdf
-  StA Bendigo - Ecological Assessment Report.pdf
-  StA Bendigo - Infrastructural CAN.pdf
-  StA Bendigo - Landscape Plans.pdf
-  StA Bendigo - Stormwater & Drainage.pdf
-  StA Bendigo - Traffic Report.pdf
-  StA Bendigo - Wind Report.pdf

Mailing notice - sample

02 December 2022

The Occupier
ADDRESS
Bendigo VIC 3550

Dear Sir or Madam,

Community housing development proposal at St Andrew's, 26 Myers St, Bendigo

St Andrew's congregation has been a part of the Bendigo community since 1854 and the current church on Myers Street built in 1930. The buildings and use of land around the church have continued to change and adapt to the needs of the congregation and community since then.

St Andrew's now sits in the middle of a vibrant and growing Bendigo CBD, with a number of under-utilised buildings and outdoor spaces around the site. At the same time, the need for community housing in Bendigo is greater than ever with rents getting higher and home ownership out of many people's reach.

Uniting Housing and the St Andrew's congregation are partnering to help deliver safe and secure long-term housing for people in housing stress.

We would like to share with you our proposal to submit a planning application to build two new buildings next door to St Andrew's that would include over 70 one- and two-bedroom units. These new additions would neighbour the existing church and community hall, preserve the stables and gum trees central to the site, and create a new path through the site linking Mollison and Myers Streets.

We've enclosed a flyer providing more information about our proposed plans and how you can provide feedback. Any submissions must be received by 23 December 2022. You're also welcome to drop-in to an information session at the Community Hall, 26 Myers St Bendigo, on Wednesday 7 December between 3.30pm-6.30pm

The project will be partially funded under the Big Housing Build.

We are seeking access to utilise the provisions of Clause 52.20 of the Greater Bendigo Planning scheme where the Minister for Planning is the decision maker and the Department of Environment, Land, Water, and Planning will manage the application. Uniting will undertake consultation in accordance with Homes Victoria's consultation guidelines. When the consultation period has ended, we will submit a report to the Department of Environment, Land, Water, and Planning outlining our response to the submissions we have received. We will also make this report available on our Uniting Housing website after the Minister has decided on the application.

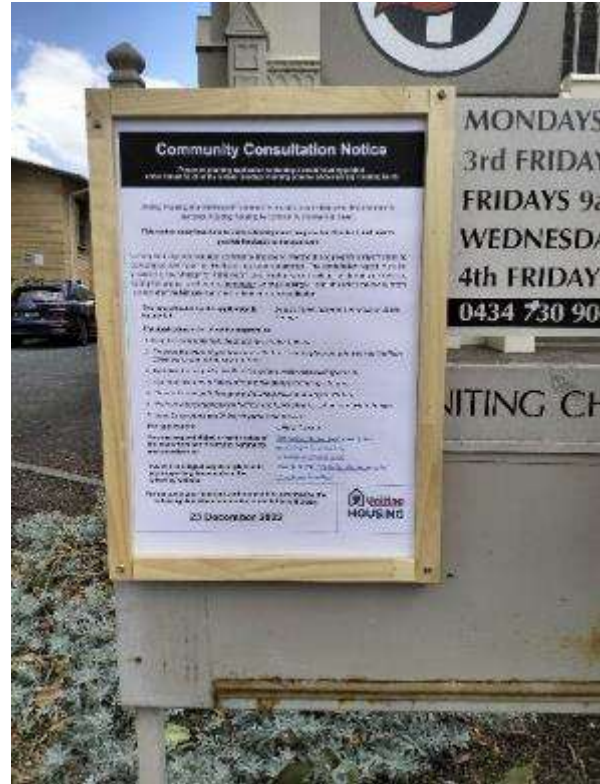
You can find out more about Uniting Housing and our housing projects on our website, unitinghousing.org.au, as well Uniting's community services at unitingvictas.org.au. We're excited about these plans and expanding our support for the Bendigo community.

Yours sincerely


General Manager, Housing and Property

Site signs

Notices on Myers Street:



Notices on Mollison Street:



Attachment 2 – Local newspaper articles

Housing agency wants feedback on game-changing Myers St idea



By [Tom O'Callaghan](#)

Updated December 6 2022 - 2:33pm, first published 1:30pm

[0 Comments](#)

[Facebook](#)[Twitter](#)[Whatsapp](#)[Email](#)

[Copy](#)



An artist impression of one of the buildings that would wrap around the St Andrew's Church. Image is supplied.

THE TEAM behind a 73-unit housing project in the heart of Bendigo says they have tried to maintain neighbourhood character in the proposed five-storey buildings.

Uniting Housing's Kristie Looney has given an in-depth interview ahead of a public information session about the Myers Street plans slated for Wednesday.

The drop-in consultations will be the first chance for members of the public to look at the proposed transformation of land around St Andrew's Church into a haven for vulnerable people, she said.

"Given that it is on the main street and it's adjacent to the church, there was a lot of thought put into the design," Ms Looney said.

The two buildings could rise near multiple other new multi-storey builds, including the Galkangu govhub a block away on Lyttleton Terrace and a host of potential hotels.

Still, Uniting Housing expects it will need special approvals to build past the third storey on both buildings.

It is also yet to get a clear sense of what neighbours and nearby business owners think.

St Andrew's congregation members have passed on some positive comments. The congregation itself is a key partner in the project.

Bendigo increasingly unaffordable

Their plans have been revealed as Bendigo rents have been branded more unaffordable than most areas of Victoria. Experts at SGS Economics & Planning have blamed rising rental prices and a scarcity of stock.

Housing project backers want to rip out the church's car park and some trees on-site, though it would keep a community hall and the historic former stables.

Plans to use the stables for anything else will be figured out at a later date and hinge on extra funding, along with fresh consultations.

Uniting Housing has chosen the Myers Street site because it is so close to public transport, supermarkets, parks and community activities.

"And St Andrew's congregation has been dreaming up this concept for years," Ms Looney said.



An artist impression of one of the buildings that would wrap around the St Andrew's Church. Image is supplied.

The congregation and the housing agency's parent group Uniting Vic.Tas wanted to take advantage of recent Victorian government Big Build funding to make that dream a reality.

Uniting Housing is among three agencies sharing in \$40 million for 135 new Big Build homes in the region.

Other groups working on projects include Common Equity Housing Limited, Uniting Housing Victoria, VincentCare Victoria and YWCA National Housing.

The projects combined bring to 325 the number of social and affordable dwellings completed, underway or on the cards for the Greater Bendigo region under the \$5.3 billion scheme.

Uniting Housing's drop-in information sessions take place from 3.30pm to 6.30pm on Wednesday, December 7 at 26 Myers Street.



Tom O'Callaghan

Wednesday 11 January 2023

RESIDENTS RAGE

BY JONATHAN MAGRATH

A PROPOSED social housing development in Mollison Street has left a group of residents fuming, with objections to the project ranging from the scale of the building to a perceived lack of community consultation.

Uniting Housing and St Andrew's Uniting Church is leading the development, which includes 73 units at 24 Myers Street through to

90 and 96 Mollison Street, on land on the fringes of Bendigo's CBD that Uniting says is under-utilised.

James Victoria will fund construction as part of the state government's \$5.3 billion Big Housing Build.

Tim Rogers, who has lived in Mollison Street for 55 years, said the public had not had adequate time to voice its opinions on the project.

"We feel that this has been

in the making for about two years and during that period there's been no consultation at all with the community," he said.

"We felt it was unfair that this proposal was only letterboxed to us about December 2 or 3 with a closing time for submissions of the 23rd of December."

The concerned residents managed to get the community consultation deadline pushed back until January

16, however Mr Rogers said many people might still be away on school holidays.

"[There hasn't been] sufficient time for people to get their head round it and look at all the issues involved," he said.

The proposed build would feature two new buildings of four to five storeys in an L-shape, adjacent to the Sandhurst Medical Practice building in Mollison Street and the St Andrew's Uniting

Church on Myers Street.

In their objecting submission, the residents note the maximum height of proposed buildings on Mollison Street is 20 metres, while other residential areas in the Bendigo city centre have provisions for buildings up to 14 metres tall.

According to Greater Bendigo Planning Scheme Amendment 279868, which councillors voted in favour of at December's council meet-

ing, the preferred height for most buildings in the city centre, which includes the new law courts and Bendigo GovHub, is 20 metres.

Another concern raised by Mr Rogers is the number of car parks provided.

While the Big Build provisions suggest 0.6 car parks per unit is the appropriate number, the proposal includes just 21 car parks for the 73 units - less than half.

Continued - P4

Anger over housing plans

BY JONATHAN MAGRATH

From - P1

The proposal's Transport Impact Assessment includes data from the Australian Bureau of Statistics, which states 35 per cent of one-bedroom dwellings and residents of 17 per cent of two-bedroom dwellings do not own or otherwise park a vehicle at their place of residence.

"Given the site's location with respect to public transport services and other services resulting in enhanced walkability, it is expected that dwellings within the subject site would be particularly appealing to potential tenants who do not have the need to park a vehicle at their place of residence," the assessment says.

The City of Greater Bendigo's amendment to the planning scheme removes the requirement for developments to provide off-street parking.

"Parking would still be added to the city centre as part of most developments, but it would be added at a rate that was appropriate for each development, not what an arbitrary figure in the



Mollison Street residents Tim Rogers and Jim Rolfe outside the Sandhurst Medical Practice, adjacent to the land Uniting Housing wants to build on. Picture by Noni Hyett

planning scheme dictated," the amendment states.

As the build is funded by the state's Big Housing Build, planning permits for social and affordable housing proposals in the program do not

require planning permits or scheme amendments, to "streamline the planning process" and ensure "rapid delivery".

However, supporting documents suggest a reduction

in car parks aligns with the municipality's vision to have less cars in the city centre.

"Furthermore, it should be recognised that the proposed dwellings are for social housing purposes which

is expected to increase the likelihood of tenants not owning their own private vehicle - therefore not generating a demand for an on-site parking space," the transport assessment says.

However, Mr Rogers said the lack of car parks would not meet the needs of residents and would contribute to a source of conflict among them. The residents' submission states the proposal fails to provide a detailed management plan which "acknowledged that residents of developments such as this bring with them an increased level of crime and antisocial behaviour".

According to Mr Rogers, crime is "endemic" in areas of public housing concentration, which "should be a matter of great concern for nearby businesses and residents who live in close proximity to the proposed development."

Mr Rogers said as 75 per cent of residents will come off the state government's priority housing list, an on-site manager should be included in the proposal.

"They're people that need

help, assistance, support; there should be an on-site manager if they're going to build something at the scale because in seeking to solve the problem of the lack of social housing in this manner, are they creating another problem?" he said.

An on-site manager would be present to "deal with conflicts over matters such as breaches of duty, parking, antisocial behaviour, unwelcome visitors, noise etc," the residents' submission states.

Uniting Housing makes no mention of crime or on-site management in its documents.

Mr Rogers said residents acknowledged the need for public housing and agreed it was one of the major issues associated with Bendigo's rapid growth.

"What we are objecting to is the scale why they have to put it all on this particular site, which we consider is an overdevelopment of the site," he said.

For more information on the development, visit www.unitinghousing.org.au/our-developments/st-andrews-bendigo

Attachment 3 – Redacted copy of submissions

([REDACTED]) Submission 01

From: WebMaster <uniting.webmaster@vt.uniting.org>
Sent: Thursday, 8 December 2022 7:48 PM
To: St Andrews Housing <StAndrews.Housing@vt.uniting.org>
Subject: New St Andrews Bendigo Submission

Name

[REDACTED]

Email

[REDACTED]

Residential Address

[REDACTED]

Your Submission

I would like to formally submit my objection to the proposed building in Myers St, Bendigo. Whilst I respect the reasoning behind the proposal to build these residences, I do not agree with them being situated in the Bendigo CBD. I do not believe that this development will assist the CBD in any way and certainly won't make it more appealing for others to invest in the CBD. You are welcome to contact me if you would like more detail. Thank you for your consideration.

([REDACTED]) Submission 02

Sent: Monday, 12 December 2022 4:47 PM

To: St Andrews Housing <StAndrews.Housing@vt.uniting.org>

Subject: [EXTERNAL] Community housing development proposal at St. Andrew's, 26 Myers St. Bendigo

Importance: High

Dear Sir/Madam,

We attended the community information session on Wednesday 7th December and spoke with [REDACTED] (planner) about our concerns regarding this development.

We live at [REDACTED] and unfortunately have a bus stop directly at the front of our property where buses stop right across our driveway. We constantly have people sitting on our front fence ([REDACTED] even took a photo of someone doing just this), throwing rubbish over our fence and also spitting over our fence.

Our main issue/concern is the increase in bus users that will occur with this development, as you are encouraging your residents to use public transport opposed to having vehicles with the limited amount of car spaces you will be providing. Currently, it is extremely frustrating and inconvenient having buses park across our driveway preventing us from entering or exiting our own property. Unfortunately, some of the drivers are extremely arrogant and won't move, even if they are not picking up passengers. As the bus stop is the last before going into the centre of Bendigo, if the drivers are running ahead of schedule they will sit at the stop and just idle until they are right to head into Bendigo. This situation will only get worse with increased bus users as will the number of people sitting on our front fence and doing all the other disgusting things people do.

On talking with [REDACTED] the scenario of having the bus stop moved to in front of the St Andrew's Community hall was suggested and very well received with how logical it was. [REDACTED] therefore encouraged us to put this suggestion forward, especially considering how convenient it would be for the residents if this development goes ahead.

It would benefit everyone if this scenario was seriously considered and actually acted upon.

We look forward to your response.

Kind Regards,

[REDACTED]

([REDACTED]) Submission 03

Sent: Wednesday, 14 December 2022 11:38 AM
To: St Andrews Housing <StAndrews.Housing@vt.uniting.org>
Subject: [EXTERNAL] 24/26 Myers St

Uniting Housing
St Andrews
Bendigo

re 24/26 Myers St Bendigo

I am writing in response to your community consultation notice in relation to the above mentioned proposed development. Whilst I support the development of social housing generally the idea that future residents of this proposed development will not have motor vehicles is unrealistic. I believe that at least one car park should be required for every residential unit and in addition car parking for visitors must be provided.

It appears that the City of Greater Bendigo does not have an overall parking strategy for this central area of Bendigo. There are restrictions to parking in Bramble St, Mollison St and parts of Myers St but the restrictions seem to be illogical. For instance the residential part of Myers St permits all day parking and workers park there all day denying residents (that do not have off street parking) the ability to park close to their residences. I have raised this matter with the Council but they refuse to take any action.

To summarise I believe the following action should be taken in relation to this development

- Provision of at least one parking space per residence (if this not provided I believe that a caveat should be placed on the title demanding that residents do not have a vehicle).
 - That a formal parking strategy be developed for the Bendigo CBD including Myers St, Bramble St and Mollison St.
 - Provision of parking for visitors
- I request that these matters be addressed as part of any development application that may be made.

Yours truly,

[REDACTED]

([REDACTED]) **Submission 04**

From: WebMaster <uniting.webmaster@vt.uniting.org>
Sent: Wednesday, 21 December 2022 8:58 AM
To: St Andrews Housing <StAndrews.Housing@vt.uniting.org>
Subject: New St Andrews Bendigo Submission

Name

[REDACTED]

Email

[REDACTED]

Residential Address

[REDACTED]

Your Submission

This submission is made on behalf of all of the residents opposite and adjoining the proposed development, namely:-

[REDACTED]

The submission is universally approved by all

[REDACTED]

Or Upload Your Submission

- [Submission.pdf](#) (See attached)

Uniting Housing

St Andrew's Bendigo Housing Project

Submission

This submission is made on behalf of the resident owners of [REDACTED] [REDACTED] which are opposite the proposed development together with the resident owner of the residential property which is next to the development.

The submission is an objection to the proposed development on two main grounds

- 1 The proposal, because of its size, height, bulk, form, density and appearance, is an
 1. is not in keeping with and fails to respond to the significance of the heritage
 1. is contrary to the applicable design and development overlay to allow for increased development densities while ensuring that the heights of new buildings fit reasonably with Bendigo's character and to
 1. fails to display any consideration of the negative impact the development
 1. fails to provide sufficient onsite parking which
 - 1.4. Parishioners, and other users of the Church and community halls
 - 1.4. who presently enjoy the benefit of on-site parking, and
 - 1.4. the customers and service providers of nearby
 - 1.4. businesses and the visitors and service providers of
- 2 The proposal, perhaps more importantly, fails to provide a detailed management
 2. Acknowledges that residents of developments such as this bring with them an increased level of crime and antisocial behaviour both within

2. describes how the residents will be monitored with respect to their
 - 2.2. The Residential Tenancies Act
 - 1 Any residency agreement applicable to their
 - 2.2.
2. makes reference to there being an on-site management presence to deal with conflicts over matters such as breaches of duty, parking, antisocial behaviour unwelcome visitors noise etc. and such
2. reassures residents of neighbouring residential properties and the owners and employees of neighbouring businesses that the management
2. addresses the likely effects, if any, on the site and surrounding land and land uses, including noise levels, traffic, air-borne emissions,

Supporting Arguments

1. The proposal, because of its size, height, bulk, form, density and
 1. is not in keeping with and fails to respond to the significance of the heritage

We note that a heritage overlay applies to the site itself as well the Mollison/Mundy/McLaren precinct.

We refer to The City of Greater Bendigo Heritage Design Guidelines – Bendigo Boom / Victorian Style 1870-1901

The heritage homes opposite the proposed development are representative of the era and homes as described in the guidelines.

Statement of Significance

Social historic context

The quartz gold mining boom transformed Bendigo in the 1870s–1890s from a dusty mining town into a glorious city with an international reach. Fortunes made on the Bendigo stock exchange were flaunted by magnates on flamboyant grand buildings, opulently decorated interiors and beautiful gardens designed by migrant architects, builders, and craftsmen.



Boom style villas with decorative projecting gable rooms.



Symmetrical single and double storey Boom dwellings.



What is significant?

The distinctive Bendigo Boom style was developed by migrant German and Austrian architects like William Carl Vahland and later, William Beebe. Vahland worked in the Northern German Baroque Revival style; his aim was to create a little 'Vienna of the south'. William Beebe's preference in the 1890s was for Queen Anne Revival, Carpenter Gothic and Art Nouveau styles.

Gold finds in the 1890s buffered Bendigo from the worst effects of the economic depression experienced by the rest of Australia. Mine owners built their grand mansions near their mines alongside miners' cottages. But for mine speculators, hillsides were favoured. Grand villas were enhanced by ornamental gardens, exotic palm trees, and elaborate fences.

The resulting housing stock from this period ranges from the grand and flamboyant to the more basic, less ornate timber villas. The boom in building was stimulated by the production of 'Vahland pattern house designs' through the Bendigo Land & Building Society which encouraged home ownership for the poor and working classes. These were often more simple in design.

How is it significant?

¹Bendigo Boom style is of cultural significance for its architectural, historic and aesthetic values.

We refer also to the Eaglehawk and Bendigo Heritage Study Volume 3 Specifically Precinct 7.05 Gravel Hill Residential and Civic

Major Contributory Streets

Bramble, Victorian, Edwardian, timber, brick
 Mollison, Victorian, Edwardian, timber, brick
 McLaren, Victorian, brick, stucco

The study also makes reference to Mollison Street and in particular its collection of large villas on the south side, valuable remnants.....

In time, structures erected around the church were the rectory (1885), offices (1898) and Sunday School.² Caire's view also takes in St. Andrew's Presbyterian Church (1859), which has since been replaced (1930) and does not comprise part of the precinct.³ However, its site adjoins Mollison Street, which still has its collection of large villas on the south side, valuable remnants of when the street was well favoured as a residential precinct. Caire's 1875 view shows a well-treed area, concealing a group of large villas.

Of note, 95 Mollison Street is identified as a key site.

The study goes on to state-

Significance

The streets, Bramble, McLaren and Mollison, provide the important residential base of this precinct with continuity of period and form of the housing within each being underscored by individually important house designs such as those listed above. The railway contains them but also provides a buffer which allows a visual focus on these streets because of their isolation and orientation towards it. The Gravel Hill school also serves as a visual focus because of its scale, its surrounding mature trees and its construction period which is related to that of the rest of the precinct.

We refer to Volume 5 of the Heritage Study – The Site Schedule

- A-C sites are of individual importance and D sites are representative of their era and are contributory to a streetscape/precinct. E sites have been altered but can still be recognised as from a particular era.
- Sites of national/state significance are value 'A', those of regional significance are value 'B' and locally important sites are 'C' value. Many of these will have detailed citations in Volume 4.
- Sites valued as MS are significant mining sites and those designated L are landscape sites but have not been evaluated in this study.
- * Streetscape level-1,2,3 representing an increasing integrity to a particular era with decreasing number, where level 3 streetscapes are of mixed period but may link other more important streetscapes, and levels 1 & 2 have high integrity to a period or type and represent historical themes active in the study area.

KENILWORTH	073-	MOLLISON STREET	C?	1
LONDONIA	087	MOLLISON STREET	C?	1
	089	MOLLISON STREET	D	1
	093	MOLLISON STREET	D	1
MAGNOLIA	095	MOLLISON STREET	B	1

N.B. Kenilworth #73, Landonia #87 and Magnolia #95 are listed as being of individual importance while #89 and #93 also contribute to the streetscape

The Mollison Street streetscape has a level 1 classification and thus has high integrity to a period or type and represents historical themes active in the study area.

There can be little doubt that the development will dominate the streetscape as viewed from the public realm and diminish the contribution the significant heritage dwellings make to it.

1. **is contrary to the applicable design and development overlay to allow for increased development densities while ensuring that the heights of new buildings fit reasonably with Bendigo’s character and to**

We refer to the City of Greater Bendigo’s CBD Structure Plan 2005 and we note the introduction with our underlining–

The Structure Plan has been prepared for the Bendigo CBD to implement State and local strategies and to ensure the continued pre-eminent role of CBD.

A Structure Plan is a document that guides major change to land use, built form and public spaces setting out preferred directions for growth and how the changes should be managed. It is a long-term plan that sets out ideas and actions that can be undertaken over many years, by Council and other stakeholders.

The Structure Plan sets out the scale and direction of development in the CBD to meet the future needs of the Bendigo community and gives clear direction to owners, investors, government bodies, business operators and the Council about preferred locations for investment and change, and areas that need to be retained and enhanced.

We note also that this plan was adopted by The City of Greater Bendigo in December 2005 after a process that was commenced in August 2004. The process included –

September 2004	Research, site survey and circulation of Community Survey
October 2004	Community Forum to discuss issues for the CBD and the Study
February 2005	Steering Committee and Community Committee consideration of draft ‘Emerging Ideas’
27 June 2005 to 22 July 2005	Public display of the Draft Bendigo CBD Structure Plan for community and stakeholder comment
September 2005	Finalise the Bendigo CBD Structure Plan taking community feedback into account

The level of community consultation stands in contrast to the hurried and clandestine approach with respect to the proposed development.

We note the following as being of particular relevance to the proposed development -

- Buildings should generally reflect the ‘low rise’ form of the CBD
- Provide safe and welcoming streets
- Allow for higher buildings where the amenity of the street spaces will not be affected and where there are already higher buildings

But we also acknowledge the Bendigo City Centre Plan 2020 cited as being a “refresh” of the award winning 2005 plan.

Its goals are stated as follows -

- Facilitate redevelopment to strengthen the role of the City Centre as an important regional mixed use hub and tourist destination.
- Encourage local retail and businesses to activate the core commercial areas, increasing activity and surveillance.
- **Ensure high quality building design, height, layout and setback controls that encourage development, yet are sensitive to existing heritage sites.**
- Create a public realm that is accessible, safe, connected and enjoyable. Facilitate and lead a transition to more active and sustainable transport modes. Encourage environmentally sustainable design for all new development.
- Incentivise development that contributes to the growth and diversity of land use in the City

We note in particular that the maximum height of buildings opposite the Mollison Street residential area is proposed at 20 metres. Other than for a very small section of Short Street, all other residential areas within the City Centre are “flanked” by a zone where the maximum height proposed is 14 metres.

We will be seeking to have the Mollison Street residential area considered along similar lines to the other residential areas. The alternative is to be quite inconsistent with respect to the residential areas.

If anything, the heritage overlay that applies to the Mollison/Mundy/McLaren residential area would suggest the appropriateness of more significant “flanking”.

Regardless, the current design and development overlay is that which is applicable other than by being overridden by the “Big Build” planning amendments.

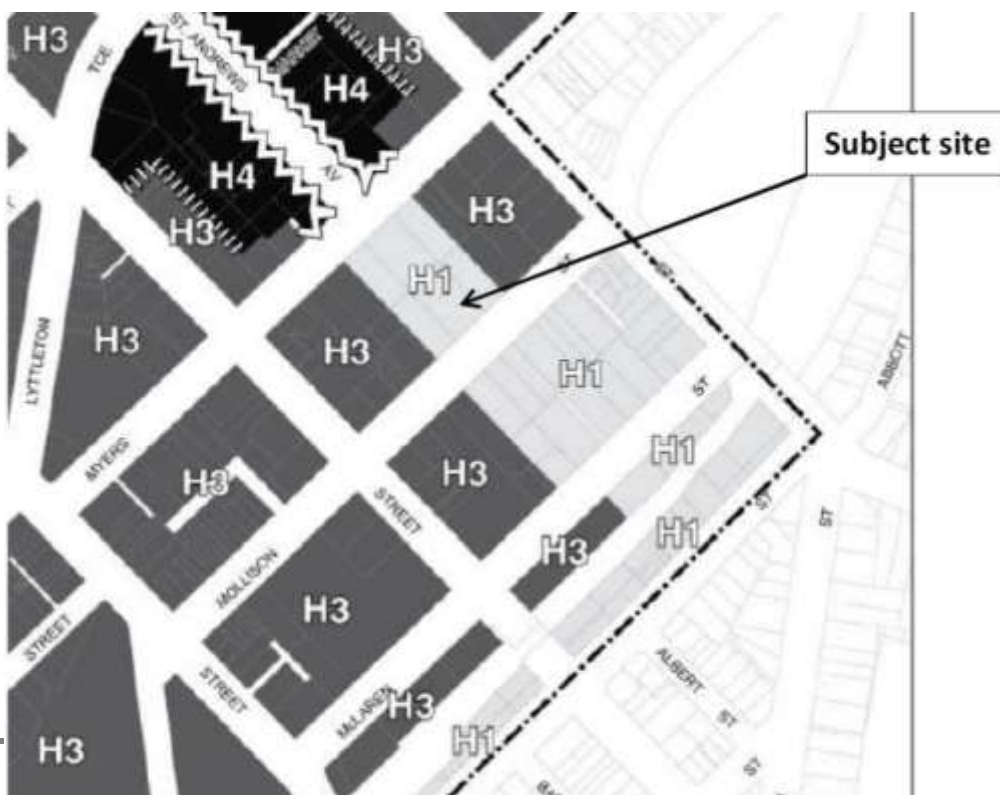
Schedule 5 to Clause 43.02 Design and Development Overlay states the following as design objectives –

Design objectives

- To allow for increased development densities while ensuring that the heights of new buildings fit reasonably with Bendigo’s character and protect the amenity of public spaces.
- **To ensure the heights of new buildings are generally consistent with the ‘low rise’ character of the CBD while responding to substantial heritage buildings in some locations.**
- To protect streets and other public spaces from overshadowing by new development.
- To ensure that the built form of new development contributes to the CBD’s physical environment by controlling building front and side set backs.
- To promote active frontages to streets, walkways and public spaces.
- To ensure street spaces are safe, welcoming and provide weather protection for footpaths in the areas of highest pedestrian activity.

And provides the following with respect to building heights –

Area	Maximum height	Purpose
H1 Low scale	9 metres	Development consistent with the traditional low rise character of the area.
H2 Transitional area	9 metres	To provide a transition to typically lower buildings on adjoining properties.
H3 Medium scale	12 metres	Any building above 3 storeys should set back upper levels to avoid overshadowing of public streets, laneways, parks or other open spaces at winter solstice.
H4 Higher scale	20 metres	To avoid overshadowing of properties and public spaces beyond what would result from a 12 metre high building, the upper levels of a building must be set back.



While it may be the case that the “Big Housing Build” planning amendments mean that these planning provisions do not apply, we believe that there must surely be some regard for them as opposed to being totally disregarded.

We note the proponent’s selective references to aspects of the planning zones and overlays while failing to acknowledge and consider the Design and Development Overlay applicable to the subject site.

1. fails to display any consideration of the negative impact the development

We refer to the stated purposes of the amendments to Victoria Planning Provisions 52.20 VICTORIA’S BIG HOUSING BUILD

Purpose

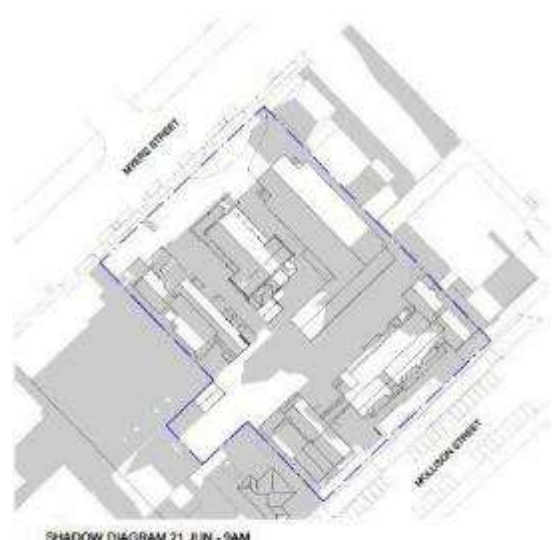
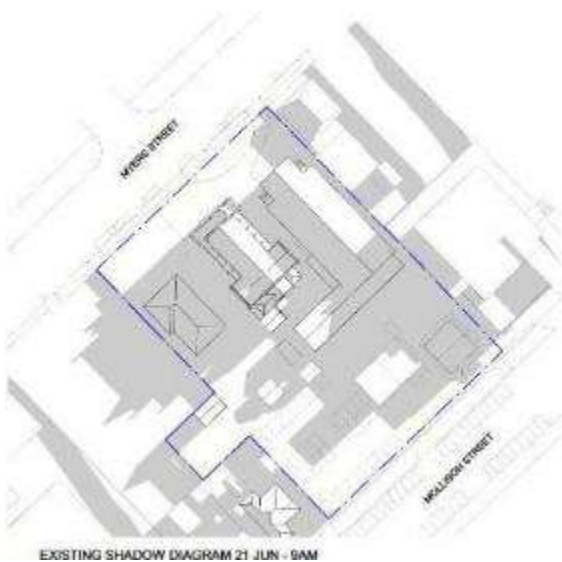
To facilitate the use and development of land for housing projects funded by Victoria’s Big Housing Build program.

To ensure that development does not unreasonably impact on the amenity of adjoining dwellings.

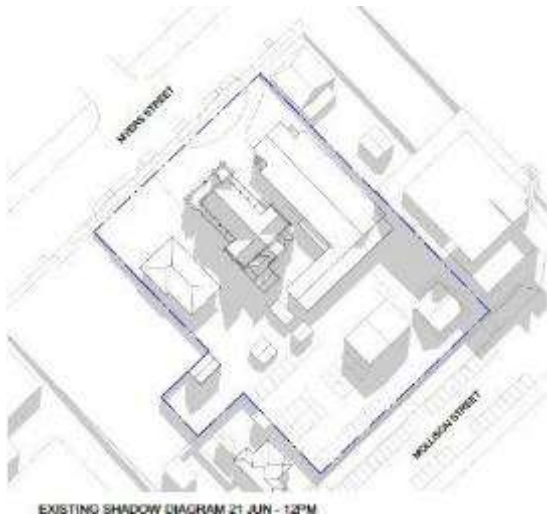
The adjoining dwelling is a single storey red brick residence which under the proposed development plans will be overshadowed by a five story residential tower in close proximity to it.

Current 21 Jun 9.00 am

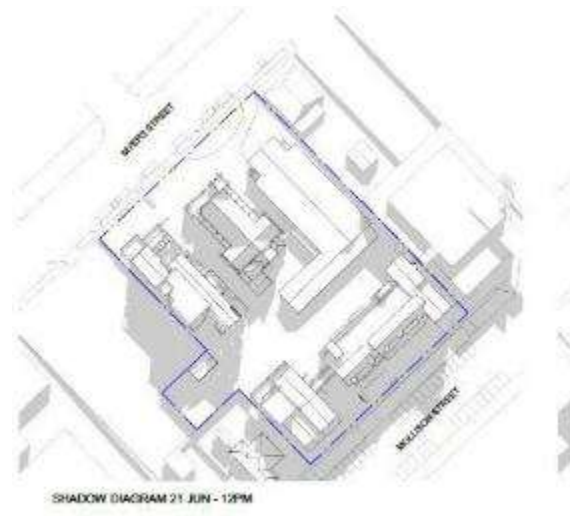
Proposed 21 June 9.00 am



Current 21 Jun 12.00 pm



Proposed 21 Jun 12.00 pm



We note the adjoining dwelling, in fact the entire house block, will be completely overshadowed 21 June 9.00 am and approximately 50% overshadowed at midday. i.e. The adjoining dwelling will be overshadowed by approximately 50% or more for the entire morning during winter.

As a result the dwelling will experience dampness, an increase in the cost of heating and no potential benefit from the installation of solar panels.

This surely fails a test of reasonableness with respect to the impact on that adjoining dwelling.

- 1. fails to provide sufficient onsite parking which
 - 1.4. Parishioners, and other users of the Church and community halls
 - 1.4. who presently enjoy the benefit of on-site parking, and
 - 1.4. the customers and service providers of nearby
 - 1.4. businesses and the visitors and service providers of

We refer to the proponent’s transport impact assessment and specifically with respect to on-street parking -

Mollison Street

Mollison Street is a local road generally aligned east-west, running between Mundy Street to the east and Mitchell Street in the west. Mollison Street provides a pavement width of approximately 19.3 metres, which includes 90-degree parking on both sides of the road, and a single traffic lane in each direction adjacent to the site. On-street parking is provided on both sides of the road, generally restricted to 2-hour parking between 9:00am and 5:30pm, Monday to Friday.

Of concern is the claim that the parking is “generally restricted to 2 hour parking....”
This is not the case. The significant majority are un-restricted.

The “all day” parking places are usually fully occupied from approximately 8.30 am to 5.00 pm on business days. On the proposed development’s side of Mollison Street there are 21 two hour parking spaces at the Mundy Street end. These offer vacancies from time to time during business hours and are needed to provide for visitors to the Church, the Sandhurst Medical Practice and residential properties. 36 unrestricted parking spaces then extend along Mollison Street to Williamson Street.

Opposite the proposed development there are 40 unrestricted parking spaces commencing from the Mundy Street intersection with 15 $1\frac{1}{2}$ hour spaces at the

In summary, there will be very limited opportunity for residents of the proposed development or their visitors to access on street parking.

Furthermore, as no provision has been made for on-site parking for users of the church and the community halls the future use of both the church and the community halls will be severely compromised noting that the majority of church uses are elderly.

From the planning documents -

Adequacy of Proposed Car Parking

The proposed dwellings are for social housing purposes, which is expected to increase the likelihood of tenants not owning their own private vehicle;
(So fewer car spaces are needed. But this has already been considered by the “Big Build” planning amendment which reduces the requirement to 0.6/dwelling)

On-street parking is largely restricted in the vicinity, which will assist in ensuring residents retain the low car ownership levels sought for the social housing development;
(Because of the lack of parking, otherwise eligible applicants won’t want to live there)

The “Big Housing Build” amendments to the Victoria Planning Provisions already take into account the lower car ownership of the likely residents. It suggests 0.6 per dwelling. It is not logical to then argue for a reduction from this by doubling up on the same reasoning.

A failure to provide sufficient resident specific parking spaces on site within the proposed development and also sufficient to meet the needs of the visitors to the residents is unacceptable. We add that such a failure would also contribute to a source of conflict among residents.



All day parking fronting the site



All day parking Opposite the site

2. The proposal, perhaps even more importantly, fails to provide a detailed

- 2. Acknowledges that residents of developments such as this bring with them an increased level of crime and antisocial behaviour both within**

We refer to a news article, THE AGE, August 8, 2021 headed “Residents push back on social housing blitz”.

Some extracts –

Last month, Maribyrnong Council in Melbourne’s inner west struck a deal with social housing provider Unison for a new building in Seddon, with the provision it employs security guards three nights a week.

One of the objectors, resident David Vasudevan, told the council he often witnessed antisocial behaviour at public housing sites in the area and the proposed development would lead to too many people with complex needs living in the area.

Labor for Housing spokeswoman Julijana Todorovic said the Maribyrnong case showed it was necessary to take powers away from local government – which could be influenced by a loud minority – to provide new homes for people in need.

Ms Todorovic said she expected the government would continue to face problems with councils in getting the big build completed.

She said using security guards set a dangerous precedent that should not become the norm.

“The demonisation of [social housing tenants] as associated with crime and drugs is terribly dangerous and frankly untrue.”

The views expressed from within this news article highlight the diversity of views with respect to the “Big Housing Build”.

With respect to claims made about crime and anti-social behaviour –

We refer to the Australia Government – Australia Institute of Criminology Research Report 06

Reducing crime in public housing areas through community development : An evaluation of the High Density Housing Program in the ACT

Extracts from that report -

Public housing areas experience disproportionate levels of crime and antisocial behaviour, including property and violent crime (DeKeseredy et al. 2003; Griffiths & Tita 2009; Matka 1997; Samuels et al. 2004; Weatherburn, Lind & Ku 1999).

We refer also to Social City 01, The Effectiveness of Strategies for Crime Reduction in Areas of Public Housing Concentration
UNSW-UWS AHURI Research Centre

The study concluded that crime was endemic in areas of public housing concentration, hotspots were strongly associated with clusters of public housing stock and radiated out into surrounding private housing areas.

There are also other research papers which lead to only one conclusion. The proposed development will bring an increased level of crime and anti-social behaviour to Bendigo’s CBD with the risk of the crime and anti-social behaviour radiating out into surrounding private housing areas.

2. describes how the residents will be monitored with respect to their

2.2. The Residential Tenancies Act

1 Any residency agreement applicable to their

2.2.

We refer to the following extracts from the Residential Tenancies Act 1997

A residential rental provider may give a renter a notice to vacate rented premises if the renter has used the rented premises or permitted their use for any purpose that is illegal at common law or under an Act.

A residential rental provider may give a renter a notice to vacate rented premises if the renter or the renter's visitor, whether by act or omission intentionally or recklessly causes serious damage to the premises, including any safety equipment, or to any common areas.

A residential rental provider may give a renter a notice to vacate rented premises if the renter or the renter's visitor by act or omission endangers the safety of—

- (a) occupiers of neighbouring premises; or
- (b) the residential rental provider or the provider's agent; or
- (c) a contractor or employee of a person referred to in paragraph (b).

A residential rental provider may give a renter a notice to vacate rented premises if the renter or any other person occupying or jointly occupying the rented premises has seriously threatened or intimidated—

- (a) the residential rental provider or the provider's agent; or
- (b) a contractor or employee of a person referred to in paragraph (a).

The Residential Tenancies Act 1997 provides a prescribed form for residential tenancy agreements. Among other things, the prescribed form states the following -

Use of the premises

The renter:

- is entitled to quiet enjoyment of the premises. The rental provider may only enter the premises in accordance with the Act.
- must not use the premises for illegal purposes.
- must not cause a nuisance or interfere with the reasonable peace, comfort or privacy of neighbours.
- must avoid damaging the premises and common areas. Common areas include hallways, driveways, gardens and stairwells. Where damage occurs, the renter must notify the rental provider in writing.
- must keep the premises reasonably clean.

Assignment or sub-letting

The renter:

- must not assign (transfer to another person) or sub-let the whole or any part of the premises without the written consent of the rental provider.

The rental provider may give the renter notice to vacate if the renter assigns or sublets the premises without consent.

The rental provider:

- cannot unreasonably withhold consent to assign or sub-let the premises.
- must not demand or receive a fee or payment for consent, other than reasonable expenses incurred by the assignment.

The prescribed form also provides for further terms to be added subject to those terms not being inconsistent with the Act.

We note also that Uniting:

Your responsibilities

As a Uniting consumer, it is your responsibility to:

- Treat other consumers, staff and volunteers with respect and behave in a non-violent, non-threatening manner
- Participate in any activities in accordance with the policies, rules and guidelines of the service
- Attend scheduled appointments or notify staff members in good time if you are unable to attend
- Work towards the achievement of any plans and goals you have agreed to
- Not be under the influence of alcohol and/or drugs
- Not bring any illegal items or substances onto Uniting premises
- Have regard for your personal safety and that of others
- In an emergency, follow reasonable clear directives from Uniting staff.

We note the absence of any explanatory document accompanying the plans for the proposed development which describes by whom and how the residents, some of them potentially quite challenging, will be assessed, monitored and managed in relation to their responsibilities under the Act, The Residential Tenancies Agreement and the responsibilities of Uniting Consumers.

2. **makes any reference to there being an on-site management presence to**

deal with conflicts over matters such as breaches of duty, parking antisocial behaviour unwelcome visitors noise etc. and

We refer to the following –

From the previously referred to “Australia Institute of Criminology Research Report 06” and referring to the role of the on-the-ground manager as part of a High Density Housing Program (HHP)

An on-the-ground manager (OTGM), employed by Reclink Australia, maintains a continuing presence across the site, coordinating existing services to residents and introducing new events, activities and programs that provide opportunities for resident interaction and relationship building and that address the needs of residents.

Later in the report -

Based on this analysis, it was estimated that the HDHP was responsible for 39 fewer assaults being committed between May 2009 and April 2013.

And-

Participating in the various activities delivered by the OTGM encouraged residents to interact with one another and fostered a sense of familiarity between individuals that was not present before. This had several benefits, including making it easier for residents to resolve conflict and encouraging a sense of belonging, both because of the relationships that had been formed but also because of the sense of joint ownership of communal spaces.

From the previously referred to “The Effectiveness of Strategies for Crime Reduction in Areas of Public Housing Concentration”

The study confirms concerns about the relationship between large public housing concentrations and crime, the ineffectiveness of physical/spatial interventions unless accompanied by broader social interventions and the value of empathetic localised intensive housing management and community policing. It also offers a new approach for spatial analysis of crime patterns over time at the micro level.

The study findings support the view that social interventions are more effective than physical/spatial interventions in reducing crime in disadvantaged public housing areas, and conversely that without supporting social strategies physical/spatial interventions are limited in reducing crime.

And from an additional resource “Crime Prevention for Australian Public Housing (Donald Perlgut)

- *Intervention in neighbour disputes.* Medium- and high-density estates are bound to produce occasional disputes among residents. Management reaction to these problems is of primary importance in the success of these estates.
- *Eviction.* It may be necessary to evict severely disruptive tenants so as to maintain stability on a housing estate.

It is now widely recognised (Wilson 1976) that estate managers, especially resident managers, are key actors in crime prevention in public housing.

We submit that the proposed development, which has been described by some as a hybrid of a “Collingwood Housing Commission Tower and a St. Kilda Rooming House”, must, as a matter of absolute necessity, include a minimum of two on-site resident managers who are able to be rostered to ensure that there is an on-site management presence 24 hours a day and 7 days a week.

By virtue of being classified as managed premises, Part 8 of the Residential Tenancies Act 1997, Violence on Managed Premises will apply.

We note the evidence that “Physical Factors” have negligible impact on crime and Anti-social behaviour when compared with “Social Factors” which are far more affective.

2. **reassures residents of neighbouring residential properties and the owners
and employees of neighbouring businesses that the management**

We refer to evidence provided earlier in this submission with respect to the correlation between crime and public housing and to the evidence provided earlier in the submission with respect to the positive outcomes achieved by “social factors”

We submit that this proposal must be accompanied by a detailed management plan which includes –

Resident on-site managers, and
Attentive monitoring of the resident’s compliance with their responsibilities, and
The control of visitation by non-residents, and
Allocation of parking places, and
Access controls to parking and each building by proximity devices or pin pads, and
Adequate Illumination throughout the site, and
CCTV surveillance.

2. **addresses the likely effects, if any, on the site and surrounding land and land uses, including noise levels, traffic, air-borne emissions,**

We are concerned in particular with the following -

Waste Management

It is proposed to utilise a private contractor to manage the collection and disposal of waste streams associated with the development.

Bins will be stored within a dedicated bin storage room on the ground floor of each building.

The waste collection vehicle will prop on Mollison Street adjacent to the vehicle access point, from where the bins will be transferred directly from each storage room to the waiting truck for emptying.

The bins will be returned to the appropriate bin storage room immediately following collection.

Residents will be responsible for disposing of recyclables, bagged garbage, organics and glass recycling into the appropriate bins located within each bin storage room via the lift (for those on upper levels).

Collections are to occur on alternate days to Council's waste collection services in the area to ensure no conflict with the municipal service.

We note the following –

PLANNING SCHEME REQUIREMENTS –

To ensure that waste and recycling facilities are designed and managed to minimise impacts on residential amenity, health and the public realm.

Protect public health and amenity of residents and adjoining premises from the impacts of odour, noise and hazards associated with waste collection vehicle movements.

We submit –

Because the parking bays will be fully occupied there will be no place to “prop on Mollison Street” during business hours.

We note that “pick ups” will occur multiple times per week and we assume this will be in the early morning

The vehicle will need to remain in position for a considerable time to allow time for the bins to be transported to and from it from the buildings.

There will be considerable noise as the bins are lifted and emptied into the vehicle. The proposal does not comply with clause 58.06-3

A comparison of the proposed development with other social housing developments

We note that as of the 16th of December there had been 33 approvals for Social Housing developments across the state. The data is summarised in the following table -

Municipality	Address	Metropolitan or Regional	Social Housing Dwellings
Geelong	59 Bellnore Drive, Norelane	Regional	2
Latrobe Valley	6 Gillie Crescent, Morwell	Regional	2
Ballarat	102 Canterbury Street, Brown Hill	Regional	2
Latrobe	164 Mary Street, Morwell	Regional	2
Glenelg	4 Woods Street, Portland	Regional	2
Southern Grampians	21 McMillan Street, Hamilton	Regional	7
Warrnambool	60 Hopetoun Road, Warrnambool	Regional	8
Knox	3 The Avenue, Ferntree Gully	Regional	10
Surf Coast	37 Willis Street, Winchelsea	Regional	12
Corangamtie	80 Camperdown- Cobden Road, Camperdown	Regional	13
Southern Grampians	23-29 Ballarat Road, Hamilton	Regional	17
Cardinia	19 Pakenham Road, Pakenham	Regional	20
Glenelg	217 Hurd Street, Portland	Regional	20
Greater Geelong	1-5 McKenzie Street, Belmont	Regional	29
Glenelg Shire	245 Edgar Street, Portland	Regional	31
Greater Bendigo	56 McKenzie Street West, Golden Square	Regional	35
Whittlesea	51 Pinetree Crescent, Lalor	Metropolitan	45
Maribymong	13 Hance Street, Yarraville	Metropolitan	16
Moonee Valley	Flemington Estate (Stage 1B), Flemington	Metropolitan	22
Whitehorse	408-410 Burwood Highway, Vermont	Metropolitan	34
Darebin	52-60 Townhall Avenue, Preston	Metropolitan	39
Brimbank	A 21 Corpernicus Way, Keilor Downs	Metropolitan	47
Maribymong	68-78 Summerhill Road, West Footscray	Metropolitan	49
Brimbank	11-13 West Esplande, St Albans	Metropolitan	53
Banyule	230 Banksia Street, Bellfield	Metropolitan	58
Banyule	2-20 Tarakan Street, Heidelberg West	Metropolitan	67
Moreland	21 – 25 Northumberland Road, Pascoe Vale	Metropolitan	70
Yarra	147 - 161 Elizabeth Street, North Richmond	Metropolitan	72
Yarra	240 Wellington Street, Collingwood	Metropolitan	73
Monash	2263-2267 Dandenong Road, Mulgrave	Metropolitan	73
Melbourne	3-15 Shiel Street, North Melbourne	Metropolitan	78
Glen Eira	8 Edgan Street, Carnegie	Metropolitan	99
Boroondara	1-12 Bills Street, Hawthorn	Metropolitan	103

Of note-

- The average number of social housing dwellings per development is 37
- The average in regional Victoria is 13
The proposed development offers more than twice the number of dwellings (73) when compared to its nearest regional rival (Also in Bendigo (35))
- To the best of our knowledge it is the only development located in the CBD of a regional city.
- None of the other regional city locations have developments other than 1 or 2 storeys.
- To the best of our knowledge, this development exceeds by far the largest previously undertaken by the developers.
- We suggest that this development is of its size and planned for its location opportunistically because of the available land.

Conclusion

- The proposed development is inappropriate for the proposed location having regard to its size, height, bulk, form, density and appearance.
- It fails to provide adequate on site parking
- Fails to have due regard for the heritage significance of the site and surrounds
- Is lacking a management plan to ensure compliance with resident's responsibilities and to mitigate risk and allay any fears with respect to neighbouring properties.
- We also note that anti-social behaviour is already prevalent, and of great concern to citizens, in the Bendigo CBD including but not limited to the Mitchell Street bus stops, the Hargreaves Mall and the Coles car park.
- We submit that this development is not appropriate for this place, is unique in regional Victoria, carries with it significant risks and should not proceed.

([REDACTED]) Submission 04a

From: WebMaster <uniting.webmaster@vt.uniting.org>
Sent: Wednesday, 21 December 2022 9:19 AM
To: St Andrews Housing <StAndrews.Housing@vt.uniting.org>
Subject: New St Andrews Bendigo Submission

Name
Phil Redmond

Email
[REDACTED]

Residential Address
[REDACTED]

Your Submission
I support the submission made by the residents [REDACTED] and [REDACTED] as uploaded.
This is an untried experiment in a regional city noting that the development is of a scale that is unprecedented. The impacts it can have on the economy of Bendigo's CBD, already in a perilous state, and the lifestyle of the residents who reside near it are of deep concern.
If it does proceed, it should be significantly scaled back and be accompanied by a management pan that includes permanent on site management.

Or Upload Your Submission

- [Submission1.pdf](#)

([REDACTED]) Submission 04aa

From: Phil <phil@redmond.cc>

Sent: Monday, 16 January 2023 11:36 AM

To: St Andrews Housing <StAndrews.Housing@vt.uniting.org>; [REDACTED] <[REDACTED]>

Cc: [REDACTED]; [REDACTED] <jirvrogers@gmail.com>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

Subject: [EXTERNAL] Uniting Housing St Andrews Bendigo

Hi [REDACTED],
Please find attached -

The original submission by the group of [REDACTED]
A second submission I have compiled thanks to the extra time that was made available to me. This additional submission has the support of the group of [REDACTED] as supplementary to their joint submission.
A submission referring specifically to the inconsistency in building heights as contained in the Urban Design Framework. (To be taken up with the COGB)
A submission by [REDACTED] you will have received from them. [REDACTED] have expressed their support for the submissions by the group of [REDACTED].
Profile details re [REDACTED] and has extensive experience in social housing and related matters.

cc [REDACTED]

Regards
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

Additional Submission

Uniting Housing – St. Andrews Bendigo

This submission is made in addition to my previous submission made in support of the joint submission by [REDACTED].

With the extra time made available it has been possible to consider a range of City of Greater Bendigo plans, reviews and frameworks, some sourced as recently as the City of Greater Bendigo’s council meeting of Monday the 12th of December, 2022.

20.1. Planning Scheme Amendment C279 - Bendigo City Centre Plan Implementation

“That Council:

- 1. Note this report and the associated documents.*
- 2. Endorse the documentation supporting Amendment C279gben to the Greater Bendigo Planning Scheme.*
- 3. Request the Minister for Planning to authorise Council to prepare Amendment C279gben to the Greater Bendigo Planning Scheme.*
- 4. When Authorised by the Minister, exhibit Amendment C279gben to the Greater Bendigo Planning Scheme giving notification as required for the minimum statutory exhibition period of one month.*
- 5. Authorise the Director Strategy and Growth to make minor changes to Amendment C279gben where the changes do not affect the purpose or intent of the Amendment.*

RESOLUTION - Resolution No. 22/12-18

Moved: Cr O'Rourke

Seconded: Cr Fyffe

That the recommended motion be adopted.

CARRIED “

Among the associated documents referred to –

- **Affordable Housing Action Plan**

While acknowledging the need for more affordable housing in Bendigo, the plan does not suggest the waiving of planning scheme requirements by either the State or Local Government to facilitate developments such as the one proposed for the St. Andrews Site.

- **Council Plan 2021-2025**

The Council Plan refers to the Affordable Housing Action Plan –

“• Provide planning support to community housing agencies to assist in attracting Big Build funding to Greater Bendigo

2 Provide support and respond to initiatives from the Big Housing Build program

3 Build collaborations between the public and private housing sectors to support the development of quality affordable housing

4 Investigate options to increase social housing supply on Local and State government land “”

Despite the above, the proposed Uniting Housing St. Andrews development is not supported by the amendments to the planning scheme proposed by the council at its meeting of Monday the 12th of December 2022.

- **Bendigo City Centre Integrated Economic Assessment and Planning Review**

“the assessment demonstrates that the proposed planning controls, based in part of the recommendations of the (Urban Design Framework) UDF, are a well-balanced and appropriate response to preserving the intrinsic urban form qualities of Bendigo City Centre and to the mixed development opportunities and constraints that this urban environment presents.”

It cannot be said that the proposed development is of a scale consistent with the assessment and planning review. It is not being appropriately constrained. It will therefore fail to preserve the intrinsic form qualities of the Bendigo City Centre.

- **Bendigo City Centre Plan 2020**

A stated goal -

“Ensure high quality building design, height, layout and setback controls that encourage development, yet are sensitive to existing heritage sites.

It cannot be said that this development is sensitive to the St. Andrews Church building, the Mollison Street heritage streetscape, the significant heritage dwellings which are opposite the proposed development and Moran’s Terrace one building site from it.

“the determination of the appropriate building height for an individual building must first and foremost take site context into consideration. Any such consideration will explore constraints and opportunities related to the site location, heritage and the characteristics of existing buildings and public spaces.”

- **Bendigo City Centre Plan Urban Design Framework November 2022**

Protection of future amenity-

“Provide for equitable development outcomes with siting and built form design that considers and responds to the development opportunities of neighbouring properties.”

In addition to the impact of the overshadowing as discussed in the submission by the group of Mollison Street Residents (which has been acknowledged), because of its location being “sandwiched” between the proposed development’s building and the heritage listed Moran’s Terrace, the adjacent residential building site has had its future development opportunities significantly impacted in the negative.

“Support higher density residential infill development to the rear of the St Andrew’s Uniting Church site, and to a preferred maximum building height of 16 metres.

Preserve the visual prominence of St Andrew’s Uniting Church with moderated building heights and setbacks to adjacent sites.

There will also be sites where development at the preferred maximum building height may have amenity, heritage or visual impacts. Building height transitions, setbacks and site coverage are to be used to manage and mitigate these impacts.”

The height of the building adjacent to the St Andrews Uniting Church exceeds the 12 metre height limit and will thus fail to preserve its visual prominence.

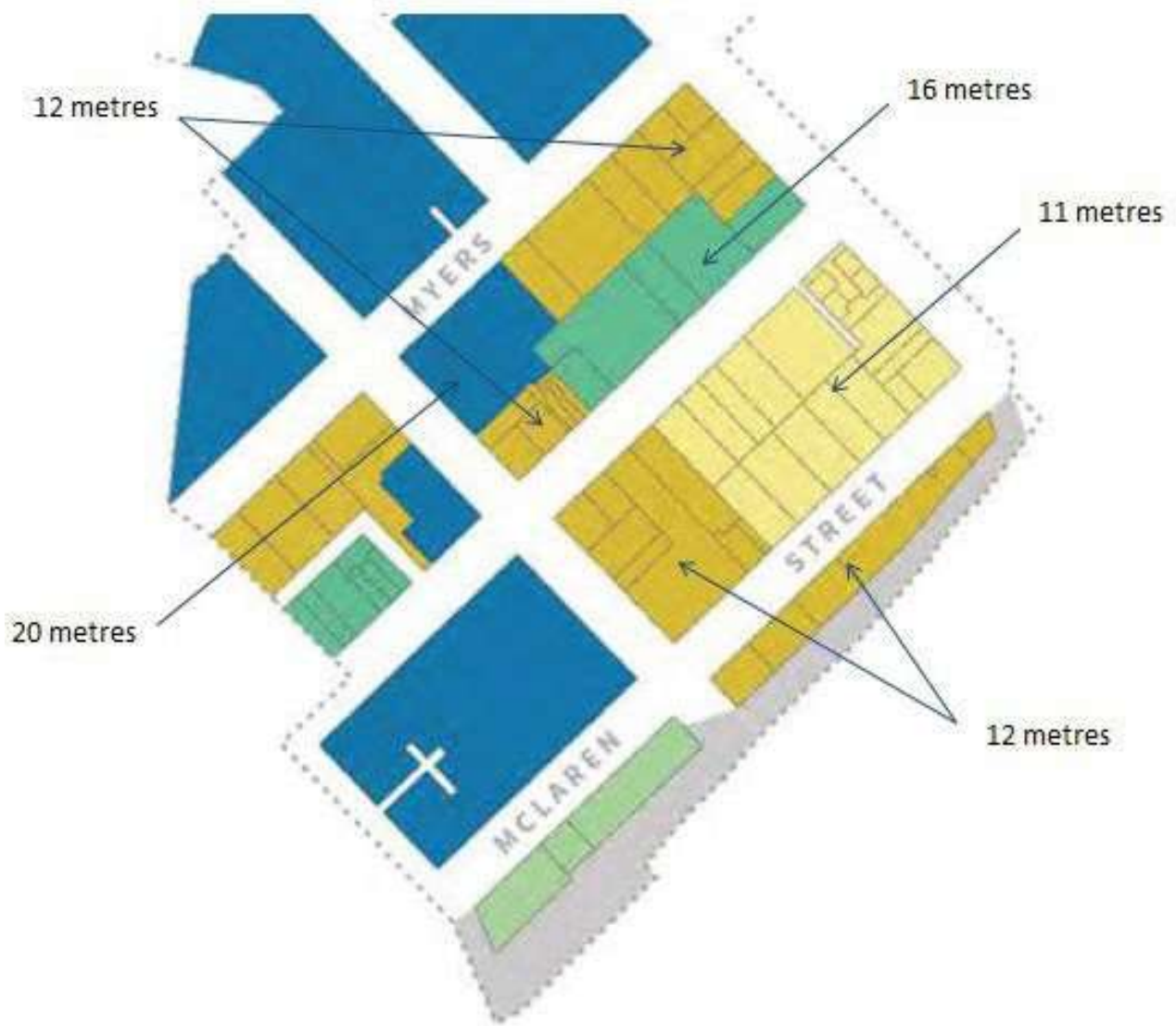
The height of the building fronting Mollison Street exceeds the preferred maximum building height of 16 metres.

Even at a height of 16 metres, the development will have an amenity, heritage and visual impact on the heritage streetscape and the heritage listed dwellings of Mollison Street

Of note –

1. The preferred maximum building height of 16 metres fronting Mollison Street is inexplicably inconsistent with the “flanking” provided in the “Premium Residential Precinct”. In the “Premium Residential Precinct” with few exceptions such as the frontage to High Street, the maximum building heights across the street from the residential dwellings is 14 metres. This is a matter I am sure is considered quite unacceptable to the owners of the heritage homes in Mollison Street. Are they not deserving of the same consideration as the homes in the “Premium Residential Precinct”? The group will seek to have the planning scheme amendment changed to achieve consistency.
2. The current planning scheme is the one that is currently applicable. A discussion concerning the current design and development overlay was included in the previous submission by the group of Mollison Street residents. It is it that planners should have regard for.

Building Heights as proposed in the COGB Urban Design Framework



Note the maximum building height opposite the heritage listed dwellings on Mollison Street is 16 metres. This is inexplicably inconsistent as follows

In the Precinct considered "Premium Residential", the residential dwellings are generally treated favourably with a 14 m height buffer



The CBD Economy

I now wish to discuss the impact the development will have on the economy of the Bendigo CBD.

As stated by Uniting Housing, all Uniting Housing tenancies will be filled with applicants from the Victorian Housing Register (VHR) with a minimum of 75% from the priority access category.

Tenancy Eligibility and Allocation



1.0 Policy

Uniting Housing Australia is committed to providing affordable rental housing to those most in need while maintaining financial viability of the organisation.

Uniting Housing Australia is committed to compliance with DHHS Guidelines for Registered Housing Agencies, Victorian Housing Register Policy Framework and to the Victorian Housing Registrar's Performance Standards.

Uniting Housing Australia (UH) will allocate tenants and set rent for its properties using a fair and transparent process. These processes will be documented and will be available to all stakeholders of UH properties.

2.0 Overview

UH participates in the Victorian Housing Register (VHR) and is approved as a Participating Registered Agency.

The VHR is a common register for all applicants for public and community housing in Victoria.

This procedure has been developed to detail eligibility and allocations of tenancies in UH's long term properties.

All UH tenancies will be filled with applicants from the VHR and a minimum of 75% will be from Priority Access.

There are 6 broad categories of priority access –

Priority access categories on the VHR

There are 6 broad categories of priority access on the VHR. An eligible applicant must meet specific criteria within one of these categories to be approved for priority access. In order of priority these categories are:

- **Emergency management housing:** for people whose housing is no longer safe or habitable, due to an emergency, for example, a bushfire, flood or storm
- **Priority transfers:** for existing social housing renters who require urgent relocation to another social housing property due to their current property being unsafe or unsuitable, being sold, redeveloped or better utilised
- **Homeless with support:** for people who are homeless or experiencing family violence and need support to obtain and establish appropriate, long-term housing
- **Supported housing:** for people who live in unsuitable housing and have a disability or long-term health problem requiring major structural modifications and/or personal support to live independently
- **Special housing needs:** for people who are living in housing that has become unsuitable and who have no alternative housing options
- **Special housing needs aged 55 years and over:** for people who are eligible for social housing who are aged 55 years and over and are not eligible for another priority category. This category only applies to single people or couples.

Uniting Housing will not unlawfully discriminate against any applicant –

Tenant Allocations – General Principles

- a) All UH tenancies will be filled with applicants from the VHR and a minimum of 75% will be from Priority Access.
- b) UH will seek VHR applicants from local IAP services, Support workers, Uniting Programs, other local community service agencies and directly from the VHR to assess for a tenancy.
- g) If there are no suitable VHR applicants UH will seek applicants from elsewhere and assist the applicant to lodge a VHR application or refer them to a support service to lodge an application.
- c) UH will treat all applicants fairly and will not unlawfully discriminate against any applicant.
- d) UH will assess all applicants before making an offer of housing. If the applicant is unsuccessful on this occasion UH will inform the applicant and the applicant will remain on the VHR.
- e) UH will allocate the successful applicant to a UH property on the VHR and complete the necessary UH signup process.
- f) Tenants will be allocated to properties that are
 - the right size for the household
 - in an area consistent with the tenants needs
 - makes the best use of UH's housing stock
 - encourages long term sustainability
 - meets any particular expressed needs of the tenant so far as they are known

The categories of Priority Access applications are as shown hereunder. This would seem to suggest that the St. Andrews Social Housing development will be providing mainly for “Singles general”, “Elderly Single” and “Single parents”

Household type — new Priority Access applications						
Category	Jun-21	Sep-21	Dec-21	Mar-22	Jun-22	% June 22
Single youth	1,672	1,698	1,743	1,729	1,702	6%
Singles general	10,790	11,289	11,970	12,023	12,198	40%
Couple with children	720	730	769	761	772	3%
Single parent	5,656	5,841	6,176	6,124	6,151	20%
Couple no children	374	383	377	373	381	1%
Group household	994	1,019	1,060	1,044	1,032	3%
Elderly couple	1,160	1,168	1,184	1,193	1,176	4%
Elderly single	7,089	7,180	7,448	7,422	7,354	24%
Total	28,455	29,308	30,727	30,669	30,766	100%

Given the afore stated information it would seem reasonable to assume that the tenants will be representative of, to a limited extent, the “Basic Needs” and to a greater extent, the “A Fairer Deal” values segments as described by Roy Morgan research. My underlining added for emphasis.

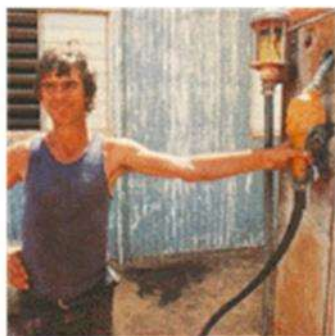
Basic Needs



Basic Needs refers to a pattern of responses offered by respondents who are focused on "getting by" on a day to day basis. They are often in their "twilight years", retired, pensioners and people on social security. To many it appears as if they have given up on life, however this segment is generally happy and contented with what they have. They are not looking for more and enjoy watching the world go by but feeling a part of it as it does. They have that sense of wisdom and happiness which comes with grey hair. The Basic Needs® segment has a strong sense of community and are often involved with programmes such as Safety House and Neighbourhood Watch, also partly because of their desire for order and security in their environment. They

promote a strong Christian ethic as basic values and are more likely to be regular church attendees.

A Fairer Deal



A Fairer Deal refers to the pattern of responses offered by respondents who are the most likely to feel they get a raw deal out of life. Pessimistic, cynical and often struggling financially, they think everyone gets all the fun and they miss out. It can relate to a belief that life has treated them unfairly and anger, disillusionment and hostility can build until it manifests in violence or self destructive behaviour. They want to get back at the system which has treated them unfairly, looking for loopholes, rorts or other ways of bucking the established order. They often feel that the world is coming apart at the seams. A Fairer Deal often see escape, either with their mates and a beer or the TV, as the only way to deal with their frustration and anger. Within this segment

there is an emphasis on physical things and things they can do with their hands, perhaps as this is all they really have that they can control. They often hot up cars, they like loud motorbikes, get into martial arts; get tattoos - things which are not socially acceptable. What they earn at work for a fair day's work is more important than the work they do. In the workplace they generally expect managers to make decisions, take responsibility and tell them what to do.

Now-

- **Bendigo City Centre Integrated Economic Assessment and Planning Review October 2022**

This review stated that Central Bendigo had a population of 1,107 in 2021 with an estimated base case annual growth rate of 1% through to 2051. The upside annual growth rate was estimated at 4.4%

Based on (say) 100 residents occupying the 73, 1 and 2 bedroom units in the proposed development, it would represent approximately a 9% increase in the City Centre resident population. All if not most will be at the lower end of the socio-economic spectrum. A majority will align with the “A Fairer Deal” values segment as described by Roy Morgan Research.

Given that the proposed development is the largest of its kind to be undertaken in a regional city’s CBD and the largest of its kind undertaken by Uniting Housing, there is no other development to use as a basis for an evaluation. The proponents could not possibly be confident that the development will have other than a significant detrimental impact on The City of Greater Bendigo and in particular it’s CBD. The CBD economy is already in a perilous state and the council is intent on revitalising it.

I submit that such an artificially engineered skewing of the distribution of the socioeconomic status of the Bendigo CBD resident population coupled with the bias toward the “A Fairer Deal” values segment, has the potential to do enormous damage to the CBD economy. The risk is far too great.

Phil Redmond
66 Mundy Street
Bendigo

This additional submission has the support of all Mollison Street residents & supplementary to their joint submission.

Submission 04b23rd December 2022

To the housing and submission team,

Thank you for taking time to consider this submission. I live at [REDACTED] with my wife [REDACTED].

As a [REDACTED], some of my concerns are particularly focused on medical aspects of housing commissions, and are made in addition to the joint submission made with our neighbours on [REDACTED].

6. Concerns relating to drug usage:

A known concern with housing estates is drug use.

[The Journeys Home project](#) (a longitudinal survey of Australians), found that of those people who had experienced housing instability or homelessness, risky use of substances was also reported for alcohol (57%), illicit drug use (39%) and the injection of drugs (14%) in the previous 6 to 12 months (Scutella et al. 2014).

Drug use in itself is not able to be prevented in housing estates by dismissing individuals who are known users of drugs. I refer to Director of Housing v TK [2010] VCAT 1839 (16 November 2010):

...The Director of Housing sought to evict a tenant, TK, on the basis of three separate instances of drug trafficking:

... it is not sufficient that the premises are merely the scene of the commission of the crime. There must be a deliberate use of the premises for the illegal purpose. There must be some real connection between the use of the rented premises and the illegal activity alleged. It is not sufficient that there be a passing connection to the rented premises... This interpretation is consistent with the important right to a home as articulated in s 13(a) of the Charter.

VCAT held that in order to succeed in the application for possession, the landlord must establish that TK used the rented premises for an illegal purpose. It is not sufficient that the premises are merely the scene of the commission of the crime; there must be a deliberate use of the premises for an illegal purpose.

The application for possession was therefore dismissed.

I also refer to In *Director of Housing v TP* [2008] VCAT 1275, the Tribunal found that the renter's ex-partner temporarily storing cannabis plants at the rented premises did not constitute illegal use.

It can be established that a housing commission of this size will lead to a concentration of drug use. It can also be established that this is harmful for those trying to cease drug use ([Victorian Alcohol and Drug Association, submission 100, pp 9–10](#)) :

Inappropriate housing can have considerable socially destructive flow-on effects:

Housing problems can cause drug users and their children to be separated, and foster care systems to become over-burdened. Often, when drug users and their families are rehoused by social services, they are placed in accommodation in close proximity to other people struggling with drug misuse problems. This can slow down or prevent drug users from recovering, placing additional strain on their families.

With the current submission for housing, I would like to raise a number of drug related concerns which need to be addressed:

- 5 There does not appear to be adequate protection for those in the estate or the local neighbourhood for the influx of drug use
- 6 There do not appear to be adequate facilities or areas to cope with drug use
- 7 There does not appear to be any plan in place to retrieve and dispose of syringes in the proposed development and surrounding neighbourhood
- 8 Ongoing presence of medically trained personnel fails to be mentioned in the proposal
- 9 This precinct is not within the medical zoning for Bendigo, not near a major access road for emergency access, parking and access for emergency vehicles is not established. There does not appear to be clear consideration for emergency services to access the grounds for all buildings to manage drug overdose
- 10 I am not aware of any engagement with the local medical services regarding ability to manage an influx of drug related calls and events
- 11 I am not aware of any engagement with local police services to manage influx of drug use and drug related crime and behaviour

7. Concerns relating to parking:

Car parking is not only a consideration for the present, but also for expected growth. Between 2021 and 2036, the population for the City of Greater Bendigo is forecast to increase by 31,964 persons (25.85% growth), at an average annual change of 1.16%. (Forecast ID, City of Greater Bendigo, 2021)

[Population summary | City of Greater Bendigo | Population forecast - .id the population experts](#)

Population summary; City of Greater Bendigo Forecast year Change between 2021 and 2036; Area 2021 2026 2031 2036 2041 Total change Avg. annual % change; City of Greater Bendigo

forecast.id.com.au

The current proposal has indicated 21 car parks will be provided. I have previously attended a Church Service at St Andrews and noted the current Church has an ageing population of around 70 attendees – most of which park on-site to attend the Sunday morning Service.

Furthermore, people with a disability have a greater risk of experiencing homelessness. A recent Australian study examining the prevalence of risk of homelessness amongst populations with a disability ([Beer et al. 2019](#)) showed in a pool of 11,436 respondents, 42 percent were recorded as having at least one disability or long-term health condition. With 49 two-bedroom dwellings and 24 one-bedroom dwellings (122 beds), in addition to current Church attendees, we expect around 200 people will require parking, with a number of them requiring disability parking.

With the current submission for housing, I would like to raise a number of parking related concerns which do not appear to have been adequately considered in the current proposal:

3. No consideration has been given to the current state of parking on Mollison street during business hours – no parking is available between 8am and 5pm
4. No consideration has been given to parking for service workers of neighbouring businesses, residents or of the development
5. No consideration has been given to parking for onsite managers
6. No consideration has been given to those who currently park on Mollison and walk to their places of work in the CBD
7. No consideration has been given to the expected growth for Bendigo and increasing parking requirements in this part of town
8. No consideration has been given to St Andrews Church members/visitors

8. Concerns relating to residential noise pollution:

Residential noise pollution has not been adequately considered. The [Environment Protection Act 2017](#) states it's an offence to make unreasonable noise from a residence. A residential property includes: any land, building or outbuilding used in connection with a residence. This includes driveways, sheds and workshops.

The current proposal seeks to add a significant number of people in close proximity on a street that currently has minimal to no noise pollution at night. Rendered images for Mollison street show buildings over a number of floors with street facing balconies.

With the current submission for housing, I would like to raise a number of noise pollution related concerns which do not appear to have been adequately considered in the current proposal:

- 1 No consideration has been given to the noise that will be generated by adding 49 two-bedroom dwellings and 24 one-bedroom apartments on Mollison street

- 2 No consideration has been given to the noise that will be generated by having street facing balconies
- 3 No consideration has been given to the fact that most heritage homes (including most of those on Mollison street – which can't be significantly altered due to heritage overlays) are designed with bedrooms at the front of the home – with windows directly facing towards the proposed development
- 4 In addition, service vehicles and waste vehicles will be required to service a development of this size, and no consideration has been given to the noise these will generate and at what times

An acoustic report and detailed plans to limit unreasonable noise is requested as part of the building plan.

9. Concerns relating to tobacco consumption:

A 2020 systematic review of studies quantifying tobacco use in people experiencing homelessness estimated that smoking prevalence among this group ranges between 57% and 82% ([Vijayaraghavan M, Elser H, Frazer K, Lindson N, and Apollonio D, 2020](#)). In Melbourne, Australia, the smoking rate among people experiencing homelessness was self-reported as 77% in 1995–1996, including 71% for those in short-term or emergency accommodation and 93% for those in non-conventional accommodation i.e. “sleeping rough” ([Kermode M, Crotis N, Miller P, Speed B, and Streeton J., 1998](#)).

A later Australian study reported a smoking prevalence of 82% among clients of a homeless service in 2011 ([Maddox S and Segan C., 2017](#)). Many adults experiencing homelessness started smoking early in life, before the age of 16 (Vijayaraghavan M et al, 2020). Studies that have collected data on average daily cigarette consumption for current adult smokers experiencing homelessness have reported an average of 10 to 13 cigarettes per day (Vijayaraghavan M et al, 2020). While one UK study reported an average of 19 cigarettes smoked per day ([Dawkins L, Ford A, Bauld L, Balaban S, Tyler A, et al, 2019](#)).

With the current submission for housing, I would like to raise a number of smoking related concerns which do not appear to have been adequately considered in the current proposal:

- Expecting a significant number of the tenants will occupy the balconies repetitively to smoke, noise generation and air pollution outside and at hours after 7pm at night could reasonably be expected which will be disruptive to neighbouring properties
- No designated smoking areas have been identified in the plans

10. Concerns relating to the disregard for best practices and the existing body of Australian and International research in the design of this social housing development

I would also like to raise that the current housing development proposal does not appear to be in the interest of either the community or the people who will occupy the building. Low density integrated (private and public) affordable housing appears to increase local property value, provide improved community integration and decrease anti-social behavior ([NSW Federation of Housing Inc, 2017](#)). I raise that a duty exists to consider the numerous studies that have shown high density housing generates consequential crime, violence, and anti-social behavior (Australia Government – Australia Institute of Criminology Research Report 06; “The Effectiveness of Strategies for Crime Reduction in Areas of Public Housing Concentration”). In the same way there must be consideration for the studies showing the benefits of low-density, mixed housing.

I agree housing is required and the goals of construction need to be in line with best outcomes for both tenants and the community.

The rationale, supporting studies and principles followed in the design of this development are requested to be shared with the community alongside construction plans.

"Rulers, Statesmen, Nations, are wont to be emphatically commended to the teaching which experience offers in history. But what experience and history teach is this - that people and governments never have learned anything from history, or acted on principles deduced from it. Each period is involved in such peculiar circumstances, exhibits a condition of things so strictly idiosyncratic, that its conduct must be regulated by considerations connected with itself, and itself alone."

- **G. W. F. Hegel**

11. Other miscellaneous concerns:

With the current submission for housing, I would like to raise a number of other concerns which do not appear to have been adequately considered in the current proposal:

- 1 How will graffiti be combatted and remedied in the proposed development & surrounding areas?
- 2 Who will be in charge of resolving on-site altercations?
- 3 Has there been any consideration to fire wardens required on site?
- 4 How will light pollution be minimised for neighbouring properties?
- 5 How will privacy be maintained for neighbouring properties? We expect the current proposed designs would give residents of the new development a direct line of sight into

[Redacted]

Thank you for taking the time to respond to and address our concerns.

Regards,

[Redacted]

([REDACTED]) Submission 05

From: [REDACTED] <[REDACTED]>

Sent: Thursday, 22 December 2022 10:26 AM

To: St Andrews Housing <StAndrews.Housing@vt.uniting.org>

Subject: [EXTERNAL] objection to St Andrews Bendigo community housing design.

[REDACTED]

- I am objecting to the proposed plans of the Mollison St side of the housing proposal .

There will be gross overshadowing of [REDACTED] for 6 months of the year . the detailed plans do not show the shadowing of the existing trees in the stable area . they are to be retained by the plan . so shadowing of said build plus exiting trees will put [REDACTED] in constant shade for April till December .

This will cause [REDACTED] bill to sky rocket 10 fold in the cooler months .and with 15.5 metre high concrete and steel walls [REDACTED] there will be very noticeable radiant heat all day and night radiating onto my house . more power consumption over summer .

The over shadowing will make solar panels a non option to negate the large rise in power needs.

The plans make no mention of rectifying the old rickety boundary fence [REDACTED] [REDACTED] . With 120 plus proposed new residence & random pedestrians able to mill around [REDACTED] is of high concern for me . Mollison street is a very busy street with vertical parking (horrible at the best of times). The traffic flow is always compromised. With the addition of 120 plus residence with very little off street parking for them or their visitors ,this will add to the already hectic and awkward parking and traffic flow .

The size and shape of this proposal will also greatly detract from the heritage street look and feel . Two story buildings facing Mollison street would be a much better fit.

Also of concern are two of the trees in the stable yard . the redgum [REDACTED] [REDACTED] .and gumtree [REDACTED] constantly drops branches . I think it would be unsafe for new residence to be under these trees . so too is the asbestos roofing on the rear of the church hall (that has not been addressed in plans scope of works to be done) .

Noise levels are also of concern ,with that many people in a small area ,with very little actual free space ,and noise bouncing around off high walls . 73 units filled with people picked off a waiting list . percentages say some will not get along together , what are the provisions to keep the peace if antisocial behaviour was to take place [REDACTED] ?.

I have no real objections to the Myers street side of build ,other the privacy /overlooking /and sheer size of building and the number of units . I believe it is way to many for this area .

Regards [REDACTED]

([REDACTED]) Submission 06

From: WebMaster <uniting.webmaster@vt.uniting.org>
Sent: Thursday, 22 December 2022 4:46 PM
To: St Andrews Housing <StAndrews.Housing@vt.uniting.org>
Subject: New St Andrews Bendigo Submission

Name
[REDACTED]
Email
[REDACTED]
Residential Address
[REDACTED]
Your Submission
[REDACTED]
Or Upload Your Submission
<ul style="list-style-type: none">• Submission20St20Andrews20Community20Housing.docx (See attached)

[REDACTED]

19/12/2022

Dear Sir / Madam

We write with respect to the St Andrews proposal for social / public housing in Mollison & Myers Street, Bendigo.

We note the comprehensive submission prepared by [REDACTED], in which they raise a range of issues about the proposal, not least of which to us is an anticipated increase in crime / vandalism in the area.

Whilst we understand the need for social housing it is of particular concern that research confirms that an increase in crime and social issues / problematic behaviour are a likely outcome.

Beyond the issues raised in the aforementioned submission, it is the possibility of an increase in crime that is a significant concern to us as residents of [REDACTED].

Having lived as home owner / residents of [REDACTED], an area marked by a heritage overlay, and wherein there are a number of notable Heritage listed buildings, we have in the last few years experienced a rise in crime / vandalism along the street.

Examples include the following:-

- Graffiti on traffic signs
- Cars doing burnouts along the street
- Pickets / wire being pulled off fences
- Nature-strip trees frequently being vandalised
- Multiple cars have had their side mirrors kicked / torn off

- Multiple cars being 'egged'
- Car being 'keyed' / bonnet scratched
- Glass bottles smashed on the road
- Drug dealers & illicit substances used by residents living in rental accommodation in close proximity to our home (neighbours)
- Violence and arguments occurring at the Airbnb in very close proximity to our home
- Plants & vegetables being stolen or vandalised prior to the Salvation Army fencing and locking the Permaculture Garden premises across the road
- Drivers consistently disregarding the 'no entry' sign at the Eastern End of the street

The absence of any CCTV equipment in the street means there is no recourse to address the unacceptable behaviour and it simply becomes a waiting game until the next incident occurs.

The Salvation Army at the Western end of Bramble Street offers a range of important 'social support programmes resulting in increased foot and vehicle traffic in the area by those seeking such assistance. To increase the number / density of 'social housing' residents in this location, as being proposed, will further increase the movements to this area and it is not unreasonable to predict that will include the 'social housing residents'.

A further significant concern to us is the prospect of construction traffic / trucks/ cranes using Bramble Street as egress during the build, given this is a 'local traffic only' thoroughfare. Should that be the case, the noise and additional volume & type of traffic has the potential to make life in this area untenable, given our homes are built to the street edge.

Thus, in our view, and consistent with the significant concerns already raised in the aforementioned submission by our neighbours in [REDACTED], the proposal for high density social housing in such close proximity to [REDACTED] is a grave concern, in light of what we believe will be an increase in criminal activity in the area in addition to increases in noise and traffic.

We trust this submission will be attended to in due course, and look forward to a formal response addressing the concerns outlined above.

Yours sincerely

[REDACTED]

 Submission 07

From: WebMaster <uniting.webmaster@vt.uniting.org>
Sent: Friday, 23 December 2022 12:16 PM
To: St Andrews Housing <StAndrews.Housing@vt.uniting.org>
Subject: New St Andrews Bendigo Submission

Name



Email



Residential Address



Your Submission

Greetings,
Having reviewed the available plans and attended the information session early in December, I would like to make the following comments regarding the design of the project:

Places of Concealment

Along the Mollison Street frontage, it was noted that there were several structures located along the footpath which would create Places of Concealment; the Power structure at the right hand side of the project (when viewed from Mollison Street), the Fence to the immediate Left of the Power structure, and the Water structure near the mid point of the block.

The cluster of visual obstructions at the right-hand side of the frontage is particularly concerning, given that the adjoining building creates an extremely secluded area immediately adjacent to a footpath.

Good luck.

(Bendigo Central and Axedale Uniting Church) Submission 08**BENDIGO CENTRAL AND AXEDALE UNITING CHURCH**

A Congregation of the Uniting Church in Australia
Synod of Victoria & Tasmania

CHURCH COUNCIL

19 December 2022

The Hon. Sonya Kilkenny MP
Minister for Planning
Level 16
8 Nicholson Street
East Melbourne
Victoria, 3002

Dear Ms. Kilkenny

The congregation and church council of St Andrews Uniting Church in Bendigo has been committed to the development of social housing on its Myers Street / Mollison Street site for 30 years. That is why the present social housing proposal has had repeated unanimous support at meetings of the congregation and church council.

The Bendigo CBD site for the project was allocated to the church in 1854 by a gold commissioner, and now the church wants to give back the purpose of the site to the community for the benefit of people in insecure housing.

The local church understands that it is embarking on a major project which will support possibly thousands of people over its lifetime. That support is about more than accommodation. Invisible to the planning process, the project will provide appropriate professional support to residents who need assistance, on an ongoing basis.

I commend this project to you on behalf of the newly formed *Bendigo Central and Axedale Uniting Church*, which includes the St Andrews site and congregation.

Yours Sincerely



Chair, Church Council

Submission 09

From: WebMaster <uniting.webmaster@vt.uniting.org>
Sent: Friday, 23 December 2022 7:04 PM (submitted in four parts)
To: St Andrews Housing <StAndrews.Housing@vt.uniting.org>
Subject: New St Andrews Bendigo Submission

Name
 [REDACTED]

Email
 [REDACTED]

Residential Address
 [REDACTED]

Your Submission

I object to this project for the following reasons:
 My address: [REDACTED]

- 1: Traffic generations: I recognise that there are excessive amount of bicycle parking options, but quite honestly 21 car parks is entirely inadequate compared to the number of houses (73) this development has proposed. Bendigo already has inadequate parking in the CBD area and the street in which this project has been proposed is already COMPLETELY FULL every day with city based workers who are employed in the CBD as it's the closest free parking to the CBD. Overflow from this site will further congest the area. Regional areas in Australia are well spaced out and the likelihood of someone relying on a bicycle to bring a sick child to the emergency department at 3AM (because there won't be any GP appointments during the day given there is such a significant deficit of GPs in regional areas currently), bring home a large amount of groceries in once go. A large underground car park catering for at least 90% of residence should be included in plans to cater for the reality of vehicle storage. I bet you, reading this right now have at least one but probably two cars registered to your household and it's unrealistic to expect that residents of the proposed building will be any different.

2. This is going to be built in an area with a heritage overlay and will detract from the aesthetics of our beautiful heritage city. The new constructions within our town really need to held to account as the general civilian population are required to adhere to strict building codes in the heritage areas and large scale constructions should also be in line with this to keep in line with the general population. This construction in its current proposal will detract from the street scape, when just across the road there are beautiful homes which were built more than 100 years ago, the architectural style inclusive of the building materials has not considered the neighbourhood. It will not age well as the rest of the city continues to do so. In addition to the facade of the building the sheer scale/size of this monolith and it is incredibly high especially for its location and will cause overshadowing for all neighbours. Not only this, but it will also be an unsightly anomaly in the area.

3. This construction is taking up valuable space in the CBD which could be better utilised to increase economic revenue within our city. Our city Center is dying (consider the number of empty shop fronts in the Hargreaves mall) and more efforts should be made to bring business back to the CBD, this site would provide an exceptional option to create an economic contribution to our regional town if it were put to better use rather than more public housing which will never be used in another way.

4. would be many other options within the town where this development would be better suited and alternative sites should be considered.

(Barwon Investment Partners) Submission 10

From: [REDACTED] <[REDACTED]>
Sent: Friday, 23 December 2022 4:10 PM
To: St Andrews Housing <StAndrews.Housing@vt.uniting.org>
Cc: [REDACTED] <[REDACTED]>
Subject: [EXTERNAL] Adjoining Owner Feedback Submission - Community Housing Development - 26 Meyers Street, Bendigo

Dear Uniting Housing,

Attached is our submission for feedback on the proposed Community Housing Development at 26 Meyers Street, Bendigo.

We are the property owners of 84 Mollison Street, Bendigo; an adjoining property to 26 Meyers Street.

We look forward to your comments on this feedback.

Can you please send me any future information on the status of the project.

Kind regards,

[REDACTED]
 Assistant Asset Manager



Barwon Investment Partners
 Level 10, 17 Castlereagh Street
 Sydney NSW 2000

[REDACTED]
 [REDACTED]
www.barwon.net.au

This e-mail message is intended only for the addressee(s) and contains information which may be confidential. If you are not the intended recipient please advise the sender by return email, do not use or disclose the contents, and delete the message and any attachments from your system. Unless specifically indicated, this email does not constitute formal advice or commitment by the sender or Barwon Investment Partners (ABN 191 160 12009 AFSL No: 298445) or its subsidiaries.

Dear Uniting Housing,

The proposed development is a significant build that requires detailed investigations into the inconsequential flow on effects that will see increased activities of many varieties to the street.

These include but are not limited to the following:

Security – Does the build development have/allow for sufficient planning around security?

For example, the build development should make allowance for security patrols 3-5 days a week, with CCTV and specific access control. This should be in preparation for potential anti- social behaviour that may present.

If the build proceeds owners either side may need to investigate full time security patrols in and around their asset and add additional measures to ensure safety of occupants. This will ensure all base building areas such as wait rooms, foyers, bathrooms are used by those they are supposed to be present and are safe to be used at all times.

Owners like us should not have to absorb these costs when they have a functioning operational security model that works as designed in the present. Further considerations:

1. Visual impact on street and neighboring properties;
2. Car parking will be an issue;
3. Any development that takes away current spaces will impact the asset and the occupants/customers that attend;
4. Additional foot traffic along with increased vehicle traffic will have a negative impact on the street and area as a whole;
5. Transport will see further increased services potentially required to cater for users, this adds to activity in area where car parking is at a premium;
6. Loss of privacy for current properties cannot be compromised;
7. Noise from the initial build and development stage will have a negative effect on our asset most likely including the increased activities afterhours from increased residents next door;
8. The impact of the street becoming densely populated is real;
9. Design of the new build (must be reviewed) to ensure any unintended issues result for assets either side with sound reverberation, lighting, smell in the air (cooking etc.) encroaching our asset; and
10. Does the design definitively meet the standards of the immediate area and its history?

Thank you for your consideration.

• [Redacted Signature]

Assistant Asset Manager



• Barwon Investment Partners

Level 10, 17 Castlereagh Street, Sydney NSW 2000

[Redacted Contact Information]

 **Submission 11**

11/1/2023

Uniting Housing

Via upload: www.unithousing.org.au

Dear Sir/Madam,

Re: St Andrew's Bendigo Housing Project

I write in response to the invitation for community comment on the above development.

I have an interest in property in Mollison Street, relatively close to the site. I am also a Bendigo-based town planning consultant with experience in social housing and developments in the Bendigo CBD, although this submission has been prepared entirely as a personal submission.

At the broadest level, I would like to express support for the idea of 70 new apartment style dwellings in the Bendigo CBD. For over 20 years, the City of Greater Bendigo's has had a strategic vision for higher density, mixed use and residential developments. Despite this vision and some developer interest, the vision has resulted in the construction of very few new dwellings. The main underlying issue is that land values that are generally not high enough in relation to median house prices in Bendigo to justify the construction of multi-level apartment developments by the private sector.

If constructed, the St Andrew's proposal will represent the largest residential development in the Bendigo CBD in terms of both dwelling numbers and scale. The CBD urgently needs this type of development to provide activity and vibrancy as its retail role in Bendigo has declined over time. It also has the potential to send a strong message about forms of development that are possible in the CBD, to stimulate other forms of regeneration and change within the CBD.

Whilst the potential benefits of the project are significant, however, I believe that the also brings with it additional responsibility, particularly in terms of design, the public realm, dwelling mix and how the proposal responds to its context. This type of development only occurs every few decades in a regional centre like Bendigo. In a relative sense, its importance to Bendigo is therefore much greater than the immediate dwelling yield or economic benefits, and much greater than if the building were located in a metropolitan activity centre. This development is likely to provide a benchmark for this type of development and has the potential influence the future desirability of small apartments in Bendigo.

Motivated by the above points, I would like to raise three concerns in relation to the proposal in its current form:

1. Plan related information

The plans provided (MGS, May, 2022), are generally of high quality. They do not, however, include streetscape elevation plans that show the heights of the proposed buildings in relation to the heights of adjoining buildings, particularly St Andrew's church. The architectural renders provide an impression from various key angles, however, actual scale and heights cannot be accurately determined from these plans.

Streetscape elevation plans should be provided for Myers Street and Mollison Street that show the nearest adjoining buildings. In addition, the City of Greater Bendigo should be able to include the proposal in a 3D model of the CBD, so that the building can be assessed in its broader context. I

believe that this information should be made available to the community for review and comment prior to a decision being made on the proposal.

2. Design matters

Conceptually, the proposal appears to be well considered, with multiple buildings, a range of materials and forms, and particular treatments for sensitive elevations such as the one on Myers Street. The pedestrian walkway through the site is an important mid-block link, and this should be available for use by the public.

I am, however, particularly concerned about how Building 2 will sit adjacent to the historic St Andrews Church. The front setback of the building is currently similar to that of the Church and I am of the view that greater setback would be a more appropriate design response. The height of Building 2 at the frontage is also a key factor in making a proper assessment of this issue and requires a scaled plan (refer to Point 1).

I am also concerned that the height of Building 2 on Myers Street (approximately 15.5m) is several metres higher than the current 9m building height in DDO5. It is also greater than the 12m preferred maximum building height that is emerging in the directions of the City of Greater Bendigo's Amendment C279, which implements the City Centre Strategy. In my view, these heights should not serve to necessarily preclude higher forms, but any exceedance should involve a more meaningful attempt to respect the height and form of the Church.

Generally, I believe that the Minister would benefit from a design review process that involves independent architects, planners, heritage consultants and urban designers. This would be an excellent way to assess all design issues. I sit on the City of Ballarat's design review panel, and have found this to be an excellent forum for critical review of major development proposals in the Ballarat CBD.

3. Housing mix, maintenance and management

The website contains little specific information about the likely tenant mix of the project or how it will be managed. I would like to encourage the developer to accommodate as many different types of social housing tenants as possible (e.g. homeless, low-income, workers, disabled, specific needs groups), and carefully consider how the site is managed and supervised. If social or other issues emerge, this has the potential to affect the residents themselves and the immediate area. It also has the potential to jeopardise the general community's willingness to accept additional higher density residential developments in Bendigo in the future.

It is vital for everyone that the development is well managed, safe, clean and a desirable place to live, not just now, but over the long-term. The developer should consider a long-term maintenance budget that enables external painting, cleaning, landscaping maintenance, graffiti removal, and general security, including cameras. The enforcement of rules for the use of balconies, noise, parties and visitors is also important. In my view, the best way to manage the site is to have an on-site supervisor at all times. These considerations, and the finances needed to fund them in perpetuity, should be secured at the commencement of the project.

I would be happy to provide further comment on this project or elaborate on these points at any time.

Yours sincerely



([REDACTED]) Submission 12

From: WebMaster <uniting.webmaster@vt.uniting.org>
Sent: Wednesday, 11 January 2023 8:49 PM
To: St Andrews Housing <StAndrews.Housing@vt.uniting.org>
Subject: New St Andrews Bendigo Submission

Name

[REDACTED]

Email

[REDACTED]

Residential Address

[REDACTED]

Your Submission

This proposal should be approved as it is broadly supported by the Greater Bendigo planning scheme and meets the objectives of the Planning and Environment Act (1987).

([REDACTED]) Submission 13

From: WebMaster <uniting.webmaster@vt.uniting.org>
Sent: Wednesday, 11 January 2023 7:24 PM
To: St Andrews Housing <StAndrews.Housing@vt.uniting.org>
Subject: New St Andrews Bendigo Submission

Name

[REDACTED]

Email

[REDACTED]

Residential Address

[REDACTED]

Your Submission

This is an excellent plan that provides for the most vulnerable in our community amidst a housing crisis, supports movement towards higher density development in our city and improves the visual character of the area in which it is built. A positive development for Bendigo.

([REDACTED]) **Submission 14**

From: WebMaster <uniting.webmaster@vt.uniting.org>
Sent: Monday, 16 January 2023 9:32 AM
To: St Andrews Housing <StAndrews.Housing@vt.uniting.org>
Subject: New St Andrews Bendigo Submission

Name
[REDACTED]
Email
[REDACTED]
Residential Address
[REDACTED]
Your Submission
Please see attached document.
Or Upload Your Submission
<ul style="list-style-type: none"> • UNITING-HOUSING-PROJECT.docx

UNITING HOUSING PROJECT- MYER and MOLLISON STREETS BENDIGO

[REDACTED]
 E: [REDACTED]

Thank you for the opportunity to forward a submission in favour of the proposed Uniting Housing Project in Bendigo. Having lived in Bendigo for 67 years, I must admit that for most of those I have taken very little interest in social housing until recent years when confronted by situations that made me acutely aware of the pressing need as a community to do more.

CASE STUDY 1- My sister was married to a farmer just across the NSW border and was living reasonably comfortably until the financial crisis caused interest rates to balloon and the bank foreclosed on their farm. Her husband abandoned the family of three children leaving them destitute and with only a trailer load of furniture. They moved to Bendigo and rented several times until after many years they finally bought a house in Long Gully. They lived hand to mouth, the mother working at different jobs to keep the bankers from the door and food on the table. Until recently, they struggled through no fault of their own. The children went on to gain employment and contribute to the community. A good family, who through no fault of their own, lived a very difficult life, not knowing what each day would bring.

CASE STUDY 2- My wife and I were about to enter K-Mart Kangaroo shop as a family was exiting. The husband was screaming at the wife, threw an object at her and stormed off. Several bystanders rushed to the family’s aid before we got there. The children were crying hysterically. As we approached one person was already phoning the police and another two were comforting her. The mother cried out, “I have to go home to him tonight, we have nowhere else to go.” Seeing a young family so distressed and subject to verbal and physical abuse, and hearing the mother’s plea still haunts me three years later. What options did the family have, emergency and long term housing were in short supply everywhere?

Recent studies have identified older single woman without superannuation and do not own a home as a new disadvantaged group in our community who are finding rental accommodation a heavy

burden. Most of the woman identified in this category, and who have contributed significantly to the community in many ways throughout their lives find themselves isolated and destitute in later life. Surely they deserve to be treated with respect and dignity, and supported to find a home where they can feel safe, secure, and live with some independence. Again good people living in difficult circumstances through no fault of their own. Having taught in a rural community at a government school for over 40 years I have been constantly reminded that wealth and poverty are not accurate indicators of a person's character and; I find labelling according to economic status self-fulfilling and gross unjust. Compassion and support make an incredible difference and change people's lives, and for generations to come.

For many of us in the broader community, social housing is not on our radar, until it directly impacts on us. For those who move in circles where there is wealth in abundance and who live in affluent suburbs they may never see the suffering that is in our community, but it is there and it is real and it is soul destroying for those who live from crisis to crisis, or couch to couch. I probably would have been ignorant of it too had it not been for these experiences I cited.

I have seen the plans for the proposed housing project and I am confident that the design will actual complement the streetscapes. Having been born in Bendigo I am very particular about maintaining the grandeur of the centre. Bendigo is a rapidly developing city and we have been very fortunate to have several recent building developments which have enhanced the streetscape (the new Law Courts and GovHub) of the area. Currently the site proposed has a sixties cream brick manse, and tennis court that is now used as a part-time car park, a games room that was never completed and a small house that is not fit for purpose. The design proposed for the social housing project was modern and yet complements the design of the existing church which will be nestled adjacent to the project. If the plans come to fruition the landscaping will be a much more pleasant vista than the existing asphalt and tired gardens which currently exist. I strongly believe it would breathe new life into the area. Development in the area is going to go ahead regardless as land is sold to developers for projects such as hotels and offices. This project at least ensures that the buildings are designed with architectural heritage and streetscaping in mind rather than concrete and reflecting monoliths.

Why is the site advantageous to social housing? It is close to major services and support agencies which are vital to improving outcomes for the residents. It is walking distance to both Commonwealth, State and local government offices. It is a block from the Bendigo and District Aboriginal Co-operative, the Salvation Army Service Centre, two blocks from Anglicare and the Baptist Support Centre and four blocks from the Cultural Support Centre. I believe there is also resident support offered by a Uniting manager as part of the complex operations. The Project itself will become a mixed community of people from different backgrounds, hopefully including some recently arrived refugees. The landscaping invites people to socialize and share and the walkway through the grounds enables interaction with the wider community. An outstanding library, only one block away further enhances opportunities for community. The supermarket, only a block away, is easily accessible to those who do not have transport. Lack of personal transport is a major issue for some and while social housing in the outer suburbs sometimes has advantages, it can also create isolation and restricted ability to access services. Parking may be an issue at times but some provision exists for parking within the complex. Not all residents will have cars, and others may no longer need to rely on cars. The support of the CEO of the city of Greater Bendigo for the project would indicate that it does not consider parking to be a major issue in the area. It should be remembered the Council currently has a public carpark adjacent to the proposed site. We regularly use parking in that area to take our grandchildren to a nearby kinder gym. We may be slightly inconvenienced by a change in parking arrangements but I am sure that walking an extra block is not going to hurt anyone should it come to that. As the city grows, we need to grow with it and expect that change is inevitable, and as a community there needs to be flexible attitudes.

A Member of Parliament talked about 'inclusive prosperity' as being an important factor in a healthy and just society. I believe that this proposed project will go some of the way to helping at least 72 plus fellow citizens to gain the financial security and safety needed to enable them to look beyond tomorrow and see a brighter future, and provide them with the dignity they deserve. If we could change places with one of the potential residents for one day, and one sleepless night, I am confident that we would clearly understand why this project needs to urgently progress beyond the planning phase.

Thank you for taking the time to read this submission and consider my perspective on the proposed Uniting Housing Project.

Yours sincerely,

██████████

([REDACTED]) Submission 15

From: WebMaster <uniting.webmaster@vt.uniting.org>
Sent: Sunday, 15 January 2023 10:52 AM
To: St Andrews Housing <StAndrews.Housing@vt.uniting.org>
Subject: New St Andrews Bendigo Submission

Name
[REDACTED]
Email
[REDACTED]
Residential Address
[REDACTED]
Your Submission
Please see attached ...
Or Upload Your Submission
<ul style="list-style-type: none">• United-Housing-22023-01-13.pdf

[REDACTED]

15 January 2023
[REDACTED] Development Manager Housing & Property Uniting Housing
Level 4
130 Lonsdale Street
Melbourne VIC 3000

Dear Sir,

Community Housing Development Proposal at St Andrew's, 26 Myers Street Bendigo

Thank you for the opportunity to respond to your proposal for a large-scale social housing development in Mollison and Myers Streets Bendigo.

Firstly, your proposal is to be commended for the detailed architectural and engineering inputs covering building design, building services, existing site, environmental, transport, and planning issues. You have clearly made a significant investment in this proposal. We expect this means you have met all the regulatory requirements of responsible authorities.

However, we can't see in your proposal that you've considered the most important element ... the people!

We can't see in your proposal where you've considered...

- The existing adjoining and nearby residents and businesses in the neighbourhood;
- The people who will no doubt be called upon to work with your proposed residents; and/or

- The proposed residents themselves ... do they really want to live in what essentially looks like hotel accommodation?

Your proposal appears to us to be a real estate investment/property development play.

What would serve Bendigo much better would be a strategy for addressing the demand for social housing in Bendigo. Such a strategy would of course include provision of social housing ... but not on the scale for one location as Uniting Housing proposes.

Whilst the provision of housing is a fundamental component to addressing the demand for social housing, it is only one part of the solution. What is needed is a solution that addresses not just the roof over their head but the “wraparound” services that address the complex issues leading to and sustaining the need for social housing ... most often drugs, alcohol, domestic violence, mental health, and history of dependence.

In its 2021/2022 annual report, Uniting Housing says “5 key principles guide our approach to housing”. It then lists them as ...

1. Local: There is no evidence in the Uniting Housing proposal that Uniting Housing has “partnered with local communities and Uniting Church congregations to explore community need, co-create housing options, and deliver housing investments together”.
We’ve been told that the local congregation came to the view that it could make better use of its under-utilised property by building accommodation for (say) women escaping domestic violence and/or women who have become homeless in their latter years. The current Uniting Housing proposal is a long way from the original wish of the local congregation.
2. Integrated: There is no evidence in the Uniting Housing proposal that Uniting Housing has “put our consumers at the centre of our work, delivering housing where we can offer integrated service delivery to residents”.
We can’t see anywhere in Uniting Housing proposal provision for integrated services. Nor can we see any provision for undertaking any on-site support activities that would be considered as integrated services.
3. Sustainable: There is no evidence in the Uniting Housing proposal to support that it is affordable, socially sustainable, financially sustainable, or environmentally sustainable.
Whilst some consultant reports address the achievement of a certain level of environmental principles, there is no evidence these have been “locked in” or will even be achievable.
4. Focused: The only focus in the Uniting Housing proposal appears to us to be maximising the number of units on a block of land. There is no mention in the proposal of how Uniting Housing will provide a “range of services”.
5. Enduring: This proposal is said to be based on a 30 year lease of the land. We are guessing it will therefore endure for 30 years. There is no mention of what happens after 30 years.
This proposal is also said to depend on Victorian State Government funding for the construction costs. How enduring can it really be with what amounts to generous subsidies.

What problem is Uniting Housing proposal aiming to solve?

It appears to us that the Uniting Housing proposal is a property development proposal ... not a proposal to assist Bendigo tackle the growing need for social housing.

We recommended a proper consultation process be undertaken in order to identify the problem to be solved and to consider alternative solutions. We recommend those to be consulted include ...

- Elected representatives including city councillors and local members of parliament;
- Government agencies who play a role in addressing the demand for social housing including DFFH, and the Department of Health;
- Local groups already working with people needing social housing including InterFaith, St Luke's Family Care, Catholic Care, Salvation Army, St Vinnies, and volunteers;
- Police who currently are the first people to be called when issues arise with the social housing tenants;
- Repair and maintenance workers who are called upon following incidents at public housing properties;
- Locksmiths who are called to attend properties to secure them from time-to-time. These locksmiths often have a special and valuable insight ;
- Neighbours of existing social housing properties who have lived experience of what happens in many social housing situations (we include ourselves in this category as we are currently victims of "the system" responsible for managing tenants of social housing when things go wrong).

What's wrong with the current Uniting Housing proposal?

We have read the joint submission from a number of residents in Mollison Street who will be directly impacted if the Uniting Housing proposal comes into being. We support the points raised in their submission.

As long-term residents of Bendigo who have also lived in other communities, our view about the current Uniting Housing proposal is ...

- There are too many units for a single location. The result will be a "hot spot" for trouble ... perhaps you are creating a ghetto;
- The buildings are too large and too high for that location;
- The design is flawed ...
 - o Not enough open space or green space;
 - o Entrance from corridors totally inappropriate for tenants and also for those first responders who will have to attend when there's an incident;
 - o The buildings should not have lifts ... instead there should be only two floors with second floor stair access and every unit must have its own entrance;
- Whilst the location is suitable for redevelopment as originally proposed by the congregation, it is not suitable for such a large number of units in one place as proposed by Uniting Housing. When such a large number of units can be justified for Bendigo (and we are confident Bendigo requires a large number of social housing units) such units should be spread across the city and not concentrated in one spot;
- The assumption that the proposed residents have fewer cars than others needs evidence. Our experience tells us otherwise. Mollison Street is a valuable parking resource for Central Bendigo businesses generally and the medical practice and nearby residents in particular.

Adopt a successful model.

We are confident Bendigo is not the only place in the world that needs social housing. This is not a new challenge.

There must be ample (good and bad) examples to learn from.

One possible model is that followed by Sacred Heart Mission in St Kilda. The key lessons Uniting Housing could adopt from Sacred Heart Mission are ...

- Have a dining hall open to all. This provides the opportunity for social workers and other support services to provide immediate support;
- Adopt a program modelled on Sacred Heart Mission’s Journey to Social Inclusion (J2SI). A roof overhead is important, but it’s just the start.
In conclusion, we summarise our response as ...
- Do not proceed with the current Uniting Housing proposal;
- Initiate a proper consultation with local residents, local professionals, local elected representatives, and local “first responders”;
- Determine clearly what the problem is ... property development or solving Bendigo’s need for social housing; and
- Work with the community of Bendigo to find the right solution (not rely on metropolitan consultants with little experience of the local community).

We realise you can ...

1. Ignore the well-considered submissions and recommendations you will have received; or
2. Take advice from the submissions you receive and modify your proposal; or
3. Do this job properly and start again working with the local community.

We recommend option 3. Our desire is to achieve the best outcome for our Bendigo community.

We would be delighted to support our submission to you in a meeting with you and your board. We can be contacted on [REDACTED] and [REDACTED]

Thank you for this opportunity to contribute to your proposed project, and ...

... Best Wishes.

[REDACTED]

([REDACTED]) **Submission 15a**

From: [REDACTED] <[REDACTED]>

Sent: Monday, 16 January 2023 5:29 PM

To: St Andrews Housing <StAndrews.Housing@vt.uniting.org>

Subject: [EXTERNAL] Community Housing Development Proposal at St Andrews, 26 Myers Street Bendigo



Dear Sir,

Regarding the proposed development at St Andrews, I have some very grave concerns. I refer you to the letter from [REDACTED] you have received and urgently request you to reconsider the proposal.

Thank you,

[REDACTED]

 Submission 16

From:  < >
Sent: Monday, 16 January 2023 9:36 PM
To: St Andrews Housing <StAndrews.Housing@vt.uniting.org>
Subject: [EXTERNAL] Re: 26 Myers Street Bendigo Big Build

Dear Sir/Madam

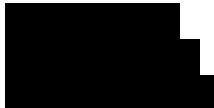
Please reconsider the proposal for the big build housing development at 26 Myers Street Bendigo as it is too large in number of potential units for the location, with potential for detrimental impact of high population density with small open areas on the surrounding locality, it is too tall when compared to the local area, creating a towering build with predominantly single story houses and a few double story terraces nearby.

There are not enough car parking spaces for the potential residents, country people have further distances to cover and therefore rely more heavily on cars than in urban areas. The lack of parking will add to the parking pressure on local street parking. Where are the common indoor spaces, other than the church hall? It is inconceivable to build a community housing project as if it is simply another apartment block, the plan needs an area for support an community development not just what looks like an age old orphanage.

Have you looked at the many houses/units at St Laurence Court California Gully with the Anglican Church through Benetas? There are many empty properties there.

Please reconsider, please consult more widely, and please work across the community for agreed solutions.

Yours sincerely



([REDACTED]) **Submission 17**

From: [REDACTED] <[REDACTED]>

Sent: Monday, 16 January 2023 4:49 PM

To: St Andrews Housing <StAndrews.Housing@vt.uniting.org>

Subject: [EXTERNAL] Proposed development 26 Myers St Bendigo: Attention [REDACTED]

Dear Sir,

Please find attached my response regarding the proposed development at 26 Myers St.

Regards

[REDACTED]

[REDACTED]

[REDACTED]
Development Manager
Housing & Property
Uniting Housing
Level 4
130 Lonsdale Street
Melbourne VIC 3000

Dear Sir,

Community Housing Development Proposal at St Andrew's, 26 Myers Street Bendigo

I would like to express my concern over the proposed development in Myers Street. While I am totally in favour of the development of projects to address the crisis in social housing I am concerned that this project is far too large. It does not seem to have considered the amenity needs of the residents who will live in the building nor the residents in surrounding neighbourhoods. People in need of housing deserve to live in homes not boxes.

I implore you to not go ahead with this current proposal. Instead take this opportunity to consult more broadly with the community and other like minded organisations and come up with a development that expounds best practice.

Yours sincerely

[REDACTED]