



MELVILLE PRECINCT PLAN COMMENTS

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Documents provided by GIBB & JDA for comments are *Final Presentation, Draft Precinct Plan, Draft Precinct Plan Annexure A, Melville ABM Draft, Activation Day Feedback, Technical Reports – Civil Services, Technical Reports – Electrical Services, Technical Reports – Transport Services Report, Combined Status Quo Report.*

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1. BROAD COMMENTS ON THE INCONSISTENT, BIASED AND POORLY FORMULATED DOCUMENT, AND THE ABSENCE OF COMMUNITY – DRIVEN CONTENT

- 1.1. Melville and Auckland Park north has been impacted by the Spatial Development Framework for Empire Perth Corridors of Freedom (CoF). The consequent potential for densification, while potentially a destructive change to a suburb, must be managed to achieve better social and economic values for all. To do this however densification needs to be realistically and responsibly applied before it is allowed as a right. If it takes away or otherwise negatively affects people's rights and livelihoods, especially those of Melville's present residents, it is likely to be legally and constitutionally challenged - hence the requirement for meaningful and significant community participation.

- 1.2. We believe that the PP consultants and the JDA have not met this level of realism and responsibility.

- 1.3. In addition, the PP consultants and the JDA have made a mockery of the community participation process, resulting in an almost complete absence of community – driven content in the latest proposals, and virtually no community support.
 - 1.3.1. The Melville community were repeatedly told by Christo Botes of the JDA at several recorded public meetings that, firstly, there were no plans for the densification of Melville, and secondly, that the Precinct Plan would emanate from the community itself, and that the community itself would determine the content thereof. "There will only be densification if you want it" was what the community was told.
 - 1.3.2. Based upon the above representations (which subsequently turned out to be false and misleading) community members were induced to exercise good faith and participate in formulating specific proposals for the precinct plan, through public meetings and participation in specific focus groups.
 - 1.3.3. Had it been made clear by the consultants at the beginning of the process that they were for the most part intent on recommending densification way beyond what the community could support, and that the community's participation and sentiments would hardly feature in the precinct plan recommendations (as is indeed the case with the present proposals) there would have been little or no community participation to speak of. The Melville community would have likely taken steps to have the present consultants



removed, and would have instead funded and appointed consultants themselves. This remains an option.

- 1.3.4. It bears mentioning that the focus groups met separately, making it difficult for anyone to follow and be privy to the discussions held in other focus groups. This evinces a lack of reporting of the outcomes of the various groups.
- 1.3.5. It bears further mentioning that at the very first public meeting, held at 27 Boxes, community members requested, and were promised, complete and unconditional transparency in the precinct plan process. A specific request was made (and such request was repeated many times throughout the process) for copies of the minutes of all discussions between the consultants and various stakeholders, as well as all correspondence in regard to the consultants' dealings with various stakeholders.
- 1.3.6. Perhaps more importantly, repeated requests were made for the contemporaneous, handwritten minutes taken at the various focus group discussions, so that it can be determined whether proposals indeed emanated from members of the community. Specific, recorded undertakings were made to provide these notes. To date, they have not been provided. Instead, typed "summaries" of such minutes were provided a mere 3 days before the final public meeting. The consultants cannot claim that the summaries are complete or accurate without the promised handwritten notes being made available. This repeated failure to provide promised information evinces a contemptuous attitude towards the need for complete transparency and accountability.

1.4. As is evident from what is set out hereunder, the proposals do not represent the community's sentiments and do not reflect any significant community participation. Clear examples of proposals contrived solely by the consultants, are:

- 1.4.1. recommendations for an additional 500 residential units in Main Rd;
- 1.4.2. recommendations to facilitate and support, over a wide area, the consolidation of three erven at a time; (this is a transparent attempt at driving the interest of developers by compromising the residential amenity);
- 1.4.3. The recommendation for 6 storey buildings in Main Rd, despite the relevant focus group reaching consensus that the buildings on Main Rd would be capped at four storeys (the SAF provides for 4 to 6 storeys in that specific area). The focus group agreed that it was



more appropriate to conserve and improve the existing Main Rd buildings rather than tear them down and erect new structures;

- 1.4.4. Recommendations to facilitate rezoning and mixed-use developments along the northern extent of Main Rd, on the condition that there remains a residential element on each such property (ie. That someone stays on the property). There are many disruptive types of businesses that could operate out of such developments, one existing example being an illegal restaurant at the corner of 10th and Main, which the City have dismally failed to combat, and which has had a serious effect on nearby residents.
- 1.4.5. The level of resistance to the above proposals was evident at the last public meeting, where consultants were repeatedly called out and criticized for misleading the community at large and the focus group participants in particular, and for presenting proposals which contradicted and ignored community sentiments and proposals. It was observed by many such focus group participants at the meeting, that despite consensus having been reached in various focus groups on a number of issues, and despite these agreed items having been presented and confirmed at previous public meetings, the latest proposals through Gibb marked a clear departure therefrom, without any explanation, while admitting that many of their proposals were not based on any needs and desirability studies or reports.
- 1.4.6. At the last public meeting the consultants continued to prevaricate on the issue of densification, but were eventually forced to provide actual numbers of proposed additional residential units in Main Rd, much to the shock and dismay of attendees, who voiced their outrage at this previously undisclosed plan. In fact, at a meeting convened by Councillor Steer a few days prior to the last public meeting, the consultants advised the MRA for the first time, of their intention to recommend that the existing number of residential units in Melville be increased from 1918 to 4691, which was met with outrage by MRA attendees.
- 1.4.7. In light of the above, and in light of the present proposals, it is nigh on impossible to identify real benefits and advantages for the residents of Melville, besides some attempts at addressing road and pavement configuration.
- 1.4.8. As a result, questions have been raised about whether the consultants' proposals have been influenced by other stakeholders who did not participate in the consultation process, as we understand it, or whether they have simply taken a reckless approach and decided to ignore the community's previously recognized and accepted proposals.



1.4.9. It is on the above basis that the consultants' conduct and motives warrant close scrutiny, and that the consultants' claims of meaningful community participation should be dismissed out of hand. **The Melville Residents' Association cannot support the present proposals – to do so would be a betrayal of its constituents' interests.**

1.5 At a detailed level, there are many statements in the Precinct Plan draft that are either inaccurate or biased in favor of achieving urban change towards denser, altered and multi-use built fabric. We request scrutiny of the following elements:

- 1.5.1 In the earlier SAF, higher dwelling unit densities and heights have been proposed along the Empire-Perth corridor, as well as in the Milpark UDF. These targets are not detailed in the Melville Precinct Plan. We believe that these regional targets will adequately and more appropriately provide for the densification demands of the region and therefore throw into question the need for extensive densification within in the Melville PP.
- 1.5.2 PP p. 18, third paragraph: "*The residential character of Melville can best be described as 'vintage' and 'confined.'*" We feel that this odd description – quantify what "vintage" means – perhaps e.g. 80% of houses pre-WW2, majority pitched roofs is ignorant and/or biased towards an attack on the existing fabric. What does "confined" imply?
- 1.5.3 PP p. 18, fourth paragraph: "*The Melville precinct local economy presents a unique blend of localised business enterprises in a village type configuration.*" What's a village-type configuration and what does that imply for design intervention?
- 1.5.4 PP p. 18, fourth paragraph: "*From an economic perspective the study area provides an environment within which small-scale, localised business enterprises can prosper – businesses that would otherwise not be able to survive in a high-rent shopping centre environment.*" How do 7th St rentals compare with malls? Was preference tested? The point here is not only to look at which shops can afford which space – it is a precinct plan which has the possibility to encourage certain types of development and discourage others. Hence the need for testing of preference – which most residents would say leans more towards small businesses and shops like those on 7th St, in keeping with the village character, and away from large shopping malls.
- 1.5.5 p. 18, fourth paragraph: "*Several smaller home enterprises are distributed throughout the residential fabric of the precinct. These include medical practices, guest houses, architectural firms, and other consulting offices.*" Again perhaps quantify? What is the amount of space used within the 25% home office allowance that does not require consent



use, as opposed to those that have completely converted to offices. The latter have a very different character and impact.

1.5.6 p. 20, first sentence: "*The natural densification potential of the Melville precinct is relatively limited on account of the small stand sizes prevalent in the area.*" Relative to what? Quantify existing du/ha to allow visualisation of proposals for the future. Most houses already have cottages - some above legal amounts - leading to a surprisingly high density already, probably over 30 du/ha. This raises the question for the need to even propose alterations. It is also true that in Melville there are "natural" restrictions on densification, such as the value given by homeowners to gardens and private green space and maintaining the views that the given topography allows. In addition that active and informed role of the MRA in vetting all Heritage Applications (which covers most houses) restricts radical change to the fabric.

1.5.7 p. 32, second column in the blue box: "*The protection of the Precinct character and its heritage value, general public environment and aesthetic upgrades, selective densification with supportive land uses and the importance of more greening elements in the precinct.*" We question the phrase, "selective densification with supportive land use" as this impetus isn't apparent in the comments before. Also, the key word here is 'selective.' What was selected through the participatory process? The later proposals **do not reflect this selectivity**.

1.5.8 p. 35, second column, under 'Homeless' – I am skeptical that any of the information presented here is based on a real rigorous analysis of the issues or if it just based on people's assumptions.

1.6 The document, especially the PP draft, suffers from extreme inconsistencies in terminology, conflicting presentation of regulations, and omission of issues of primary importance; this invalidates the document for comment. Images showing proposed height zones and densities are inconsistent. Lack of cross-referencing with existing policies and even inter-document for this plan creates conflicts of policy. Numerous major issues are left unaddressed. Some of the urban design requirements do not appear to work with zoning requirements (i.e. the 10% green space requirement, when zoning for residential 1 requires 40-60% open space depending on height). Looking at this in detail:

1.6.1 p. 17, first paragraph: "*The SAF however, earmarks Main Road as permitted 4-6 storeys.*" Reference how the SAF applied this proposal, and note the limit of this height zone in all directions: we think that the PP exceeds that proposal. Workshops with the community



came to a general consensus that these zones would be capped at 4 storeys in order to encourage refurbishment of existing building stock rather than demolition and rebuilding solid 1950's fabric. This was quite a contentious point with some community members and it is problematic that it is not recognized here. Along the same lines, within the community workshops the development of setback rules from neighboring residential properties was discussed, including the "gap" that the treed parking lots behind Main Road properties, especially on the west side of the road. That concern with carefully stepping down from high to existing fabrics does not appear to have been included.

- 1.6.2 p. 26, under '*Stormwater*'. This section is given only as background in the PP but is actually very critical to proposed interventions and needs a strict coordination with them. Improved urban design implementations may require relocation, upgrading, complementing or redesign of existing storm sewer catchpits and capacities, and if stormwater system upgrades are implemented without this in mind it is basically throwing both money and opportunities out the window. Furthermore, this only mentions pipes – why is the precinct plan not embracing the 'complete streets' approach which seeks to utilize natural soakpits and vegetation to capture rainwater where possible? The CoJ already has a 'complete streets' guideline, and the Civil Services report specifically mentions some of the principles on p. 20 of that report, **but these principles are not followed in the urban design guidelines later in the Precinct Plan document**, representing a significant inconsistency. On the whole the proposed infrastructural interventions appear to be very underdeveloped.
- 1.6.3 p. 27 – there's a section about electricity, and an entire separate electrical services report, and not one mention of the number of dysfunctional streetlights? Also, on p. 20 of the electrical services report, it mentions LED lighting with white light because it is ideal for security surveillance? Is there any scientific evidence of this? There are plenty of studies which show cooler light negatively affects sleeping patterns in humans and that warmer colour temperatures are better from that standpoint.
- 1.6.4 p. 28, first column, fifth bullet point: "*The majority of roadways within the precinct have a surfaced sidewalk on both sides of the roadway.*" This is true only if you disregard the state of repair. The majority of roadways have surfaced sidewalks in various states of disrepair, often with complete disregard for even basic universal design principles such as flat paving, curb cuts, etc. Improving the pedestrian environment ought to be one of the central foci of this plan (and probably one of the least controversial ways of spending a possible capex budget).



- 1.6.5 p. 29, first column, fourth paragraph: *"It is therefore anticipated that there is generally less pedestrian activity in the Melville area in comparison to the rest of the City."* How is this being determined? Against what benchmark is it measured? Taking an average of the 'City' is not necessarily an appropriate indicator, as pedestrian activity varies significantly from location to location based on various factors. The comparison should be to other areas of similar density and land use. If that comparison is made, we suspect Melville has greater pedestrian activity than other similar areas. This statement is currently lacking analysis. If the pedestrian environment is poor due to narrow sidewalks, pavement in disrepair, and dysfunctional street lighting, then of course people will choose not to walk. This is not the question. The question is how the precinct plan will encourage pedestrianism and what the rules for design of road curbs, sidewalks, etc. will be in order to accomplish that. We do not see much in this document which spells that out.
- 1.6.6 p. 48, under 'Main Rd (from 4th to 6th)' and 'Main Road (from 6th to 11th)' – The provision here from 4th to 6th of 4 storeys at 120du/ha is in direct contradiction to the provisions on the previous page, which are written in a way that does not specify where on Main Road the 6-storey 160du/ha density would apply. The provision here from 6th to 11th is also in conflict with the provision on the previous page for the same reason. Here, 3-storeys and 30-80du/ha are proposed, but this is completely absent from the map shown on p. 66. A 3-storey height here corresponds to existing rights and is not a problem. However, indicating the density as 30-80 du/ha is problematic, as it would make any densities less than 30 du/ha illegal. The number should be the maximum, not a questionable range. We note again that many Melville properties do already achieve around 30 du/ha.
- 1.6.7 p. 66, regarding 'Residential diversification and controlled development on Main Road' - This whole section requires much more detail; for instance erven beyond Main Road are shown as having 160 u/ha but this contradicts the text (i.e. 80 du/ha).
- 1.6.8 p. 66 Fig. 46 indicates increased densities in the areas indicated in yellow that were not discussed as part of the participation process and seems completely unnecessary in the context of this PP given the densities indicated along the Kingsway-Perth corridor in the SAF.
- 1.6.9 p.56 *Approved high density residential developments on the south of Streatley (Portion 2 of Erf 1114 and a part of Portion 4 of Erf 1114 Auckland Park Township) also influence the need to apply an appropriate strategy in response to the proposed densities.* The higher density strip along the south side of Streatley Ave on the Campus Square site was originally intended as a "buffer strip" between the commercial development of Campus Square and the houses on the north side of Streatley Ave. The high density residential proposal on



Campus Square is still in question and has as yet not been approved. The Lothbury and Streatley Ave densification proposals would need to be discussed with APRA and affected residents.

- 1.6.10 p. 71, last paragraph, 3rd bullet point: *"All developments within the precinct shall comply to the conditions and processes of... The South African Heritage Resource Agency and the National Heritage Resource"* Most erven on Main and 7th are covered by this legislation - ie the buildings are protected - those sites need to be taken out of the calculations here and on following page.
- 1.6.11 p. 74: under *'New developments on main streets'* – *"the main roads and NMT routes in the precinct will be used to cluster the energy and intensity of development."* We feel this statement is vague and meaningless. Also, there are numerous references to NMT routes in this document but no actual proposal for them.
- 1.6.12 p. 76-77, under *'Guideline 2: 10% green space... All developments have to provide 10% communally accessible green space.* This needs much more nuance. For residential 1 spaces, this is too low – zoning rights require between 40-60% open space, depending on height. *'Communally accessible'* needs to be defined. Does that mean public? Or accessible to all those who reside within the erf? I assume it is the latter. But consider a scenario in which there are 2 dwellings (a house and a cottage) on an erf, and each one has it's own green space which the other unit does not have access to, and which together add up to 50% of the plot area. Surely the green space is sufficient, but it would not meet this regulation because neither are *'communally accessible.'* The existing and revised (not yet adopted) CoJ land use scheme sets maximum site coverage for a single-story building in a residential 1 zone at 60%, which would mean 40% is left for green space and carport/parking. If this requirement is applied for commercial/retail/office spaces, as it will simply result in small, token *'green spaces'* which serve no particular function and are too small to have any real value. Either the 10% needs to be increased, or it should not apply to commercial development in targeted areas (Main Rd, 4th, 7th, Lothbury).
- 1.6.12.1 p. 120 – how can the upgrade of Main Road include only an electricity capacity upgrade? Landscaping, raised walkways, new sidewalk paving, and many other things are being proposed but are not budgeted for. This is highly problematic.
- 1.6.12.2 p. 121 – similar comment, this time on 7th St & Lothbury. And only R 22 million for all of 7th & Lothbury? This will not be anywhere near enough to do what is being proposed.



- 1.6.12.3 p. 122 – similar comment – how can streets be converted to one-ways if money is only spent on stormwater management and electricity? Streetscaping is needed.
- 1.6.12.4 p. 123 – same comment, again.
- 1.6.12.5 The Electrical Services document, figure 2, shows a height restrictions map which is different from some of the ones presented in the Precinct Plan document.
- 1.6.12.6 In the Civil Services document, PDF p. 36, the Water Infrastructure Layout Plan **does not even show Melville!**

1.7 Many precedents are completely inappropriate

- 1.7.1 Informational signage system, the bottom precedent and the beacon sketch on p. 45 do not. Which is to be followed? Also note that on the intervention map on p.49, most of the locations proposed at the bottom of the Koppies (the smaller purple circles on the map) are not actually gateways into Melville as you'd have to cross at least 1 other gateway in order to get to them. They are redundant.
- 1.7.2 p. 49 – the precedent photo shown on this page is among the **worst precedents you could possibly choose**. It shows a street and sidewalks which look to be more than double the width of Main Road – or any road in Melville for that matter. These dimensions are fundamentally unachievable. Worse, the building in the image is at least 10 storeys, with 3 storeys of completely blank, unarticulated, lifeless façade at ground level, which is exactly the opposite of what is needed. **This is a precedent of what MUST NOT BE DONE in Melville.**
- 1.7.3 p. 55 – again the dimensions of the street and building setback in the top image are not plausible on most streets in Melville. Many houses are build closer to the street than this and getting sidewalk set back 2m from the street curb (which includes parking), and then an additional 2-3m before the building line, is just not realistic. The bottom precedents are slightly more accurate from a dimensioning standpoint but are very much uninspiring.
- 1.7.4 p. 57 – the bottom precedent is again not achievable with Melville's streets. Also, labeling these 'precedents indicating proposed intervention outcomes' is a cop-out. It is the precinct plan's purpose to define what the outcome must be and set the rules for how it is achieved, not to just put photos for people's interpretation of what an outcome might maybe someday possibly be. P.58 - top photo – it is completely unclear what is even being proposed with this precedent.



1.7.5 p. 61 – none of these are objectionable as precedents, but there is no indication as to what the governing principles for where benches, rubbish bins, etc. should be located.

1.7.6 P.63 – top photo – how does this show public open space?

1.8 Completely inadequate exploration of scenarios through urban and typological design that the proposed potential rights will allow for: e.g. how the building types will be developed on given sites where trees, orientation, heritage, edge conditions apply. Have the consultants even considered how moving the boundary fence back by 2 meters would fail in relation to Melville typology that largely has houses within 6m of the street and parking in front. The transport plan shows no pedestrians, almost entirely oriented through private cars. Impacts of buses and other public transport were not studied and considered.

1.8.1 p. 11, second paragraph *"The policies discussed allude to the vision of a pedestrian friendly environment along 7th Street, 4th and 1st Avenues and 9th Street."* This may be true, but pedestrian-friendly environments should be developed/encouraged everywhere, not only on these streets. Appropriate urban design principles/guidelines supporting that – including streetscape design principles and rules – are needed, but generally do not appear in this document.

1.8.2 p. 29 second column, third line: *"It should be noted that obstructions encroaching onto sidewalks were observed along specific road sections, most notably along sections of 7th Street and 4th Avenue where street furniture (eg tables, chairs, benches) associated with adjacent retail facilities reduce the available sidewalk width. These obstructions are considered a hindrance to pedestrians, further imparting a negative perception of the walkability of the immediate area for pedestrians on these key precinct routes."* Yes – this is a very important observation. The problem is there is **nothing written into this plan which proposes a solution.**

1.8.3 p. 42-43, under 'Urban Design Principles and Elements' some of the urban design principles listed are commendable. Further detail is required as is mentioned later in the document.

1.8.4 p. 48, regarding the Main Road sketch – far more detailed (and, frankly, better designed) proposals were workshopped with the community and generally met with approval. Why were they omitted in favour of a less-detailed sketch, which is toothless when it comes to holding implementing agencies accountable, as it offers no rules, dimensions, or specific information? Furthermore, it is unlikely that the sketch would even be possible – there simply isn't enough space for the minimum sidewalk widths + parallel parking + 2 lanes of traffic + a median strip wide enough to support tree growth + 2 more lanes of traffic +



angle parking + sidewalks on the other side. We would support the idea of greater vegetation, sidewalk expansion and controlled parking indicated in the sketch – although the safe island for pedestrian crossing at the median strip is conspicuously missing and it shows traders and a planter box blocking the crossings - but as it stands this sketch lacks the detail to be implementable.

- 1.8.5 p. 50, regarding the bullet points of *'Intervention 2: Preserving and Strengthen the Heart of Melville'*. Regarding the second bullet point about raised intersections - this requires detailed level exploration, and is probably not an appropriate use of corners. Regarding footnote 4 from the 3rd bullet point - All public space ceded to private use requires rental and maintenance. Additional use population is a burden on residential neighbours and must be set off to benefits for them. In addition, the purpose of extending the sidewalk is to ease pedestrian movement, not to further restrict it by allowing cafes to hijack this public space. That being said we support removing parking where necessary in order to create a better pedestrian environment here. Regarding the fifth bullet point about green pockets within the limited open space of 7th street requires detailed exploration.
- 1.8.6 p. 51 – Once again, far more detailed work on the urban design of this area has already been done and workshopped with the community. Why has this information not been included? Current provisions are inadequate. In addition, the sketch showing the Lothbury/7th intersection with 1st Ave is showing two corner plots, which would require demolishing heritage-protected buildings to implement, that is strongly advised against.
- 1.8.7 p. 54, first column, second paragraph: *"1st and 4th Avenue connect to both Main Road and 7th Street. These roads are earmarked as NMT routes and carry a lot of through fare traffic despite their narrow nature."* If you draw a plan and section through 1st Ave, you will find that adding NMT lanes here is impractical. It is similar on 4th. 2nd and 3rd would probably be better candidates due to the lower traffic volumes and similar level of east-west connectivity. Also, note that the manner which NMT lanes have been implemented elsewhere in the city – by trying to squeeze them in on the road – has done more harm than good to promoting an NMT culture. Truly safe and accessible NMT lanes are separated from the road and not immediately adjacent to parking, where any open door can send a cyclist flying head over heels. If any NMT lanes are being proposed, please DO THEM RIGHT!
- 1.8.8 p. 54, in the box titled *'Intervention 3: Create Improved Accessibility'* – We not think that 1st and 4th avenues should be turned into one-way streets and would like to see the traffic modeling data which suggests that one-ways on 1st and 4th are good ideas. We suspect they will simply increase traffic volumes on 2nd and 3rd without actually solving the problem



– which has more to do with illegal and uncontrolled parking than it does with volume of traffic. One-way streets which prioritize traffic over street parking also tend to increase vehicle speeds, which is what we'd be trying to prevent. If you design the road curb appropriately, you can help control parking and prevent blockages on these important 2-lane streets. You can then use 2nd and 3rd, which have lower traffic volumes, as one-ways and allow parking on both sides with one lane of through traffic.

- 1.8.9 p. 55 – regarding the street map – why would the one-ways of 2nd and 3rd stop at 8th as opposed to continuing to 9th, which is where most of the through traffic comes from on that side. Having one block of 2-way traffic turn into a 1-way will just cause confusion, and confusion causes accidents.
- 1.8.10 p. 56, in the box titled '*Intervention 4: Support the Development Corridor*' – On the first bullet point re: Land Use Strategy, we do feel this could work but requires more information regarding types (ideally not more drinking venues) and hours. On the second re: Street Furniture – street furniture is not nearly as important as increased sidewalk widths and reduced vehicle lane widths. Vehicle lanes on most of Lothbury are unusually wide, which encourages speeding. On the 3rd bullet point re: lighting – we agree, but why is this not mentioned EVERYWHERE? On the remaining 2 bullet points we are also supportive.
- 1.8.11 p. 72, under '*Expected yield in terms of the redevelopment potential*' - This is hugely problematic at a detail scale. Regarding the '*total new units (balance)*' for 7th St and 4th Ave, remove. There are asterisks, double asterisks, triple and quadruple asterisks on the proposed densities here, but what they refer to is a mystery. The methodology of this calculation and rationale for proposed densities needs to be clearly defined and presented.
- 1.8.12 p. 72, under '*Redevelopment*' - This is not in any way related to specific sites - very dangerous as a "policy" and in conflict with a lot of the vague statements elsewhere.
- 1.8.13 p. 74 – '*Guideline 1 – Building have to interact with streets*, under '*Retain and refurbish*' Cannot be applied to existing structures and is problematic in relation to sound and privacy. This guideline should apply to retail/commercial land uses and needs much more detail to give it teeth and make it enforceable. I doubt there is any legal mechanism to compel residential home owners to abide by this.
- 1.8.14 p. 74, under '*Redevelopment*' – the diagram pictured appears to have long strips of landscaping between the building and sidewalk, which is in contradiction to the principle of promoting ground-floor interactivity and frequency of entrances, which create active streetscapes.



- 1.8.15 p. 78, 'Guideline 3: Parking and vehicular access' under 'Retain and refurbish... Where the house is used for retail or offices some on-street parking can be provided depending on the street condition" – Too vague.
- 1.8.16 p. 83, under 'Redevelopment' – in the diagram, the most important dimension – the distance of the building from the street curb – is not indicated, please rectify.
- 1.8.17 p.7: "This mechanism [the Knowledge Precinct] therefore aims to: Fast track development – through cutting out the time consuming land use process; Provide development models that are aesthetically pleasing and financially feasible; and Promote incremental but structured development within the SDZ."
- 1.8.17.1 Point 1 is potentially problematic unless it relates directly to the knowledge precinct. We are currently watching a parking garage go up in this area and the expansion of a shopping mall – neither of which are things that are inherently boons to a knowledge precinct.
- 1.8.17.2 Point 2 is currently unenforceable – who determines what is aesthetically pleasing? These are exactly the kinds of things the precinct plan should be addressing on a more detailed and nuanced scale, but there is very little here which does this.
- 1.8.18 p. 39, second column, under 'Socio-economic Objectives' – Given the diverse demographics of Melville, we find it disappointing that there is no mention of mixed-income accommodation as a socio-economic goal, and following from that I find it problematic that there are no development regulations proposed which would facilitate this.
- 1.8.19 p. 41-43, under 'Scenario Development' - This is being presented as an either-or choice: stable and non-disruptive or densification and area reconfiguration. Both are bad options and it is not a binary choice between one or the other. The goal ought to be to control the mechanisms of development and resulting densification to be done in a manner which is itself non-disruptive. Scenario 1 basically describes doing nothing. Scenario 2 describes complete transformation. Although the document describes Scenario 1 to have been chosen, this is not really the case. It's hard to understand why there isn't a Scenario 3 here which speaks to an intelligent form of densification which meets targeted strategic objectives identified through the participation process.
- 1.8.20 p. 47, second column, the bullet points of 'Intervention 6: Strengthening & Enhancing the Main Road Corridor.' First, this is listed as intervention 2 in the left column and intervention 6 in the right column. That is not the real issue. First bullet point "The maximum permissible height along this section of Main Road is 6 Storeys at a density of 160du/ha" This was workshopped quite extensively with the community and the outcome was to cap



this at 4 storeys. This was one of the few points of consensus amongst nearly everyone involved – the purpose being to encourage refurbishment of existing building stock rather than wholesale demolition and re-building. We are concerned that to provide unregulated license to build up to 6 storeys at 160du/ha will likely result in quick and cheap speculative development that will have a tendency to depreciate land values in the vicinity. The extremely high 160du/ha density target is unlikely to even be achievable with anything but very small units along Main Road alone once you subtract out heritage-protected buildings, and mixed-use floor space. The zoning diagram on p. 66 indicates 2 erven deep into existing single storey residential areas are earmarked for this density. This is something that has not been workshopped with the community and was explicitly raised as a concern. The community objects to this proposal, especially since there are not development controls whatsoever presented in this plan. We are not opposed to higher densities per se, but support for it would be conditional upon strong development rules and a functioning urban management structure, the first of which is nonexistent in this document and the second of which has not yet been formed.

1.8.21 p. 66, regarding '*Residential diversification and controlled development on Main Road*' A map showing overlap with SDF goals should be shown to explain which density proposals are from the MPP and which come from CoF goals. The title of the section includes the words 'diversification and controlled development,' but there are very few regulations proposed which would actually control development and absolutely none regulating the diversity of dwelling unit types. Creating some type of unit diversification requirements might help force developers to perform more in-depth and responsive analyses of market needs as opposed to just erecting quick and cheap dormitory-style flats for UJ students, which is what will likely happen if this remains unregulated. The diversity requirements can also be a tool to encourage mixed-income development, as opposed to the highly segregated development driven by laissez-faire policies (or lack of policies).

1.9 As it stands the resolution of many subjective issues will rely on as yet unformed bodies e.g. aesthetics committee on p5 exec summary/p87; our concern that the guidelines, experience, budget etc. for these forms of control groups will not exist for a while leaving us in limbo in the near term. A workable mechanism needs to be prescribed.

1.10 all engineering plans are predicated on the now outdated/retracted higher density plan - include Rustenburg Road, lower Main Road, high densities in 7th St and 4th Ave.



- 1.11 One way systems along the feeder routes are not considered carefully in terms of their impact on traffic speed, commercial impact and spillover to surroundings (e.g. to 2nd and 3rd Ave)
- 1.12 Proposed Intervention 1: "Create gateways" (pg.4; 45-46; 119 refers). The existing signage installed in Melville that defines precinct entry gateways is sufficient and reflects the unpretentious character of the neighbourhood and must be maintained. Spending R2 650 500 (pp119) on building superfluous landmarks to glorify the precinct would be poorly invested expenditure that does not serve the local interests. All attempts at building landmarks in the precinct should be strongly avoided. Gateways should rather pioneer pedestrian and NMT accessibility principles within the precinct. This includes pedestrian crossings, bike sheds and lanes, detectable warnings, elevation changes, handrails, mountable curbs, sidewalks, steps/ramps, bollards, lighting, etc. Gateway nodes can be subtly defined by pedestrian rest spaces provided with benches, bins and indigenous landscaping.
- 1.13 Very poor mapping of existing use: especially in areas of vacancies (esp. retail and office space) and abuse (esp. alcohol/noise issues). Get data from MRA.
- 1.14 The socio-economic analysis section (p23) presents statistics of the study area but derives no conclusions or insights from the data. No pertinent trends or inter relationships are developed. Of particular concern for the resident community are these points: no indication of our perception that there is an increasing demographic of parents with young children in the area (though visible in the graph on pp x). This shift impacts on the need for good schools (or lack thereof); potential conflicts with noise and behavioral impacts of bars and nightclubs; need for safe public green spaces and parks; traffic control.



- 1.15 Budgeting for upgrades (pp119-126) needs to be unpacked in terms of value, need analysis and detail design. We feel this section is superficial, unrealistic and provisional and cannot yet serve as a meaningful financial indication for future investments. For instance:
- 1.15.1 Page 120 details upgrades for Main Road from 2019 onwards, which we agree with, but omits any allocation for reshaping the road (even though this is mentioned). Only electricity bulk services are proposed.
 - 1.15.2 The amounts on page 122 of converting 1st, 2nd, 3rd and 4th Avenue to one ways at nearly R40 million requires detail, but even without that appears hugely exaggerated. It must be noted that the street profiles include heritage elements such as stone gutters and kerbs that need to be preserved. The further amounts on this page of over R7.5 million for electricity and nearly R11 million for storm water suggest changes in density or less porous areas that might require such services. Again, such proposals require some urban design detail to be justified at that scale.
 - 1.15.3 The timelines for budget allocation needs to be reconsidered in the light of community comments. The delay, for instance, of “systemic upgrades” (p124) until the 2023 budget year is out of line with the relative urgency for improved pavements, lighting and street furniture expressed at community meetings.



2. RESPONSE TO FRAGMENTED PLANNING APPROACH AND THE LACK OF POLICY INTEGRATION

- 2.1. Strategic Area Framework (SAF) & the Spatial Development Framework (SDF) Corridor of Freedom (CoF) potential rights vs Melville Precinct Plan (MPP) proposal. (E.g. the SAF makes no prescription for 7th Street, 4th Avenue, Lothbury and Streatley Ave.); also consider density impacts in CoF as a whole.
- 2.2. Town Planning Schemes (implicit rezoning all over through mechanism of mixed use)
- 2.3. Housing studies in Empire Perth SAF are very good and need to be tested against real conditions along Main Rd and included in the MPP.
- 2.4. Heritage study references are vague and refer to an out of date study, to be updated.
- 2.5. Other precinct plans e.g. The Knowledge Precinct and the Milpark/Richmond Precinct plans need to be read in conjunction with the Melville PP to ensure consistency, identify contradictions and prevent unnecessary overlaps in uses and densities. No reference is made to these in the MPP.
- 2.6. Tender call compliance with ToR: lacks implementation plan; socio-economic plan
- 2.7. Own status quo report included in the suite of documents does not seem to be taken on board in urban design
- 2.8. City of **Johannesburg Complete Streets Design Guidelines** are not referred to in the MPP and relevant principles should be incorporated in the MPP.



2.9. Urban management plan should overlap with changed use proposals and go to a detail level especially for difficult new types: high density housing including student residences; alcohol serving venues; security impacts. Without regulations and enforcement, guidelines are not sufficient.



3. PROACTIVE SUGGESTIONS OF ELEMENTS NOT WITHIN THE STUDY AREA.

- 3.1. Fill the corridor first: The higher density and intensification proposals for Empire-Perth Corridor should be encouraged and implemented before enabling intensification in stable residential areas as is being proposed in the MPP. **Campus Square is at a very low density** and represents huge potentials for top structures that can achieve high density rather than the very high residential density along Streatley Ave. The "Opera House" site and the UJ parking lot which is zoned Res 4 should be developed before invading other areas and needs to be considered in terms of safe cross spaces for students and night workers. Steam Laundry Site where new low mall is proposed could have much higher, well-located new housing in high-rise typologies with no negative impact on surroundings.
- 3.2. Find, document and replicate typologies that do work e.g. good student residences; backyard cottages; guesthouses; neighborhood serving shops, etc.
- 3.3. For new housing, or additions, prioritize approval of small projects that do not involve consolidation as a means of testing innovative approaches e.g. eco-row housing.
- 3.4. Quantify the value of Melville to city image: guesthouses host many foreign journalists and tourists - go to press coverage to understand this value and how easily it can be destroyed. Provide references with articles that shows a potential for an organically established, street level kind of social cohesion that has no equivalent in the city.
- 3.5. Urban ecology: the Melville Koppies experience of botany and Stone Age remains are a major asset to the city. Protection of that heritage site needs to be absolute. A cross-city policy and policing of all trees, wetlands, indigenous spaces, ridges is required that can feed back into Melville approaches. Try for best practice on our own, but link with wider initiatives where possible. Flooding will become worse and most of Melville runs off into the Spruit.



- 3.6. Bring existing schools back into Melville community via shared space, scholar intakes and shared fora.
- 3.7. Public space? It minimally exists in Melville; we think more of it is needed for larger public events, but the opportunities for this require linking to citywide initiatives eg Braamfontein Spruit; City Parks; Melville Koppies; Westcliff Ridge. The malls need to include decent public spaces: 7th Street is not big enough for the projected crowds.
- 3.8. We need to break the long roads that are used for entertainment purposes. There needs to be diversity in the kinds of social spaces that are supported by the MPP even if they lie along the same route: nodal development with safe, affordable and community oriented pauses.
- 3.9. Prevent unscrupulous development e.g. Open up planning practices to public view to lead to well-built urban types with good quality of space and management.
- 3.10. We would suggest that, where denser housing is allowed, that the city actively approaches proposals from developers with a successful track record in developing mixed income housing (e.g. the 20/80% model) that is shown to retain private buyers as well as providing affordable options for workers in the community.
- 3.11. Mechanisms for realizing already articulated community led visions e.g. homeless shelters, public toilets, micro park potentials of substation sites, the staircases on closed streets, urban gardens/wetland on Carlow at top of CSIR site, community sports facilities in that area, Telkom exchange/Post Office for police station, carnivals and fairs, new site for post boxes currently near Shell garage on Main. We suggest that the budget allocated for gateways rather be allocated for bids by community organizations that are located in "gateway" sites for the provision or upgrading of facilities that actually make a social difference.
- 3.12. Existing and new buildings at the edge of Melville should be designed or, when altered, positively impact on the neighborhood fabric through vertical greener (see for instance, ivy on brick at lower end of 9th Street) and through a stepping down profile to meet the adjacent buildings. The blank facades of the parking garage being constructed on Lothbury should be softened with planting.



4. SERIOUS SHORTCOMINGS IN URBAN DESIGN GUIDELINES, THEIR REGULATORY FRAMEWORKS AND THEIR INTERACTION.

Proposals for linking detail urban design with regulatory frameworks (either top down or community approved and developer provided) are requested at the mid-scale for:

4.1. Main Road

4.2. Lothbury Road near Campus Square

4.3. 4th Avenue nodes: proposed health precinct; Picobello/Perron; 27 Boxes

4.3.1. p. 13, third paragraph: *"4th Avenue shares a similar land use character to 7th Street..."*
Not really – it has similarities near 7th St but not along its entire length. Appropriate nuance needs to be developed into the plan which acknowledges these differences.

4.4. 7th Street paving, lighting, refuse and parking.



5. COMMENTS ON THE URBAN MANAGEMENT FRAMEWORK

- 5.1 The Area Based Management (ABM) Plan proposes that Melville becomes a Special Rating Area (SRA), able to raise additional revenue for 'top-up services' to add to/ complement normal City services. 60% of property owners would need to vote to establish an SRA and a non-profit company would need to be set up to run it. The detailed engagement that this proposal needs from Melville residents was not able to happen during the Precinct Plan public participation process due to the many issues needing attention in the Plan itself and the repeated scheduling of the urban management proposals towards the end of agendas. In addition to there being insufficient engagement with the ABM by residents for clear positions to be formulated, the MPP and the ABM need better alignment (for example the current MPP says little about issues such as public toilets and social initiatives whilst the ABM has more on this). It is thus not appropriate for the current tight comment period (with 15 Dec 2017 deadline) to apply also to the ABM proposal.
- 5.2 Once the MPP has been satisfactorily revised in response to comments now being submitted, the **ABM proposal needs to be revisited** with Melville residents. A different Vision statement needs to underpin the Plan and needs to draw from the recently drafted vision for Melville, which the MRA solicited the public's comment on. This is substantively different to that referred to in the plan (eg p3 paragraph 5; p38; p128). For example, the MRA vision includes the notions of 'progressive', 'diverse', taking responsibility and collective action. It elaborates a number of different components under the summary statement of 'A progressive, well-maintained, safe and diverse suburb which welcomes visitors, provides a home for residents and students, and is a stable working environment for responsible small businesses'. This vision is more closely aligned with the substantive comments being made in this document.