Flemington Life
Planning Scheme Amendments
GC40 Flemington Green and
C290 550 Epsom Rd

Urban Design Expert Witness Statement

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# Contents

1 Introduction ........................................................................................................................................... 4  
   a Personal Details ................................................................................................................................. 4  
   b Area of Expertise in this Case ............................................................................................................. 4  
   c Clients Instructions, Scope of Work .................................................................................................... 4  
   d Reference Documents ....................................................................................................................... 4  
   e Involvement of Others ....................................................................................................................... 5  
   f Summary of Opinion ........................................................................................................................... 5  

2 Issues Relating to Both Sites .................................................................................................................. 6  
   a Built form Context .............................................................................................................................. 6  
   b Intensity of Development .................................................................................................................... 6  
   c Building Typology - Podium/tower Form ............................................................................................ 7  
   d Building Height ................................................................................................................................. 8  
   e Building Bulk .................................................................................................................................. 9  
   f Building Design ............................................................................................................................... 9  
   g Activation and Frontages .................................................................................................................... 10  
   h Open Space ................................................................................................................................... 10  

3 Flemington Green ................................................................................................................................ 11  
   a Built form Context .............................................................................................................................. 11  
   b Intensity of Development .................................................................................................................... 11  
   c Building Typology ............................................................................................................................ 12  
   d Building Height ................................................................................................................................ 13  
   e Landmark ....................................................................................................................................... 14  
   f Building Design ................................................................................................................................ 15  
   g Public Space .................................................................................................................................... 15  
   h Sustainability ................................................................................................................................... 16  
   i Staging ............................................................................................................................................ 16  

4 550 Epsom Rd ......................................................................................................................................... 17  
   a Built form Context .............................................................................................................................. 17  
   b Response to Context ........................................................................................................................... 17  
   c Intensity of Development .................................................................................................................... 18  
   d Landmark ....................................................................................................................................... 19  
   e Building Height ................................................................................................................................ 21
1 Introduction

a Personal Details

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Qualifications

B Arch (University of Adelaide) 1981
Architect

Experience


Senior Architect and Urban Designer at City of Melbourne, 2002 to present – initially in City Projects, now in the City Plans Team, Urban Strategy Branch.

b Area of Expertise in this Case

I have extensive experience in undertaking urban design assessments of development proposals and have presented expert evidence at several VCAT hearings. My assessment is limited to urban design issues, and does not address heritage or internal amenity issues.

c Clients Instructions, Scope of Work

Provide an urban design assessment of the proposed Planning Scheme Amendments GC40 (Flemington Green) and C290 (550 Epsom Road).

d Reference Documents

I have referred to the following documents in the preparation of this statement:

- the folder of A4 documents titled Flemington Life Exhibition Version Jan 2016, with a focus on the Comprehensive Development Zone schedule and Comprehensive Development Plan (CDP) for each site;
- A3 documents titled Flemington Life Book of Plans Exhibition Version Jan 2016
- email from Urbis of 9/2/16 stating site areas and development densities
- Memo of 23/2/16 from Woods Bagot titled Response to Flemington Hill and Epsom Road advisory Committee
I have also referred to Plan Melbourne May 2014, Plan Melbourne refresh discussion paper October 2015, the Melbourne Planning Scheme, the Moonee Valley Planning scheme, Draft Racecourse Road Activities Area Structure Plan October 2012, and City North Structure Plan, 2012.

e Involvement of Others

The proposed building envelopes have been modelled by James Regan, 3D Analyst in the GIS Team, City Of Melbourne. There have been no other significant contributors to the report.

f Summary of Opinion

As the proximity of landscaped open space is a dominant aspect of both sites’ contexts, their designs should more deliberately respond to it.

I support replacement of open-lot carparking with some form of redevelopment at Flemington Green – particularly the provision of low-rise development and public realm improvements, including the park. Beyond that, however, I have some fundamental concerns with both the nature of the proposed development and the framing of the proposed amendments.

The amendments seek to achieve the development densities associated with urban renewal areas without providing the rich mix of uses, facilities, housing diversity and services needed to build community in such areas, together with the reliable, easily-accessible public transport needed to avoid dependence on private motor vehicles. No social housing is included, for example.

There is a lack of strategic justification for towers, given the absence of any relevant structure plans and the lack of commitment to regular train services on the Flemington spur line. As a minimum, it is recommended that the extent of podium-tower development in Flemington Green be reduced in favour of low-rise and that there be no tower on the Epsom Rd site.

If any towers are permitted, the CDZs should be amended to either a) make tower setbacks mandatory and at least 10m from all boundaries; or b) set maximum widths or floor areas to limit the bulk of towers.

If any towers are permitted on the Flemington Green site, they should be limited to one single tower, no taller than Tower 3 (13 or 14 storeys), and reduced in floor plate to achieve 10m setbacks.

If a tower is permitted on the Epsom Rd site, its height should be significantly reduced and a pedestrian crossing should be required at the developer’s expense prior to commencing construction. If the objective of placing a landmark on this site is considered worthy, consideration should be given to alternative typologies which better respond to the landscape setting; alternatives could include a narrow tower at the northeast corner of the site, up to about 10 storeys without setback, for example.

Multiple design architects be engaged, to provide variety within the precinct. If any towers are permitted, an AIA-endorsed design competition should be required for each podium-tower building to ensure exemplary design quality is achieved commensurate with the building’s prominence.

Within each CDP, the guidelines need to be stronger and they need to be given a heading which reflects this, such as “Requirements” or “Performance Measures”.

At Flemington Green, the low-rise Precinct A is supported, subject to tightening up controls to ensure pedestrian permeability and well-scaled interfaces. The podiums need greater permeability for pedestrians.
2 Issues Relating to Both Sites

a Built form Context

1. Clause 21.15 of the MSS in the Melbourne Planning Scheme provides the following guidance for Built Environment: “Encourage sympathetic infill redevelopment and extensions that complement the architecture, scale and character of Kensington and Flemington.” I consider that the low-rise components of the Flemington Green site are broadly consistent with this policy, but not the tower components.

2. In terms of built form and destinations, the racecourse is essentially a void, meaning that both development sites are on the periphery of urban areas, which makes them relatively ill-suited for activity centres, where density is best concentrated.

3. As the proximity of landscaped open space is a dominant aspect of both sites’ contexts, their designs should more deliberately respond to it – for example through a requirement that green (ie planted) roofs be provided to podiums. A requirement for edible plantings would be consistent with Clause 21.06-3 the Moonee Valley Planning Scheme, which includes “Design subdivisions and new buildings to provide for private and, where suitable, shared garden space for food production.”; “Encourage roof top and vertical gardens to provide opportunity for food growing.” And “Support the establishment of community gardens.”

b Intensity of Development

4. “High and/or medium density urban living” is proposed for both sites. Plan Melbourne defines medium-density housing as about 21–80 dwellings per net residential hectare, which includes local roads but not public open space. The proposed amendments would allow for high densities throughout.

5. I am concerned that the amendments propose significantly increased residential density for a particular demographic without the range of complementary accommodation needed to build community, nor the sustainable transport improvements needed to avoid car-dependence – effectively exploiting the rights associated with urban renewal areas without taking on the associated responsibility, beyond the provision of open space. Furthermore, neither site is currently designated as an urban renewal area.

6. Plan Melbourne defines urban renewal thus: the improvement or rehabilitation of urban areas. Urban renewal traditionally involved demolishing old or run-down buildings on brownfield sites in inner-city areas to build new residential or commercial developments or large-scale public works projects (such as convention centres, stadiums or freeways). Urban renewal can also build on an area’s existing strengths to make better use of underutilised land located close to jobs, services and transport. Activity centres are: suburban centres that provide a focus for services, employment, housing, transport and social interaction.

7. In the absence of strategy planning having been done for the subject sites, it is useful to refer to the Arden Macaulay and City North Structure Plans. These areas, which are designated for urban renewal and as extensions of the central city, are planned for residential densities of 85 and 118 dwellings/ha respectively, together with associated community facilities and employment. Given the lack of structure plans for the subject sites, together with their locational characteristics, their densities should be less than for Arden Macaulay.
8. The location and mix of intensive development should be such that residents are not reliant on private cars to access their day-to-day needs. The quantum of carparking proposed in the Indicative Development Concept suggests that this would not be the case here.

9. Initiative 2.3.1 of Plan Melbourne includes “...where rezoning is necessary to achieve urban renewal, we will explore the capacity to capture a proportion of the increased land value to directly contribute to the costs of providing social housing.” For development of the proposed densities, a component of social housing should either be included or should be funded via a development contribution. Ideally, this would be included within the site, contributing to a richer demographic mix.

c Building Typology - Podium/tower Form

10. Reasonably high density can be achieved through a range of building typologies. To my knowledge, there has been no analysis presented of the pros and cons of these options.

11. Podium-tower forms are proposed within both sites. This typology is generally more suited to an inner-city context, where it reinforces an established pattern, land prices demand intensive development, high density is supported by good access to public transport, employment and other destinations within walking distance and towers contribute to the cityscape. Such development also offers some benefits in the Flemington context – towers providing panoramic views while podiums can mediate the visual and wind impact of towers on pedestrians, contribute human-scaled streetscapes and provide communal rooftop space directly accessible from the tower. However, the podium-tower also has significant negative impacts here. At Flemington Green it results in large blocks lacking permeability for pedestrians. These large blocks have deep floor plates which limit the range of possible uses due to lack of daylight. The proposed towers generate very high densities which in turn generate significant vehicular traffic, given that public transport is currently limited and few destinations are within walking distance. These high densities also tend to demand extensive service areas, limiting the provision of active uses and frontages at ground floor level. The tower forms are at odds with neighbourhood character and would tend to have an overwhelming impact on the surrounding pedestrian realm, particularly given the lack of setback requirements. Towers also have higher energy demands than other housing typologies (see appendix) and lack the health benefits of housing which can be accessed via stairs. Finally, towers in open landscapes such as the subject sites have a tendency to generate adverse wind impacts in the public realm, particularly where requirements for substantial setbacks are lacking. Windy conditions can compromise the communal use of podium roof space.

12. To justify a development typology with so many negative impacts, strong strategic evidence is warranted. I do not consider that this has been adequately provided.

13. The Comprehensive Development Plans call for wind impact to be considered in the design of the pedestrian environment, but it is of more fundamental importance to avoid built forms which generate adverse winds in the first place. This is mentioned in terms of tower locations at Flemington Green and in terms of orientation at Epsom Rd, but needs to be more rigorously controlled. The proposed envelopes and the Indicative Design Concept should be wind-tested prior to the amendment being approved, and built-form envelopes should then be amended if necessary to ensure that they capable of preventing unacceptable wind conditions. I am pleased to note the inclusion in the CDPs of a requirement that “wind tunnel testing must
demonstrate appropriate conditions at street level”, but “appropriate” needs to be defined. Page 5 of CCZ3 provides an example of this:

- **Developments affected by Schedule 1 to the Design and Development Overlay (Active Street Frontages – Capital City Zone)** should be designed to be generally acceptable for stationary long term wind exposure (where the peak gust speed during the hourly average with a probability of exceedence of 0.1% in any 22.5o wind direction sector must not exceed 10 ms-1).

- **All other areas should be designed to be generally acceptable for short term wind exposure** (where the peak gust speed during the hourly average with a probability of exceedence of 0.1% in any 22.5o wind direction sector must not exceed 13 ms-1). However, if it can be demonstrated that the street frontage or trafficable area is only likely to be used as a thoroughfare for the life of the development, the building interface should be designed to be generally acceptable for walking (where the peak gust speed during the hourly average with a probability of exceedence of 0.1% in any 22.5o wind direction sector must not exceed 16 ms-1).

- **Developments should not rely on street trees for wind protection.**

14. To the extent that podium-towers are permitted, stricter controls need to be put in place to minimise negative outcomes. Substations, vehicular entries and other service areas need to be rationalised, taking advantage of Flemington Green’s large scale to reduce their impact.

d **Building Height**

15. At both sites, CBD-height buildings are proposed well outside the central city, and outside of the expanded central city as defined in Plan Melbourne. Height limits are defined in terms of RLS; these are only meaningful if the associated ground levels are also provided. Clause 5.1.2 of each CDZ refers.

16. The development envelopes have not been fully tested. The indicative design occupies only part of the width of the tower envelopes and only part of the height of the podium and low-rise envelopes. It therefore does not fully test these envelopes in terms of visual and shadow impacts, for example.

17. I do not consider that the tower components are consistent with Clause 21.06-4 of the Moonee Valley Planning Scheme, which includes:

- “Ensure that taller built form is located within areas that have been identified for High to Substantial Housing Intensification as defined at Clause 21.05-1. [ie “within Activity Centres identified in Plan Melbourne, provided that the height, scale and massing of new development is in accordance with the requirements and recommendations of adopted structure plans or strategies for those centres, and that development respects the surrounding built form context”].

- Ensure that all new development of five or more storeys makes a positive contribution to an area's character, protecting and contributing to its valued natural, built and community qualities.

- Ensure that all new development of five or more storeys reinforces the character of the area. Building height, scale and massing are to be derived from the local context, street conditions and local character objectives.”
18. Similarly, Objectives in Clause 22.17 of the Melbourne Planning Scheme (Urban Design Outside the Capital City Zone) include:

- To ensure that the scale, siting, massing and bulk of development complements the scale, siting, massing and bulk of adjoining and nearby built form.
- To ensure that the height of buildings relates to the prevailing patterns of height and scale of existing development in the surrounding area.
- To reduce unacceptable bulk in new development.

19. The tall buildings encouraged in the proposed amendments would be distinctly at variance to the prevailing patterns of height and scale - with the one exception of the approved Only development.

e Building Bulk

20. To ensure towers are slender, it is necessary to limit their floor area. As currently proposed, the amendment would allow extremely bulky towers. Even in the indicative design, the elongated towers shown would each be slender from some viewpoints, but not from others.

f Building Design

21. The design criteria set out in the Comprehensive Development Plans are not considered adequate.

22. An AIA-endorsed design competition should be required for each podium-tower building to help ensure exemplary design quality is achieved commensurate with the prominence of these buildings. Their prominence demands, inter alia, that their form and design improves the significant views identified in the urban context report and the Advisory Committee’s Stage 1 report. This would be consistent with the following Objective in Clause 22.17 of the Melbourne Planning Scheme (Urban Design Outside the Capital City Zone): To ensure that buildings on prominent sites are designed to achieve a high standard of design which reflects the importance of their location and extent of their visibility.

23. A requirement should be added to make use of all roof spaces, including green roofs and solar panels. I note that the Indicative Development Concept shows only limited use of podium roofs at Flemington Green and none at 550 Epsom Rd.

24. Criteria are provided to limit noise within private development; these should be extended to cover traffic noise and to ensure that acoustic measures also maintain natural ventilation.

25. Consideration should also be given to additional criteria such as: Ensure that at all pedestrian interfaces buildings are of human scale, including strong articulation and varied frontages to achieve a sense of fine-grain subdivision; Contribute to the legibility of the neighbourhood and enhance wayfinding without reliance on signage; Design buildings to be adaptable to different usage in future; and Respond positively to the topography, including minimising the impact of building services and vehicular entries. (The latter is addressed to a degree in the proposal.)

26. Two of the proposed Objectives at Clause 5.1.1 of each CDZ could be counter-productive to good design, and should be reworded. Firstly: “Materials, finishes to be of a high quality and generally consistent throughout the development, drawing design cues from the Flemington Racecourse precinct and the surrounding residential neighbourhood.” I agree with the need for high quality; however, consistency of materials and drawing design cues from the racecourse are means to an end (achieving high design quality), not ends in themselves, so this objective...
may unduly constrain designers. I also note low quality materials are quite common in the surrounding residential neighbourhood. Consistent materials are beneficial for public realm works, but in buildings too much consistency can lead to monotony and work against the objective of creating a composition of varied building forms. (Similarly, the following statement at p51 of the Urban Context Report may be counter-productive: “The design themes embodied in the new Club Stand are reflective of the future direction of architecture at Flemington. Redevelopment at the Flemington Green Precinct and Epsom Road sites should take this as inspiration for their architectural directions”. I see no benefit in limiting the potential sources of architectural inspiration to the Club Stand.)

27. Secondly: To provide sufficient car parking and utilise, where possible, the fall across the site to minimise the view of car parking areas from the street frontage. Given that the high density of development proposed relies on an argument that the site is effectively within an urban renewal area, it should not be car-dependant; so, rather than “To provide sufficient car parking ...”, it would be more conducive to minimising negative impacts from cars to reword this thus: “To provide the minimum necessary car parking ...” or similar. I support the objective of working with the topography and minimising views of car parking, noting that car parking also has impacts other than visual (space consumption and traffic generation for example), and these should also be minimised.

g Activation and Frontages

28. Given the primacy of ground floor space, a requirement should be added prohibiting carparking at ground floor level. Substations should also be avoided at ground level, preferably being located in the top basement level.

29. The criteria for active frontages should include the provision of habitable space to at least 80% (say) of all public interfaces of all podium/low-rise levels. (80% would be consistent with policy for Southbank, for example, where Decision Guidelines include “The impact the proposal will have on street amenity if on-site parking occupies more than 20% of the length of the street frontages at ground level and in the first five levels of the building.” (p6 of CCZ3))

h Open Space

30. The amendment would permit a significant reduction in the permeability of the ground plane. Given that open space is a significant aspect of the existing context, it is recommended that the amendment include a requirement to incorporate measures including green roofs, permeable ground surfaces and new and existing trees, to result effectively in no nett loss of soil permeability or green infrastructure. This would be consistent with Clause 22.23 of the Melbourne Planning Scheme (Stormwater management) and Option 53 of the Plan Melbourne Refresh Discussion Paper: “Adopt strategies to encourage the: • Increase of tree canopy, vegetated ground cover and permeable surfaces throughout Melbourne • Use of Water Sensitive Urban Design and irrigation with various water sources to cool the city by providing water features, supporting trees and vegetation”. City of Melbourne’s Urban Forest Strategy includes a target to increase the city’s tree canopy to 40 per cent by 2040.
3 Flemington Green

a Built form Context

31. The existing houses fronting Fisher Pde sit comfortably in the neighbourhood, which includes a range of low- and medium-density housing. The character of the area is evolving, with apartment buildings of about 4 storeys becoming more common, so higher-density low-rise development could also integrate well.

32. The rest of the site is vacant, generally contributing nothing to the neighbourhood in terms of use, amenity, aesthetics or the environment, other than some established trees and low-grade open space.

33. The submission provides very little information on the interface with the Showgrounds site in either the short term or in the event of redevelopment of the Showgrounds in the long term.

34. I note that the former childcare centre adjacent the site is now used as offices.

b Intensity of Development

35. There is great scope to improve this site through redevelopment – particularly the replacement of existing open-lot carparking. The proposed park could become the germ of a cluster of community facilities serving the local population.

36. The Indicative Development Concept yields an average housing density of 314 dwellings per site hectare. This cannot be exactly correlated with the Plan Melbourne definition of high density of more than 80 dwellings per net residential hectare, as the latter includes local roads; nevertheless, the proposed density is very high for a neighbourhood where current densities are much lower and which is fairly car-dependant. Density is particularly high in the podium-tower buildings, where 80% of the 736 dwellings are concentrated in an area approximating half the site. Even greater density is permitted in the proposed amendment, as the proposed CDZ1 envelopes would permit greater heights and tower widths than those illustrated in the Indicative Development Concept. The low-rise half of the development has correspondingly lower density – in the order of 80 dwellings per hectare in the Indicative Development Concept; again, the proposed CDZ1 envelopes would permit greater heights and densities than this.

37. Map 11 of Plan Melbourne does not show a potential urban renewal precinct in this location. Figure 1 of MPS Clause 21.04 Settlement appears to include the Flemington Green site in the Racecourse Rail Corridor potential urban renewal area. Clause 21.04-1.4 states “The Racecourse Rail Corridor between the Flemington Racecourse and the Showgrounds has potential similar to the Jolimont Rail Corridor. The area’s potential for urban renewal will depend on future options of a rail service to the area.” (For Jolimont Rail Corridor, it includes “As inner and central city locations have become more highly valued, development over transport corridors will become increasingly attractive not only for the development space they can yield but also for the opportunity to connect adjacent parts of the city that have been separated.”) At a more detailed level, Figure 14 which accompanies Clause 21.15 in the Melbourne Planning Scheme shows this Potential Urban Renewal Area limited to a thin strip of land straddling the spur line, not extending to any significant degree into the proposed development site. Clause 21.15 states that urban renewal of this rail corridor “will depend on future options for a rail service to the area.” I understand from the Advisory Committee Stage 1 Report that PTV do not support regular rail services along the spur line. It is possible that, in
future, they may see value in selling development rights along and above the spur line as a way of funding the necessary rail infrastructure upgrade necessitated by the introduction of regular services, but such a change may be decades away, and cannot be relied on for the current assessment.

38. We face something of a “Catch 22” in terms of the relationship between development density and public transport. Currently, the bus service along Fisher Pde would not be sufficient to justify the central-city type development proposed, and there is generally no train service to the site. On the other hand, there is currently no incentive to run train services due to the lack of users living or working within walking distance of the station. There is need for a structure plan for the area, prepared with the involvement of PTV and Metro and with a commitment to provide train services once demand reaches a certain level. Any development which precedes such planning and commitment should be at a moderate density (sufficient to support local retail etc and thus limit car-dependency to a degree), possibly with provision for expansion in the event of train services becoming regular.

39. Based on the 20-minute neighbourhood principle of Plan Melbourne, Flemington Green would not be a suitable place for higher-density housing unless a good range of local services were provided as part of the proposed development. This is not simply due to the physical distance to facilities such as Showgrounds Village (which would in fact be within a 20 minute walk), but also the sense of isolation and the unattractiveness of the journey which would tend to result in people driving rather than walking. The site has a Walk Score of 28 out of 100. (See Appendix 3.)

c Building Typology

40. I support the consolidation of development into a limited number of blocks (although two of them warrant greater permeability for pedestrians), which in turn enables vehicular crossovers to be minimised. I recommend that this be taken a step further by limiting crossovers to the four shown in Clause 5.1.2 and more consistently locating these near the lowest corner of each block.

41. The low-rise Precinct A is broadly supported. The indicative development concept shows the opportunity for these sites to generate well-scaled development which provides significant accommodation. However, more detail is needed to ensure that this opportunity is realised, including more specific height limits, as outlined below.

42. The Urban Context Report and indicative development concept propose “courtyards” within each block, with pedestrian access through the two larger blocks. This is commended, and I recommend that the associated Principle on page 12 of the CDP be elaborated to clearly require these spaces and to provide public access through LR1 and LR2. It would be of further benefit to limit the depth of these buildings; this would have the additional benefit of enhancing natural light and ventilation.

43. The podium-tower typology is of concern, as outlined above for both sites
d Building Height

44. The building height analysis (p73 of Urban Context Report), shows that the tallest existing buildings near Flemington Green are the existing grandstands. This is appropriate, given that the racecourse is probably the most significant destination in the area. However, the report does not address the desirability of this relative prominence, and the proposed amendment would diminish it.

45. The proposed height limits are unclear, as ground level benchmarks are not provided. If these are the same as those shown on p66 of the Planning Report, the low-rise components vary between about 15m and 24m maximum (5 to 8 storeys), the podiums between 20m and 26m (6 to 8 storeys, based on 5m ground floor and 3m typical floor-to-floor heights) and the towers between 53m and 94m (13 to 31 storeys). These are generally greater than the heights illustrated in the Indicative Development Concept, which shows low-rise at 3 to 4 storeys, podiums 1 to 4 storeys and towers 14 to 25 storeys.

46. The shadow diagrams provided are based on a lesser extent of development than that permitted in CDZ1, as the Indicative Development Concept includes lower podiums and greater tower setbacks than the CDZ permits.

47. The height limits appear to allow heights of about 24m (8 storeys) at boundaries where the ground level is relatively low. They also allow a height of about 21m (7 storeys) adjoining the new park, which would result in significant overshadowing (about 2 thirds of the park at 3pm on the equinox). Either lower height limits need to be set at these interfaces, or provisions need to be added to avoid adverse outcomes.

48. Additional provisions are applied to address the residential interfaces to the northwest. Here “Rescode setbacks are to apply”; however, it is unclear just how Rescode would be applied in this situation. I assume it means that Clause 55.03-1 Street Setback Objective would apply; given that both the affected sites are on corners, Table B1 stipulates, assuming all three interfaces are considered to be side streets, front walls should be set back at least 3m and side walls should be set back 2m. [This should be clarified.] Such setbacks affect the location of the street wall but not its height. I note that CDZ1 does not apply any height or setback constraints to Lot 5, which interfaces with showgrounds land.

49. The proposed podium height limits are similar to those for the low-rise, and these are supported subject to specific interfaces being addressed, such as a height of 26m being permitted adjacent to the heritage wall at Fisher Pde. Variation in podium height is “encouraged”, but firmer criteria are needed to ensure variation in the height and design of long podium forms, particularly those fronting Leonard Cres.

50. Throughout the precinct, I recommend that the street wall height vary, typically between 2 and 5 storeys relative to the adjacent ground level, subject to wind, shadow and streetscape studies for each site to ensure each building responds to its neighbours, topography and street width. (The perspectives in the Indicative Development Concept do not show the relationship between the proposed low-rise development and existing buildings.)

51. The towers are out of character with existing development in the vicinity, and would continue to be for the foreseeable future. The desire for a landmark does not adequately justify the towers, as discussed below.


52. The Key Directions on p 60 of the Urban Context Report include “The Flemington Green Precinct site represents a great opportunity to create an identifiable city-wide landmark to locate Flemington Racecourse.”, while Section 9.2: Neighbourhood Context includes “Built form massing to provide a local landmark to contribute to way finding and legibility and identify the entrance to Flemington Racecourse.” (p78). The Planning Report proposes “higher development to mark this high point [the head of a ridge] and the arrival at the gate of Flemington Racecourse ...”(p90). I endorse the objective of built form contributing to way finding and legibility, but do not endorse the ambition for a city-wide landmark. Legibility could be achieved with a single tower, or indeed with none, as heights in the order of 8 storeys would be double that of existing buildings in the vicinity (other than the grandstands, which present as about 5 storeys on the Flemington Green side). Either tower 1 or tower 3 alone would achieve the above ambitions. Additional towers would tend to weaken the effectiveness of this marker without more effectively reinforcing topography - particularly Tower 2, which is further from the entrance. Tower 2 is on slightly higher ground than the other towers, but not at the high point of the site, which is quite rightly allocated to lower development in response to its residential neighbours. Multiple towers tend to be read as an activity centre, which is not what is proposed; they therefore detract from urban legibility in this instance. This is illustrated in the perspective from Lynch’s Bridge. That perspective also shows that the racecourse is already well-marked by the existing grandstands, without the need for apartment towers.

53. I recommend that the podium-tower components of the site be reconceived more along the lines of the low-rise blocks. In the event that towers are nevertheless approved, there should be no more than one tower, located at either Tower 1 or Tower 3, adjacent the station and racecourse gates. It should be limited to a development envelope no taller than Tower 3 (13 or 14 storeys), and reduced in floor plate to achieve 10m setbacks.

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The Pixel Building in Carlton illustrates the scope for a building of modest scale to provide an effective place-marker.
f Building Design

54. While consistent public realm treatments are desirable to provide a cohesive “backdrop” to a neighbourhood, if the buildings are all designed by the same hand, the result tends to be monotonous and overbearing. Given the scale of Flemington Green, a “community” of individual buildings is warranted in order to create the sense of an evolving precinct, rather than a single, very large development. To achieve this, a requirement should be added that multiple design architects be engaged, to ensure variety in design between one building and another.

g Public Space

55. Page 12 of the Masterplan Design Response shows a resubdivision of the site to provide for the park and a new east-west road and to widen some existing streets. However, this is only partially dimensioned, does not provide for the forecourt outside the racecourse entry and is not included in CDZ1 or the CDP.

56. Scale comparisons should be undertaken to gauge the dimensions and enclosure of both the park and the forecourt space. Spaces designed for large crowds tend to be barren and uninviting outside of event times. This presents a significant design challenge which is not currently mentioned in the CDP for Flemington Green. There are ways of addressing this challenge – through an array of canopy trees for example, or a deliberately-designed space such as St Peters Square in Rome. Page 12 of the Landscape Design Report shows a reasonable provision of canopy trees, but some of these would be compromised by basements below, if built as shown on p25 of the Masterplan Design Response Report. I recommend a design requirement that basements not be located where trees are proposed, or (preferably) that basements be located within the curtilage of above-ground buildings.

57. The definition of both the park and the forecourt would be improved by extending the northeast corner of podium 2 further to the east than is shown on the Indicative Development Concept. The park scales at about 22m in width. A squarer proportion would be preferable, producing a broader, more useable space less exposed to traffic. This could be achieved by reconfiguring the adjoining building into an L-shape with a wing providing enclosure and definition to the south edge of the park.

58. The “courtyards” carved out of the low-rise blocks (shown on p41 of the Indicative Development Concept) could be attractive, but there is nothing in the CDP to bring these about. I also note that, as currently shown in the Indicative Development Concept, these spaces would present as lanes rather than courtyards due to their linear proportions.

59. Under Clause 22.17 of the Melbourne Planning Scheme (Urban Design Outside the Capital City Zone) it is policy that: “Developments on large sites are encouraged to provide laneway and pedestrian through block links.” The “courtyards”, if required, would achieve this for the low-scale component of the development (Precinct A). A requirement should be added for links through Precincts B and C, which could be in the order of 90m and 110 x 130m long respectively.
h Sustainability

60. There should be a requirement to take advantage of the large size of the Flemington Green site to provide precinct-scale sustainable infrastructure. Reference should be made to either One Planet Living criteria or the Green Star Communities tool, to ensure that a broad range of social as well as environmental criteria are addressed.

61. The proposed amendment is an opportunity to respond to Option 54 of the Plan Melbourne Refresh Discussion Paper: “Introduce strategies to encourage the uptake of green roofs, facades and walls, as appropriate materials used for pavements and buildings with low heat-absorption properties.”

i Staging

62. The park should be required to be delivered as part of the first stage of the Flemington Green development.

63. Staging should be sequenced to retain existing assets such as houses and trees for as long as reasonably possible and to plant new trees reasonably early, giving them time to mature.
4 550 Epsom Rd

a  Context

64. The dominant feature of the Epsom Rd site is landscaped open space. The site itself has some well-established trees on rolling grassland overlooking the green flood plain of the racecourse. The Quest apartments to the south, although not an exemplary development, respond to this setting by placing 1- to 3-storey buildings in a landscape setting which, like the racecourse, is fenced off from Epsom Rd. Its signage and extensive paving reflect a place designed to be accessed by car, not on foot. To the north, the VRC building presents a 1- to 2-storey form aligned with Epsom Rd but buffered from it by landscaping. For a short section of Epsom Rd, the Jockey’s Convalescent Lodge is visible behind the crest of the hill. From some viewpoints, the landscape flows across to Newmarket reserve, helped by the street trees and sunken topography of this section of Epsom Road.

65. To the north-east, across the municipal boundary, there is a greater tendency for buildings to be built hard to the street boundary, and landscaping is limited to modest street trees along Racecourse Rd. Fronting Epsom, Ascot Vale and Racecourse Roads, most buildings are single-storeyed, with the 20-storey “Only” development being a dramatic exception. Further north, the 13-storey housing commission tower in Crown St also stands out.

66. The views down Ascot Vale and Racecourse Roads are currently terminated by substantial eucalypts (including one in the roundabout) and some unfortunate racecourse signage.

67. Nearby land in the City of Melbourne is designated in the MSS as a stable residential area, where only incremental change is envisaged.

b  Response to Context

68. 550 Epsom Rd faces the challenge of responding to both a landscape and a street.

69. I do not consider the proposal to be a sensitive response to its landscape setting. Consideration should be given to the range of design strategies available for buildings to achieve this. One option would be a new companion building or two of modest scale which, together with enhanced landscaping, enables the lodge to be well used and more fully appreciated. The result would be a community of buildings - the pavilions-in-a-landscape approach. Other strategies include to carefully frame the landscape and strengthen its definition; or to raise buildings on piloti so that the landscape flows through beneath them.

70. The proposed development includes a low-rise podium addressing the street and reinforcing the street boundary, which would be an appropriate response in many more conventional inner-city locations. Here, it has the benefit of providing passive surveillance to the street and to Newmarket reserve, could potentially provide interest and shelter to passing pedestrians and could in theory provide a degree of enclosure and edge-definition to Newmarket Reserve, although in practice this would be severely constrained by the two sites being offset, together with the need for a sight line to the Lodge. Unfortunately, the only point at which the Jockey’s Convalescent Lodge is visible from the street is at the south end of the site; it is therefore desirable to keep this section of the frontage free of buildings. The above benefits help compensate for the disruption to the landscape, but the building would sit awkwardly in its setting, at odds with its neighbours.
71. I understand from the Advisory Committee Stage 1 Report (p12) that it is intended that the Former Jockey Convalescent Lodge be made available for community use. This is highly desirable, particularly if allied with the community park across the road, with a clear visual link and a direct, safe pedestrian link between the two, and it would be of additional benefit to connect through to the racecourse. However, I see no statement or requirement to this effect in the proposed amendment documents. I recommend that the CDZ schedule be amended to include a requirement that the Lodge be made available for community use and that a design criterion be added to ensure that Lodge presents as a community facility and that the site is laid out so as to welcome the public in to the Lodge.

c **Intensity of Development**

72. The proponent has advised that the Indicative Development Concept yields a housing density of 377 dwellings per net residential hectare. This is very high, and the density permitted by the amendment as currently proposed would be higher still, as the envelope diagram permits more levels and larger floor plates than those in the Indicative Development Concept. In addition to the built form impacts (discussed separately), intensive development generates servicing demands bringing negative urban design impacts at ground level. These include service spaces such as substations, vehicular traffic crossing the footpath and, as illustrated by the plan on p35 of the Landscape Design Report, extensive paved areas for vehicles. The Indicative Development Concept shows 1.1 car spaces per dwelling, which is higher than is typical for the inner city.

73. I see no convincing argument for intensive development on the Epsom Rd site. It is isolated by Epsom Rd from all potential destinations other than Quest Apartments and the infrequently-used racecourse. This isolation would need to be overcome before any significant development could be justified at 550 Epsom Rd. The Draft Racecourse Road Activities Area Structure Plan calls for “better walking and cycling connections through the intersection of Epsom, Ascot Vale and Racecourse Roads” (p15).

74. With a Walk Score of 82, 550 Epsom Rd is within a 20 minute walk of a good range of local services, consistent with the 20-minute neighbourhood concept of Plan Melbourne, making it a suitable site for housing. However, the Racecourse Rd activity centre is neither large enough nor well enough connected to warrant the high density of development proposed at Epsom Rd.

75. There is some inconsistency in the mapping of urban renewal areas and activity centres in Plan Melbourne. Map 31 shows an activity centre centred near Newmarket Station and a linear urban renewal opportunity (Flemington-Newmarket Precinct) extending along the north side of Racecourse Rd from Epsom Rd to Moonee Ponds Creek. Reference is also made to Flemington-Newmarket Precinct as an urban renewal opportunity for the Central Subregion, but no urban renewal area or activity centre is shown at or adjoining either site on Map 30, nor on Map 21. Maps 11 and 20 show Flemington-Newmarket Precinct urban renewal area as a circle centred on Newmarket Station.

76. The Moonee Valley MSS shows a Major Activity Centre around Newmarket Station, with an employment node extending west to Ascot Vale Rd. No specific guidance is provided in Clause 21.07, which simply states “Prepare Racecourse Road Activity Centre Structure Plan”. However, the structure plan prepared for the (abandoned) Amendment C118 shows retail extending to Newmarket and Eastwood Streets (about 550m and 750m respectively from 550
Epsom Rd), periphery commercial to Coronet St and increased residential density extending to Epsom Rd. The Draft Racecourse Road Activities Area Structure Plan shows 550 Epsom Rd to be partially within a gateway view, where “attractive, landmark buildings, used as points of reference throughout the RRAA” are proposed, although it may be that this was only intended to apply to 1 Ascot Vale Rd. The latter is designated for 10 storey height, in contrast to 4 to 6 storeys on surrounding sites.

77. Built form issues identified in the Draft Racecourse Road Activities Area Structure Plan include: Ensuring landmark developments, such as that proposed for 1 Ascot Vale Road, establish a defined character for the western end of the activities area; Encouraging more dense built form along Epsom Road, Ascot Vale Road and the Flemington railway line with improved connections to public transport; Ensuring that new development improves the quality and offering of the public spaces within the precinct.” (p16) and “Encourage higher built form on properties adjacent to the intersection of Ascot Vale and Racecourse Roads.” (p19) These suggest support for development at the subject site, but not to the intensity proposed and not necessarily a landmark.

78. On the other hand, Figure 1 of MPS Clause 21.04 Settlement provides no guidance for the 550 Epsom Rd site, but designates the area to the east and south as Stable Residential.

79. Taking the above documents into account, the density of proposed development at 550 Epsom Rd is considered excessive.

d Landmark

80. Having considered the proposed development in terms of the need, nature, placement and scale of such a landmark, I consider that the case for a landmark at 550 Epsom Rd is not substantiated and that the proposed amendment would not necessarily result in a successful landmark.

81. Landmarks can contribute to the legibility of an area. Currently, as stated on p61 of the Urban Context Report, “There are concentrations of higher density, mixed-used areas along main roads that form the activity centres. These activity centres are characterised by taller buildings ...”. Concentrating height at activity centres helps the legibility of urban areas; concentrating height elsewhere, such as at 550 Epsom Rd, can make them less legible. Unlike Newmarket Station, for example, the racecourse is easily found at the end of Racecourse Road without need of a landmark.

82. The Key Directions on p 60 of the Urban Context Report include “The Epsom Road site presents an opportunity to create a local landmark to locate Flemington Racecourse in the eastern approach.”, while Section 9.3: Neighbourhood Context includes the Key Directions statement “Built form massing to provide a landmark to contribute to way finding and legibility along Racecourse Road, Ascot Vale Road and Epsom Road.”

83. Given that the approved 21-storey tower at 1 Ascot Vale Road will already provide such a landmark at the junction of Racecourse Road, Ascot Vale Road and Epsom Road, these Key Directions are already being implemented and do not provide compelling grounds for a second tower, at 550 Epsom Rd. Indeed, a tower on the subject site may compromise the clarity and effectiveness of the landmark currently under construction, as the South Yarra example below illustrates. None of the perspectives provided show the combined effect of the two towers.
84. Some of the justifications for tall development at 1 Ascot Vale Road are lacking on the subject site; the former does “bookend” development along the north side of Racecourse Rd, whereas 550 Epsom Rd is separated by a park and two busy roads from the buildings it would be endeavouring to “bookend” (ie development along the south side of Racecourse Rd).

85. Despite such justifications, 1 Ascot Vale Road posits a built form starkly contrasting with its low-height neighbours, and I would expect it will have negative impacts on the precinct. If development of such height and density were to be replicated at 550 Epsom Rd, it would establish a pattern of development; other developers would tend to follow suit, and the cumulative impact would have significant negative impact on the pedestrian environment, on Newmarket Reserve, on the character of the area and probably exacerbateng wind and traffic conditions.

86. I agree that the view along Racecourse Rd is important, needs to be well terminated and could benefit from being more deliberately and sensitively terminated than it is at present. However, given that the important destination worthy of highlighting (and from which Racecourse Rd takes its name), is Flemington Racecourse, the most effective termination would tend to feature landscape treatments or a vertical or exquisite sculpture for example, rather than an apartment tower, which draws attention away from the racecourse. A building of modest scale and exemplary design could make a positive contribution within this landscape - there is a strong tradition of gatehouses and pavilions punctuating landscapes – but the bulky 35 storey tower facilitated by the amendment would be too great for that.

87. Landmarks are often valuable to mark public buildings, but that is not what is proposed here. Although the racecourse is a public destination, the landmark building would be a private residential development sitting next to the racecourse – not part of it. A range of methods is available for marking destinations; if the objective is to mark the racecourse as a destination, options such as a tall sculpture within the racecourse site, aligned with the Racecourse Rd vista, or an impressive gateway located at the racecourse entry would be more appropriate than the proposed podium-tower development.
88. The off-axis placement of the site limits its potential to provide a destinational marker visible down the length of Racecourse Rd. Only a small fraction of the site – its north corner – encroaches into the Racecourse Rd alignment, and the tower would not be within that. The perspective on p36 of the Masterplan Design Response Report illustrates this. The tower is more likely to be clearly visible down Ascot Vale Rd, depending on its placement within the site. (The indicative design shows it roughly aligned with the Only development, which would partially block views of it.)

89. The 550 Epsom tower is not located at a gateway to the racecourse, nor within an activity centre; I therefore disagree with the claim on p89 of the Planning Report that the indicative development concept provides “visual markers and demarcation points to identify key gateways into the Flemington Racecourse and to define the precinct as a major centre of activity”.

90. A landmark is by definition conspicuous, and therefore needs to be particularly attractive. For a tower, slenderness is an important criterion. Despite the CDP stating that buildings which rise into the skyline should be slender, there is nothing in the CDP to ensure this is achieved.

91. If the amendment is passed, it should include more stringent controls on the design quality of the tower, given how conspicuous it would be from a broad range of viewpoints. The indicative design, for example, is not considered to achieve the warranted standard. Design excellence is very difficult to ensure through planning controls; the most reliable and objective mechanism of which I am aware would be to require an AIA-endorsed design competition.

e Building Height

92. I agree that both Epsom Rd and Newmarket Reserve could benefit from stronger built form to define their western edge. However, this is can be achieved through podium-scale development, with the tower making no positive additional contribution. Rather than comfortably enclosing the park, the tower would dominate over it, adding cumulatively to the imposing presence of the Only development at 1 Ascot Vale Rd. The perspective from Racecourse Road at Coronet Street gives a sense of this impact.

93. The proposed height limit is unclear, as the plan at Clause 5.1.2 of CCZ4 shows a height of 123.9m, while the perspectives show an RL of 123.9m without providing a benchmark RL at ground level. It appears from the Indicative Development Concept that the intended height limit is about 107m, based on an RL of 16.9m at the centre of the street frontage. This would enable a 35 storey tower (plus plant), based on a typical floor-to-floor height of 3m. The Indicative Development Concept shows a 33-storey building with a parapet height of about 103m. The proposed podium height limit appears to be about 12m; the Indicative Development Concept shows a 2- to 3-storey podium of 8 to 10m.

94. The shadow diagrams provided at p43 of the Architectural Design Response Report show overshadowing of part of Newmarket Reserve from just before 3pm at the equinox. Actual shadows could be more extensive, as these diagrams are based on a lesser extent of development than that permitted in the CDZ, as the Indicative Development Concept includes lower podium and tower and greater tower setbacks than the CDZ permits. Development guidelines in the Open Space Strategy include “The open space must receive a minimum of 3 hours of direct sunlight between 9am and 3pm during mid-winter …” (p116 of Technical Report). Shadow diagrams should be provided to show the impact of a building fully occupying
the envelope set out in CDZ4, and should be provided for the winter solstice as well as the equinox.

95. I note that the building would overshadow the Jockey’s Convalescent Lodge and its surrounding landscape for much of the day; I have not seen any consideration of the implications of this.

96. The CDP should include criteria to avoid adverse wind conditions in public and communal spaces, as discussed under Building Typology for both sites.

97. Local precedents for exceptionally tall buildings include the Vue Apartments at 80 Speakmen St, which reaches a height of 12 storeys at the corner of Smithfield Rd, and the public housing towers at Crown St (13 storeys). Housing Commission towers provide well-established demonstrations of how poorly out-of-context towers can present. Yet, as illustrated on the aerial view on page 1 of the Indicative Development Concept, the 550 Epsom Rd proposal would dwarf both of these precedents.

98. The bulk of the Epsom Rd tower should be reduced significantly. Rather than simply lopping off some of its height, I believe it would be more appropriate to reconceive this development from first principles, locating a marker (if needed) within the racecourse itself and assessing a range of site-specific built form options for the 550 Epsom Rd site. Even if the objective of placing a landmark on this site is considered worthy, consideration should be given to alternative typologies, such as a much narrow tower at the northeast corner of the site, up to (say) 10 storeys without setback.

f Building Design

99. The envelope proposed in Clause 5.1.2 of CDZ4 allows for a very bulky tower. I recommend that this be remedied by making the tower setbacks mandatory (amending the wording of Clause 4.2) and by increasing these setbacks. The 4m setbacks are far less than the 10m design standard that has applied in the central city and Southbank (noting that this design standard is currently superseded by interim controls requiring a 5m mandatory minimum), and those are more robust areas, where towers integrate into the pattern of development and where taller podiums (up to 40m) help towers to be relatively recessive. The 4m street setback is also less than that in West Melbourne, where buildings up to 40m tall are required to be set back at least 6m. Alternatively, tower bulk could be controlled through a maximum floor plate area, a maximum façade length or a maximum plot ratio. I also note that Clause 5.1.2 does not dimension any podium setbacks from the Jockeys Lodge. The Indicative Development Concept illustrates that even a tower which (presumably) sits well within the CDZ4 envelope could be of excessive length (in the order of 60m) and bulk from some viewpoints, as shown in the perspective views on pp 34 and 35 of the Architectural Design Response Report.

100. The design criteria set out in the Comprehensive Development Plan are not considered adequate. For example:

- The section on Character calls for development to respond to the racecourse almost exclusively, with minimal reference to other components of the site’s context and without addressing the fundamental challenge of how a substantial building might respond to a landscape setting.
- The call for buildings to be oriented to take advantage of views should be deleted, as developers will do this anyway, and it detracts from the more valuable criterion of maximising northern orientation.
• The requirement for buildings to be curvilinear/organic could unduly constrain the creativity of some Architects, as would the requirement to be similar to development at Flemington Green.

g Open Space

101. The analysis fails to recognise the value of substantial trees in the northern part of the site, and the proposal would remove these. More generally, the amendment would permit a significant reduction in the permeability of the ground plane. It is recommended that the amendment include a requirement to remediate the landscape both within and adjacent the site (including the removal of redundant paving) to maximise soil permeability and green infrastructure.

102. The CDP should include a requirement that the Jockey’s Convalescent Lodge and surrounding landscape be publicly accessible and that the development be configured so that the lodge area presents as being open to the public.
5 Conclusions

103. The redevelopment of the Flemington Green area is supported – particularly the replacement of open-lot carparking, the provision of low-rise development and public realm improvements, including the park. Beyond that, however, I have some fundamental concerns with both the nature of the proposed development and the framing of the proposed amendments.

104. The amendments seek to achieve the development densities associated with urban renewal areas without providing the rich mix of uses, facilities and services needed to build community in such areas, together with the reliable, easily-accessible public transport needed to avoid dependence on private motor vehicles. No social housing is included, for example.

105. There is a lack of strategic justification for towers, given the absence of any relevant structure plans and the lack of commitment to regular train services on the Flemington spur line. As a minimum, it is recommended that the extent of podium-tower development in Flemington Green be reduced in favour of low-rise and that there be no tower on the Epsom Rd site.

106. If any towers are permitted, the CDZs should be amended to either a) make tower setbacks mandatory and at least 10m from all boundaries; or b) set maximum widths or floor areas to limit the bulk of towers.

107. If any towers are permitted on the Flemington Green site, they should be limited to one single tower, no taller than Tower 3 (14 storeys), and reduced in floor plate to achieve 10m setbacks.

108. If a tower is permitted on the Epsom Rd site, its height should be significantly reduced and a pedestrian crossing should be required at the developer’s expense prior to commencing construction. If the objective of placing a landmark on this site is considered worthy, consideration should be given to alternative typologies, such as a narrow tower at the northeast corner of the site, up to about 10 storeys without setback.

109. If any towers are permitted, an AIA-endorsed design competition should be required for each podium-tower building to ensure exemplary design quality is achieved commensurate with the building’s prominence.

110. Within each CDP, the guidelines need to be stronger and they need to be given a heading which reflects this, such as “Requirements” or “Performance Measures”.

111. At Flemington Green, the low-rise Precinct A is supported, subject to tightening up controls to ensure pedestrian permeability and well-scaled interfaces.

6 Expert Witness Statement Declaration

This statement has been prepared in accordance with Planning Panels Victoria Guideline No. 1 – Expert Evidence. There are no provisional opinions. My assessment is limited to urban design issues, and does not address questions falling outside my expertise.

I have made all the inquiries that I believe are desirable and appropriate and no matters of significance which I regard as relevant have to my knowledge been withheld from the Panel.
7 Appendices

Appendix 1: Views of the Proposed Permissible Building Envelopes

The following views are extrapolated from Clause 5.1.2 to show the maximum height and width of buildings which would be permissible if tower setback requirements were added at all interfaces. (Where no setbacks have been dimensioned, the tower footprints drawn in Clause 5.1.2 have been traced over.)

View equivalent to page 1 of the Masterplan Design Response Report
Views equivalent to page 42 (looking south along Leonard Cres, above) and p41 (from Racecourse Rd at Crown St, below) of the Masterplan Design Response Report
Appendix 2: Energy Efficiency of Different Housing Typologies

Extract from Multi Unit Residential Buildings Energy & Peak Demand Study by Paul Myors of EnergyAustralia & Rachel O’Leary & Rob Helstroom of NSW Department of Infrastructure, Planning & Natural Resources, October 2005

![Annual per capita greenhouse emissions vs dwelling type](image-url)
Appendix 3: Walkscore: Extract from Wikipedia

The company's flagship product is the Walk Score, a walkability index and the namesake of the company. The company serves more than four million scores per day to over ten thousand participating websites.[1] A Walk Score may be assigned to a particular address or an entire region, and the company maintains a ranking of the most walkable cities in the United States.[5]

Josh Herst, CEO of Walk Score, has stated that he wants Walk Score to be a part of every real-estate listing in the future. He envisions the Walk Score of a home to be as important as how many bedrooms or bathrooms the property has.[4]

According to the site's creators, "The Walk Score algorithm awards points based on the distance to the closest amenity in each category. If the closest amenity in a category is within .25 miles (or .4 km), we assign the maximum number of points. The number of points declines as the distance approaches 1 mile (or 1.6 km)—no points are awarded for amenities farther than 1 mile. Each category is weighted equally and the points are summed and normalized to yield a score from 0–100. The number of nearby amenities is the leading predictor of whether people walk."[6] Relevant amenities include "businesses, parks, theaters, schools and other common destinations."[7]

Criticism

Walk Score has received some criticism in the media, particularly from urban planning professionals, for the limits of its accuracy and relevancy in methodology and results.[11][12] Specifically, Walk Score doesn't calculate whether there are sidewalks, how many lanes of traffic one must cross, how much crime occurs in the area, or what the weather is typically like. It also doesn't differentiate between types of amenities, for example a supermarket grocery store versus a small food mart selling mostly chips and liquor.

Walk Score does not accurately score areas adjacent to international borders. The algorithm prioritizes locations across the border which leads to low and inaccurate scores.[13]
Appendix 4: Extracts from Melbourne Planning Scheme

- Developments affected by Schedule 1 to the Design and Development Overlay (Active Street Frontages – Capital City Zone) should be designed to be generally acceptable for stationary long term wind exposure (where the peak gust speed during the hourly average with a probability of exceedance of 0.1% in any 22.5° wind direction sector must not exceed 10 ms⁻¹).

- All other areas should be designed to be generally acceptable for short term wind exposure (where the peak gust speed during the hourly average with a probability of exceedance of 0.1% in any 22.5° wind direction sector must not exceed 13ms⁻¹). However, if it can be demonstrated that the street frontage or traffica ble area is only likely to be used as a thoroughfare for the life of the development, the building interface should be designed to be generally acceptable for walking (where the peak gust speed during the hourly average with a probability of exceedance of 0.1% in any 22.5° wind direction sector must not exceed 16ms⁻¹).

- Developments should not rely on street trees for wind protection.

(Wind criteria for Southbank, from CCZ3, p5)
22.17 URBAN DESIGN OUTSIDE THE CAPITAL CITY ZONE

This policy applies to land in the municipality excluding the Capital City Zone and the Docklands Zone.

Policy Basis

Melbourne’s buildings, streets, open spaces and landscape features combine to give the municipality its unique appearance and feeling.

It is important that the valued aspects of the City’s character are not lost through redevelopment. Where the built form character of an area is established and valued, new development must respect this character and add to the overall quality of the urban environment.

In areas where built form change is more substantial, a new and equally attractive environment must be created. The Municipal Strategic Statement identifies areas where there is a desire for built form change and a preferred new built form character. The Design Objectives and Built Form Outcomes in the Design and Development Overlays also guide the scale and form of development in the creation of a new built form character. The Municipal Strategic Statement sets the objectives for built form and heritage.

Objectives

- To ensure that the scale, siting, massing and bulk of development complements the scale, siting, massing and bulk of adjoining and nearby built form.
- To ensure that the height of buildings relates to the prevailing patterns of height and scale of existing development in the surrounding area.
- To reduce unacceptable bulk in new development.
- To ensure that buildings on prominent sites are designed to achieve a high standard of design which reflects the importance of their location and extent of their visibility.
- To ensure that building design, including the use of materials and activities at the ground floor frontages of buildings creates and improves pedestrian interest and engagement.
- To ensure that development includes architecturally integrated building tops.
- To ensure that development uses design and detail to ensure all visible facades (including the rear and sides of buildings) provide a rich and positive contribution to the public realm.
- To ensure that development avoids ambiguity and conflict in the design of fronts and backs of buildings.
- To ensure that development contributes to a pedestrian and vehicular network which ensures pedestrian movement and amenity as a priority and strengthens networks of pedestrian pathways through an area.
- To ensure that development maintains and enhances traditional street patterns of projecting cornices and allows projecting balconies and canopies where they follow an existing pattern and/or contribute positively to the public realm.
- To ensure that development promotes building forms that will minimise the adverse impacts of wind in surrounding public spaces and provide weather protection where appropriate.
- To ensure that development creates and maintains a high quality landscape setting.