Amendment C177

DHHS Flemington Housing Renewal Program

Submission on behalf of Moonee Valley City Council
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1.0 Executive Summary

Council’s response addresses the Terms of Reference established for the Social Housing Renewal Standing Advisory Committee, namely:

- The appropriateness of the proposal in light of key strategies including Homes for Victorians and Plan Melbourne 2017-2050.

- The appropriateness of the proposal against the objectives of the Planning and Environment Act 1987 and any other relevant provisions of the planning schemes.

- Whether the Minister for Planning should act as Responsible Authority for the development site(s) and if this would expedite future planning approvals.

- Whether the proposed changes to the planning scheme and/or planning permits should be approved, subject to any recommended changes.

There is an undisputed need for major upgrades to the housing stock at the Flemington Housing Estate, and widespread recognition of the opportunities for redevelopment on the site. The Flemington Renewal project presents a series of complex challenges that must be addressed. This complexity is generated by a range of factors, including creating the densest populated area in the municipality. Central to the complexity of issues is the fact that the project has many different impacts on a variety of groups, many of whom have diverging expectations.

Other renewal projects will involve the removal and replacement of housing on the whole of existing estates. Flemington will retain four tall buildings, which will continue to house existing residents. The challenge for those involved in planning for the best outcomes is to understand the issues and balance the needs of affected parties in various categories. These groups generally include:

- The existing residents of the walk ups that are to be replaced – their issues may include relocation and displacement, size and quality of new dwellings, car parking, access to services and loss of open space.

- Future residents of the proposed “private dwellings” – managing their expectations for quality buildings, provision of car parking, open space and amenity in and around an established housing estate.

- The existing residents of the high rise towers – this community will experience significant changes that will be delivered over a period of many years. Impacts are likely to include changes to existing car parking arrangements, loss of the current open expanses, with an influx of additional people on their door step, and no major upgrades to their own premises as part of the current renewal program.

Whilst Council is generally supportive of the Flemington Renewal project initiative, there are a number of key issues that must be adequately addressed prior to Council fully endorsing the Amendment proposal.
Responsible Authority Status

The Amendment proposes the Minister for Planning will become the ‘Responsible Authority’ to approve the required Development Plan and subsequent planning permit applications for the Debney’s Precinct. This means that the Minister for Planning rather than the Council would be responsible for administering and enforcing the planning scheme in relation to the Debney’s Precinct.

Council has previously written to the Minister for Planning, and to the Minister for Housing indicating support for having a single Responsible Authority for the whole of the Debney’s Park Precinct. This decision was initially taken since it was considered having the Minister for Planning in this role would provide the planning certainty to expedite the whole precinct to be master planned. Following exhibition of the relevant Amendment material and the preparation of the Submission, it is considered that the interests of the Moonee Valley community would be best served by having Council remain as the Responsible Authority until such time as a Development Plan has been prepared. It is also considered appropriate that Council remain as the Responsible Authority for all Council owned land.

At the Ordinary meeting of Council held on 22 August 2017, it was resolved that Council:

Write to the Minister for Planning advising that Council will advise the Chair of the Social Housing Renewal Standing Advisory Committee at the forthcoming hearing on Amendment C177 that it is the position of Council that it remains as the Responsible Authority for the whole of the Debney’s Precinct, including DHHS land, until such time as a Development Plan has been prepared to the satisfaction of Moonee Valley City Council in consultation with DHHS, DEET, and Transport for Victoria at which time the Minister for Planning should become the Responsible Authority for the DHHS land.

Stage 1: DHHS Site

Transport and Connectivity

Despite being highly proximate to tram services and Flemington Bridge Station, the existing connections to these are poor, and require major improvements. Access to the station is unsafe. Similarly, there are no current or proposed tram “superstops” on Racecourse Road, in locations adjacent what is proposed to be the most densely populated component of the renewal project.

The intensification of the site in the manner proposed, with a significant increase in new residents, can only be supported on the proviso that Transport for Victoria, fully investigate and agree to fund improved connections to Flemington Bridge Station, via Mount Alexander Road and provide additional connections to the station via Racecourse Road.

There is an obligation on key stakeholders to give consideration to the Transport Integration Act 2010. As such, it is critical that Transport for Victoria and other Government agencies explain how and when transport mitigation measures are to be delivered in relation to the Flemington Renewal Project. There should not be a reliance only upon developer contributions to provide for necessary components at some time in the future.

There are a range of other major developments and projects occurring in the general vicinity of the Flemington Estate that will add pressure to the existing road and transport network. These developments include the Ascot Vale Renewal Project, private developments in the Ascot Vale Road precinct, Arden-Macaulay and the West Gate Tunnel project amongst others. Without the knowledge of how the area will be supported in terms of major transport infrastructure, it is difficult for Council to fully support the project.
Car Parking Rates

Insufficient evidence has been provided by DHHS to support a difference in car ownership rates by residents of public and private housing types. A consistent parking rate must be provided for both public and private new housing stock.

Council fundamentally disagrees with the proposed differentiated rates. There should be consideration of whether applying a differential ratio based on tenure of home ownership or otherwise is consistent with the Victorian Equal Opportunity Act 2010 or other relevant anti-discrimination statutes.

Built Form and Design

Whilst Council officers provided feedback to DHHS in the preparation of the proposed structure plan, the final outcome does not wholly reflect these views. There are a number of deficiencies with the plan, and it is Council’s submission that more detail should be specified within both the Development Plan concept and the controls (the DPO Schedule) to ensure future urban form achieves the agreed design principles.

The existing 20 storey high-rise towers on the DHHS site are to be retained and as such, will act as the benchmark for development heights on the remainder of the site. The building envelopes proposed for the new dwellings in the Racecourse Road precinct will therefore be set by these established high rise buildings. In addition, all new buildings will be required to comply with the new Better Apartments Designs Guidelines (Cl.58 of the Moonee Valley Planning Scheme).

The final design outcomes for new high-rise buildings will therefore be influenced by the policy requirements and the established built form. New buildings that are generally consistent with the existing 20 storey heights will not be seen to be out of context, subject to them being carefully designed and located, and having appropriate finishes and treatment.

The ability to accommodate buildings of substantial height on the DHHS site will provide the ability to ensure the right balance of site yield, height, open space provision and connectivity can be achieved. Consideration must also be given to design outcomes that preserve open space and minimise amenity impacts on existing and future residents.

Consideration should also be given to the development scenarios that will emerge from the future development of Arden-Macaulay, requiring the DHHS site layout demonstrate regard for the emerging Arden-Macaulay precinct to the south and the surrounding land uses.

Affordable Housing

Ideally a higher ratio of more affordable social housing would be provided at the site given that Government as the land owner, can take the opportunity to create net community benefit in accordance with the Homes for Victorians policy. The opportunity is available to provide affordable housing stock along with new private dwellings. Council recommends that this is provided at a rate of 10 per cent, in addition to the uplift of social housing proposed as part of the Renewal Program.

The provision of affordable housing for key workers in Flemington and surrounds should also be considered. Key workers, often defined as nurses, teachers, and police officers, are essential to the efficient functioning of the local area because they deliver much needed community services. Key worker accommodation strengthens the overall liveability of the area. Increasing challenges of housing affordability may push lower income key workers to seek residence elsewhere and as such, they become more likely to seek employment in locations
closer to their homes. Ensuring housing meets the financial needs of key workers provides net community benefit in the form of continued delivery of community programs and services to meet the increasing population forecast for Flemington.

**Outstanding Land Tenure Matters**

Council has identified there is approximately 2,698 square metres in outstanding land transfers that will require resolution as part of the renewal project. Currently the Community Gardens at the eastern periphery of the DHHS land is under Council ownership. The future of this area should be resolved in Stage 1 of the Advisory Committee process given the importance of this facility to the residents and location vis-a-vis the wider Debney’s Park precinct.

**Debney Meadows Primary School**

The current land use zoning of the school site is erroneous. Debney Meadows Primary School is currently zoned Public Park and Recreation (PPRZ), and a portion of Debney’s Park open space is zoned for Public Use Zone (PUZ) purposes. The Amendment proposes to apply a PUZ to the school site in place of the PPRZ.

The school sits at a critical location at the interface between the Victoria Street walk ups, Debney’s Park and the established Flemington community to the west. Council is unaware of the views of DEET at this point in time. This component of the Amendment is not supported until the long term future of the school has been determined.

**Social Infrastructure**

The exact structure of what will be delivered on the DHHS land has yet to be finalised, however it is clear there will be additional demand upon Council’s social infrastructure. Council will present further information to the Advisory Committee with regards to these likely additional impacts and proposed mitigation measures.

**Stage 2: Debney’s Park and Environs**

Council recognises the obvious interface between decisions made on DHHS land and the implications and opportunities for Debney’s Park.

The Draft *Debney’s Park Structure Plan* allows Council the community, DHHS and stakeholders to seek direction and advice on the future of Debney’s Park through the Standing Advisory Committee process. Having the *Debney’s Park Structure Plan* incorporated as a Reference Document into the MSS is a suitable method for key matters to be addressed.

The matters that will required to be addressed include the following:

**Debney Meadows Primary School:** A decision on the future of Debney Meadows Primary School will have major implications for the future of Debney’s Park. As such, no decision can be made at this stage as to the future of this part of Debney’s Park.

**Flemington Community Centre:** The Flemington Community Centre has reached a point in time where it is no longer fully fit for purpose. Significant investment in the existing building is no longer viable. The Housing renewal program allows for a new Community Centre to be constructed on DHHS land. This has created the opportunity to explore the future of the land
where the centre currently sits. Options may include using the land for open space and recreation facilities, and/or a building on the site incorporating alternative land use(s) that could include commercial or residential uses, providing that any such uses do not result in a net loss of open space or community facilities.

**Formal and Informal Recreation Opportunities:** The growing population proximate to the park will increase pressure for access to formal and informal recreation opportunities. It is important that funds are available for upgrades of the various elements of the park to ensure high standards are maintained, and that opportunities for improvements are fully captured. This should be in the form of contributions to assist Council with provision of the requisite items.

**Hopetoun Children’s Centre:** The centre is strategically located on the corner of Victoria Street and Racecourse Road and contains a single level building and an at-grade car park. Future opportunities may be presented to repurpose the site that could incorporate additional and, or alternative uses that could support Council’s policy commitments for community infrastructure and, or social housing. This may involve a building envelope more consistent with those being considered by the Committee for the adjacent DHHS land.

It would be Council's intention that should any redevelopment occur that this would entail additional or improved community facilities as well as exploring opportunities for social housing.
2.0 Background

In late 2016 the Minister for Housing announced the Housing Renewal Program. In March 2017, the Victorian Government announced Homes for Victorians, which sets out the Government’s vision for increasing housing access and affordability in the state. The policy includes a number of initiatives to reduce the amount of people on the public housing waiting lists and transition them into appropriate housing. An announcement on the Flemington Housing Renewal was made at that time.

As part of the program, the Victorian Government is providing a significant investment to renew and expand public housing, including through the redevelopment of up to 2,500 public housing dwellings and increasing the number of social housing properties by at least 10 per cent across metropolitan and regional sites.

DHHS has released a Registration of Capability (ROC) to invite responses from market participants in relation to their capability to deliver components of the Housing Renewal Program. This includes their interest in specific sites or groups of sites to inform the packaging of the sites for the release to market in the RFP phase.

The ROC contains the following design and place objectives:

- Deliver new social housing stock in accordance with Better Apartments Design Standards (March 2017) and the Livable Housing Guidelines – gold level (www.livablehousingaustralia.org.au/).
- Produce a design that provides ‘value for money’ asset management and ‘whole of life’ outcomes.
- Deliver well-designed buildings and places that make the most of the identified sites and their opportunities. This will enable the best and most efficient use for owners, occupants and other users while also providing broader benefits such as creating high quality buildings and public spaces.
- Deliver an outcome that has private and social housing dwellings integrated into a unified community.

The ROC process will apply to eight sites across Melbourne, including Flemington.

The Flemington Estate is currently occupied by a number of high density residential buildings with a total of 916 dwellings, serviced by approximately 750 on-site car parking spaces. The Estate’s land area is approximately 6.3 ha.

To facilitate the financing of the redevelopment, each site will introduce the number of private dwellings. The total number of additional private dwellings for each site is still being determined. However the Transport Assessment uses a figure of 825 private apartments for the whole of the DHHS land.

All 198 low rise apartments, the walk-ups, are to be demolished as part of the Flemington Housing Renewal and replaced with 218 new social housing.

Since the Minister for Housing’s original announcement, the Minister for Planning has established the Standing Advisory Committee to consider the Housing Estate Upgrade Program, and provide detailed advice on each site.

Council has undertaken community consultation and an initial assessment of issues and opportunities.
There exists a clear interface between decisions made on DHHS land and outcomes to be achieved on Debney’s Park. This includes the resolution of land tenure and uses and physical and social infrastructure. As such, it is critical that a pragmatic approach is taken in the development of the Planning Framework for the broader area.
Figure 1: Subject site as relates to the CBD and Arden-Macaulay Precinct

Figure 2: Subject site as relates to Racecourse Road, Flemington
3.0 Submission Format

This submission forms Council’s response to the Standing Advisory Committee’s exhibition material referred to as C177. The submission is underpinned by the need to capitalise on the opportunities provided by the Government’s significant investment. This can only be achieved by considering a whole-of-site master planned response to the precinct. This includes optimising the use of land by ensuring strong integration of the Estate with the neighbouring area, and re-introducing a grid pattern for residential streets within the precinct.

The agreed approach with DHHS, DELWP and Council has been that the submission will generally respond to the Stage 1 component of the renewal opportunity. This entails a focus on DHHS land, with the expectation that the Standing Advisory Committee holds a further hearing to consider matter directly relating to the wider Debney’s Park land.

The Flemington Estate and Debney’s Park have a long planning history, which has had an impact on the Estate’s tenants as well as the wider community. Most recently, the East West Link Project was the subject of an 18-month long exercise that saw the potential loss of public open space, community facilities and the possibility of the formal acquisition of Council land. The process included the introduction of a new elevated freeway, close to the existing high rise dwellings and a four-lane road through Debney’s Park. The controls to allow this to proceed were incorporated into the Moonee Valley Planning Scheme via an Incorporated Document, and land acquisition commenced.

The proposed Amendment C177 will result in a significant change to the existing conditions in this part of the municipality. There will be a significant change to the physical and social character of the area, influencing how people use and move through the area. The redevelopment project will not only impact existing Estate residents, but will contribute to a major change to inner metropolitan Melbourne.

Council recognises the need for, and is generally supportive of, the changes the Amendment will facilitate. However this support can only be provided where there is holistic recognition by the key stakeholders of the impacts this scale of change will bring to the area. Council’s support is provided on the basis that there is a commitment to provide the infrastructure investment required to meet the needs of the projected population increase for the precinct.

Council supports a genuine approach to a more integrated (salt and pepper) housing model rather than segregated public or private housing buildings. A genuine integrated approach would reduce stigma associated with public housing estates and support the long term development of an integrated and thriving community.

As such, the submission is formatted to address Stage 1 matters on DHHS land, making recommendations to ensure that an appropriate planning framework and controls are prepared.

For Stage 2, Debney’s Park, and where matters are unresolved in Stage 1, Council will seek guidance and direction from the Committee. This will allow the relevant parties to undertake further work and prepare responses with a view of reaching resolutions on key matters to be embedded in the Moonee Valley Planning Scheme.

Notwithstanding this, it will be important that consideration is given during Stage 1 to the longer term vision for Debney’s Park and the wider area. Given the increased pressure of ongoing population increase, this includes significant opportunities to upgrade and expand the open space area and connections within. Similarly, the interface of Debney’s Park with Moonee Ponds Creek must be considered for future upgrades by Melbourne Water in collaboration with Council and relevant stakeholders.

Council’s presentation to the Committee will build upon the matters raised, any additional matters raised through the formal endorsement process by the Moonee Valley City Council and after considering submissions made by key Government agencies.
The submission will provide general support for the Housing Renewal Program, where it is demonstrated that the issues raised by Council are adequately addressed and that there is a sufficient provision of physical and social infrastructure to support the large increase in the residential population of Flemington.
4.0 Responsible Authority Status

The Amendment proposes the Minister for Planning will become the ‘Responsible Authority’ to approve the required Development Plan and subsequent planning permit applications for the Debney’s Precinct. This means that the Minister for Planning rather than the Council would be responsible for administering and enforcing the planning scheme in relation to the Debney’s Precinct.

Council has previously written to the Minister for Planning, and to the Minister for Housing indicating support for having a single Responsible Authority for the whole of the Debney’s Park Precinct. This decision was taken since it was considered having the Minister for Planning in this role would provide the planning certainty to expedite the whole precinct to be Master Planned.

Following exhibition of the relevant Amendment material and the preparation of the Submission, Councillors considered that the interests of the Moonee Valley community would be best served by having Council remain as the Responsible Authority until such time as a Development Plan has been prepared. It is also considered appropriate that Council remain as the Responsible Authority for all Council owned land.

At the Ordinary meeting of Council held on 22 August 2017, it was resolved that Council:

Write to the Minister for Planning advising that Council will advise the Chair of the Social Housing Renewal Standing Advisory Committee at the forthcoming hearing on Amendment C177 that it is the position of Council that it remains as the Responsible Authority for the whole of the Debney’s Precinct, including DHHS land, until such time as a Development Plan has been prepared to the satisfaction of Moonee Valley City Council in consultation with DHHS, DEET, and Transport for Victoria at which time the Minister for Planning should become the Responsible Authority for the DHHS land.
5.0 Development of Amendment Material

DHHS and Council have jointly worked on the documentation that has been made available for exhibition, however it has been made clear to DHHS that input into these documents have been from officer level only, and cannot be viewed as Council’s final position until the views of the Moonee Valley community have been heard, and full Council endorsement obtained.

As such, there may be points of difference between DHHS and Council on the material exhibited. It was recognised by all parties that it is Council’s prerogative to make its own formal submission to the Advisory Committee on all key matters, through the use of detailed reports and expert witnesses.

On 28 March 2017, Council considered a report on the project and it was resolved that Council would support the Minister for Planning to be the Responsible Authority for the Debney’s Precinct through the forthcoming planning process. This was agreed to by Council on the proviso that a two-staged Advisory Committee process would be provided. For example, this includes that the Stage 1 Hearing’s objective will be to define the potential outcomes for DHHS land and to identify issues and opportunities for the wider area (Debney’s Park and surrounds). The same Advisory Committee would be retained to hear matters relating to Stage 2 at a later date.

Council also gave in-principle support for the relocation of the Flemington Community Centre closer to Racecourse Road in any future development outcomes. DHHS agreed to include a relocated Community Centre Facility within the DHHS land. The exact location and form of such a centre will be discussed further through the next stage.

Since March 2017, further work has continued to be undertaken on a suitable location for the Community Centre. It has become apparent, and mutually agreed between DHHS and Council that a new Community Centre facility located in position adjacent to Debney’s Park would provide a greater flexibility of layout with benefit to users. As such, initial design opportunities for such a Centre are being developed to allow further discussions with DHHS to occur. The Draft Debneys Precinct Structure Plan will be amended to reflect this.

Council has encouraged DHHS to involve Transport for Victoria early in this process to gain an understanding of their commitment to the public transport infrastructure investment required to meet the needs of the projected population increase for the precinct.

The exhibition of proposed planning controls, site, building form, transport implications and wider planning for Debneys Precinct were exhibited under the provisions of the Planning and Environment Act 1987. The proposed Amendment C177 to the Planning Scheme takes the form of:

- Mixed use Zone (MUZ).
- Development Plan Overlay (DPO) that sets the general layout and building envelopes.
- Car Parking Overlay (CPO) that sets the car parking requirements for the site.
- Draft Debneys Structure Plan (MSS)

The Minister for Planning will undertake an amendment to the Moonee Valley Planning Scheme. This will allow DHHS to be in a position to lodge application for each site.
6.0 Community Consultation and Feedback to Council

Throughout the exhibition period, Council attended joint DHHS community and resident meetings and heard directly from Moonee Valley residents. Some of the feedback received related to matters beyond the remit of the Standing Advisory Committee to review or consider, as outlined in the Terms of Reference, and included:

- The suitability of joint venture partnerships as a delivery model
- Leveraging underutilised public land to deliver an increase in social housing
- The dwelling yields needed to achieve an increase of at least 10 per cent in social housing.

There was also the understandable and obvious community concern relating to the relocation process, and how residents would be impacted. Many residents stated that they wished to remain in the area.

The Flemington Housing Renewal project presents an increasingly apparent series of complex challenges that must be addressed. This complexity is generated by a range of factors, but has at its core the fact that the project has different impacts on a variety of groups, many of whom have diverging expectations. The challenge for those involved is to understand the issues and balance the needs of affected parties in various categories. These groups generally include:

- The existing residents of the walk ups that are to be replaced – their issues may include relocation and displacement, size and quality of new dwellings, car parking, access to services and loss of open space.

- Future residents of the proposed private dwellings – managing their expectations for quality buildings, provision of car parking, open space and amenity expectations in, and around an established housing Estate.

- The existing residents of the high rise towers – this community will experience significant change that will be delivered over a period of many years, with impacts to existing car parking arrangements, loss of the current open expanses, additional people on their door step, and with no major upgrades to their own premises as part of the current renewal Program.

The underlying theme of the feedback received is that the community want a place that is safe, accessible and comfortable and has access to great facilities. Flemington Estate should no longer be viewed in terms of a “stand alone” place but as one that is integrated as part of the wider community.

Underpinning the Victorian Government’s Housing Renewal Program is the promise of improved social cohesion and the associated positive outcomes. There is a general expectation that in return for this significant change, there is an accompanying upgrade to the wider public realm. This includes improved transport and social infrastructure to ensure the existing Flemington Housing Estate achieves full integration into the wider community.
Stage 1: DHHS Land

7.0 Housing Demand and Affordability in Moonee Valley

Current Flemington Profile

There is very little affordable housing stock throughout the municipality, with the 2011-2016 period indicating a further decline in affordable rental properties. This is particularly evident in regards to 1 and 2-bedroom units. DHHS defines affordability as rent costing no more than 30 per cent of household income. Using this benchmark, the *DHHS Rental Report (2016)* reveals that only 1 per cent of rentals in the municipality are affordable. This is significantly lower than the 8.2 per cent reported for metropolitan Melbourne.

In June 2017, Essential Economics prepared an *Affordable Housing for People with a Disability Report* for Council. The report revealed that in 2011 5.1 per cent of households in the municipality comprised of social housing rentals. Of this figure, over 25 per cent lived in Flemington with a significant proportion occupying public housing dwellings (Figure 3).

There has been a rise in the resident population of Flemington (including Travancore) from 9,553 in 2011 to 10,122 in 2016. This is projected to continue to increase to 15,665 in 2036. It should be noted that this figure does not consider the current intensity of residential development in the area, and the subsequent population growth. The increase of people moving to Flemington will put further demand on the provision of affordable housing and housing diversity in the area.

![Figure 3: Social Housing Locations in the City of Moonee Valley, 2011](image)
Dwelling Numbers

There will be an increase in the number of walk-ups and 825 proposed private dwellings. This will have an impact on those in the wider Flemington community, and the existing residents in the high rise towers, whose needs should be considered throughout the Amendment. The Flemington Renewal Program will add approximately 1,600 private housing residents and increase the social housing provisions. This will bring significant changes to the demographic profile of Flemington and undoubtedly, will have an impact on the need and provision of social infrastructure.

Site Development Assumptions

Council has assumed the total number of new dwellings will be 1,043 which includes 218 new social housing units and 825 private dwellings. Based on the figures taken from the Beveridge Williams Traffic Report (April 2017), 1 and 2-bedroom dwellings will be dominate the private dwelling stock, and this will influence the demographic profile of the projected private housing residents. It is likely that the site’s profile will be in line with trends from other higher density development within Moonee Valley, such as the nearby 1 Ascot Vale Road redevelopment.
8.0 Strategic Planning Justification for the Redevelopment

City of Melbourne Arden-Macaulay Structure Plan

The area to the immediate south of Racecourse Road and the municipal boundary, is subject to proposed Amendment C190 in the City of Melbourne. It is understood that Amendment C190 has been adopted by the City of Melbourne and that DELWP advice is near final approval.

It is critical any consideration of Amendment C177 has regard for the City of Melbourne’s Amendment C190, given the scale of the future development proposed at Arden-Macaulay and its proximity to the DHHS site and Debney’s Park. According to the *Melbourne Metro Business Case 2016*, the Arden-Macaulay growth area projects an additional 22,500 residents to move to the area by 2040 (Arden-Macaulay Structure Plan 2012) and an additional 43,500 jobs by 2050.

The *Arden-Macaulay Structure Plan* is framed around compatible built form comprising medium rise attached buildings and a preferred street profile of 1:1 (street width to street wall height ratio) and a tailing down of development toward residential edges. This vision also seeks to define three Activity Nodes which will serve as Neighbourhood Centres with active uses and facilities in North Melbourne, Macaulay and Racecourse Road. The Structure Plan seeks to embed goals for open space and recreation initiatives through the establishment of new parks and green spines along Moonee Ponds Creek.

Built form along the northern edge of the *Arden-Macaulay Structure Plan* interfaces with Racecourse Road, and stipulates a 9-storey building height with a maximum height of 12-storeys where community benefit can be demonstrated. It is considered that planning controls for the Flemington Housing Estate should align with Amendment C190 and be viewed as a northern extension to this precinct.
9.0 Planning Framework and Strategic Justification

Planning Framework

Strong policy support and strategic justification for a higher density redevelopment of the Flemington Housing Estate site can be found at State and Local level within the Victorian Planning Framework. Contributing to this is the:

- strategic location of Flemington within metropolitan Melbourne,
- the inherent development opportunities within the site in terms of under-utilised areas,
- improvements to existing social housing,
- opportunity to create additional social housing in various forms of tenure, and
- opportunity to create additional private housing in a key location.

Council’s position with respect to the planning framework is that the proposed Development Plan Overlay for the site could be further refined. This is to achieve a closer alignment with key policies and strategies contained within Plan Melbourne 2017-2050, State and Local Planning Policy Frameworks and Infrastructure Victoria’s 30 year Strategic Plan.

Plan Melbourne 2017 - 2050

The proposed amendment broadly aligns with the outcomes, directions and policies of Plan Melbourne 2017–2050.

Outcome 2 – Melbourne provides housing choice in locations close to jobs and services

Direction 2.1: Manage the supply of new housing in the right locations to meet population growth and create a sustainable city.

Policy 2.1.2: Facilitate an increased percentage of new housing in established areas to create a city of 20-minute neighbourhoods close to existing services, jobs and public transport.

- The proposal to redevelop the Flemington Housing Estate at higher residential densities is consistent with Direction 2.1 of Plan Melbourne given the site’s proximity to existing services and public transport. Additional investment in transport infrastructure will strengthen transit-oriented development and ensure the site’s strong potential to be considered a 20-minute neighbourhood. This is particularly relevant to the aspects of the proposal that are closest to Racecourse Road where the majority of the new development will be focussed.

Direction 2.2: Deliver more housing closer to jobs and public transport.

Policy 2.2.3: Support new housing in activity centres and other places that offer good access to jobs, services and public transport.

- Flemington – Racecourse Road is designated as a major activity centre in Plan Melbourne 2017–2050 and, as such, the proposal is consistent with Direction 2.2 and Policy 2.2.3.

Direction 2.3: Increase the supply of social and affordable housing.

Policy 2.3.1: Utilise government land to deliver additional social housing.
• The intent of the Flemington Public Housing Renewal is to increase the yield of social housing at the site by at least 10 per cent which is consistent with this direction and policy. However, in Council’s view, it is important that affordable housing outcomes are also achieved as part of the project, particularly in light of the Homes for Victorians strategy.

**Direction 2.5:** Provide greater choice and diversity of housing.

**Policy 2.5.1:** Facilitate housing that offers choice and meets changing household needs.

• In order to address Direction 2.5 and Policy 2.5.1 it is recommended the proposed Development Plan Overlay Schedule 8 (DPO8) includes a requirement for an appropriate mix of dwelling sizes to cater to an increasingly diverse demographic, as well as providing for adaptable housing which can accommodate the changing needs of occupants over time. Council recommends a maximum of 30% 1 bedroom dwellings, 50% 2 bedroom dwellings and 20% 3 bedroom plus dwellings. This recommendation is based on the projected demographic profile of the site (including the private and social housing stock) included in this submission.

**Outcome 5 – Melbourne is a city of inclusive, vibrant and healthy neighbourhoods**

**Direction 5.1:** Create a city of 20 minute neighbourhoods

**Policy 5.1.1:** Create mixed-use neighbourhoods at varying densities

• Council is supportive of the application of the Mixed Use Zone (MUZ) to facilitate the redevelopment of the Flemington Housing Estate. The concept of the 20-minute neighbourhood is strengthened by providing a diverse range of housing choices proximate to the Racecourse Road Major Activity Centre, Flemington Bridge Station and Newmarket Station, routes 57 and 59 tram lines and the Capital City bicycle path.

• The use of the MUZ will also encourage ground floor retail and commercial activation of proposed buildings within the development. This reinforces the objective of a connected neighbourhood in which residents have access to local jobs, retail activity and services.

**Activity Centres**

• *Plan Melbourne* establishes a hierarchy of Activity Centres, within which Metropolitan Activity Centres are the highest tier. There are nine existing and two future Metropolitan Activity Centres identified in *Plan Melbourne*, none of which are in within the City of Moonee Valley City.

• Metropolitan Activity Centres are supported by a network of Major (middle tier) and Neighbourhood (lower tier) Activity Centres of varying size, role and function. Major Activity Centres in Moonee Valley include Airport West, Moonee Ponds, Niddrie-Keilor Road, North Essendon, Ascot Vale-Union Road and Flemington-Racecourse Road.
Figure 4: Plan Melbourne Activity Centre Map (Department of Environment, Land, Water and Planning)

State Planning Policy Framework

The proposed amendment generally accords with the State Planning Policy Framework (SPPF) as set out in the Moonee Valley Planning Scheme. Council recommended changes to ensure that the renewal project has greater consistency with these key policies.

SPPF Clause 11.02-1 – Supply of Urban Land

Objective: To ensure a sufficient supply of land is available for residential, commercial, retail, industrial, recreational, institutional and other community uses.

Strategy:
Planning for urban growth should consider:
Opportunities for the consolidation, redevelopment and intensification of existing urban areas.

- The proposed amendment represents an intense re-development of a highly connected existing urban area in a key strategic location for the municipality.

SPPF Clause 16.01-1 – Integrated Housing

Objective: To promote a housing market that meets community needs.

Strategy: Increase the supply of housing in existing urban areas by facilitating increased housing yield in appropriate locations, including under-utilised urban land.

Strategy: Ensure that the planning system supports the appropriate quantity, quality and type of housing, including the provision of aged care facilities, supported accommodation for people with disability, rooming houses, student accommodation and social housing.

Strategy: Ensure housing developments are integrated with infrastructure and services, whether they are located in existing suburbs, growth areas or regional towns.

Strategy: Facilitate the delivery of high quality social housing to meet the needs of Victorians.

- The amendment proposes to increase the supply of social and private housing in an established and well connected area of inner Melbourne. It is recommended that the integration of the proposal with its adjoining infrastructure and services is optimised by providing improved connections both internally within the site and along its external interfaces, particularly prioritising active transport options such as walking and cycling.

- The proposal provides the opportunity to provide for the needs of a diverse group, including a range of aged care facilities, supported accommodation for people with disabilities and larger scale dwellings within the redevelopment to ensure that new social and private housing. Council also recommends that this is applied to any affordable housing included in the project. Council will work closely with DHHS through the implementation of the renewal program to determine that the needs of these groups can be met where possible.

SPPF Clause 16.01-2 – Location of Residential Development

Objective: To locate new housing in or close to activity centres and in urban renewal precincts and sites that offer good access to jobs, services and transport.

Strategy: Increase the proportion of new housing in designated locations within established urban areas and reduce the share of new dwellings in greenfield and dispersed development areas.

Strategy: Encourage higher density housing development on sites that are well located in relation to jobs, services and public transport.

Strategy: Ensure an adequate supply of redevelopment opportunities within established urban areas to reduce the pressure for fringe development.

Strategy: Facilitate residential development that is cost-effective in infrastructure provision and use, energy efficient, incorporates water efficient design principles and encourages public transport use.
• The Flemington Housing Estate site is located within an established urban area with good access to public transport and services. A higher density redevelopment of this site will reduce development pressure on the city’s urban fringe. Any redevelopment of the site should comply with Clause 21.04-3 (Ecologically Sustainable Development) and Clause 22.03 (Stormwater Management – Water Sensitive Urban Design) of the Moonee Valley Planning Scheme.

SPPF Clause 16.01-4 – Housing Diversity

Objective: To provide for a range of housing types to meet increasingly diverse needs.

• The proposed redevelopment of the Flemington Housing Estate represents an opportunity to improve the diversity and provision of both social and private housing in an established and well-connected area. It is recommended the proposed Development Plan Overlay for the site includes a requirement for an appropriate mix of dwelling sizes to cater to an increasingly diverse demographic.

SPPF Clause 16.01-5 – Housing Affordability

Objective: To deliver more affordable housing closer to jobs, transport and services.

Strategy: Improve housing affordability by:
• Ensuring land supply continues to be sufficient to meet demand.
• Increasing choice in housing type, tenure and cost to meet the needs of households as they move through life cycle changes and to support diverse communities.
• Promoting good housing and urban design to minimise negative environmental impacts and keep down costs for residents and the wider community.
• Encouraging a significant proportion of new development to be affordable for households on low to moderate incomes.

Strategy: Increase the supply of well-located affordable housing by:
• Facilitating a mix of private, affordable and social housing in activity centres and urban renewal precincts.
• Ensuring the redevelopment and renewal of public housing stock better meets community needs.
  o It is considered the redevelopment of this site should provide for affordable housing stock in addition to social and private housing as a means to address the issue of housing affordability in the wider metropolitan area. It is recommended a requirement of 10 per cent affordable housing stock is included as a General Requirement in the proposed Development Plan Overlay Schedule 8 (DPO8).

Clause 18.01-1 – Land Use and Transport Planning

Objective: To create a safe and sustainable transport system by integrating land-use and transport.

Strategy: Plan urban development to make jobs and services more accessible by:
• Coordinating improvements to public transport, walking and cycling networks with the ongoing development and redevelopment of the urban area.
• Requiring integrated transport plans to be prepared for all new major residential, commercial and industrial developments.
• Promote walking and cycling when planning for new suburbs, urban renewal precincts, greyfield redevelopment areas and transit-oriented development areas (such as railway stations).

  o The proposed redevelopment should maximise its connections with key nearby transport nodes such as Flemington Bridge Station, Newmarket Station, the Capital City Bicycle Trail, Mt Alexander Road and Racecourse Road Strategic Cycling Corridors, the Route 57 tram along Racecourse Road and the Route 59 tram along Mt Alexander/Flemington Road. The Development Plan in particular should address walking and cycling connectivity to Flemington Bridge Station and the Route 59 tram, acknowledging the present physical barriers (such as Moonee Ponds Creek) between the site and these nodes.

Local Planning Policy Framework

The proposal to introduce additional higher density built form and increased residential density is generally consistent with local policy in the Moonee Valley Planning Scheme, however, as with Plan Melbourne 2017–2050 and State Planning Policy Framework, there are some recommendations provided in order to achieve greater policy alignment.

Clause 21.03-2 – Strategic Planning Vision

Council’s Strategic Planning Vision for the municipality has seven themes. It is considered the proposed amendment aligns with, or has the potential to align with, the relevant themes as follows:

• Council’s vision for Sustainable Environment is for, amongst other things, a thriving urban ecology that provides livability and wellness for the community, a connected city and a conscious city which makes efficient use of resources. Whilst the proposed mixed-use redevelopment will contribute to the connected city component of this vision due to the advantages of medium to high density development in highly connected areas such as Flemington there is more detail required as to how a thriving urban ecology and a resource efficient city will be achieved. To assist in meeting these objectives Council has made recommendations relating to open space provision and ecologically sustainable development requirements which are discussed later in this submission.

• The municipal vision for Housing is for an inclusive, sustainable and livable community, a diverse range of housing which meets existing and future needs in appropriate locations and new development that enhances existing unique character. The redevelopment of the Flemington Housing Estate represents a significant opportunity to contribute to Council’s Housing Vision by providing a diverse range of both social and private housing, including affordable housing, at a density appropriate to the site. To this end, Council recommends the proposed Development Plan Overlay requires a mixture of dwelling sizes to both the social and private stock (maximum of 30 per cent 1-bedroom dwellings, a maximum 50 per cent 2-bedroom dwellings and a minimum of 20 per cent 3-bedroom plus dwellings) as well as a requirement for the provision of affordable private housing at a rate of 10 per cent.
• In terms of the **Built Environment**, Council’s vision is for architecture and building design which responds to the environment, local character and context of the area, with environmental sustainability as a consideration as well as the prioritisation of public safety, health and wellbeing and an active public realm. The redevelopment of the Estate should achieve Council’s Built Environment vision by responding to its existing and future context. It is considered that the scale of built form allowed for in the proposed Development Plan Overlay will result in building heights which are out of context with the existing and emerging context of the locality.

• Of particular contextual importance is the Arden-Macaulay urban renewal area which is located immediately to the south of the estate, and where building heights are envisaged to range between 9 – 12 stories. Refer to the Urban Design Assessment for further discussion on Council’s assessment of the proposed built form.

• Council seeks to develop economically, environmentally and socially sustainable **Activity Centres** which provide for a range of goods, services, facilities and diverse housing and transport options for the community. Each activity centre is to be a vibrant community place that retains unique identity and character.

• Due to its location within the Racecourse Road Major Activity Centre (**Plan Melbourne 2017–2050**), the redevelopment of the Flemington Housing Estate provides an opportunity to contribute to the vibrancy of the Activity Centre in accordance with Council’s Activity Centre vision. The redevelopment in particular should increase the availability of diverse housing in this key local precinct.

• Council’s vision for **Economic Development** is for a city which is vibrant, diverse and attractive and that meets the needs of the growing population to live, work, invest and prosper and support emerging business opportunities. Council is therefore supportive of the proposed application of the Mixed Use Zone to the site due to the flexibility it provides in terms of retail, commercial and medical uses.

• Moonee Valley’s strategic planning vision for **Transport** is to have a range of choices for how people move within and to and from the municipality, with a priority for sustainable transport modes. As discussed throughout this submission, the subject site is advantageously located within close proximity to a number of key transport nodes, such as Flemington Bridge Station and Newmarket Station, tram routes 57 (West Maribyrnong – Flinders Street) and 59 (Airport West – Elizabeth Street), Racecourse Road and Mt Alexander Road and the Capital City Bicycle Trail. The challenge posed by the redevelopment will be to improve connections to and from these nodes from within the site and along its edges.

• Council’s **Social and Physical Infrastructure** vision for the municipality seeks to provide a linked, sustainable and accessible system of quality open spaces and community facilities. Debney’s Park will continue to fulfill this function in terms of open space, whilst it is recommended that the Flemington Community Garden is relocated to within the site (at ground level) to increase on-site amenity. The Garden plays an important role in the community and is highly valued by those that use it. As such, any relocation would be required to be undertaken with extensive consultation with users and stakeholders to ensure that consideration is given to their needs.

Clause 21.03-2 also introduces Council’s Strategic Framework Plan which identifies the principal, major and neighbourhood activity centres within the municipality as well as its employment nodes. The plan clearly illustrates the strategic advantages of the Flemington site given its proximity to the Racecourse Road major activity centre as well as employment nodes along Racecourse and Mt Alexander Road.
Infrastructure Victoria – 30 Year Strategy

Infrastructure Victoria is tasked with ensuring the future of Victoria is planned with transparent, independent and exert infrastructure advice and seeks to guide decision making and enhance public debate about Victoria’s future. The number one key role of the organisation is to prepare a 30 year infrastructure strategy for the State, which was completed in 2016 and contains 137 initiatives/recommendations, most of which address large scale metropolitan or regional objectives.

The recommendations of the 30 year strategy are largely high level and therefore do not directly relate to the Flemington proposal, however the high density redevelopment of the Flemington Housing Estate is consistent with two of Infrastructure Victoria’s top three recommendations:

1. Increasing densities in established areas and around employment centres to make better use of existing infrastructure.

3. Investing in social housing and other forms of affordable housing for vulnerable Victorians to significantly increase supply.

Council contends that the Flemington Housing Estate renewal should include the provision of affordable housing units on site as this would align with Infrastructure Victoria’s 30 Year Strategy.
10.0 Affordable and Adaptable Housing

Municipal Strategic Statement

Council’s strategic planning vision for housing is, amongst other things, for “an inclusive, sustainable and liveable community where all residents will enjoy a good quality of life”. A crucial factor in achieving this is addressing the increasing need for the provision of affordable housing in the municipality. This is particularly important given today’s economic climate in which housing costs have experienced uninterrupted growth in inner and middle ring suburbs, which are conveniently located proximate to transport, services, employment, schools, parks and other amenities. Clause 21.05-3 (Affordable Housing) of the Moonee Valley Planning Scheme therefore contains the following objective and strategies:

Objective: To improve housing affordability within the municipality for households with household incomes below the 60th percentile of income groups.

Strategy: Encourage affordable housing in locations with good access to public transport, services and retail opportunities.

Strategy: Encourage affordable housing through partnerships with housing providers or participation in the National Rental Affordability Scheme.

Strategy: For residential developments of 10 or more dwellings, encourage the provision of affordable dwellings.

Given the subject site’s strategic location, which has been discussed at length in this submission, and the scale of the redevelopment proposed, it is Council’s position that affordable housing stock be provided in addition to the planned uplift of social housing. This position is formed in accordance with Council’s Affordable Housing policy which forms part of the Municipal Strategic Statement.

Plan Melbourne

Plan Melbourne 2017–2050 sets out directions and policies to guide the future growth of Metropolitan Melbourne. It includes broad directions and policies relating to housing affordability and diversity as follows:

Direction 2.3: Increase the supply of social and affordable housing.

Policy 2.3.1: Utilise government land to deliver additional social housing.

Direction 2.5: Provide greater choice and diversity of housing.

Policy 2.5.1: Facilitate housing that offers choice and meets changing household needs.

- Council subsequently contends that for the redevelopment of the Flemington Housing Estate to align with Plan Melbourne, there needs to be a greater focus on including affordable housing into the mix and ensuring that the social and affordable dwelling stock provided by the redevelopment caters to a diverse range of needs. This means providing housing for different household sizes (i.e. number of bedrooms) as well as providing adaptable housing which meets the long term needs of occupants.

Homes for Victorians

The Terms of Reference for the Committee does not allow for consideration of
a. the increasing demand for one and two bedroom social housing dwellings;
b. the suitability of joint venture partnerships as a delivery model;
c. leveraging under-utilised public land to deliver an increase in social housing;
d. the dwelling yields needed to achieve an increase of at least 10 per cent in social housing and;
e. the appropriateness of community housing providers to administer the provision of social housing.

As per the Minister’s Terms of Reference the Committee is tasked with addressing:

The appropriateness of the proposal in reference to key strategies including Home for Victorians and Plan Melbourne 2017-2050.

The Victorian Government announced the Homes for Victorians strategy as part of its 2017/18 budget. The strategy aims to address housing affordability in Victoria and includes funding packages targeted towards improving the quality of social housing, increasing affordable housing options and rental assistance schemes.

The Homes for Victorians strategy defines affordable housing as housing that is appropriate for the needs of a range of very low to moderate income earners, and priced so these households are able to meet their essential basic living costs. Generally, this is defined as housing that costs no more than 30 per cent of gross household income. The Affordable Housing for People with Disability Study prepared for Council indicates that there is limited affordable housing stock that has been included in developments currently holding planning approvals or under construction in the municipality. The Flemington Public Housing Renewal has the potential to fill this gap in the market by providing more affordable housing alongside existing increases in social housing.

With the release of the Homes for Victorians strategy, there exists a widespread recognition that housing is becoming increasingly unaffordable for a significant proportion of Victorians. It is Council’s submission that the Flemington Public Housing Renewal presents a major opportunity for the Government to begin meeting this housing challenge and deliver on many of the strategy’s initiatives. This includes:

Initiative 2.2: Increasing development opportunities in the inner and middle suburbs

Initiative 2.4: Inclusionary housing to increase the supply of social and affordable housing

By definition, the Flemington Housing Estate redevelopment will fulfil Initiative 2.2 through the provision of additional housing on the site. This increase in development will benefit from the site’s strategic proximity to Melbourne CBD and public transport options, as previously discussed.

A component of Initiative 2.4 is the Inclusionary Housing Pilot program where developers will be offered surplus Government land at discounted prices as an incentive to provide new social housing as part of any redevelopment. Council acknowledges that the Flemington site is not surplus Government land and that the proposed redevelopment is already seeking to increase social housing units on the site. However, the renewal project presents the opportunity to have a pilot program as a means of achieving the provision of affordable housing units in addition to the social housing uplift.
Initiative 2.4 also introduces a framework for inclusionary housing in major developments which will give developers and Councils the ability to enter into partnerships and provide social and affordable housing in private developments. In exchange for rezoning approval or permit uplift conditions, developers could enter into agreements to:

- Transfer ownership of an agreed number of dwellings to a community housing association or the Director of Housing for use as social housing;
- Sell dwellings to a community housing association at a negotiated discounted price to be used in perpetuity as affordable rental;
- Establish rent-to-buy schemes where Victorians struggling to enter the owner-occupied housing market commence as tenants on subsidised rent, but are then eventually provided with the opportunity to purchase the property; and
- Offer units for sale to first home buyers through a shared equity scheme.

At this stage, the process for awarding the development contracts for the Flemington site is unclear. However Council would expect that an agreement in one or more of the above formats will be reached to secure the provision of extra affordable housing units at the site.

**Initiative 3.3: Making long-term leasing a real option for Victorians.**

- Council supports the initiative to introduce optional standard long-term leasing agreements for landlords and tenants. It is considered that this is a good way to improve housing security for renters, particularly families, and it is envisaged that future occupants of the redeveloped Flemington Housing Estate will benefit from this initiative.

**Initiative 4.1: A new Social Housing Growth Fund**

**Initiative 4.2: Building more social housing and redeveloping ageing supply**

**Initiative 4.3: Financial backing for the community housing sector**

**Initiative 4.4: Increasing the capacity of the community housing sector**

The four initiatives listed above have, or will, clearly benefit the existing residents at the Flemington Housing Estate as well as future occupants of the site for whom new housing opportunities will be provided. Council is supportive of the initiative to redevelop the Estate for the stated aim of renewing existing social housing stock whilst simultaneously providing additional social housing.

A higher ratio of affordable housing could be provided at the site given that Government, as the land owner, can take the opportunity to create net community benefit in accordance with its recently established policy. There is an opportunity to provide affordable housing stock along with private dwellings. Council recommends that this is provided at a rate of 10 per cent.
11.0 Planning Controls

Existing Planning Controls

Debney’s Precinct is affected by the provisions of the Moonee Valley Planning Scheme and includes the Flemington Housing Estate (land owned by DHHS) and Debney’s Park (land owned by Council). The current zoning of the Precinct is summarised as follows:

- General Residential Zone (GRZ) applies to the Flemington Estate, Hopetoun Children’s Centre and a small portion of Debney’s Park fronting Victoria Street.
- Public Parks and Recreational Zone (PPRZ) relates to Debney Meadows Primary School and also applies to the remainder of Debney’s Park.

Current overlay provisions that apply to the Precinct include;

- Design and Development Overlay – Schedule 3 (DDO3) which applies to the Mt Alexander Road frontage of Debney’s Park.
- Citylink Project Overlay (CLPO) which runs along the eastern boundary.
- Environmental Significance Overlay – Schedule 2 relates to significant trees within Debney’s Park.
- Land Subject to Inundation Overlay relates to areas within Debney’s Park.
- Incorporated Plan Overlay – Schedule 5 relates to areas within Debney’s Park and Debney Meadows Primary School.

The existing General Residential Zone does not reflect the existing high density of the land and limits the potential for increased housing density and diversity of land uses.

Proposed Planning Controls

The proposed Amendments are:

- Mixed Use Zone (MUZ) to apply across the Flemington Estate. This will support the preferred housing density and resultant built environment in a suitable location. The MUZ will also enable the provision of a broader range of land uses, such as retail, commercial and community facilities, to provide for the needs of the local community. The MUZ also potentially allows for medical centre uses (subject to floor area conditions) and residential aged care facilities. Council is supportive of the application of the MUZ to the entire site, on the condition that there is a guaranteed commitment to provide retail and commercial uses in the areas specified in the DPO8. It should be noted that the provision of retail and commercial uses is not mandatory in the MUZ.

- Public Use Zone – Schedule 2 (PUZ2) relates to the adjoining Debney Meadows Primary School. The zoning incorrectly applied to the northwest corner of Flemington estate is proposed to be rectified through this amendment. The PUZ2 prohibits the use of the land for residential purposes.

The proposed overlay provisions for the Debney’s Precinct are summarised as follows;

- The application of the Development Plan Overlay (DPO) will provide a framework to guide the future residential development of the Flemington Estate. The DPO Schedule 8 will outline design responses expected for the Flemington Estate. The application of
the DPO aims to provide assurance to government agencies, Council, developers and the local community about future development outcomes on the land.

- The application of the Parking Overlay (PO) seeks to facilitate an appropriate provision of car parking spaces for residential uses within the Flemington Estate.
- All other overlay provisions relating to Debney’s Park are proposed to be retained.

The Debney’s Precinct Structure Plan provides a holistic approach to future development and enhancement of this precinct to meet the existing and future needs of the community. It is proposed to be included in Clause 21.06 (Built Environment) of the Moonee Valley Planning Scheme as a reference document.

**Recommended Changes**

Council is generally supportive of the form of the amendment that will allow for the implementation of the Housing Renewal Program. Council also supports the use of the MUZ, Structure Plan, DPO and CPO as means of directing land use, car parking and built form outcomes at the site.

However it is Council’s view that some of the planning mechanisms currently proposed lack sufficient detail and do not provide assurances about the future development outcomes of the Flemington Estate and wider precinct.

To this end, Council has provided a summary of issues and recommended changes to the planning controls below. Track changes to the exhibited DPO8 are also provided as Attachment 1 to this submission. Key elements of Council’s position are:

- More detail should be specified, particularly in the Development Plan Overlay (DPO) and associated Structure Plan, to ensure future urban form is clearly presented and achieves Council’s objectives for the site, which above all was to ensure the inclusion of strong and specific requirements in the proposed controls.

- There are disparities between the Design Framework Plan, Structure Plan and DPO that presents challenges in analysing the cumulative impact of building heights and population densities. The parcel areas in the DPO do not correlate with the parcel areas in the Design Framework.

- Ensure that all nominated building heights are mandatory rather than discretionary, particularly by avoiding the use of the word “should”.

- Ensure any references to ‘Merri Creek’ in the DPO are replaced with ‘Moonee Ponds Creek’.

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<thead>
<tr>
<th>DPO8 Clause</th>
<th>Recommended Change / Inclusion</th>
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<tbody>
<tr>
<td>2.0 Conditions and Requirements for Permits</td>
<td>• It is recommended that the standards for the Construction Management Plan/Strategy be relocated to Clause 3.0 of the DPO schedule, and consequently that a Construction Management Plan/Strategy be required to form part of any Development Plan prepared.</td>
</tr>
<tr>
<td>3.0 Requirements for Development Plan - General</td>
<td>• It is considered any redevelopment of this site should provide affordable housing stock in addition to social and private housing, as a means to address the issue of housing affordability in the wider metropolitan area. It is recommended that this is included at a rate of 10 per cent. Council</td>
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acknowledges that a rate of 5 percent was decided on through the panel process for the Flemington Life and Moonee Valley Racecourse developments, however it should be noted that these occurred prior to the release of Homes for Victorians.

- It is recommended an appropriate mix of dwelling sizes is required in the DPO to cater for an increasingly diverse demographic.
- A requirement for adaptable apartments should be included in the DPO at minimum rates of 1 in 50 for 2-bedroom dwellings and 1 in 10 for 3-bedroom plus dwellings. Further, adaptable housing should comply with Australian Standard 4299.
- The inclusion of the following objective is recommended: “To deliver an exemplary environmentally sustainable development, incorporating leading practice in climate adapted and Water Sensitive Urban Design, sustainable building design and construction, low carbon energy systems and energy efficiency and waste minimisation”.

### 3.0 Requirements for Development Plan – Built Form

- The renewal of the Flemington Estate must be cognisant of existing built form context and likely future development outcomes on the site. In particular this means acknowledging Flemington Hill to the west of the site (generally low medium rise residential), the remaining DHHS high rise buildings at 20-storeys, and the emerging Arden-Macaulay Renewal area to the south.
- The differential nature of the existing and proposed building forms creates a significant challenge to ensure that the best outcome is achieved on the DHHS site. The existing high rise towers set the bench mark standard for future outcomes,
- The development should act as a reference point for future developments in the area, and also integrate with the proposed Arden-Macaulay Renewal area to the south. (Built form along the northern edge of the Arden-Macaulay Structure Plan, which has a direct interface with Racecourse Road, stipulates a 9-storey building height with a maximum height of 12-storeys where community benefit can be demonstrated.)
- Development above 5 storeys should be required to provide a podium to define the street wall. All building podiums should:
  - Be oriented to complement the street system.
  - Be of a scale that provides an appropriate level of street enclosure having regard to the width of the street.
  - Include high quality treatments to side walls where visible above adjoining buildings.
  - Be designed to internalise above-ground car parking behind active uses such as dwellings, to ensure a visual relationship between occupants of upper floors and pedestrians to improve surveillance of the public realm.
  - Be able to mitigate wind impacts at street level.
- The DPO should specify minimum setbacks between buildings according to their height in order to protect internal amenity for residents. Council recommends:
  - A 6 metre setback between buildings for developments between 6 – 10 storeys,
  - A 10 metre setback between buildings for developments of 11 storeys and above
- The DPO should make the following specifications with respect to the design of towers:
  - Achieve equitable distribution of access to an outlook for public and private housing, sunlight between
towers and adequate sun penetration at the street level.
  - Ensure habitable room windows do not directly face one another and that consideration is given to the development potential of adjoining lots (equitable development).
  - Ensure that sunlight, good daylight and privacy and an outlook from habitable rooms for both the existing and proposed towers can be provided.
  - Distribution of blind tenure between all parcels ("tenure blind").
  - Active design guidance for pre-podium levels.
  - Appropriate noise and vibration attenuation measures to minimise noise, vibrations and air pollution impacts on proposed dwellings from CityLink, the Upfield Railway Line, Racecourse Road and any non-residential uses on the site.
  - It is recommended building forms on the site should minimise the adverse impacts of wind on streets and public spaces, and provide weather protection where appropriate.
  - A Wind Impact Analysis should be prepared to ensure the built form arrangement achieves acceptable standards in regard to pedestrian comfort and safety. The design should give consideration to management measures such as stepped facades, articulated facades and wind screening in order to ensure a hospitable environment for trees and residents is retained.

### 3.0 Requirements for Development Plan – Landscape and Open Space

- Retention of trees identified in the Homewood Consulting Arborist’s Report submitted by Council dated 19 July 2017 where mitigation measures can be deployed to ensure their retention.
- Replacement of the 9 trees assessed in the Homewood Consulting Arborist’s Report and listed for removal with trees that provide equivalent amenity value to residents and the public realm.
- The primary new public open space is provided to the north of the site, adjacent to Debney’s Park, in order to enhance this existing asset, with additional open spaces to align with the locational allocation indicated in the Urban Design report.
- Relocate the Flemington Community Garden to within the Flemington Housing Estate, with a major frontage to Debney’s Park.

### 3.0 Requirements for Development Plan – Circulation

- Further to built form concerns, the connectivity and activation between the north and south of Racecourse Road is of primary importance if they are to integrate into one precinct in the future, particularly direct connectivity to Debney’s Park. Of particular importance is the north-south connection from Stubbs Street. The DPO8 should show or make provision for active retail/commercial frontages along this north-south corridor that connects to Stubbs Street to the south of Racecourse Road, with the alignment thorough the precinct to align with Stubbs Street with no deviations.
- The Development Plan in particular should address walking and cycling connectivity to Flemington Bridge Station, Newmarket Station, the Capital City Bicycle Trail, Mt Alexander Road and Racecourse Road Strategic Cycling Corridors, the Route 57 tram along Racecourse Road and the Route 59 tram along Mt Alexander/Flemington Road.
- There are currently no specification, dimensions or hierarchy for internal streets and key pedestrian/cycling linkages. It is
recommended these details be incorporated into the DPO to ensure that internal streets are connected to the wider street network (see further detail within the Urban Design Assessment section of this submission). There are no details within the DPO about how the built form should interface with internal streets.

- The Racecourse Road streetscape plan is a City of Melbourne action for the 17/18 year and will link with the City of Moonee Valley Streetscape and Activation Plan.
- The Streetscape and Activation Plan for the Racecourse Road and Pin Oak Crescent Shopping Precinct (to the west of the subject site) recommends a range of physical improvements to the streetscape, as well as suggested activities and events where the community, traders and Moonee Valley City Council can work together to make the precinct more vibrant and lively.
- The plan has been informed by: a review of existing plans, policies and strategies relevant to the project; extensive consultation with stakeholders, traders, interest groups and the community; combined with onsite observations of usage and an assessment of streetscape elements and character.
- The redevelopment of the DHHS site presents the opportunity to extend the works to the east, along the front of the DHHS site. This will allow a continuation of the key streetscape elements that can assist in physically integrating the Debney's precinct into the wider area.
- Council strongly recommends that the recommendations of Streetscape and Activation Plan are delivered in conjunction with the current project, including interface with Racecourse Road and associated setbacks that will be determined.
- The Development Plan should make provision for:
  - The continuation of the key streetscape elements that can assist in physically integrating Debney's precinct into the wider area.

3.0 Requirements for Development Plan – Required documents, plans and reports - #1 A Planning Report

- As part of the Development Plan, it is recommended a Planning Report is prepared (to the satisfaction of the Responsible Authority), that demonstrates how the recommendations of the Integrated Transport and Traffic Management Plan, Construction Management Plan/Strategy, Environmental Site Assessment, Adverse Amenity Impacts Report, Stormwater Drainage Master Plan and Ecologically Sustainable Development Plan have been incorporated into the proposed development of the land.

3.0 Requirements for Development Plan – Required documents, plans and reports - #6 A Landscape and Open Space Plan

- It is recommended that the Landscape and Open Space Plan (to be submitted as part of the Development Plan) include:
  - “typical cross-sections of Victoria Street, Racecourse Road and internal roads”.
  - Reference to Water Sensitive Urban Design (WSUD) measures being informed by the Stormwater Drainage Master Plan.

3.0 Requirements for Development Plan – Required documents, plans and reports - #7 A Dwelling Diversity

- As part of the Development Plan, it is recommended a Dwelling Diversity & Affordable Housing Report is prepared (to the satisfaction of the Responsible Authority), that demonstrates:
  - How the development will achieve an appropriate level of dwelling diversity across the site, being a maximum of 30 per cent 1-bedroom dwellings, a maximum of 50 per cent 2-bedroom dwellings and a...
### & Affordable Housing Report

- Minimum of 20 per cent 3-bedroom plus dwellings. The report should include an analysis of both projected dwelling typology needs and the existing dwelling stock on the site to inform the proposed apportioning of dwelling types as part of the development.
  - How the development will provide adaptable apartments at a rate of 1 in 50 for 2-bedroom dwellings and 1 in 10 for 3-bedroom dwellings, and in accordance with AS 4299 (Adaptable Housing).
  - How the development proposes to provide a minimum of 10 per cent affordable housing throughout the development. The report must also include criteria for determining affordable housing stock. The provision of this affordable housing must be in addition to any commitments made in relation to the proposed uplift in social housing stock across the Estate.
  - How the development achieves a ‘tenure blind’ approach, ensuring that each building within the site is provided with an appropriate mix of social housing.

### 3.0 Requirements for Development Plan – Required documents, plans and reports - #8 An Ecologically Sustainable Development Plan

- It is recommended the plan must meet the requirements of Clause 21.04-3 of the Moonee Valley Planning Scheme, and all buildings must achieve a minimum of 6 – 7 star rating against the Green Building Council of Australia’s Green Star Rating System for design and construction (or achieve an equivalent standard using an equivalent rating tool).

### 3.0 Requirements for Development Plan – Required documents, plans and reports - #9 An Adverse Amenity Impacts Report

- As part of the Development Plan, it is recommended an Adverse Amenity Impacts Report is prepared to the satisfaction of the Responsible Authority. The report(s) must identify all potential adverse amenity impacts from nearby uses and detail any ameliorative or remedial measures for dwellings that can and will be taken to minimise and avoid future impacts for residents. Potential adverse amenity impacts that must be addressed in the report(s) include noise, vibrations and air pollution impacts from City Link, the Upfield Railway Line, Racecourse Road and any non-residential uses on the site.

### 3.0 Requirements for Development Plan - Required documents, plans and reports - #10 A Services and Infrastructure Plan

- It is recommended the integration of the proposal with its adjoining infrastructure and services is optimised by providing improved connections both internally within the site and along its external interfaces. In particular, this means prioritising active transport options such as walking and cycling, providing sufficient space within the street and setbacks to accommodate boulevard trees with large canopies.
- It is recommended the Stormwater Drainage Master Plan include stormwater treatment, capture and reuse, and Water Sensitive Urban Design measures to ensure appropriate protection of the Moonee Ponds Creek adjacent to the land.
- The development will need to meet the requirements of Clause 22.03 of the Moonee Valley Planning Scheme - Stormwater Management (Water Sensitive Urban Design)

### 3.0 Requirements for Development Plan – Required documents, plans and reports - #11 A Construction

- As part of the Development Plan, it is recommended a Construction Management Plan (CMP) and/or Construction Management Strategy (CMS) be prepared prior to any works including demolition. The CMP/CMS must detail how the development of the land will be managed to ensure the
Management Plan and/or Construction Management Strategy

Protection of the amenity, access and safety of adjoining residents. The CMP/CMS must address:

- Demolition, bulk excavation, management of the construction site, land disturbance, hours of construction, noise, control of dust, public safety, construction vehicle road routes and traffic management (including location of construction vehicle access and worker parking), soiling and cleaning of roadways, discharge of any polluted water and stormwater, security fencing, disposal of site waste, location of cranes, location of site offices, storage of plant and equipment, redirection of any above or underground services and the protection of trees on or adjacent to the site to be retained in accordance with an Arboricultural Assessment Report prepared in accordance with this schedule.

3.0 Requirements for Development Plan – Required documents, plans and reports - #12 An Environmental Site Assessment

It is recommended the proposed Environmental Site Assessment must be prepared by a suitably qualified professional and be to the satisfaction of the Responsible Authority. In addition to the scope currently proposed, the assessment must also address:

- Site history and current site uses.
- Provide advice on the need for a full statutory environmental audit on all or part of the site, and the need for a Site Remediation Strategy Plan to be prepared.

3.0 Requirements for Development Plan – Required documents, plans and reports - #14 A Waste Management Plan

Council recommends a Waste Management Plan (WMP) for the site is prepared as a requirement of the DPO. The WMP must be in accordance with Council’s ‘Waste Management Plans – Guidelines for Applicants’.

Table 1: DPO Clause Recommended Changes

<table>
<thead>
<tr>
<th>CPO Clause</th>
<th>Recommended Change / Inclusion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Parking Rates</td>
<td>A standard rate should apply across the board regardless of housing tenure.</td>
</tr>
</tbody>
</table>

Table 2: CPO Clause Recommended Changes

Requirements for Development Plan – Development Concept Plan. Council must have a significant input into the final outcomes on the requisite Development Plan. There must be an established regime to enable Council review.
12.0 Significant Trees

**Significant Tree Review 2017**

Council recently commissioned Homewood Consulting Pty Ltd to undertake a municipal wide review and identify all trees of potential significance throughout the municipality. Identified trees within the Significant Tree Review 2017 are proposed to be included in the Moonee Valley Significant Tree Register and protected under the Environmental Significance Overlay (ESO) Schedule 2 of the Moonee Valley Planning Scheme.

Forty two trees of potential significance, see Figure 3 below, have been identified within or in close proximity to the Flemington renewal site. Council’s preference is to preserve trees that have been identified as being significant but accepts that in some instances, trees will need to be removed to accommodate proposed units.

![Figure 6: Significant Trees Located at Flemington Housing Estate](image)

To minimise the impact of the development on the health of the trees that have been identified as significant, Council has commissioned Homewood Consulting Arborists to carry out a further review of the Flemington Estate.

Table 3 below details the retention status of each tree based on the construction impact of the proposed development. In summary it concludes that:

- Nine trees require removal and should be replaced with trees of equal amenity value.
- Seven trees are substantially affected and require mitigation measures to be able to remain successfully in the landscape.
- Four trees require minor mitigation measures to remain successfully in the landscape.
• 22 trees are unaffected by the proposed development.

<table>
<thead>
<tr>
<th>TRN</th>
<th>No of Trees</th>
<th>TPZ Encroachment</th>
<th>Construction Impact</th>
<th>Retention Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>T242, T242a, T243, T244, T245, T246, T248, T251, T252g</td>
<td>9</td>
<td>Major 34-100%</td>
<td>High</td>
<td>Remove Major design changes required to retain these trees</td>
</tr>
<tr>
<td>*Shown in Figure 1 as</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>T247, T247a</td>
<td>2</td>
<td>Major 100%</td>
<td>High</td>
<td>Minor design modifications to car park will enable retention of these trees</td>
</tr>
<tr>
<td>T250, T252f, T253a, T253b, T253c</td>
<td>5</td>
<td>Major 10-20%</td>
<td>High</td>
<td>Retain with TPZ fencing and arborist supervision</td>
</tr>
<tr>
<td>T241, T249, T253, T273a</td>
<td>4</td>
<td>Minor (less than 10%)</td>
<td>Low</td>
<td>Retain with TPZ fencing</td>
</tr>
<tr>
<td>T241a, T241b, T250a, T250b, T250c, T252, T252a, T252b, T252c, T252d, T252e, T254, T254a, T273, T273b, T273c, T273d, T273e, T273f, T273g, T273h, T317</td>
<td>22</td>
<td>None</td>
<td>None</td>
<td>Retain with TPZ Fencing</td>
</tr>
</tbody>
</table>

Table 3: Retention status based on Construction Impact

To ensure the significant trees that are to be retained remain successfully in the landscape, the following is recommended:

• When designing buildings, carparks and infrastructure including construction methods and techniques within the TPZ of trees, consideration should be given to root sensitive construction techniques and methods.

• Modifications to the car park on the southern side of the site in the vicinity of Trees T247 and T247a requires minor modification to enable these two trees to remain in the landscape.

• The final design should be assessed by a qualified arborist to determine further impact on the trees.

• Following an approved design:
  o All site workers must be familiar with the mitigation measures outlined in this report and any other subsequent reports prior to any works commencing on site.
  o TPZs must be installed around all the significant trees to be retained.
o TPZ fencing should be a minimum of 1.8m high.
o TPZ fencing should be inspected by a qualified arborist prior to demolition and construction to ensure it is adequate. All TPZs should be checked at regular intervals by a qualified arborist (recommended every 6-8 weeks) during the construction phase.
o Within the TPZ there are to be:
   - No excavation other than discussed in this report.
   - No storage of materials, liquids or vehicular equipment.
   - No soil changes (i.e. grade changes) other than what is discussed in this report.
   - No pedestrian or vehicular access into the TPZs.
o TPZs where works are being carried out should be mulched to a depth of 150mm and irrigated periodically as determined by a qualified arborist and supervised by a qualified arborist.
o Any demolition of buildings or infrastructure carried out within the TPZ of retained trees should be undertaken with care and under arborist supervision. No large roots are to be severed.
o When the time comes to construct within the TPZ of any tree, the TPZ fencing can be moved back to the construction footprint and all work must be carried out from within the footprint. No other works should be carried out within the TPZs other than that approved following a final design.
o All works within TPZs including demolition and construction should be supervised by a qualified arborist to ensure minimal damage to roots.
o Any underground services should be bored under TPZs, rather than trenched.

Full details of the Homewood Arborists report is contained in Attachment 2 to this submission.

There are a number of trees present proximate to Racecourse Road, however none of these are deemed significant. Given these are within the 3m allocated to accommodate a shared path, if these trees are retained, it would not be possible to deliver a shared path or improved pedestrian conditions (as has been indicated by DHHS), and or to achieve MVCC’s broader streetscaping and active transport objectives for Racecourse Road.

Elsewhere in this Submission, Council has strongly advocated for the recommendations of the Racecourse Road Streetscape Plan to be delivered in conjunction with this project. Council has highlighted the need to allocate a 3 metre wide strip to allow for a shared path along the Racecourse Road frontage, to be delivered as part of the Racecourse Road Streetscape Plan. It is anticipated the existing trees will be replaced with more appropriately located large canopy trees as part of a new boulevard treatment. It is noted that both Council and the City of Melbourne have budget to undertake this work this current financial year.
13.0 Public Use Zone

The current land use zoning is erroneous. Debney Meadows Primary School is included with the Public Park and Recreation Zone and a portion of Debney’s Park open space is zoned for Public Use Purposes.

The design of buildings as they front this section of Debney’s Park will be important. Similarly, the design and location of open space, landscaping and connections all need to be carefully considered and designed.

Council cannot support this component of the Amendment until the long term future of the school has been determined. The school sits at a critical location at the interface between the Victoria Street walk-ups, Debney’s Park and the established Flemington community to the west.
14.0 Transport and Parking

Transport Context

The Debney’s Park precinct is situated in the south east corner of Moonee Valley, approximately 4km from Melbourne CBD.

With multiple tram, train and cycling routes within the locality of the site, it is arguably one of the most accessible locations in Moonee Valley. Notwithstanding, the site does have many challenges that prevent full accessibility to all transport options. In particular, this includes the fact that although the site is close to Flemington Bridge Station, physical access to this station is poor and improvements are required. Consolidation and improvements to tram stops in Racecourse Road are an imperative to supporting better access for current and future residents, together with additional commercial uses that could front Racecourse Road.

Attention is required to be given to the location of the Flemington Renewal site in the context of other major developments occurring within reasonable proximity. All of these have the potential to generate significant additional traffic to the region, and an understanding of the cumulative impacts on the main road corridor and the requisite mitigation is needed.

These development sites within Moonee Valley are shown below and include:

- 1 Ascot Vale Road - 350 dwellings
- 11-13 Ascot Vale Road - approximately 250 dwellings (awaiting VCAT decision)
- DHHS Wingate Estate - potentially 2000-4000 dwellings
- Victoria Racing Club Epsom Road Site – approximately 400 dwellings
- The Top Cut site (between Epsom road and Ascot Vale road adjacent the railway line) is currently zoned for Industrial purposes. In the event that this site is rezoned in the future, a site of this size could be expected to see application for circa 1000 dwellings (note that no rezoning requests have been submitted to Council at this stage).

Further afield there are range of significant developments that will influence vehicle movements in the area including:

- Victoria Racing Club – Flemington Hill – approximately 500 dwellings
- Moonee Valley Racecourse – 2000 dwellings
- Moonee Ponds Activity Centre – multiple dwelling sites
In addition, there are sites in the City of Melbourne that have traffic generation impacts. This includes the Royal Agricultural Showgrounds and Flemington Racecourse which considers the Epsom Road development included as part of the recently approved Comprehensive Development Zone.

With an increase of approximately 845 dwellings on the site, the proposal offers a unique opportunity to implement Transit Oriented Development (TOD) principles and maximise efficiencies associated with sustainable transport modes such as walking, cycling and public transport usage. These opportunities are likely to increase given the reasonable proximity to Arden-Macaulay at the Metro tunnel station.

Similarly, the scale of development is such that it provides the opportunities to exploit emerging transport technologies that will almost certainly influence how people travel in and around the area. These will include the use of electric and autonomous vehicles, more shared vehicles use and bicycle sharing schemes.

The site has frontage to Racecourse Road (Road Zone) which is operated and managed by VicRoads. It is therefore important that the views of VicRoads are known and understood, and that as a key Government agency, their commitment to the project is provided.

**Strategic Transport Objectives**

**Walking**
- Create an environment in which walking becomes the mode of choice for trips less than 2km
- Recognise the importance walking plays in connecting to public transport, facilitating the local economy, social interaction and physical activity
• Recognise the importance of walking as a mode that encompasses all age and social groups

Cycling
• Create an environment in which cycling becomes the mode of choice for local trips (2-5km) by creating a safe network of connected, continuous bicycle lanes and paths, that allow for movement though the site particularly in an east-west movement.
• Prioritise safe access by bicycle to Activity Centres, schools and public transport nodes, as well as key connections to adjoining municipalities
• Increase the mode share for cycling across the municipality to match adjoining local government areas (i.e. City of Melbourne)

Public Transport
• Increase public transport mode share for trips originating within Moonee Valley
• Provide higher levels of active transport accessibility around public transport services and interchanges
• Increase public transport reliability, frequency and reduce travel times on the network
• Increase pedestrian safety at public transport stops, stations and interchanges
• Expand high quality public transport options across Moonee Valley

Integrated Transport Policy, Behaviour Change and Land Use Planning
• Achieve higher land use density and development mix along tram corridors and around train stations through the encouragement of Transit Oriented Development (TOD) and Pedestrian Oriented Development (POD) principles
• Reduce the need to travel (20-minute city) via improved accessibility to local services, employment and leisure opportunities
• Ensure all new development prioritises sustainable travel choices through infrastructure provision consistent with the Road User Hierarchy
• Encourage new residential development in areas with high public transport accessibility
• Use TOD and POD design principles to underpin new development and growth
• Allocate road space on the principle of safety and efficiency (space and resources), particularly in Activity Centres

Motorised Traffic Network and Car Parking
• Manage the level of car use through demand management techniques
• Road space design is guided by the principles of the Road User Hierarchy
• Decrease car mode share for trips less than 5km within Moonee Valley
• Assist the community by making sustainable travel choice the easy travel choice
• Reduce demand for private car travel within Moonee Valley

Summary of Proposed Development Issues and Opportunities

<table>
<thead>
<tr>
<th>Issues</th>
<th>Opportunities</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Car Dependence</strong></td>
<td>Car dependence, particularly for short trips, has been identified as a key issue for Moonee Valley that has detrimental environmental, social and economic implications. Car parking on the site and within Holland Court is currently in high demand but is not regulated.</td>
</tr>
<tr>
<td>Public Transport Accessibility and Desirability</td>
<td>Allocation of road space to accommodate high quality walking and cycling links to nearby cycling corridors, Activity Centres and transport hubs.</td>
</tr>
<tr>
<td>---</td>
<td>---</td>
</tr>
</tbody>
</table>
| Issues such as DDA compliance, journey times and frequency (particularly at weekends) remain a barrier to public transport use by many residents in Moonee Valley. | Public transport has the potential to provide quick and reliable access from the site to major employment and Activity Centres such as Melbourne CBD, Parkville and Moonee Ponds.  

Improve pedestrian wayfinding within the development to raise awareness of nearby public transport routes/stations.  

Address real and perceived pedestrian safety concerns at nearby public transport stops/stations.  

Improve accessibility to Flemington Bridge Station by providing DDA compliant pedestrian links to both the Upfield and City-bound platforms.  

Either upgrade tram stop 24 on Racecourse Road to meet DDA requirements or consider merging stops 23 and 24 to construct a consolidated, high quality, pedestrian-friendly tram stop capable of catering for large volumes of pedestrian movements.  

Advocate to PTV and TfV for DDA compliant rolling stock to be supplied on the 57 and 59 tram routes to allow greater accessibility for the elderly, disabled and residents with push chairs.  

Improve the desirability of tram usage for residents by undertaking a corridor study (similar to the study undertaken for Moonee Valley Racecourse) for both the 57 and 59 tram routes in order to identify tram priority measures between Ascot Vale/Moonee Ponds and Melbourne CBD. |
| Road Safety | Road safety issues, particularly for vulnerable road users, is a major barrier to increasing modal share for sustainable transport modes throughout Moonee Valley. |
| Reduce the real and perceived risk for sustainable travel modes in line with Principle 8.6 of Council’s *Transport Safety Strategy*.  

Incorporate high quality walking and cycling facilities within the internal road and footpath networks and connect these to nearby movement corridors along Mt Alexander and |
| **Cycling** | The Victorian Government has identified three Strategic Cycling Corridors that abut the site (Mt Alexander Road, Racecourse Road and Moonee Ponds Creek). In line with Plan Melbourne, the purpose of these routes are to provide direct connections for commuters to major Activity Centres.  

In addition, Council has committed significant resources to develop a 'shimmy' cycling route along the Craigieburn Rail corridor for less confident cyclists in line with its Walking & Cycling Strategy. | The development presents a clear opportunity to establish a strong preference for cycling by residents ahead of private car use.  

Advocate VicRoads to upgrade cycling facilities on Mt Alexander Road and Racecourse Road to provide protected bicycle lanes. Where on-road protected facilities are not able to be provided, include space abutting Racecourse Road within the site for the provision of a cycling connection to Moonee Ponds Creek/Capital City Trail. |

| **Walking** | Poor streetscape along Racecourse Road reduces pedestrian amenity.  

Vehicle speeds along Racecourse Road are generally above the 40km/h daytime speed limit for strip shopping centres.  

Existing ground floor surface is dominated by car parking, making pedestrian permeability through the site difficult and undesirable, particularly at night. | Highlight Racecourse Road as a pedestrian priority area and acknowledge its importance to pedestrian movement between the site and Flemington Bridge Station.  

Upgrade streetscape along Racecourse Road (as per SSRIP design) to help reduce vehicle speeds and encourage walking trips to Flemington Bridge Station, Racecourse Road tram stops and the Racecourse Road Activity Centre.  

Upgrade pedestrian crossing treatments across Racecourse Road to provide better access to tram stops and the future Arden-Macaulay precinct.  

Provide high quality wayfinding within the site to improve pedestrian awareness of nearby destinations.  

Improve pedestrian access through the site by providing high quality pedestrian paths between Racecourse Road and Debney's Park, incorporating passive surveillance and other CPTED design principles. |

| **Increased Traffic Volumes on Local Roads** | Traffic, parking and road safety issues have been longstanding concerns of residents within Flemington Hill area (the area immediately west of the site). | Ensure the design of the internal road network does not encourage vehicles to divert into the local road network.  

Review signal phasings along Racecourse Road to prioritise through |
movements and encourage greater use of arterial road network.

Table 4: Transport Issues and Opportunities

DHHS is proposing to redevelop a section of its social housing stock on the site and include a significant addition of private dwellings. While the extent of the development is yet to be confirmed by DHHS, an indicative development schedule is provided in Table 3 of the accompanying Traffic and Transport Assessment, prepared by Beveridge Williams.

<table>
<thead>
<tr>
<th>Dwelling Type</th>
<th>No. of Dwellings</th>
<th>Existing</th>
<th>Proposed</th>
<th>Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Housing</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>High Rise</td>
<td>718</td>
<td>718</td>
<td></td>
<td>-</td>
</tr>
<tr>
<td>Walk Ups</td>
<td>198</td>
<td>218</td>
<td></td>
<td>+20</td>
</tr>
<tr>
<td>Subtotal</td>
<td>916</td>
<td>936</td>
<td></td>
<td>+20</td>
</tr>
<tr>
<td>Private Dwellings</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 Bedroom Dwellings</td>
<td>-</td>
<td>425</td>
<td></td>
<td>+425</td>
</tr>
<tr>
<td>2 Bedroom Dwellings</td>
<td>-</td>
<td>400</td>
<td></td>
<td>+400</td>
</tr>
<tr>
<td>Sub-Total</td>
<td>-</td>
<td>825</td>
<td></td>
<td>+825</td>
</tr>
<tr>
<td><strong>TOTAL DWELLINGS</strong></td>
<td><strong>1,772</strong></td>
<td></td>
<td><strong>+845</strong></td>
<td></td>
</tr>
</tbody>
</table>

Table 5: Indicative Development Proposal

Existing Transport Network

Public Transport

The site is well served by a range of public transport options with two metropolitan train stations serving the Upfield and Craigieburn lines within walking distance from the site, as well as two tram routes 57 and 59 travelling along Racecourse Road and Mt Alexander Road respectively.

A summary of public transport services within walking distance to the site is included below:

<table>
<thead>
<tr>
<th>Mode</th>
<th>Station / Route</th>
<th>Approximate Peak-Time Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Train</td>
<td>Flemington Bridge</td>
<td>Every 20 minutes</td>
</tr>
<tr>
<td></td>
<td>Newmarket</td>
<td>Every 10 minutes</td>
</tr>
<tr>
<td>Tram</td>
<td>57</td>
<td>Every 10 minutes</td>
</tr>
<tr>
<td></td>
<td>59</td>
<td>Every 10 minutes</td>
</tr>
</tbody>
</table>

Table 6: Public Transport Availability

The rolling stock on both tram routes is not DDA compliant and anecdotal evidence indicates that this is a significant barrier for use, especially for passengers with prams, the elderly and those carrying bulky goods.

The implications of the Flemington Housing redevelopment, together with approved and other proposed major residential developments (such as developments at 1 Ascot Vale Road, and Victoria Racing Club Flemington) will have significant implications on the walking, cycling and public transport networks along Racecourse Road between Epsom Road and Boundary Road.

It is noted that as part of the Moonee Valley Racecourse redevelopment, TfV requested a corridor study be undertaken to assess public transport priority improvements along the 59
and 82 tram routes (along Mt Alexander Road and Ascot Vale Road/Maribyrnong Road respectively). In agreeing to the requisite Integrated Transport Plan for the Racecourse development, TfV and VicRoads required that MVRC make a financial contribution to implement tram infrastructure improvement for the 59 tram route.

Given the scale of redevelopment planned within the area of Flemington, it is considered appropriate/necessary for a similar corridor study to be undertaken for the 57 tram route between Boundary Road and Maribyrnong Road.

Access to Flemington Bridge Station

A significant amount of new dwellings are proposed to be located closest to the frontage with Racecourse Road. This area does not have good nor convenient access to Flemington Bridge Station. In order to access the station, the only opportunity is from Mt Alexander Road. This equates to a distance of approximately 250 metres as a direct route through the park, as opposed to 750 metres, a reduction of 500 metres.

For many following this route at night, this would generate a safety risk. As such, the direct journey is replaced by a longer and less convenient walk that adds further time to reach the train station.

In addition, current access to city-bound trains is via a steep and relatively narrow walkway that also serves as the principal cycling route.

Significant improvements to convenience and journey times that would be achieved by creating an additional link to Flemington Bridge Station are shown below. Although this station is located within the City of Melbourne, Council has long recognised the importance of having a connection to Flemington Bridge via Racecourse Road, and the value this brings to commuters and the wider community.

![Figure 8: Flemington Bridge Station Access via Racecourse Road](image)
Traffix Group was engaged by Moonee Valley City Council to investigate improvements of the pedestrian and cycling links in the vicinity of the Flemington Bridge Railway Station, including upgrading the access between the railway station, nearby tram stops, existing shared paths and surrounding land use.

The *Flemington Bridge Railway Station Shared Path Model Interchange Link* Report (Attachment 3) presents the existing site issues, the outcomes of the data collection and consultation activities, discussion of the potential path alignment options, including likely difficulties with their construction and the impacts on the surrounding community.

The report also includes recommendations concerning the preferred treatments. Given the significant residential increases expected from the renewal project (many of whom may seek to use Flemington Bridge Station), improved connectivity is considered to be fundamental to facilitate successful interaction of the additional dwellings and reduce the dependency on private vehicles.

The value of additional connections, to ensure better usage of Flemington Bridge Station, was also seen by the Victorian Government during the approved design for the East West Link project. Council and the community were advised that a bridge was to be provided as part of the works package, connecting Debney’s Park to the Station. No further work was undertaken on this once the Government did not proceed with the East West Link project.
As shown, the new linkages recommended would improve accessibility for current and future residents, whilst also creating the conditions whereby there would be less reliance on private vehicle usage.

The intensification of the site in the manner proposed can only be supported on the proviso that TfV fully investigate and fund improved connections to Flemington Bridge Station, via Mt Alexander Road. This is to provide an additional connection to the station via Racecourse Road.

The provision of adequate transport infrastructure in key locations is the fundamental remit of Government. The renewal project will have a major impact on the existing Flemington area. The situation should not be created whereby infrastructure provision is forced to play catch up. There should not be a reliance upon only developer contributions to provide for key components. Council is looking for advice from TfV and other Government agencies to explain how and when transport mitigation measures will be delivered.

Cycling

The site also benefits from a strong network of on and off-road bicycle links providing convenient access to major employment clusters including Parkville and Melbourne CBD. Four Strategic Cycling Corridors (SCC’s) have been identified by the Victorian Government in the vicinity of the site:

- Route 1 – Flemington to Main Yarra Trail (Racecourse Road);
- Route 7 – Flemington to Burnley Gardens (Capital City Trail);
- Route 13 – Essendon to Port Melbourne (Mt Alexander Road);
• Route 16 – Moonee Valley to Fishermans Bend (Moonee Ponds Creek)

The Strategic Cycling Corridor (SCC) network is identified in Policy 3.1.6 of Plan Melbourne as the primary cycle network to accommodate commuter cyclists direct routes to and from employment centres.

The VicRoads Traffic Engineering Manual includes guidelines for the design of strategically important cycling corridors (TEM Vol 3 Part 2.18) and identifies SCC’s as being intended to provide the following objectives:

• A long-term vision for a network of safe, direct and high quality cycling corridors connecting activity centres, public transport hubs and other key locations
• A step-change in cycling facilities to encourage cycling of all ages and abilities – using a combination of high quality a) off-road paths, b) on-road separated bike lanes and c) traffic-calmed local streets
• A focused planning and investment effort along these corridors.

The journey times during a typical weekday morning from the site to nearby Activity Centres by bicycle are comparable to private vehicles and public transport.

<table>
<thead>
<tr>
<th>Destination</th>
<th>Journey Time from Debney’s Park during a typical weekday morning</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>By Bike</td>
</tr>
<tr>
<td>Southern Cross Station</td>
<td>20 minutes</td>
</tr>
<tr>
<td>Melbourne Central</td>
<td>19 minutes</td>
</tr>
<tr>
<td>Flinders Street Station</td>
<td>24 minutes</td>
</tr>
<tr>
<td>Brunswick</td>
<td>22 minutes</td>
</tr>
<tr>
<td>Moonee Ponds</td>
<td>13 minutes</td>
</tr>
<tr>
<td>Royal Melbourne Hospital (Parkville)</td>
<td>13 minutes</td>
</tr>
</tbody>
</table>

Table 7: Journey Time Comparison between Transport Modes (Source: Google Maps)

Road Network

Racecourse Road is classified as a Primary Arterial road while Mt Alexander Road is classified as a Secondary Arterial road. Both are under the control of VicRoads and operate the 57 and 59 tram routes respectively.

The local road network, particularly the Flemington Hill area immediately west of the site, has been subject to extensive traffic management studies in response to community concerns about traffic, parking and road safety in the area. In May 2013, Council endorsed initiatives within the Flemington Hill Traffic and Parking Management Plans that included significant alterations to the local road network to deter drivers from using the local road network as a means to avoid congestion on the arterial network.

The West Gate Tunnel Project may have impacts on the main arterial roads in proximity to Flemington. Council notes that the City of Melbourne’s response to the relevant Advisory Committee is that it is not clear that the EES has appropriately assessed the impacts of the Project on the areas identified in the Arden-Macaulay Structure Plan.
Car Parking

The site includes approximately 750 car spaces, all of which are at ground level. Parking is unregulated and not allocated to specific dwellings.

Studies undertaken by DHHS indicate a high level of occupancy during the evenings where up to 98 per cent of spaces were observed to be occupied. This level of occupancy decreases during the daytime, with a minimum occupancy rate of 57 per cent observed during the weekday period.

The challenge for the redevelopment is to balance the expectations and needs of the existing residents of the high rise towers. These residents will experience significant changes over a period of many years.

A detailed, collaborative and implementable approach is required to what is no doubt a complex and potentially emotional issue for many current occupiers. For the density of development that is being proposed by DHHS to be successful, there has to be solution that assists current tenants to integrate with broader strategic transport objectives. Such objectives aim to reduce the reliance on private vehicle that utilise unfettered car parking access located on public land.

Road Safety

A review of crash statistics available on the VicRoads RCIS database between 1 January 2012 and 31 December 2016 reveals the following crash blackspots within the vicinity of the site.

<table>
<thead>
<tr>
<th>Location</th>
<th>No. of Reported Crashes</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Other</td>
</tr>
<tr>
<td>Racecourse Road</td>
<td></td>
</tr>
<tr>
<td>Intersection with Victoria Street</td>
<td>3</td>
</tr>
<tr>
<td>Intersection with Holland Court</td>
<td>6</td>
</tr>
<tr>
<td>Intersection with Lambeth Street</td>
<td>2</td>
</tr>
<tr>
<td>Intersection with Stubbs Street</td>
<td>3</td>
</tr>
<tr>
<td>CityLink off-ramp</td>
<td>6</td>
</tr>
<tr>
<td>Mt Alexander Road</td>
<td></td>
</tr>
<tr>
<td>CityLink on-ramp</td>
<td>8</td>
</tr>
<tr>
<td>Intersection with Mooltan Street</td>
<td>3</td>
</tr>
<tr>
<td>Approximately 60m SE of Mooltan Street</td>
<td>4</td>
</tr>
</tbody>
</table>

Table 8: Summary of Crashes

The statistics also reveals a pattern of crashes involving cyclists along Racecourse Road where six crashes involved cyclists being struck by right-turning vehicles from Racecourse Road (five into Holland Court and one into Lambeth Street).

Recommendations

Walking

Adoption of TOD principles to encourage walking through, to and from the site. Urban realm initiatives such as visually active and physically permeable frontages, as well as landscaping and street furniture that provide shelter should be incorporated into the design of footpaths.

Best practice for specifying footpath widths are included in Transport for London's *Pedestrian Comfort Guide*, see excerpt below:
### Table 9: Indicative Footpath Widths

<table>
<thead>
<tr>
<th></th>
<th>Low Pedestrian Flows (&lt;600pph)</th>
<th>Active Pedestrian Flows (600 - 1,200pph)</th>
</tr>
</thead>
<tbody>
<tr>
<td>No. street furniture</td>
<td>2.0m</td>
<td>2.2m</td>
</tr>
<tr>
<td>Street furniture</td>
<td>2.9m</td>
<td>4.2m</td>
</tr>
</tbody>
</table>

#### Cycling

In line with TEM Vol. 3 Part 2.10 (Figure 11), appropriate cycling facilities should be provided within the internal road network. Cycling infrastructure on Racecourse Road should also be upgraded to align with design guidelines as a priority between Moonee Ponds Creek Trail and Flemington Bridge Station.

#### Bicycle Parking

The TIA identifies a strong opportunity to capitalise on the site’s proximity to multiple strategic cycling routes. As such, it recommends providing bicycle parking far in excess of the statutory requirements outlined in Clause 52.34 of the Moonee Valley Planning Scheme.

While the Planning Scheme rate requires a minimum of 1 resident space to every 5 dwellings and 1 visitor space to every 10 dwellings, the TIA recommends a provision of 1 space to each dwelling.

This rate is strongly supported by Council’s Transport department. All bicycle parking must be designed and located in accordance with AS2890.3:2015 and the relevant VicRoads TEM supplements.
Public Transport

Council supports a truly integrated public transport network which is safe and inclusive for the whole community no matter their age or physical ability.

While the site benefits from excellent access to public transport, many of the pedestrian routes leading to and from tram stops and stations are not DDA compliant.

Specific pedestrian access issues must be addressed at the following locations:

- Flemington Bridge Station (both Upfield and City-bound platforms)
- Tram stop 24, Racecourse Road (Route 57)
- Tram stop 24, Mt Alexander Road (Route 59)

Despite being highly proximate to tram services and Flemington Bridge Station, the existing connections are poor and require major improvements. Access to the station is unsafe. Similarly there are no current or proposed tram “superstops” on Racecourse Road or in locations adjacent to what is proposed to be the most densely populated component of the renewal project.

While DDA compliant tram stops are one part of the solution, the tram rolling stock on both the 57 and 59 tram routes do not allow for step-free access to be accommodated. Council therefore encourages TfV and PTV to commit to increasing the proportion of low-floor accessible trams along both routes.

The intensification of the site, and the resulting increase in new residents, can only be supported on the proviso that TfV fully investigate and fund improved connections to Flemington Bridge Station, via Mt Alexander Road. This is to provide an additional connection to the Station via Racecourse Road.

There is an obligation on key stakeholders to give consideration to the Transport Integration Act 2010. The Act:

- Recognises that the transport system needs to be sustainable on a triple bottom line basis (economic, social and environmental terms)
- Provides a universal framework – a vision, objectives and principles – for integrated and sustainable transport policy and operations
- Integrates land use and transport planning and decision making by extending the coverage of the Act to land use agencies ("interface bodies") whose decisions are likely to have a significant impact on the transport system

The Transport Integration Act Policy framework states that there should be a full assessment and integration of transport and land use decision making. This is particularly important when projects are being delivered on behalf of the Government. The Framework states that:

The transport system should provide for the effective integration of transport and land use and facilitate access to social and economic opportunities:

a) so as to improve accessibility and transport efficiency with a focus on:
   i  maximising access to residences, employment, markets, services and recreation
   ii planning and developing the transport system more effectively
   iii reducing the need for private motor vehicle transport and the extent of travel
   iv facilitating better access to, and greater mobility within, local communities.
b) the transport system and land use should be aligned, complementary and supportive and ensure that:
   i) transport decisions are made having regard for the current and future impact on land use
   ii) land use decisions are made having regard for the current and future development and operation of the transport system
   iii) transport infrastructure and services are provided in a timely manner to support changing land uses and associated transport demand.

c) improving the amenity of communities and minimising impacts of the transport system on adjacent land uses.

As such, it is critical that TfV and other Government agencies explain how and when transport mitigation measures are to be delivered in relation to the Flemington Renewal Project. There should not be a reliance upon only developer contributions to provide for key components at some time in the future.

Without the knowledge of how the area will be supported in terms of major transport infrastructure, it is difficult to fully support the Flemington project.

Off-Street Car Parking

While car parking is in high demand, the provision of significant numbers of additional car parking at Flemington can be seen as contradictory to the strategic transport objectives outlined previously and embedded within the State Planning Framework.

Car parking rates proposed within the TIA (prepared by Beveridge Williams) recommend adopting differential parking rates for the public and private housing stock. This is based on an analysis of data taken from the 2001, 2006 and 2011 censuses. It is noted that since the release of the TIA, updated census data is now available for 2016.

- Public Housing: 0.6 spaces per dwelling
- Private Housing (1-bedroom): 0.7 spaces per dwelling
- Private Housing (2-bedrooms): 0.9 spaces per dwelling

The parking rate proposed for public housing stock (0.6 spaces per dwelling) is provided regardless of dwelling size. Standard practice is to assign separate parking rates for different dwelling sizes, as has been calculated for the proposed private housing component.

The rate is also contradictory to the survey results recorded by Beveridge Williams in December 2016 where a maximum of 740 vehicles were recorded within the site and on Holland Court. Assuming that the majority of these vehicles were associated with the existing public housing stock on the site (916 dwellings), a parking rate of 0.8 spaces per dwelling is calculated.

It is considered insufficient evidence has been provided to distinguish a difference in car ownership rates by residents of public and private housing types. It is therefore recommended a consistent parking rate be provided for both public and private housing stock based on 2016 census data and empirical assessments, in line with the requirements of a Car Parking Demand Assessment outlined in Clause 52.06-7 of the Moonee Valley Planning Scheme.
In addition, there needs to be consideration of whether applying a differential ratio based on tenure of home ownership or otherwise is consistent with the Victorian, *Equal Opportunity Act 2010* or other relevant anti-discrimination statute. The *Equal Opportunity Act* prohibits:

*Discrimination in employment, partnerships, firms, qualifying bodies, industrial organisations, education, provision of goods and services, disposal of land, accommodation (including alteration of accommodation), clubs, sport, and local government.*

Given the site’s proximity to alternative modes of transport, and a substantial body of relevant Local and State policy objectives, a substantially reduced resident car parking rate to the standard Planning Scheme rates (within Clause 52.06) is considered appropriate.

Section 5.5 of the TIA estimates a substantial demand for visitor car parking to be generated by the development (176 spaces) during the evening and weekend periods. As outlined within the TIA, a substantial proportion of this visitor car parking is anticipated to be accommodated within the proposed development.

Crossovers to off-street car parking should be minimised in order to limit the loss of on-street car parking and create a more vibrant and walkable streetscape.

There is a need to fully consider the cumulative impacts of the proposed changes to the car parking arrangements for the existing residents of the high rise towers.

In addition, a substantial proportion of visitor car parking is expected to be generated by the overall development. While some of this must be accommodated within the car parks of the new development, it is accepted that a proportion will be accommodated on the street network.

There needs to a be recognition of the impacts of some of the parking being accommodated on the street network, noting that Council is frequently in receipt of complaints about the lack of parking in and around the Flemington Hill area.

In order to ensure the car parking generated does not adversely impact the existing and proposed street network, short-term parking restrictions (maximum 2P) will need to be considered as part of a broader LATM study for the Newmarket area. Council anticipates this LATM study to be undertaken in the 2019/20 financial year.

**Motorised Traffic Network**

The proposed internal road network must include sufficient traffic calming devices to make the operating speeds of vehicles below 40km/h.

Such measures may include, but are not limited to:

- Road humps
- Raised threshold treatments
- Splitter islands
- Shared zone treatments (where justified).
Road Safety

A road safety audit must be undertaken on agreed concept plans prior to being progressed to detailed design stage.

Section 4.8 of the TIA includes a discussion around the road safety issues within the vicinity of the site. It identifies the intersection of Holland Court and Racecourse Road as of specific concern in regards to the number of right-through accidents recorded at this location.

In response, the report recommends restricting this intersection to a left-in, left-out treatment.

Given the crash statistics for this intersection, Council strongly supports this proposed treatment.
15.0 Built Form and Design Response

The Subject Land and Environs

The Debneys Precinct is the land bounded by Racecourse Road, Mt Alexander Road, Victoria Street and the Moonee Ponds Creek. This includes DHHS land, Debney’s Park and Debney Meadows Primary School and the Hopetoun Children’s Centre. They form a precinct due to the strong street network that defines its edges and the heavily tree and green open feel that defines its interior.

Recognised in the Mount Alexander Road Design Guidelines (2010) the open space character of Debney’s Parks defines the beginning of the boulevard of metropolitan significance. With a 20 metre road reserve, Mount Alexander Road meanders as it rises from the Moonee Ponds Creek. Council considers the Debney’s Precinct as the southern gateway to the City of Moonee Valley as experienced in movement northward along Mount Alexander Road and westward along Racecourse Road.

The gateway experience is that of built form and landscape emerging after the journey across the Moonee Ponds Creek, with Debney’s Park expanding the green lungs of Royal Park westward. The more recent built form of Travancore, including the ALT Tower, introduces a strong built form edge to Mount Alexander Road encouraging the eye toward the open green of Debney’s Park and filtered views through the established canopy vegetation that line the edge of the park.

The experience along Racecourse Road is dominated by the skyline contribution of the DHHS towers although at street level the established canopy vegetation and open setting seems to draw the parkland through the Estate. This provides visual relief and contrast to the hard industrial edge of the Macaulay precinct on the south side of Racecourse Road.

Dissecting the precinct at its eastern edge is the defining City Link Freeway and Moonee Ponds Creek corridor which served as a critical outflow in the industrial 19th century era of growth in manufacturing and industry that defined the precinct and gave it its name. The form and profile of the elevated freeway, and undercroft accommodating the railway, bike path and creek remain as defining elements through the precinct.

The Debney’s Precinct forms a rough triangle of land with Victoria Street forming the third side to the triangle. Victoria Street introduces a new built form from that experienced on Racecourse Road seeking a transitional scale to the single level detached housing stock on the precincts rising western flank. The ‘walk ups’ are sited to face Victoria Street in a four storey form providing balconies and a landscape setback to complement the existing conditions on the north side of the street.

The street grid surrounding the Precinct, particularly as the land rises to the west, is aligned perpendicular to Mount Alexander Road with long streets running across the slope and High and Hill Street orientated down the slope toward the Precinct. Internally Holland Court replicates the block depth and orientation of Victoria Street.

A publicly managed road, Holland Court provides the main connection from internal surface carparks for the walk-ups to Racecourse Road. The remaining internal street network on DHHS land is curvilinear and in contrast to the established grids outside of the Estate contributing to both a visual and physical change in setting emphasising an ‘Estate’ feel.
There is considerable slope between Victoria and Holland Court before the land flattens out. The built form of the “walk ups” has responded either through undercroft storage areas or elevated buildings only touching the ground plane to accommodate building entries. Whilst this has provided clearance to obtain views though the built form, it has also resulted in a lack of ownership over the public realm including car park areas.

The four high rise towers contain a total of 718 dwellings. The siting of the four high rise towers adopts a north-south orientation referencing the Racecourse Road alignment with the tail or shortest elevation some 6 metres from the edge of the road reserve. The broadest elevation is read on approach along Racecourse Road. The towers were also designed as elevated structures from the ground plane although, over time refurbishment and infilling has occurred, creating community spaces and enlarged entry foyers on the ground level. However the ground level interface to Racecourse Road is inactive adding to the sense of hostility of a road corridor at this edge.

Other buildings on or surrounding the site include Council’s Flemington Community Centre, with access from Mt Alexander Road, and the Hopetoun Children’s Centre at 220 Racecourse Road. Debnay Meadows Primary School is located on east side of Victoria Street and interfaces with the park. The school relies upon the park for play space and land tenure issues between the Department of Education and Council are yet to be resolved.

In the wider context, Racecourse Road west of the precinct is characterised as a low scale strip centre incorporating fine grain frontages toward Newmarket Station with an anchor supermarket at Newmarket Plaza west of the train line. The centre serves a local or neighbourhood role as recognised in Clause 21.07-5 of the Moonee Valley Planning Scheme.

To the south of the site is the upper extents of the Macaulay precinct. Subject of the recent amendment C190 to the City of Melbourne Planning Scheme, the structure plan envisages ‘Arden-Macaulay will transition into a dense, mixed use inner city suburb while protecting key industrial sites. Intensified commercial activity at Arden Central linked to the Melbourne Metro will bring significant job growth and extend Melbourne’s Central City to the north-west.”

Particularly relevant to the redevelopment of the Flemington Estate is the future urban form anticipated in Arden-Macaulay. The concept is framed around the notion of a relatively consistent built form comprising of medium rise attached buildings, a preferred street profile of 1:1 (street width to street wall height ratio) and a tailing down of development toward residential edges.

This vision also seeks to define 3 Activity Nodes which serve as Neighbourhood Centres with active uses and facilities at North Melbourne, Macaulay and Racecourse Road. The concept also seeks to embed ambition for open space and recreation initiatives through the establishment of new parks and green spines along the Moonee Ponds Creek.

Urban Design Response: The Design Framework

The suite of documents that informs the Public Housing Renewal Program at Flemington and associated planning scheme amendment documentation includes the Design Framework and the Structure Plan developed by Message Consultants (both dated June 2017). Sitting above these are a set of design principles developed by the DHHS, OVGA and DELWP to guide all sites subject to the renewal project. The principles include broader aspirations for economic, social and environmental considerations.

Council provided feedback on both the Design Framework and Structure Plan to DHHS through attendance at a workshop (on site) and written feedback during their development.
Within the Design Framework document is a series of site analysis diagrams, set out under broad themes:

- Building heights
- Street grid
- Topography
- Fine grain residential interface
- Pedestrian movement
- Cycling connections
- Public transport
- Vehicles (including car parking)
- Solar access
- Views and open space
- Tree retention

As is common in urban design and strategic planning practice, the analysis synthesises to form the Design Framework that the Structure Plan then responds to. The Design Framework document describes a series of thematic maps entitled Built Form, Movement, Landscape and Open Space. This analysis appears to be replicated in the summary document or the Structure Plan albeit at a broader scale and with the implication that significant detail is lost.

Council is concerned that there is a disconnect between the layers of information clearly mapped in the Design Framework document and the eventual Framework Plan (Figure 5) of the Structure Plan. Graphically the guiding instrument or “The Plan” has the potential to oversimplify the information into a diagram that will not fully interpret the collated context analysis.

There are a number of deficiencies with the plan, and it is Council’s submission that more detail should be specified within both the Development Plan concept and the controls. This is to ensure future urban form achieves the agreed design principles.
Structure Plan

The Structure Plan "provides the framework to guide future development and enhancements in the precinct". The Structure Plan denotes the mix of uses within the precinct, which along with DHHS land and Debney's Park, includes Hopetoun Children’s Centre, Debney Meadows Primary School and the Flemington Community Centre. The Structure Plan states as its purpose:
“The Plan is intended to be implemented in 2 stages as a consequence of the dual land ownership of the precinct:

- Stage 1 will be the redevelopment of the Flemington Estate by DHHS.
- Stage 2 will be enhancements to the land owned by the City of Moonee Valley”.

Whilst this seems at face value to be a holistic approach to the evolution of the precinct, there are a number of siting, land use zoning and capacity issues that need to be resolved or embedded in the Stage 1 masterplan to ensure that there is capacity to deliver Stage 2.

As presented, the Framework Plan to guide the Public Housing Renewal Program within the DHHS owned land has not made adequate provision for what Council considers necessary to support the level of intensification sought for the site. Council requires consideration of specific issues during Stage 1 including:

- Resolution of the existence of Debney Meadows Primary School, the proximity of proposed built form within DHHS land provides no flexibility for the school to expand except into Debney’s Park. This over reliance upon Council’s asset is not supported. The existing “walk ups” are very close to the school and this creates privacy issues. Future built form should be set back at least 50 metres from the existing boundary to create a buffer.
- Relocation of the Flemington Community Garden to within the DHHS land at ground level, to ensure the Moonee Ponds Creek environs can remain as naturalised as possible.
- Location and tenure resolved to include a fit for purpose new community centre within a mixed use building on Racecourse Road.
- How DHHS will contribute to improved access to Flemington Bridge Station across the Moonee Ponds Creek.

Urban Form Concept

The character of Flemington to the west of Debney’s Park is strongly based upon a Victorian era grid which is typical of inner areas of Melbourne. This is supported via a network of laneways. Streets were laid out with view corridors linking two sides of the neighbourhood.

A number of dwellings along Victoria Street, Flemington have been identified in Council’s adopted Heritage Gap Study 2014. The Heritage Gap Study identifies all places and precincts outside of the Heritage Overlay that have potential heritage value and warrant further research. The Gap Study also provides a 10 year work program to guide which Stage 2 heritage studies should be undertaken in the future.

The first Stage 2 study (Heritage Study 2015) has recently been completed culminating in Heritage Overlays being applied to high priority sites as identified in the Gap Study. Council is now completing a tendering process to commence work on the next Stage 2 study (Heritage Study 2017) which includes Victorian and Interwar period dwellings along Victoria Street. The following groups of dwellings along Victoria Street will be further investigated for potential heritage status;

- 7-13 Victoria Street, Flemington (Victorian period) - potential Heritage Overlay as a group of brick Victorian houses.
- 57-123 Victoria Street, Flemington (Victorian period) – potential addition to the existing Heritage Overlay (HO24) - Wellington Street Precinct.
- 139-145 Victoria Street, Flemington (Interwar Period) – potential Heritage Overlay as a group of Interwar houses.
There are no Heritage implications from the proposed project on these buildings or any on the DHHS site.

Replicating the surrounding grid pattern can be seen as a tool to assist in knitting the Estate back into the wider context. The road layout proposed maintains a curving road pattern particularly to the east of the site. The orientation of the towers that are to be retained provide the reference for a more simplified north-south grid, which would align with the Macaulay precinct to the south.

![Figure 13: Historical Plan of Flemington Estate](image)

The number of the streets proposed and the alignment may not improve legibility from and within the Estate.

There is the opportunity to reimagine the precinct through a comprehensive master planning exercise. Within the Structure Plan and the eventual Development Concept Plan in the DPO, Council would prefer to see a focal point to aid in developing a sense of community and to fully respond to the design principles of legibility and social integration.
A simplified singular point of entry from Racecourse Road that aligns with Stubbs Street to the south would provide a focus for retail and small enterprise to evolve on both Racecourse Road and also on an internal boulevard.

Council supports a signature rising building to this corner. North-south orientation offers the best daylight penetration to the primary axis connecting through to Debney’s Park in the north. An active sleeve of retail/commercial could wrap the corners at ground level.

The opportunity is available for Holland Court be decommissioned, acting as a green link to provide an attractive outlook for future built form.

**Street Widths**

There are no specifications for internal streets either as a hierarchy of streets nor the preferred dimensions. Street cross sections should be provided within ‘The Plan’ to ensure the streets feel connected to the wider system. This is primarily achieved through their spatial characteristics. The following specifications are sought for the precinct:

<table>
<thead>
<tr>
<th>Street Type</th>
<th>Building Edge to Building Edge</th>
<th>Other</th>
<th>Materials</th>
</tr>
</thead>
<tbody>
<tr>
<td>Boulevard</td>
<td>20 metres</td>
<td>Include dedicated cycling lanes 4 metre footpath Footpaths to each side Central median for avenue planting</td>
<td>Blue Stone Curb and 2 pitcher channel Asphalt Footpaths</td>
</tr>
<tr>
<td>Park Edge</td>
<td>15 metres</td>
<td>Include 45 degree angle parking to park side</td>
<td>Blue Stone Curb and 2 pitcher channel Asphalt Footpaths</td>
</tr>
<tr>
<td>Other Streets</td>
<td>15 metres</td>
<td>Allow for street trees Pedestrian paths to each side Parallel parking</td>
<td>Blue Stone Curb and 2 pitcher channel Asphalt Footpaths</td>
</tr>
<tr>
<td>Laneways</td>
<td>6 metres</td>
<td>Finer grain materiality to encourage pedestrian use and development facing onto not just service use</td>
<td>Sawn top blue stone pitcher with 3 pitcher central drainage channel</td>
</tr>
</tbody>
</table>

*Table 10: Street Width Specifications*

Street wall heights should be informed by the 1:1 ratio of street width, particularly to the primary boulevard, to provide a sense of enclosure and definition without being over bearing within the pedestrian’s field of vision.

**Building Heights and Density**

The disparity between the Design Framework, Structure Plan and Development Plan Concept Plan embedded in the DPO presents challenges in analysing the cumulative impact of building heights, and proposed population densities. The parcels identified within the Development Plan Concept on page 10 of the DPO do not correlate with the parcel areas or indicative built form shown in the Design Framework, either in numbering or boundary/area.

The proposed density per hectare that is generated by the potential of each land parcel and proposed heights bears should fully integrate with the emerging context within Arden-
Macaulay. The existing built form scale to the west and south is 1-3-storeys with future scale within Macaulay precinct a preferred 9-storeys, and an anticipated dwelling density in the order of 85 dwellings per hectare.

What is proposed on the DHHS land within the Debney's precinct equates to a gross 270 dwellings per hectare (gross calculation incorporates the total land area divided by the total number of dwellings). As a comparison, the redevelopment of the Moonee Valley Racecourse (MVRC) will create 286 dwellings per hectare.

Table 11: Comparison of Densities per Hectare, Flemington Estate and MVRC

<table>
<thead>
<tr>
<th></th>
<th>Flemington Housing Estate</th>
<th>MVRC</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>All dwellings</td>
<td>New Dwellings - Public and Private</td>
</tr>
<tr>
<td></td>
<td>Gross</td>
<td>Gross</td>
</tr>
<tr>
<td>Total area (Ha)</td>
<td>6.82</td>
<td>3.12</td>
</tr>
<tr>
<td>Dwellings</td>
<td>1,772.00</td>
<td>845.00</td>
</tr>
<tr>
<td>Dw per Ha</td>
<td>250.84</td>
<td>270.43</td>
</tr>
</tbody>
</table>

For the density is to be absorbed, the spatial characteristics, particularly open space provision and community services and infrastructure, should be provided holistically to accommodate this new population.

Council notes that the MVRC development was required to include an open space area of 7,000 square metres as part of the Approved Active Centre Zone Schedule. Council acknowledges that there is opportunity to locate a similarly scaled podium tower arrangement along the Racecourse Road frontage but as with the design guidance within the racecourse, the podium extents and tower separations should be carefully prescribed to ensure maintenance of internal amenity of the existing towers.

Council acknowledges the ‘Development Concept Plan’ provides for a stepping down at the site's external interfaces including preferred setback diagrams, however no detail is given to ensure built form interfaces with internal streets. Council is concerned and would encourage further specification and for building profile diagrams to be embedded in the control.

Whilst the existing towers define the skyline views of the Estate, simply infilling the remaining open areas with built from will not in of itself solve the underlying site planning issues, nor address the over reliance upon Debney’s Park to provide the open space and release valve for this level of density. In particular:

- There is no capacity in the plan to accommodate the Community Garden at ground level in an unimpeded sunny location.
- There is no generosity surrounding the school for privacy or expansion, and,
- The proximity of built form proposed at the interface with the Hopetoun Children’s Centre does not achieve an equitable development scenario for future development of this key Council asset.

The design of on podia car parking, as described in the design framework, is problematic. The large multi storey facility to the eastern edges of the site ignores the significant views toward the Moonee Ponds Creek, effectively providing an inactive building edge in a critical location for passive surveillance of the park and creek environs and limiting views at this edge.

The redevelopment offers the opportunity to enhance the size and capacity of Debney’s Park. This can be done by ensuring that the open space contribution is realised through a land contribution at the periphery of the DHHS-owned land. This would make a significant
contribution to the capacity of Debney’s Park as a regional open space within Council’s Open Space Strategy.

This requirement should be reflected more directly within the DPO control as a condition and requirement for permit and indicated on the Development Control Plan, shifting the extent of building envelopes particularly at the north and east edges of the DHHS land.

The open space contribution should have regard to the MVRC’s Advisory Committee recommendation because of the similar increase in population. The open space contribution appropriate for this site at the minimum of 5 per cent of the total area of the site and on ground area equates to around 3350 square metres of land.

Safety and Design

One of the major issues affecting Flemington Estate is the safety and security of the residential buildings and surrounding areas. This issue has been raised often by community members in the various community engagement activities held on the proposal.

As such, it is critical that the site layout and design of the buildings, reflects this matter and positive steps are taken to include Crime Prevention Through Environmental Design (CPTED) principles into the design.

The CPTED principles are a crime prevention strategy which outlines how physical environments can be designed in order to reduce the opportunity for crime. CPTED concepts and principles are ideally incorporated at the design stage of a development, but can also be applied to existing developments and areas where crime and safety are a concern.

This is achieved by creating environmental and social conditions that:

- maximise risk to offenders (increasing the likelihood of detection, challenge and apprehension)
- maximise the effort required to commit crime (increasing the time, energy and resources required to commit crime)
- minimise the actual and perceived benefits of crime (removing, minimising or concealing crime attractors and rewards)
- minimise excuse making opportunities (removing conditions that encourage/facilitate rationalisation of inappropriate behaviour).

The CPTED guidelines considers both design and use, identifies which aspects of the physical environment affect the behaviour of people and then utilises these factors to allow for the most productive use of space while reducing the opportunity for crime. This might include changes to existing poor environmental design, such as through improved street lighting and landscaping. In addition, all new buildings should be designed with security and safety in mind, and should adopt passive surveillance of key areas wherever possible.

Urban Design Recommendations

From an urban design perspective, Council is generally supportive of the opportunity to improve and rectify the site planning challenges of the Flemington Estate which have resulted in a lack of ownership over the public realm, poor legibility across the Estate (including the street network), a lack of civic focus and integration of the estate with the wider context. Council sees the realisation of this opportunity through a whole-of-precinct renewal program rather than simply infilling available land. The dwelling mix and density should be capped.
Council has identified a lack of urban design detail and guidance in both the DPO Control and Development Concept Plan, which will be the guiding spatial planning assessment tool for future development of the DHHS land. In relation to the DHHS land further guidance and resolution is required. It is recommended that the development is designed to:

- Ensure the central main street boulevard visually aligns with Stubbs Street on Racecourse road providing a direct connection through to Debney’s Park in the north.
- Provide specific detail on the hierarchy of streets including cross section and materials to ensure the new development knits into the surrounding area. Site built form parcels away from park edges.
- Enshrine street wall heights and setbacks to internal streets to enable sunshine to footpaths and a pedestrian scale to building interfaces.
- Provide meaningful on ground open space at the sites external interfaces to enlarge the Debney’s Park as the most effective use of the open space contribution.
- Ensure building separations consider the amenity of new and existing resident’s access to daylight and outlook.
- Ensure the development capacity of the Hopetoun Children’s Centre is preserved through minimum 9 metre setbacks from the common boundaries.
- Ensure capacity within the DHHS land holding to accommodate the community garden at-grade and future expansion of the Debney Meadows Primary School so as not to further erode the capacity and program of Debney’s Park.
- Locate tower and podium form generally along Racecourse Road opting for mid-rise infill forms to the interior of the site.

Key matters for resolution and inclusion within the DPO Concept Plan include:

- Visual continuation of Stubbs Street through the precinct as a new north-south high street with no deviation in the alignment to that south of Racecourse Road.
- A minimum width of 20 metres for all internal roads with dedicated and separated pedestrian and bicycle treatment, and width to accommodate large boulevard trees.
- Adjustment of the street network to demonstrate direct connectivity south of Racecourse Road through to Debney’s Park and lines of sight through the precinct with a preference for no offset intersections.
- Measures to achieve enhanced north-south connectivity across Racecourse Road, including multiple crossing points.
- Indication that the frontage to Racecourse Road is subject to the Racecourse Road Streetscape Plan (City of Melbourne), with a minimum 3 metre building setbacks and indentation for a new consolidated tram stop west of Stubbs Street.
- Allocation of commercial activity to the Stubbs Street extension and the associated corners of Racecourse Road.
- Relocation of the Flemington Community Garden to within the site and at ground level.
- Allocation of approximate building footprints.
- Allocation of open space to complement the trees to be retained (where possible).
- A minimum 15 metre building setback along the Debney’s Park frontage.
- Addition of an ‘interface treatment’ along the southern edge of Precinct 1, where this precinct shares an interface with the Hopetoun Children’s Centre.
- Extend the interface treatment of Precinct 3 along the western section to ensure appropriate graduation between this precinct and Debney Meadows Primary School.
16.0 Open Space

The proposal provides the opportunity to significantly enhance the setting of the current development. This includes ensuring low impact on the surrounding open space and waterway function, and to provide adequate surveillance as per Crime Prevention through Environmental Design (CPTED) principles to improve the amenity and ensure social cohesion of the space.

Opportunities exist in:

- Open Space Provision – Quantity
- Open Space – Interface with the proposed development
- Community Garden
- Development and adjacent open space context.

Open Space Provision

The suburb of Flemington has been identified as having an insufficient amount of open space in the Moonee Valley City Council Open Space Strategy. The population for Flemington (including Newmarket and Travancore) in 2008 (when the Strategy was underway) was 8,900 with an overall 12 square metres of open space per person (calculated at 10.7ha/8900). The 2016 estimated resident population for Flemington (including Newmarket and Travancore) is 10,036.

The existing public open space within Flemington as noted in the Open Space Strategy is 10.7 hectares.

Due to its size, location, existing facilities and surrounding land uses, Debney’s Park is the largest public open space in this part of the municipality. As such Debney’s Park provides a range of functions for a variety of different groups including:

- Formal and informal recreation space for current residents of the Estate and the wider area
- Playgrounds
- Tennis courts
- Community Garden
- Car parking
- Recreation area for Debney Meadows Primary School.

Attachment 4 contains a description of all key elements of Debney’s Park.

The redevelopment of the site will significantly increase the number of residents in Flemington and this in turn will create further pressure on open spaces within Debney’s Park and the suburb.

With a population increase exceeding an additional 1,500 people through the proposed development, an overall expected population of close to 11,000 is expected in Flemington. This would result in approximately 9 square metres of open space per person, which is an overall reduction of public open space provision of 25 per cent.
Increased population at future developments at Flemington Life, 1 Ascot Vale Road and others in region including Arden-Macaulay, will only seek to increase pressure on the scarce open space reserves in Moonee Valley.

The current interim report for the State Government’s National Cities Performance Framework stipulates the following Liveability and Sustainability Indicator:

*Access to urban green space is the proportion of a city’s residents that can access parks, playing fields or other open green space within 400 metres. Green space within a city provides human health and environmental benefits. Knowing a city’s access to green space helps to understand whether a city has adequate open space for residents to enjoy and measures to protect biodiversity.*

Current best practice for the provision of open space is 20 square metres per person, according to the Parks and Leisure Australia Open Space Planning and Design Guide 2013. Within the subject site, the amount of open space on the DHHS site measures approximately 13,580m² (6.2sqm per 2170 person) this includes play spaces and open areas of grass accessible to the public and residents.

The proposed open space within the new development measures approximately 8,230m² (2sqm per 3793 person) which represents a loss in open space on the site of 5,350m². The majority of the proposed open space sits at podium level as part of the built form as opposed to the existing at-ground open space areas. Podium level open space does not always represent an accessible open space outcome for the public or the future residents within the development.

Unless carefully managed, podium level open space can restrict opportunities for social interaction and ecological opportunities.

This reveals the challenges of providing open space for various housing tenures, and highlights issues that current tenants have relayed back to Council.

These issues are focussed on the fact that tenants of the Estate feel that they have a sense of ownership to the open space adjacent to their residences. This can sometimes be seen at odds with other members of the public whom feel that the whole Estate should be able to be utilised as public open space.

Recently there have been documented issues in relation to the co-sharing and lack of access to open space in the DHHS redevelopment in Carlton.

Podium level open spaces do not allow opportunities for large tree plantings. They also create a disconnection between the Moonee Ponds Creek corridor and associated linear park to the proposed open space on DHHS land.

A reliance on podium level space would not achieve the general Development Plan objectives to:

- *To provide landscaping and communal open space that is resilient and enhances the sense of place, sustainability and liveability of the site and local area.*
- *To integrate with the surrounding area by responding to existing or preferred neighbourhood character, enhancing the public realm and existing networks and delivering ‘good neighbour’ outcomes.*
- *To deliver buildings and spaces that are accessible and practical for people of all abilities and adaptable to respond to the future needs of residents*
The Parks and Leisure Australia Open Space Planning and Design Guide should be used to provide guidance for the design of open space to ensure diversity and compatibility of functions, to complement the fabric of the new development.

The open space should consider and demonstrate how it relates to the following aspects:

- Be linked to existing or proposed future public open spaces where appropriate.
- Be integrated with flood ways and encumbered land that is accessible for public recreation.
- Be suitable for the intended use.
- Be of an area and dimensions to allow easy adaptation to different uses in response to changing community active and passive recreational preferences.
- Maximise passive surveillance.
- Be integrated with urban water management systems, waterways and other water bodies.
- Incorporate natural and cultural features where appropriate.

The project will potentially see a net loss of accessible open space within the DHHS and as such the impact on an increased population within the site and broader context needs to be considered as part of this proposal.

Schedule 8 of the Development Plan stipulates: ‘A new open space area of 1,000sqm open space area, generally located as shown on the Development Concept Plan and containing significant trees to be retained.’

Recommendations is to increase the available public open space by locating open space, at ground level, within the DHHS development site adjacent to Debney’s Park to further increase capacity and functionality of the public open space, enhance the sense of place, sustainability and liveability of the site and local area.

To create a nexus between open space need and the new population at the DHHS site, including requirements for Open Space Contributions, it would be appropriate to adopt the 5 percent requirement of the total area of the site to provide at grade open space of 3350sqm.

Open Space: Interface with Development

Other guiding principles from the Moonee Valley Open Space Strategy for interface with the DHHS development include:

- Existing public access to the open space reserve is to be retained where the access is located on public land or provided from publicly accessible spaces.
- Open space access should be improved where possible as a result of the proposed development, particularly in medium to higher density residential development. Note: direct pedestrian access to the reserve from individual properties should not be counted as improved public access and should only be approved where the design interface does not discourage public access directly to the reserve or through the site, or appear to privatise the open space. Generally, direct pedestrian access from private land, if proposed, will be more acceptable for larger reserves. The site design should maintain a clear public access in addition to the private access. Private vehicle
access and car parking arrangements that seek to use public open space will not be approved.

- No loss of public open space
- The design does not appropriate or encroach onto public open space for private use through expansion of infrastructure, furniture or fittings, boundary treatments, garden landscaping, access arrangements or other methods
- Retains all existing vegetation in open space (where it is not a declared weed)
- Subdivision/development layout achieves at least some passive surveillance where possible from adjoining properties of open space in preference to high boundary fences adjoining the reserve. Passive surveillance should be balanced with the need for open space to be clearly available to the public
- Retain key views into open space from all existing or proposed public access points including views from Racecourse Road and Victoria Street.
- The scale, height, building mass, building design and fencing does not adversely affect weather patterns, including wind, and retains a minimum of five hours sun access to the existing and proposed open space between 9am and 2pm when measured on 22 September
- The site layout and building design adequately caters for any noise and light that spills from the adjoining open space, i.e. through sensitive dwelling orientation or location of bedrooms. Note: pre-existing recreational activities will not be rescheduled or relocated
- Short term occupation of open space during the construction phase on nearby properties will not be granted, due to the community use of the space, access and surveillance of the area
- The proposed development will not encourage vehicle access from or through open space
- Existing properties with vehicle access and/or parking in or through open space will not be provided new or changed arrangements except where initiated to reduce private use of open space.

Open Space Outcomes Sought

The following elements should be incorporated into the design to assist in maximising open space integration and opportunities for new and existing residents and other users of Debney’s Park.

- Provision of adequate setbacks and adjoining landscape settings to increase the size and amenity of Debney’s Park and interface with the Moonee Ponds Creek where possible.
- The Council is currently working with Melbourne Water and Moreland City Council to prepare a Master Plan for Moonee Ponds Creek, which includes recommendations to create a strong linear park and providing water quality, shared pathways, biodiversity, improved ecology and activation initiatives along the creek.
- A Moonee Ponds Creek collaboration group has been established with stakeholders along the extent of the Creek, including Hume, City of Melbourne and Friends of Moonee Ponds Creek. Initial discussions have included that appropriate setbacks from development to the creek are met. Access of immediate and surrounding
residents to the creek is important. The collaboration group encourages pedestrian access to the west bank of the creek.

- Further improved access lighting under the Racecourse Road Bridge on the east bank would encourage more frequent use of the Flemington Bridge Train Station.
- There should be a mix of open space typologies to complement the podium private open space with communal open space at ground level to activate for various user groups.
- Ensure adequate surveillance of Debney’s Park through appropriate land uses at the interface of the development and through CPTED principles.
- Ideally the Community Garden should be at ground level within the DHHS site. It should remain consolidated and be located with a compatible community facility to maximise community capacity building.
17.0 Environmentally Sustainable Development (ESD)

The scale of the Housing Renewal project and the level of financial investment creates a major opportunity for a state-of-the-art development in terms of ESD outcomes that recognise the needs of current and future residents, together with the opportunities to improve Debney’s Park and the Moonee Ponds Creek interface. Council wishes to ensure that the environmental performance of the development improves amenity and enhances resident wellbeing and resilience to climate-related impacts.

The planning process that is to be established will require a future Development Plan and designs of individual buildings to be prepared. This will allow the following objectives to be successfully addressed through design:

- ESD, energy and climate adaptation
- Wind
- Integrated water management and Water Sensitive Urban Design
- Waste management and resource recovery
- Trees and green spaces
- Social sustainability
- Environmental site assessment and potentially contaminated land

Recommended changes to the Development Plan Overlay are included in Attachment 1.

Environmentally Sustainable Design Principles and Objectives

In a changing climate, people living on lower incomes are disproportionately impacted by increased frequency of heatwaves, rising energy prices and other impacts of extreme weather and flood. Strong commitments to environmental sustainability in the Planning Scheme, and embedded throughout project delivery, are critical to deliver on other key objectives. This is namely ‘to create safe buildings and spaces’ and ‘to provide landscaping and communal open space that is resilient and enhances the sense of place, sustainability and liveability of the site’.

Schedule 8 to the Development Plan Overlay, 3.0 Requirements for the Development Plan includes an objective ‘to deliver a sustainable and high quality development that contributes to the longevity of housing stock and reduces the cost of living.

Council suggests the inclusion of an objective: ‘to be an exemplary environmentally sustainable development, incorporating leading practice in climate-adapted and Water Sensitive Urban Design, sustainable building design and construction, low carbon energy systems and energy efficiency and waste minimisation’.

Recommendations

Schedule 8 to the Development Plan Overlay requires:

“An Ecologically Sustainable Development Plan that demonstrates how development on the site will achieve best practice standards and incorporate innovative initiatives on a precinct-wide scale. The Plan is to address the areas of energy efficiency, water resources, indoor
environment quality, stormwater management, transport, waste management, innovation and urban ecology”

The Plan should also consider on-site renewable energy systems and ensure built infrastructure is resilient to climate-related impacts.

The Ecologically Sustainable Development Plan needs to meet the requirements of the Moonee Valley Planning Scheme clause 21.04-3.

A carbon emissions reduction target should be set for the development, as well as standards and commitment to actions to achieve targets such as:

- All buildings to achieve a minimum of 6-7 star rating against the Green Building Council of Australia’s Green Star rating system for design and construction (or achieve an equivalent standard using an equivalent rating tool).

- Council notes a presentation from DHHS to Council on 20 June 2017 states that all dwellings achieve a 7 star NatHERS rating. However this does not seem to be included in the publicly released Planning Scheme amendment documents and supporting documents. Council recommends a higher NaTHERS target be adopted, considering the successful 8.9 NatHERS rated Horsham Catalyst Project (Attachment 5) which has set a successful precedent for energy efficient social housing projects (Figure 14).

- Set a target for the proportion of on-site renewable energy generation (i.e. solar panels and solar hot water) and commit to using renewable electricity rather than gas (a fossil fuel).

- Incorporate energy efficiency measures in all new buildings and the public realm including:
  - Active shading during summer to minimise unwanted solar heat gains
  - High-performing building facade and glazing systems, including thermal mass and green walls
  - Building energy systems and monitoring of building’s environmental performance
  - Energy efficient technologies, lighting and appliances
  - Natural ventilation and the ability to purge excess heat
  - Designs and materials which accommodate changing environmental conditions.

- Ensuring best practice passive solar design including orientation, shading, natural daylight and natural ventilation

Figure 14: Horsham Catalyst Project
Passive Solar Design

Melbourne is primarily a heating climate with residential space heating typically required for up to two-thirds of the year. It is therefore desirable to find ways to bring low winter sunlight into buildings whilst providing shelter from Melbourne’s hot summer afternoons. This can be achieved by limiting unshaded walls and windows directly exposed to the summer afternoon sun on the western facade of buildings and maximising exposure of northern and, to some extent, eastern sunlight. The installation of devices such as breeze soleil and the inclusion of exposed thermal mass can also assist in the passive thermoregulation of buildings.

The present precinct plan is such that many ground level areas and buildings will be overshadowed for the majority of the time when sunlight is most desired in the winter. This is likely to result in higher heating and lighting costs and lower amenity for residents in winter.

The location, height and orientation of Building A4 is close to ideal for solar passive design with a long east-west axis, short north-south axis, medium rise with potential to not overshadow the next building to the south. The remaining buildings with long north-south axes and short east-west axes (A1, A2, A5, A7, A8, C4, C5) will likely result in higher cooling costs and lower amenity in summer, as well as higher heating and lighting costs and reduced amenity in winter.

There are several ground level areas adjacent to and partially enclosed by the proposed buildings. These spaces will be sheltered from prevailing wind and will create an opportunity for passive recreation. However, the west/south orientation of these (i.e. the courtyard surrounded by buildings A6, A7, A9, the enclosed area to the west of A1 and A8 and the podium enclosed by A2, A3 and A4) will tend to result in high afternoon temperatures and cold morning temperatures. Similarly, several buildings and groups of buildings (i.e. A1, A5, A6 and A7) are oriented for minimum solar exposure before midday, when it is most desirable, and maximum solar exposure after midday, when it is least desirable.

It is recommended that final building designs should consider location, height and orientation for solar passive design opportunities with the above in mind.

Rationale for Recommendations

Council has committed to achieving zero net emissions for the Moonee Valley community’s greenhouse gas emissions. Energy use in residential buildings accounts for 30 per cent of the community’s greenhouse gas emissions. Hence such a major development provides a key opportunity to reduce emissions, significantly reduce energy costs and improve health outcomes of occupants. It's also noted at the state level, the Victorian Government has committed to achieving zero net emissions for the Victorian community by 2050 and to renewable energy generation of 40 per cent by 2025. In line with this commitment, the Victorian Government's social housing renewal projects should adopt leading practices for low carbon developments.

Human induced climate change in Moonee Valley is predicted to result in more frequent and severe droughts, heatwaves, extreme weather and flooding, coupled with increased heat due to great urbanisation (buildings and roads). In the coming years, energy and food supply and prices are also expected to be impacted by climate change.

Poor design, construction and demolition of buildings can result in substantial environmental, social and health impacts, especially for more vulnerable public housing tenants who are living on low incomes. For example, there are significantly more cases of heat, cold and damp-related diseases affecting low income members of the population occupying poor housing
stock, both as a consequence of adverse design leading to poor indoor environment quality and where the cost of energy for heating and cooling is prohibitive.

Wind

Changing the built form can result in changes to ground level wind conditions. These changes can sometimes be detrimental and result in areas becoming inhospitable with the potential to become unsafe.

Ground level winds in some localised areas of the site are already high due to the existing high rise buildings. The proposed infill has the potential to cause further adverse ground level wind conditions as well as reducing direct sunlight. In Council’s experience, such conditions tend to result in stunted street-tree growth and overly cold, dark and windy streetscapes such as those that occur in many areas of Docklands.

Council seeks to avoid such highly compromised streetscape amenity.

Scale model wind tunnel tests are one way of ensuring that the final design complies with relevant standards, such as those listed in the City of Melbourne Planning Scheme. The design should give consideration to management measures such as stepped facades, articulated facades and wind screening to ensure a hospitable environment for trees and residents is retained.

Integrated Water Management and Water Sensitive Urban Design (WSUD)

The development will need to meet the Stormwater Management (Water Sensitive Urban Design) requirements of Clause 22.03 in the Moonee Valley Planning Scheme.

Targets should be set to reduce potable water use and to collect, treat and reuse rainwater and stormwater on-site. Standards and commitments to achieve the targets could include:

- ‘Fit for purpose’ water, including substituting potable water and mitigating flood through alternative water sources (water harvesting, grey water use tanks and other storage systems)
- Water efficient building fixtures and appliances
- Implementing intelligent control systems for flood and water management (i.e. smart tanks)
- Potential grey water reuse for the buildings
- Incorporating Water Sensitive Urban Design in the public realm to include rain gardens, passive irrigation of trees and landscapes and efficient irrigation systems to create cool spaces

Taking an integrated water management approach enables the conservation of mains water, utilisation of alternative water sources and improvement in stormwater quality through Water Sensitive Urban Design. It also supports healthier vegetation, cooler spaces and flood mitigation.

Large redevelopment sites offer rare opportunities to harvest rainwater and stormwater to save valuable potable water, while at the same time preventing waterway pollution.

There are similarities in Flemington Housing Estate and Fishermans Bend in soil contamination and local flooding issues.

As such, Council recommends reviewing the Corporate Research Centre for Water Sensitive Cities – Ideas for Fishermans Bend Report and considering similar ideas such as:
• Buildings that actively manage stormwater and microclimate, including intelligent systems
• Designing landscapes that tolerate temporary flooding

Waste Management and Resource Recovery

Smart design can help residents and businesses to generate less waste and provide opportunities to reuse and recycle the goods, materials and equipment.

A Waste Management Plan (WMP) should be required in accordance with Council’s waste management guidelines and should prioritise measures to minimise waste and promote reuse and recycling.

Waste Management Planning and Services

The management of waste and services highlights the challenges and intricacies of the Housing Renewal project, and the intertwined service requirements that will come from a mix of private and public housing. Council is responsible for rubbish collection at the existing Flemington Estate.

In relation to new private dwellings, Council does not normally provide waste collection services to developments over six dwellings. However Council and DHHS will need to determine the most suitable model for collection, given the mix of public and private housing.

In doing so, the WMP should set out how the development will meet best practice waste management and minimisation. The WMP should account for the entire development (private and public housing) and should also seek to minimise heavy vehicle movements within the Estate. Compactors or underground waste management may assist in the minimisation of vehicle movement.

Special consideration should also be given to the sustainable management of organic/food waste, particularly resulting from the operation of cafés that may be developed.

Reuse Hub

As additional measures, DHHS may consider allocating space for a ‘reuse hub’ or ‘repair café’ within the precinct. This would provide a valuable resource for the community and could also provide employment and training opportunities. Further, charity donation bins would be a welcome inclusion although this is not fundamental to the WMP.

Construction and Demolition Waste

Poor waste management practices also result in litter and dumped rubbish, which often leads to other anti-social behaviours and other negative impacts to residents and visitors.

The development has the potential to generate a significant volume of waste during construction and demolition. Council recommends that DHHS develop a waste minimisation plan for the project which will address, at a minimum, the following criteria:

• Retention of elements of existing structures where possible
• Reuse and recycling of materials from demolished buildings
• Minimisation of waste through a ‘cradle to cradle’ approach to design and construction and responsible selection of building materials

Council strongly supports the retention of the Community Garden and medium and high value trees, as set out in the Design Framework. DHHS should also ensure that the trees and Community Garden are adequately protected throughout construction activity, through minimising traffic over root zones. Where possible, apartments should also be designed with green walls, rooftop gardens, and also with balconies that will allow for cooling and growing food.
18.0 Environmental Site Assessment and Potentially Contaminated Land

Council agrees that an Environmental Site Assessment needs to be carried out based on the likely past uses of the site. Preliminary desktop research on potentially contaminated sites identified the Debney’s Park area as a former landfill. The exact dates of filling are unknown. An environmental audit, including soil testing, was carried out in the mid-1990s and these reports were provided to DHHS in early 2017. The reports showed some exceedances of the State Environment Protection Policy (Prevention and Management of Contaminated Land).
19.0 Social Impact Assessment and Community Infrastructure Provision

Community Infrastructure

Community Infrastructure and Social Outcomes Contained in Draft DPO

Undoubtedly the Renewal Program will bring about a significant change to the demographic profile of Flemington. This in turn will have an impact on the need for and provision of social infrastructure.

The Draft Schedule 8 to the DPO sets out the following in relation to social outcomes and community infrastructure for the site:

General
  • To provide retail, commercial or community uses to meet an identified local need or stimulate local activity or participation
  • To foster social connections between residents and the wider community
  • To deliver buildings and spaces that are accessible and practical for people of all abilities and adaptable to respond to the future needs of residents.

Land Use
  • Community facilities in appropriate locations

Council Response and Recommendations

Council agrees with the principles contained in the wording of the proposed DPO as set out above. In particular, the intention to build social connections and deliver accessible and adaptable community facilities. Notwithstanding, Council has some concerns regarding the measurability of the current objectives contained in the DPO.

Based on the initial understanding of the community infrastructure impacts, Council recommends that, to ensure the necessary community infrastructure provision is achieved, a bespoke S173 Agreement be entered into between DHHS and Council, in advance of any new planning controls affecting the planning governance of the site.

The primary community infrastructure priority for the Flemington area is to develop an integrated community hub at Debney’s Park that includes the amalgamation of the existing sport and community centre functions in one building. The hub will include an increased number of multi purposes spaces to meet the long term needs of the local community.

Council is developing indicative concept plans for a new community centre that could be accommodated on the DHHS land. Whilst still in embryonic form, the principles that will inform the design and location are as follows

  • to achieve an iconic building that meets the needs of residents and the wider community
  • located with a major frontage to Debney’s Park,
  • a facility suitable for a wide range of uses.

In regard to the potential Agreement, the general objectives sought should be that the provision of the following elements are to be provided in the first stages of development, on DHHS land:
1. To deliver an integrated community hub that includes, where possible, the amalgamation of the existing community services in one building. The hub will be flexible in design and provide an increased number of multi-purposes spaces to meet the long term needs of the local community, including:

- study area/mobile work spaces
- community lounge
- community hall (seating 200 people)
- multi-purpose children’s room
- small meeting spaces
- medium meeting spaces
- library outreach space
- consulting rooms
- community kitchen
- classrooms/training rooms
- art space
- reception area
- administrative and staff facilities

2. Select an appropriate site for community facilities based on the following location principles:

- An integrated centre
- Within easy walking distance
- Close to public transport
- Co-located with existing open space (Debney’s Park)
- Minimise the loss of open space
- Protects the view line and heritage precinct of Victoria Street

3. Design community facilities to instil local pride, foster integration and increase utilisation from both social and private housing tenants, and the surrounding Flemington neighbourhood community.

Base Assumptions: Population and Demographics

Site Development Assumptions

Council has assumed the total number of new dwellings will be 1,043 which includes 218 new social housing units and 825 private dwellings. The proposed site development for Stage 1 will include a combination of 1 and 2-bedroom properties which in Council’s experience creates a range of demands upon Council’s social infrastructure.

In order to calculate the projected population for the additional dwellings, Council has applied the average household sizes contained in the Community Facility and Infrastructure Needs Assessment (Capire, 2014). In this report the average housing size for the SLA1s that comprises the Flemington Housing Estate is 2.37 persons. The average household size for the remainder of the study area (the suburbs of Flemington and Travancore) was 1.91 persons.
The difference in average household size is due to the higher proportion of families with children living in the existing social housing compared to the remainder of the study area. The table below shows the expected increase in population.

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<th>Private Housing</th>
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<td>Additional population per dwelling type</td>
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<td>1,576</td>
</tr>
<tr>
<td><strong>Total additional population</strong></td>
<td><strong>1,623</strong></td>
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</tr>
</tbody>
</table>

*Table 12: Expected Increase in Population*

**Demographic Profile**

The demographic profile of the development site is likely to change significantly given the addition of approximately 1,600 private housing residents. The mix of 1 and 2-bedroom dwelling types will also influence the demographic profile of the new private housing residents. It is likely that the profile of the new Flemington Renewal site residents will be in line with trends from other higher density development within Moonee Valley, such as Flemington Life (ie the Victoria Racing Club development).

To illustrate this point the key differences in the likely demographic profile of Flemington Life residents when compared to Flemington as a whole include\(^3\) are:

- Higher income professionals (85 per cent are expected to be white collar workers with incomes 33 to 45 per cent higher than the Melbourne average)
- A comparatively low proportion of zero to 14 year olds (around 10 per cent) and residents aged 65 years and over
- A larger proportion of 15 to 39 year olds compared to the surrounding areas
- Over two-thirds of the dwellings will be lone person and couple households
- Over one-third of the dwellings will be lone person households
- Children are most likely to be very young children up to four years of age

These assumptions suggest that the new private residents are likely to require access to the following types of community infrastructure:

- Libraries
- Multi-purpose spaces/halls for hire
- Early years services, particularly childcare
- Formal and informal (social) sport and recreation facilities including sports fields, leisure centres, pools and indoor recreation
- Informal social sport competitions (particularly indoor).

In comparison to the private residents, the social housing resident demographic profile will continue to include:

- A higher proportion of young families, including both single and couple parents
- A higher proportion of children and young people aged 5-24
- Lower levels of educational attainment and a higher proportion of disengaged young people
- A higher proportion of people from non-English speaking backgrounds and / or born outside Australia.

\(^1\) Source: Flemington housing estate study area average based on Capire report, 2014
\(^2\) Source: Flemington study area average based on Capire report, 2014
\(^3\) Source: Flemington Hill and Epsom Road Advisory Committee: Submission from Moonee Valley City Council, February 2016
This demographic cohort will also require access to many of the same sorts of community facilities as the private residents but will have an additional need for social services.

The entire population of the development will be highly multicultural and community facilities should be planned to accommodate uses which respond to this diversity.

Social Impact of Development

It is important that the underlying social impacts of the project are properly considered and the full opportunities to improve community cohesion are achieved.

There has been concerns that in other previous redevelopment projects, developers saw private dwellings next to or integrated with public housing as undesirable and requested separate blocks of private and public dwellings. Among others, this resulted in separate car parking, entrances and courtyards. This diverged significantly from the integrated community that was promoted and expected.

Demand for Community Infrastructure

A range of policies and research (listed as references) have informed Council's understanding of local community infrastructure needs.

The *Flemington Community Centre: Community infrastructure needs assessment*, prepared by Capire Consulting in 2014 identified that the following community infrastructure and services are required to meet the future needs for the residents in Flemington and Travancore:

- childcare
- formal meeting spaces
- informal meeting spaces
- youth specific spaces and programs
- lifelong learning program space
- library outreach services
- consultation space for outreach services

In addition, there is a need to increase the capacity and condition of a number of sports facilities and fields in the area.

Council Wide Community Infrastructure Objectives

Council is currently preparing our long term community vision, MV2040. It will include a framework that provides for the future provision of all Council managed/provided community facilities across the municipality to 2040, with the key objective of achieving a network of community facilities for people to access service, meet, participate and foster a sense of place.

The key objectives of the community facilities framework are to:

- Ensure that the future needs of Moonee Valley residents are identified and appropriately planned
- Consider the diverse needs of residents, workers and visitors in the planning and provision of service and facilities
- Optimise the use of facilities through encouraging broader uses by multiple users
• Pursue new desired delivery models, specifically the development of community hubs and co-location of services
• Support accessible and sustainable design of community facilities
• Identify priorities for investment in community facilities

The following principles guide decision making around community facility projects in Moonee Valley. In summary they include:

• Improving coordination around community facility planning and delivery
• Transitioning to community hubs and co-located services
• Addressing community needs and aspirations
• Implementing best practice in urban and environmental design. This includes location criteria such as proximity activity centres and public transport.
• Providing facilities that ensure equity and access for the community
• Ensuring facilities have effective and efficient management and governance models
• Delivering facilities in a manner that is financially sustainable.

Council's preferred provision of community infrastructure is based on a community hub model. Community hubs typically:

• Include a range of activities that share buildings/spaces
• Strengthen a place's identity and help define the character of a neighbourhood
• Enhance connections and relationships among people
• Encourage collaboration between co-located services
• Optimise the use of facilities and support land efficiencies
• Have clearly defined models of ownership, funding and management.

Flemington Estate Community Infrastructure Priorities

Community Facilities

Adjacent to the Flemington Estate, Debney’s Park contains the Flemington Community Centre and sport pavilion. Significant functionality and capacity issues have been identified with each of these facilities (Table 13).

Council’s strategic vision and primary community infrastructure priority for Flemington as contained in the MV2040 Community Infrastructure Plan (Draft) is to develop an integrated community hub at Debney’s Park which includes the amalgamation of the existing sport and community centre functions in one building. The hub will be designed to increase cross utilisation and integration between the Flemington Housing Estate and surrounding Flemington neighbourhood community. It will include an increased number of multi-purpose spaces to meet the long term needs of the local community into the future.

Some of the key functions to be included within the future hub include:

• integrated early years services
• study area/mobile work spaces
• community lounge
• community hall (seating 200 people)
• multi-purpose children’s room
• small meeting spaces
• medium meeting spaces
• library outreach service space
• consulting rooms
• community kitchen
• classrooms/training rooms
• art space
• reception area, and
• administrative and staff facilities.

**Sport and Leisure**

In general, Council seeks to increase the level and frequency of leisure activity performed by its residents. This goal is supported through the provision of sports facilities that are fit for purpose, provide for multiple groups and a broad range of community activities.

The future development direction for sport and leisure facilities for Debney’s Park are described in the *Debney’s Park Master Plan* (draft). Some key initiatives in the master plan include:

• extend and realign pedestrian and cycling paths
• improve vehicular entry
• refresh and improve landscaping
• provide two full sized soccer pitches for junior/training and small sides football areas
• improve lighting and seating.

**Performance and Capacity of Community Infrastructure**

Overall, Council’s community infrastructure within proximity to the Flemington Housing Estate has a lack of capacity to absorb increase demand. Most facilities are stand-alone, lack integration and have condition and functionality issues.

Performance and capacity observations of this community infrastructure is provided in the below table.

<table>
<thead>
<tr>
<th>Facility</th>
<th>Primary service/s</th>
<th>Notes</th>
<th>Future capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Community facilities (buildings)</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Flemington Community Centre</td>
<td>• Facility accommodates the Moonee Valley Community Development team</td>
<td>This facility is in need of replacement. It is in poor condition and operating at capacity.</td>
<td>No capacity</td>
</tr>
<tr>
<td></td>
<td>• Facility accommodates a range of recreational, social and learning programs</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>delivered by Council and other service providers including occasional care</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Facility includes multi-purpose spaces (one hall, four medium flexible rooms</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>and one computer room), a range of offices and ancillary spaces</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Debney’s Park Pavilion</td>
<td>• The pavilion is adjacent to sporting fields. It contains a small kitchen for</td>
<td>Facility does not meet state sporting association guidelines.</td>
<td>No capacity</td>
</tr>
<tr>
<td></td>
<td>canteen</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Facility</td>
<td>Primary service/s</td>
<td>Notes</td>
<td>Future capacity</td>
</tr>
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<td>----------------------------------</td>
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</tbody>
</table>
| Hopetoun Children’s Centre       | • Sessional kindergarten  
• Long day care                                                                         | Facility has recently been redeveloped. It will be at capacity in the near future. | Limited capacity |
| Canterbury Stables Community Centre | • Community hall with seating capacity for 100 people                          | Facility is in poor condition and has high utilisation.               | Limited capacity |
| Crown Street Stables             | • Community hall and social enterprise (café)  
• Community hall is located on the first floor and has capacity for 60 people | Facility in good condition, with limited universal access to community hall. | Moderate capacity |
| Flemington Library               | • Library services  
• Facility includes a library space, one classroom and one training room       | Library is extremely small and has no capacity to increase required floor area to meet community expectations. | No capacity      |
| Farnham Street Neighbourhood House | • Community centre providing a range of social services and programs  
• Venue is home to more than eight service organisations | Services now rely on hiring external venues (including commercial venues) to meet programming demands/service delivery needs. | No capacity      |
| Flemington Street Children’s Centre | • Long day care                                                                | Building has functionality issues and is in poor condition.             | Limited capacity |

### Sports fields

<table>
<thead>
<tr>
<th>Sports fields</th>
<th>Capacity</th>
<th>Future capacity</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Debney’s Park sports field</td>
<td>Capacity increased only improved by upgrading surface.</td>
<td>No capacity</td>
<td></td>
</tr>
</tbody>
</table>
| Debney’s Parks sport courts    | Social use only. Poor quality courts not suitable for competition sport.  
Capacity increased only by upgrading (renewing) tennis courts. | Limited capacity |                                                                       |
| Fairbairn Park                 | Requires infrastructure investment                                         | Limited capacity |                                                                       |
| Walter Street Reserve          | Heavily utilised  
Sports pavilion has no change rooms and requires upgrade to increase field use | No capacity      |                                                                       |

**Table 13: Supply and Capacity of Local Community Infrastructure**

**Location Principles**

Based on previous work including the key activities and functions, guiding principles and demographic profile, Council has developed a number of key locational attributes for selecting an appropriate site for future community facilities within the Flemington Estate.

The locational attributes include:
• An integrated centre – the new site needs to be able to accommodate a large community building that provides a focus for community development and social integration.
• Within easy walking distance of housing – the new site needs to be located on footpath/cycle networks.
• Close to public transport – the new site needs to be located near a tram stop and within easy walking distance of the train station.
• Co-located with existing open space (Debney’s Park) – the new site would be best located adjacent to existing open space and leisure opportunities at Debney’s Park.
• Visual presence – the new site should be in a strategic position and have a strong visual presence that builds community pride.
• Minimise the loss of open space – the site needs to be located to avoid reducing usable open space. Proposed buildings should minimise the building footprint through the design including consideration of multilevel buildings.
• Protects the view line and heritage precinct of Victoria Street – the new site needs to be located to avoid impacting on the heritage nature of Victoria Street.

These criteria will be used to formulate Council’s and DHHS designs for a future Community Centre in Stage 1.

**Council Response and Recommendations**

Overall, Council’s community infrastructure proximate to the Flemington Housing Estate has a lack of capacity to absorb increased demand. Most facilities have condition and functionality issues, are stand-alone and lack integration.

In addition, there is a need to increase the capacity and condition of a number of sports facilities and fields in the area. In terms of sport and leisure generally, Council seeks to increase the level and frequency of leisure activity performed by its residents. This goal is supported through the provision of sports facilities that are fit for purpose, provide for multiple groups and a broad range of community activities.

The future development direction for sport and leisure facilities in Debney’s Park are described in the *Debney’s Park Master Plan* (draft). Some key initiatives in the master plan include:

• extend and realign pedestrian and cycling paths
• improve vehicular entry
• refresh and improve landscaping
• provide two full sized soccer pitches and junior / training and small sides football areas
• improve lighting and seating.

The primary community infrastructure priority for the Flemington is to develop an integrated community hub at Debney’s Park that include the amalgamation of the existing sport and community centre functions in one building. The hub will include an increased number of multi purposes spaces to meet the long term needs of local community.
20.0 Infrastructure Contributions, Staging and Timing

As part of its ongoing planning, Council is working through the development and community infrastructure contributions required to accommodate the growing population in Flemington. Council had not foreseen further substantial population growth in the Flemington Housing Estate, and much of the land within the municipality area and nearby the site is developed. The environs of Racecourse Road, Moonee Ponds Creek and Mt Alexander Road are also a complex confluence to plan. Growth in the adjoining areas that share local and state infrastructure needs greater consideration and coordination between state agencies and local municipalities.

Council considers that the Advisory Committee should provide advice on the implications of an additional 825 dwellings in Flemington, and whether there is a need for a contribution to be made to assist the maintenance and delivery of services and infrastructure.

Council has not prepared contribution rates for the proposed development. However, the Committee’s attention should be drawn to recent major developments where there is an established requirement for financial contributions:

- Moonee Valley Racecourse redevelopment.
- Flemington Hill and Epsom Road Advisory Committee.

Amendment C98 to the Moonee Valley Planning Scheme introduced a public open space contribution (for subdivisions of three lots or more) through the Moonee Valley Planning Scheme. In particular it:
  - Introduces a public open space contribution under the schedule to Clause 52.01 Public Open Space,
  - Introduces a new local policy (Public Open Space Contribution) into the Moonee Valley Planning Scheme at Clause 22.02; and
  - Makes minor changes to the MSS at Clause 21.08.

Public open space contributions (for subdivisions of three lots or more) are currently levied through the Subdivision Act 1988.

Justification is required as to why contribution of open space commensurate with land as per Open Space Contribution of 5 per cent of land area for the new private dwellings is not a mandatory requirement.
21.0 Structure Plan and Consideration of Stage 2 Issues

The Structure Plan "provides the framework to guide future development and enhancements in the precinct". The Structure Plan denotes the mix of uses within the precinct which along with DHHS land and Debney’s Park, includes Hopetoun Children’s Centre, Debney Meadows Primary School and the Flemington Community Centre. The Structure Plan states as its purpose:

“The Plan is intended to be implemented in 2 stages as a consequence of the dual land ownership of the precinct:

Stage 1 will be the redevelopment of the Flemington housing estate by DHHS.
Stage 2 will be enhancements to the land owned by the City of Moonee Valley”

Council requests that the Framework Plan guiding the Public Housing Renewal Program makes adequate provision for facilities necessary to support the level of intensification sought for the site. Council requires consideration of specific issues during Stage 1 including:

Debney Meadows Primary School: Resolution of the existence of Debney Meadows Primary School. The proximity of proposed built form within DHHS land provides no flexibility for the school to expand except into Debney’s Park. This over reliance upon a Council asset is not supported. The existing “walk ups” are very close to the school and this creates privacy issues for the school. Future built form should be set back at least 50 metres from the existing boundary to create a buffer.

Flemington Community Garden: Relocation of the Community Garden to within the DHHS land at ground level, to ensure the Moonee Ponds Creek environs can remain as naturalised as possible.

Flemington Community Centre: Location and tenure resolved to include a fit for purpose new community centre within a mixed use building on DHHS land.

There has been general agreement between Council and DHHS that the existing Community Centre will be repositioned onto DHHS land as part of the redevelopment. This creates a range of opportunities for the future of the land where the Community Centre currently sits. As part of its submission, Council will present the options explored with regard to opportunities for the site, and will seek guidance from the Advisory Committee as to their recommendations for future outcomes on the site.

Hopetoun Children’s Centre: The inclusion of the site at the corner of Victoria Street and Racecourse Road presents the opportunity to consider the future potential for this site. Council may also present and seek the views of the Advisory Committee on the options for this key corner site, in addition to the proposal that the MUZ apply to the site.

It would be Council’s intention that should any redevelopment occur that this would entail additional or improved community facilities as well as exploring opportunities for social housing.

Moonee Ponds Creek Interface: Provide adequate setbacks and adjoining landscape settings to increase the size and amenity of Debney’s Park and interface with the Moonee Ponds Creek. This is particularly important given the increase in residential population and loss of open space within the DHHS site. The Council is currently working with Melbourne Water and Moreland City Council to prepare a Master Plan for Moonee Ponds Creek, which include
recommendations to create a strong linear park and provide water quality, shared pathways, biodiversity, improved ecology and activation initiatives along the creek.

A Moonee Ponds Creek collaboration group has been established with stakeholders along the extent of the Creek, including Hume, City of Melbourne and Friends of Moonee Ponds Creek. Initial discussions have included that appropriate setbacks from development to the creek are met. Access by residents (immediate and surrounding) to the creek is important. The collaboration group encourages pedestrian access to the west bank of the creek.

Further provisions that improve access lighting under the Racecourse Road Bridge on the east bank would also encourage more frequent use of the Flemington Bridge Station.