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1.0 EXECUTIVE SUMMARY AND COUNCIL’S POSITION

The proposed Amendment to rezone parts of the Flemington Racecourse to facilitate development in the manner proposed is not supported by Council. The Amendments appear to be based wholly on the needs and goals of the VRC, rather than on the fundamental principles that are typically expected to underpin proposals for land use and development of this scale in Victoria.

The proponents have assessed what land is considered surplus to their needs, and developed a high yield outcome for the site. However the proposal;

- Has no identifiable support in a strategic planning policy context,
- Does not enjoy the critical support from key government service authorities, including Public Transport Victoria (PTV),
- Bares no relationship to the surrounding urban built form,
- Does not adequately identify, or consider the likely living conditions for residents at the doorstep of the major events precinct, and how the interface between the need to manage and maintain reasonable residential amenity standards can realistically be achieved.

Whilst every future development scenario cannot be planned for, after considering the exhibited documentation it is apparent that the Amendment documentation prepared does not adequately justify the development outcomes proposed. To permit the proposed Amendments in their current form would be to support piecemeal development on a macro scale, without the requisite infrastructure provision that should be expected for land use planning on this scale.

Moonee Valley City Council’s response is that:

- The proposal to rezone the Flemington Green site to facilitate high density development in buildings up to 25 stories is not supported.
- The Advisory Committee should recommend to the Minister for Planning that the municipal boundary be realigned to incorporate the whole of the Flemington Green site within the City of Moonee Valley. The Epsom Road site should remain as is within the City of Melbourne.
- The Advisory Committee should recommend to the Minister for Planning that the City of Moonee Valley be the Responsible Authority for all further planning decisions made on the site.
- The proposal to rezone the Epsom Road site (City of Melbourne) is considered acceptable subject to amelioration works, developer contributions, and a lower maximum building height being agreed.

The Advisory Committee has directed that the proponent undertake research and prepare additional reports, which are due after this Submission is presented to the Committee. Council will review this material and respond to the Advisory Committee at the public hearings as required.

The proponent has not proposed sufficient on site public open space, or infrastructure contributions that are considered consistent with Council’s own needs assessment and future planning for the area. Council will continue to work with the proponent and stakeholders to reach agreement on these matters.
2.0 SUBJECT LAND AND ENVIRONS

2.1 Strategic Context

Flemington Racecourse is located at the western periphery of the City of Moonee Valley. To the north is the City of Maribyrnong, including Footscray Activities Centre, Victoria University and sporting precinct separated by the Maribyrnong River.

The Moonee Ponds Principal Activity Centre is 2.3 km to the north of the site along Ascot Vale Road. This is the primary Activity Centre for the City of Moonee Valley.

2.2 The Flemington Green Site

The land within Moonee Valley which is affected by the draft amendment is irregular in shape, and has a total area of approximately 1.6 hectares. The subject site is located within a General Residential Zone and is within a neighborhood character precinct profile, Garden Suburban 1 (adopted by Council in 2012).

The site is not covered by any design related overlays. There are however, several overlays affecting sites adjacent to the subject site, including the following:

- Clause 43.02 - Design and Development Overlay (Schedule 1 – Skyline Area)
- Clause 43.02 - Design and Development Overlay (Schedule 2 - Maribyrnong River Protection)

These are at Appendix 1 - Planning Controls
3.0 PLANNING FRAMEWORK AND THE REQUIREMENT FOR A STRATEGIC JUSTIFICATION FOR THE AMENDMENTS

3.1 Planning Framework

That part of the subject land that is within the City of Moonee Valley is within the General Residential Zone and contains dwelling stock that is consistent with that in the immediate surroundings, and an open carpark. Whilst there has been a gradual intensification over time, this has seen a transition from single dwellings on a lot, to multi-unit development, of a scale that is to be found elsewhere in the inner/middle ring of metropolitan Melbourne.

There has been ample opportunity for consideration of the subject area, and those surrounding it, for consideration of significant change to the urban form of the area. However the area has not been identified as an area for major change through the:

- Plan Melbourne and Plan Melbourne Refresh 2015 Discussion Paper
- Residential Zones Review
- Moonee Valley Municipal Strategic Statement and Planning Scheme Review (which is a mandatory requirement for all Councils to be undertaken on five yearly cycle)

Without any strategic direction for a development of the scale proposed, the amendment proposals can effectively be seen as an unsolicited bid by the proponent for a major change to the urban hierarchy of this part of the municipality.

For a development of the scale proposed by the proponent there must be a robust strategic justification which addresses the Moonee Valley Planning Scheme and Plan Melbourne. At present there is a lack of strategic justification for the scale of development proposed, particularly within the Flemington Green Precinct.

It is considered inappropriate to locate what would be one of the most significant developments in the municipality in an area with poor accessibility to public transport, convenience centres, schools and community facilities.

The Amendment does not adequately demonstrate whether or not the site can be considered as a “Strategic Development Site”. Council considers that, as yet the amendment documentation does not clearly demonstrate a response to the Local Policy context in that it should:

- Provide for growth in identified locations such as an expanded central city, key employment clusters/nodes, identified Activity Centres and on key transit orientated urban renewal sites consistent with Clause 21.04 of the Melbourne Planning Scheme and Clause 21.05 of the Moonee Valley Planning Scheme.

- Higher density residential development in locations which have the capacity for change or on strategic sites/locations in proximity to transport and services – Clause 21.07 of the Melbourne Planning Scheme and Clause 21.05-1 of the Moonee Valley Planning Scheme.

- Higher density residential development in locations in close proximity to existing Activity Centres and close to high capacity transport nodes, such as the identified Racecourse Road Activity Centre and Union Road Activity Centre which are in close proximity the site – Clause 21.05 of the Moonee Valley Planning Scheme.
It is considered that the material presented does not provide justification for the Flemington Green precinct to be considered as a Strategic Development site, particularly in relation to its lack of connectivity in a public transport sense.

At the meeting held on 23 November 2015, the Advisory Committee was advised by Public Transport Victoria (PTV) that there is no demonstrated commitment for changes to the existing transport conditions. Particularly there is no proposal to activate the rail spur line due to capacity limitations and impacts on existing services.

The proponent is proposing some minor upgrades to the road network. Neither the proponent nor VicRoads is considering wholesale funding for modifications to the surrounding road infrastructure and access at this stage. While the mitigation measures proposed may, or may not be justified, it is clearly expected that the Flemington Green Site will be car dependent. High density, car-dependent development is not supported by Local or State Planning Policy.

As such, without any wholesale change to transport connectivity (through activation of the heavy rail spur line, increased tram and bus services, and vehicular accessibility) it is difficult to concur with the proponent’s assertion that the site represents a Strategic Redevelopment site.

The lack of strategic justification is manifested in what would appear to be fundamental lack of understanding of the existing conditions, or at best an over generous assessment of the opportunities available to the VRC.

Council strongly disagrees with the basic tenet within the proponent’s exhibited Amendment Documents under “Strategic Assessment of the Amendment” and “Why is the Amendment Required”?

The area around the Flemington Green site is already undergoing renewal, with catalysts for change including the proximity to the Flemington Racecourse rail line, the Victoria University and the development of individual parcels of land for higher intensity housing in the immediate locality.

This is not necessarily the case. Whilst the site is in close proximity to the Flemington Racecourse rail line, this is an irrelevant factor unless there are rolling stock and scheduled services assigned to the line. As discussed elsewhere within this report, and in written documentation provided by PTV, there is no commitment for this to be provided.

It has not been Council’s experience that there has been the development of individual parcels of land for higher intensity housing in the immediate locality.

The role of Victoria University as catalyst for change on the subject site has not been made clear by the proponent. If anything, the proximity of the educational institution and any future expansion highlights that there will be an increasing demand for the limited available public transport infrastructure in the vicinity.

Council concurs with the Advisory Committee in their Stage 1 Report (P24);

It is evident that the density of residential accommodation on both sites has not been justified having regard to such aspects as road network capacity, public transport capacity (now and in the future), ease of access to community services and facilities, and impacts on the amenity of adjacent sensitive land uses. While these sites are new potential residential areas, they are not expressly identified in
strategic documents such as Plan Melbourne or the forward planning of either of
the two municipalities.

The proponents have stated that:

The size of the subject site at 3ha and its limited interface with existing residential
development presents an opportunity for an intensity of residential development
that would not be possible on the majority of sites within Ascot Vale.

There are other large scale sites in Ascot Vale including the “TopCut” site (31-33 Ascot
Vale Road and 161-163 Epsom Road, Ascot Vale) between Ascot Vale Road and Epsom
Road that is being considered for residential development. Even on the above site it is
extremely unlikely that Council would countenance supporting for a high density
residential development to the level proposed by the VRC, despite the fact that it has
much greater public transport connectivity than Flemington Green.

The Amendment does not accord with the State Planning Policy Framework (SPPF) as
set out in the Moonee Valley and Melbourne Planning Schemes.

SPPF Clause 11.01-2 – Activity Centre Planning

The objective is: To encourage the concentration of major retail, residential, commercial,
administrative, entertainment and cultural developments into activity centres which
provide a variety of land uses and are highly accessible to the community.

If constructed, the proposed development at Flemington Green would be one of the
highest and most intense developments within the municipality. This would undermine
the current hierarchy of activity centres within the municipality.

SPPF Clause 16 Strategic Redevelopment Sites

The Amendment proposal does not comply with Clause 16.01-3 – Strategic
Redevelopment Sites of the SPPF, as outlined below.
Clause 16.01-3 states:

Objective
To identify strategic redevelopment sites for large residential development in
Metropolitan Melbourne

Strategies

<table>
<thead>
<tr>
<th>SPPF Identify strategic redevelopment sites that are:</th>
<th>Flemington Proposal</th>
</tr>
</thead>
<tbody>
<tr>
<td>• In and around Central Activities Districts.</td>
<td>Not in, or close to a CAD</td>
</tr>
<tr>
<td>• In or within easy walking distance of Principal or Major Activity Centres.</td>
<td>No</td>
</tr>
<tr>
<td>• In or beside Neighbourhood Activity Centres that are served by public transport.</td>
<td>No</td>
</tr>
<tr>
<td>• On or abutting tram, train, light rail and bus routes that are part of the Principal Public Transport Network and close to employment corridors, Central Activities Districts, Principal or Major Activity Centres</td>
<td>No Only Epsom Rd is on a tram route and one bus route.</td>
</tr>
<tr>
<td>• In or near major modal public transport interchanges that are not in Principal or Major Activity Centres.</td>
<td>No</td>
</tr>
<tr>
<td>• Able to provide 10 or more dwelling units, close to activity centres and well served by public transport.</td>
<td>No</td>
</tr>
</tbody>
</table>
SPPF Clause 16.01 - Location of Residential Development

Objective: To locate new housing in or close to activity centres and employment corridors and at other strategic redevelopment sites that offer good access to services and transport.

Strategy: Encourage higher density housing development on sites that are well-located in relation to activity centres, employment corridors and public transport.

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.

It is considered that the proposed development at Flemington Green is not well-located in terms of services or public transport provision, and therefore is not an appropriate site for a high-density residential development.

SPPF Clause 18.01 – 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 community services more accessible by concentrating key trip generators such as higher-density residential development in and around Central Activities Districts, Principal, Major and Specialised Activity Centres on the Principal Public Transport Network.

It is considered that the subject site for the proposed development at Flemington Green is not an appropriate location for a key trip generator such as a higher-density residential development, as it is not located in close proximity to an activity centre, local services or public transport.

Clause 18.01 – Transport System

Objective: To coordinate development of all transport modes to provide a comprehensive transport system.

Strategy: Encourage higher land use densities and mixed-use developments near railway stations, major bus terminals, transport interchanges, tramways and principal bus routes. Pedestrian and cyclist access to public transport should be facilitated and safeguarded.

It is considered that the subject site for the proposed development at Flemington Green is not an appropriate location for high-density residential development and that the proposal will not function appropriately or be complimentary with the existing transport system.

Plan Melbourne

It is considered that any strategic justification for a redevelopment of the scale proposed and for one that will obviously have ramifications for future land use and development decisions, beyond the boundaries of the land that is subject to the current amendment, should be able to demonstrate a much higher level of integrated decision making and
agreement between key parties and government agencies than currently exists. The Victorian Government has a plan to transform the road and rail network, which will be reflected in Plan Melbourne 2016. The policy emphasis, and directions of these new projects continue to align well with Plan Melbourne 2014 and transport system development.

Through the Plan Melbourne Refresh the Government will also:

- Drive spatial change and support development of areas of concentrated jobs and housing,
- Integrate the transport system across modes and with land use,
- Increase the network’s capacity, particularly to strategic employment, gateway and industrial locations,
- Plan for higher capacity and more sustainable transport such as public transport, walking and cycling as the city grows and consolidates,
- Use existing transport assets efficiently, with system improvements and support for more development near existing public transport corridors and key nodes, and
- Ensure transport improves Melbourne’s liveability and amenity and supports development of key places and precincts.

The Amendment should be supported by relevant information to demonstrate alignment with these strategic actions and show that key agencies, land holders and the proponents will be able to implement outcomes that support the vision of the State Government.

This does not appear to be the case to date.

3.2 Lack of Accessibility

Council has analysed the relative accessibility of the whole municipality to public transport and developed a Public Transport Accessibility Level (PTAL) heat map. (Figure 1) The benefit of this mapping is that we are able to determine and interrogate the real accessibility of individual land parcels based on its accessibility to transport options, rather than rely on generalised statements on the suitability of a site.

For the purposes of the Flemington Life proposal, Council is able to determine and demonstrate what the relative connectivity of the site is at present, and what it would be in the event that the spur line was made functional. Effectively a before and after snapshot of the having the spur line operational has been created. The PTAL mapping is based on the:

- Walkable distance to public transport
- Compares train/tram/bus modes of public transport
- Available service information

A modal hierarchy is applied which is based on service preference utilising perceived frequency, capacity and speed. A PTAL before and after map has been prepared adopting a train frequency using the existing Craigieburn schedule as a “shadow” timetable.

Analysis shows that at present, without the spur line open, Flemington Green has some of the lowest levels of neighbourhood accessibility within the Moonee Valley Council area. With the spur line operational the access score of the locality is lifted to be consistent with other local train stations in the municipality with a level of access similar to that of Strathmore train station.
Figure 1 Public Transport Accessibility Level (PTAL) heat map.
If the spur line were to open the density and scale of development that is proposed would not be appropriate. The proposed density is far more consistent with a major activity centre such as Moonee Ponds rather than Strathmore. Moonee Ponds Activity centre is well provided for in terms of retail offer, restaurants, medical facilities, public transport and off street parking as well as being an employment hub. Council’s lower order centres generally exhibit a reduced scale of these elements relative to their reduced accessibility.
4.0 TRANSPORT, ACCESS AND PARKING

4.1 Traffic Modelling

The Flemington Green site is poorly served by public transport, and is not within convenient walking distance to goods and services, which are at least 1.5kms away. It is likely that future residents will be highly car dependent. It is against state and local planning policy to support high density, car-dependent development. It is considered the traffic modelling method adopted (a combination of mesoscopic and SIDRA) does not clearly represent the likely traffic conditions following development, given the limitations of the respective programs' capability to model intersection impacts, and network modelling.

All modelling files should be made available to all transport stakeholders for interrogation to confirm the phasing and timing of intersections.

Based on the information currently provided, it is considered that the following intersections require mitigation as a result of density of this proposal:

- Princes Highway/Epsom Road – to address queuing into the Flemington Road / Epsom Road roundabout (which is not picked up in either the mesoscopic or SIDRA assessments)
- Epsom Road/Union Road – to address queuing through the Showgrounds Shopping Centre signalised intersection on Epsom Road; (which is not picked up in either the mesoscopic or SIDRA assessments), and
- Epsom Road/Showgrounds Shopping Centre Access – to address queuing through the Epsom Road / Union Road signalised intersection (which is not picked up in either the mesoscopic or SIDRA assessments).

4.2 Mitigation Treatments

The following proposed mitigation treatments require additional consideration to ensure they are feasible and safe options:

- Epsom Road / Racecourse Road / Ascot Vale Road roundabout – to ensure that appropriate traffic lane widths are provided for the eastbound lane extension on Racecourse Road and justification that the exclusive left turn lane on Epsom Road into Flemington Drive can be shortened.
- Fisher Parade / Leonard Crescent – to address the safety concerns associated with separate left and right turn stand up lanes and the practicality of providing left-in / left-out access for the driveways in the vicinity of the proposed pedestrian refuge.
- Langs Road / Leonard Crescent – to address the safety concerns associated with separate left and right turn stand up lanes, pedestrian movement and large vehicle access.
- The Epsom Road Tram Fairway – to ensure sufficient traffic lane widths are provided adjacent the fairway dividers;
Additional information regarding modelling for the following proposed mitigation treatments needs to be provided:

- **Epsom Road / Langs Road** – to confirm the correct phasing has been adopted for the analysis.
- **Ballarat Road / Farnsworth Avenue / Droop Street** – to consider the complexity of the three intersection group. An effective way of undertaking this would be microsimulation modelling.

Given the car dependent nature of the Flemington Green development, parking provision for this site should be in line with the Planning Scheme requirements. As such residential visitor parking rates for the Epsom Road site should not be lower than 0.1 spaces per apartment.

There is a significant omission in that the current use of the Flemington Green site as a location for approximately 410 VIP event parking spaces is not properly examined or addressed. The ITAP notes that all car parking currently provided on the Flemington Green site for events will be relocated to ‘surplus’ land within the Flemington Racecourse following development of the site. The loss/displacement of the existing car parking as a result of the Flemington Green development is not assessed – it is of concern that no attempt has been made to detail how the existing use will be accommodated elsewhere, and the associated impacts of such a relocation.

Essentially the proponent’s position is that this is too difficult to model. What is clear is that there will be significant difficulties for new residents to access the new dwellings prior to, during and after event times. In the most extreme conditions Victoria Police are assigned to managing traffic in the vicinity.

It is essential that measures are identified in providing alternative car parking in the vicinity as part of this process.

The proposed internal layout of the Flemington Green site is considered deficient in that it is likely to encourage rat-running, and to lead to pedestrian and vehicle conflict, especially on event days. The entrance arrangements into the racecourse from Leonard Crescent also require redesign. The walking and cycling mitigation and improvement measures are poorly conceived with feasibility of shared paths being a particular issue.

For example:

- The proposed shared zone along Leonard Crescent is not in accordance with shared zone design principles, and the changes to ‘Special Event Management; are incompatible with a shared zone.
- The proposed bicycle lanes (or shared path) to Langs Road have not been assessed for feasibility – Council’s high level analysis based on current carriageway width indicates that there is insufficient spaces to provide these without extensive parking loss.
- It is considered unlikely to be feasible to provide a shared path along the west side of Fisher Parade as suggested, due to multiple crossovers, trees and poor visibility.
- Restriction on the hours of operation of existing paths through Flemington Racecourse is likely to exclude use by commuters and trips for social, shopping etc
purposes in the evening. Also, given the likely unfeasibility of the shared path on Fisher Parade, access to the Maribyrnong River Path, a key cycling route to the city, would be constrained to daytime hours only, removing much of its potential to provide a viable cycling option for access to/from the site.

- The proposed Epsom Road shared path may not fit entirely within the road reserve. VRC land may be required – this should be clarified. The path also has many obstacles which would affect effective width.

- A functional plan for proposed shared paths should be provided to show that they can be delivered.

Some mitigation measures have an impact on on-street parking. For example the removal of parking on Racecourse as proposed to mitigate the intersection of Racecourse Rd/Epsom Road to accommodate additional demand due to the development. Another example is the proposed bicycle connection to Langs Road. Any such impact would require assessment of the likely parking impacts.

Council will be undertaking further analysis of information prepared by PTV, VicRoads and the proponent, due to be provided to the Committee, and will respond appropriately at the public hearing.
5.0 URBAN DESIGN AND LAYOUT

5.1 Flemington Green

The lack of strategic justification for the proposal is manifested in the contradictions inherent within the design objectives found in the Comprehensive Development Plan put forward by the proponent. The proposal juxtaposes high-rise towers in an area surrounded by low-medium scale development.

The Objectives should be revised to recognise that there will be a wholesale change to the built form of the area (around Flemington Green) with a radical change to the skyline, rather than the contradictory and perhaps misleading, current objectives include;

- To provide an appropriate building height transition between new development and the interface with adjoining properties.

- Materials and finishes to be of a high quality and generally consistent throughout the development drawing design cues from the Flemington Racecourse precinct and surrounding residential neighbourhood.

The Moonee Valley boundaries are in part its major environmental features – the Maribyrnong River and Moonee Ponds Creek and their associated parks and reserves. In the south, the boundary forms on the outside of Flemington Racecourse and Racecourse Road. The Maribyrnong River is identified in both State Planning Policy under Clause 12 Landscape and Environmental Values (12.05 Rivers) as a key environmental asset of Metropolitan and State significance.

The site is located within the established residential area of Ascot Vale. The area is characterised by a variety of housing typologies. The built form along Leonard Crescent is predominantly single and double storey, and is very much eclectic, with no strong urban character. Recent development along both sides of Fisher Parade which include multi-level dwellings of a modern and contemporary nature. Recent multi-level developments generally extend the built form into the site and either present as double or triple storey developments to the street. Examples of recent multi-level developments on Fisher Parade provide a higher site coverage and larger built form than has traditionally occurred in the surrounding area.

The site interfaces with Leonard Crescent in the southern part of the site, separating the site into two sections. The site has an approximate frontage of 140m to the west of Leonard Crescent, and approximate frontage of 106m to the North of Leonard Crescent, and approximately 114.8m frontage to the South of Leonard Crescent. The site has a frontage to the east of Fisher Parade of 115.6m (excluding Leonard Crescent). In contextual terms these urban blocks are broader than the prevailing characteristic lot and further linkages and breaking down of these super blocks should be indicated on the CDZ maps to ensure future development presents a similar grain to the existing context.

Within the redevelopment area, existing dwellings fronting Fisher Parade (42-44, 46 and 50 Fisher Parade, Ascot Vale), are single storey from the Post-War period; triple-fronted brick-veneer and weatherboard houses. These style dwellings sit high on the site, and occupy the front two-thirds of allotments and have a pattern of detached outbuildings built in their rear, orientated towards one side boundary. The remaining areas of site are vacant, with some notable canopy trees to the east of Leonard Crescent.
5.2 Surrounding area

Generally, the newer larger developments on Fisher Parade are characterised by their setbacks from the Maribyrnong River and their recess with the hill face as the height of the development increases. However in close proximity to the subject site examples of two and three storey form exists along the river interface with minimal break in form for the lower levels.

On the western embankment (City of Maribyrnong) of the river a more intense and higher density of development has occurred within the Edgewater Marina development. That side of the river is developed with medium and multi density residential development, however there is a general horizontal vista to the skyline that is not punctuated by significantly tall buildings.

5.3 Planning Controls and Urban Design Planning Framework – Flemington

The subject site is located within a General Residential Zone and is within a neighborhood character precinct profile, Garden Suburban 1 (adopted by Council in 2012).

Neighborhood Character Guidelines - Garden Suburban 5 - These are at Appendix 2.

The subject land is identified as being within character area ‘Garden Suburban 5’. The Precinct Description describes the area as:

*The sloping streets covered with mature plants and trees establishes a vegetated, landscape character in this precinct. Undulating roadways and open streetscapes provide expansive views of surrounding reserves, creeks and waterways. Dwellings are built to follow the contours of the topography, with raised or lowered ground levels providing a contrasting dominance in appearance.*

The Preferred Character Statement includes:

*New developments will contribute to the character of this area with well established gardens, and consistent siting to ensure they are secondary in appearance from the streetscape.*

The proposed Flemington Life development presents a much more intensive style of development that bears no relationship whatsoever to what is described in the Garden Suburban 5 precinct profile.

Overlays

The site is not affected by any design related overlays.

5.4 Proposed building typology

Council is not in agreement with the premise of the podium/tower format for Flemington Green. Broadly the arrangement of lower scale building footprints appears on face value to represent an orderly urban design. However Council finds the indicative development concept misleading in representing a lower scaled 3 storey podium interface to the public realm yet the Comprehensive Development Zone identifies super blocks of 5 and 6
storey podium heights, with the various tower forms protruding above. The wholesale application of the 5-6 storey podium results in quite a different urban form and street feel to the photo montages presented.

There is simply nothing to be found in the existing planning framework that directs or encourages, building form of the style provided for in the Planning Scheme Amendment.

In fact the planning controls affecting the site and surrounding area specifically deter buildings of the style proposed.

The Melbourne Planning Scheme (SUZ1) Flemington Racecourse Buildings and Works requirements (4.1) which states that Development must not create tower forms.

The Flemington Green site’s proximity to the Maribyrnong River requires an appropriate design response and scale of development, so that it does not detract from the view lines of this important open space corridor. This is especially relevant considering the site sits on one of the highest points in the area, and therefore any built form will feature prominently within the surrounding context. The Design And Development Overlay DD01 Skyline Area – abuts the subject land to the west.

The design objectives include:

- To protect areas along the Maribyrnong River from visual intrusion caused by the inappropriate siting or appearance of buildings and works.
- To encourage development in keeping with the character and appearance of the area.
- To protect and enhance the skyline when viewed from the river or its banks.

Design and Development Overlay Schedule 2 (DDO2) Maribyrnong River Protection has the following design objectives:

- To protect the significant features of the Maribyrnong River Valley from visual intrusion caused by the inappropriate bulk, outline, setbacks, height, siting and appearance of buildings and works.
- To encourage development that is in keeping with the landscape character and appearance of the Maribyrnong River Valley.
- To maintain publically accessible views into and along the Maribyrnong River Valley.
- To ensure buildings do not create dominant forms on the skyline when viewed from the river or parklands.
- To preserve and reinforce the long views across the floodplain of the Maribyrnong River Valley.

It is quite clear that the proposal by the VRC is antithetical to the intent of these planning controls which have a clear objective of limiting height and having a relatively uniform skyline free from protruding tower designs. The proponents may well argue that this is not a matter for the consideration of the Advisory Committee as these controls do not apply to the subject land. However, Council considers these controls should be considered as the objectives of the DDO will effectively be made null and void if the tower heights within the CDZ are approved.

The proponent’s Urban Context Report (P60) states that “The Flemington Green Precinct site represents a great opportunity to create an identifiable city-wide landmark to locate Flemington Racecourse”.

This demonstrates the extreme discourse between the monumental outcomes proposed by the proponent, juxta-posed against the existing objectives within Planning Scheme in relation to the articulated built form sought along the Maribyrnong River. The DDO1 has
been developed with solid research and background, resulting in clear objectives with the required strategic justification.

Council would have to give consideration to amending the DDO overlays to take into account the changed circumstances if the VRC/Greenland development is commenced in its current form. For example it would be difficult to manage development proposals for taller buildings in Langs Road and Fisher Parade that would have previously punctuated the skyline, and would soon have 14/20/25 storey towers as the backdrop.

The surrounding neighbourhood of Ascot Vale is largely low scale detached suburban stock some of notable heritage value including the mid-rise Wingate Housing Estate east of Racecourse Road. In more recent times a number of developments have occurred along Fisher Parade and Leonard Crescent contributing to an emerging character of more diverse housing forms including unit developments of 2-4 storeys.

Recent VCAT determinations in the vicinity of the Flemington Green site note that surplus land as capable of accommodating a degree of housing change. However Council believes that the podium/tower typology is not in keeping with either the established or emerging character of the location. The significance of the allotments pronounced elevation with a rapid descent to the west from the ridgeline has the effect of rendering the ridgeline exposed to long range views across the Maribyrnong River and south from the CBD.

The impact of tower forms in this location is to attract and denote an urban node however this is at odds with the established Activity Areas identified in the municipal framework plan. Further, Council believes the prominent backdrop location behind the racecourse infrastructure and the significance of the location in terms of visibility from surrounding areas should dictate a lower scale development to allow the primacy of the grandstand and sense of openness surrounding the racecourse be maintained as primary attributes of the Flemington Green precinct. The determination of appropriate building heights in this location should be sensitive to the orderly planning of the City and not based upon opportunistic development scenarios.

Overall there appears to be no design justification for the scale of development sought by the proponents. Council considers that any new development should not be permitted to punctuate the existing building envelope and skyline views that are established via the DDO1 guidelines affecting the river and the existing heights of the grandstands on the racecourse. This height has an established acceptance in the community, and has been a reference point in many planning decisions. Council notes, and agrees with the Advisory Committee’s statement in the Stage 1 Report, (p24)

- **The Design Response Report suggests that, in order to have landmark roles, the buildings need to be high-rise in terms of built form. This proposition is not convincingly made.**

- **Developments can achieve landmark status other than by height. Medium-rise apartments, more in keeping with the predominant built form in the vicinity of the two sites can achieve landmark status.**

The Racecourse has been an historical feature of the area for over a century. The main built form component, the grandstands, have been developed at different periods during this time. Although differing in design and scale each has a similar rectangular form, that, whilst visually dominant they establish a skyline that is familiar and appropriate to the use of the land as a racecourse.
It is against this skyline that planning controls and development decisions have been made. The Grandstands should continue to set the benchmark building envelope for future developments. The Amendments as proposed would allow buildings to harshly intrude into the skyline, without any supporting design justification for such a radical change.

It is considered that if development is to proceed a much greater sliding scale should also be provided for building separations within the CDZ controls to ensure future development maintains a sense of spaciousness and outlook between built forms and to eliminate screening between apartments.

The proximity of building envelopes to the Showground’s boundary is also questioned. The potential of conflicts between future residents and the functioning of the Showgrounds needs to be carefully considered. Recent development has been to the west of Leonard Crescent which provides spatial separation to the new residential dwellings. The building envelope described in 6.1.12 Precinct A to the west side of Leonard Crescent would be more appropriately utilised as a buffer to the Showground’s land and used as additional open space for residents particularly as during event days the village green will not be available as open space.

5.5 Office of the Victorian Government Architect’s Response


The Advisory Committee in their Stage 1 Report has outlined that the report emphasised the opportunity that the two sites provide for an exemplary development, noting that “The scale of change ... requires more serious regard to be given to local conditions beyond the boundaries of each site”. The OVGA encouraged the project team to “undertake further options in studies of form, precinct/site-planning, and architectural design.”

The material that has been exhibited does not represent a significant change from that presented to the OVGA.

In regard to Flemington Green, the OVGA report noted that the site “offers significant potential for an exemplar development” but that “the site’s full potential has neither been convincingly explored nor realised in the current proposal”.

The Advisory Committee notes in the Stage 1 Report that in particular, the report questioned the podium-and-tower model for built form and massing, considering that this site “presents a completely different design opportunity”.

The OVGA considers that the type and scale of open spaces was considered to require further design consideration. The Architectural response for each building “do not combine into a harmonious and meaningful architectural composition” and that this is an unsophisticated approach to interpretation.

Council concurs with the report submitted by the OVGA, and concurs with the comments provided by the Committee in their Stage 1 report.
5.6 Epsom Road

In the vicinity of the Epsom Road frontage, other commercial activity is located to the east within the Racecourse Road strip centre surrounding Newmarket Station with further employment areas along Union Road and Ascot Vale Road. Infill form has largely responded to the low scale traditional 1-3 storey scale. The skyline is punctuated periodically by feature built form particularly at the convergence of Racecourse Road and Mount Alexander Road where State Housing towers within the Flemington Estate and neighbouring redevelopment of the former Lombard’s site (ALT tower) at Travancore provide the area’s significant skyline contribution. The location of the proposed Epsom Road tower as a standalone site can be considered outside the existing established suburb of Ascot Vale. For all intents and purposes, the wider community will view the site as being within the Flemington Racecourse.

The development at 1 Ascot Vale Road is located at a major intersection interconnecting Epsom Road, Ascot Vale Road and Racecourse Road. It is a triangular site that is under construction for an (VCAT) approved 22 storey apartment building. Council acknowledges this precinct is under development pressure.

The Submission and supporting documentation does not provide a convincing argument for the tower height as proposed. In fact the material presented highlights the inherent flaws within the proposal and the contradictory documentation produced.

Within the 550 Epsom Road Comprehensive Development Plan the proponents have set themselves the following Principles;

- **Development should contribute to the character and identity of Flemington Racecourse whilst defining a new character for the apex of Racecourse Road/Ascot Vale Road.**

- **New building architecture should respond to and enhance existing key elements including the dominant element in the precinct which is the Racecourse.**

The proposal would achieve a single tower of 31 storeys which does not relate well to the approved form at 1 Ascot Vale Road and more generally from other buildings in close proximity. The Racecourse does not have any buildings of a tower form. Rather the vernacular is one of wide open spaces, gardens and the track itself, with a variety of lower scale buildings including Heritage assets. Where there are buildings (e.g. the grandstands, training facilities) a strong horizontal built form cluster presents a cohesive rhythm to the Flemington Green edge, with lower scaled form commensurate with the use of the land as a racecourse.

The height and form as proposed is in stark contrast to the racecourse context. If one is to accept that this site as more able to accommodate additional height, a vertical intrusion of 31 storeys in no way responds to, and enhances either the existing key elements in the Racecourse or the surrounding, albeit emerging urban context.

Council is of the view that a building of substantially lower height than that proposed could be accommodated on this site. An overall maximum form between 10 and 14 storeys dependant on the design execution would be appropriate to provide a transition between the higher built form of the approved 1 Ascot Vale Road and the Racecourse proper.
The OVGA has also provided commentary on the Epsom Road tower.

We question the difference in scale between the linear Epsom Road building and the tower. We are unconvinced by the arguments to support the height of the tower, and propose its scale needs to be reviewed more sensitively with regard to other tower proposals on the same road. We are concerned that the architectural composition of the buildings when read as a whole is compromised. We are not convinced that it is realistic to presume the Epsom Road frontage will be truly active as, based on the advice of the design team, there is a limited need for commercial/retail space in this location. The result is a linear building designed to the height of a typical podium that predominantly consists of residential apartments, including some at street level with a landscape buffer. In its current layout, we do not consider this a positive solution for the street, for residential amenity, or for the overall building and site composition. We encourage the design team to interrogate the context more deeply to come up with a more convincing design response. (p5 of 7)

Council agrees with the above position by the OVGA on this matter. There has been no adequate justification by the proponents for the excessive heights proposed for the Epsom Road site.
6.0 OPEN SPACE PROVISION

6.1 On site Open Space

There is a lack of suitable open space proposed to be provided both in terms of scale and location. Providing only five percent open space for such a large number of residents that must then be relied upon to provide amenity and access for events and race meetings is simply inadequate. The public open space will not be available at all times for residents’ use as it will be unavailable or unsuitable when race meetings and events are being held.

Whilst Council acknowledges the five percent open space provision responds to Local Policy Clause 22.05 there are instances where additional area is sought particularly when examining the extent of the additional population and the anticipated demographics based on the development design.

By merely offering what would ordinarily be expected to be provided on any small to medium scale residential development fails to recognise the future conditions that would be experienced in the Flemington Green precinct.

The Moonee Valley City Council Open Space Strategy has as one of its primary objectives to:

‘Promote the principle of multiple-use for all existing and new facilities where practical. Particular attention is to be given to areas where open space is in short supply including in Newmarket, Flemington, Ascot Vale, Niddrie, Essendon, Essendon North, Moonee Ponds and parts of Airport West’

The Flemington Racecourse development was not anticipated to occur within the timeframe of the adopted Open Space Strategy as it was not identified in any Strategic Planning documents. Therefore no specific recommendations for this site have not been included in the Precinct Directions. Hence the Open Space Strategy can only provide direction on development outside of the Racecourse.

When developing the Open Space Strategy the anticipated level of development within Ascot Vale and Newmarket were envisaged to be:

- Ascot Vale: 716 additional dwellings
- Flemington-Travancore: 415 additional dwellings

The proponent needs to demonstrate the Racecourse proposal is able to accommodate a much larger population in the immediate area, without impacting on existing open space in the surrounding area. This is in addition to demonstrating that it can include open space of sufficient scale to meaningfully provide for the new population that can be used for its primary purpose whilst catering for regular surges of patrons to the racecourse.

Council is concerned that the area provided in the village green is insufficient for the projected population and the programming of this space does not provide sufficiently for families particularly young children. This is as a development on this site is seeking as an objective ‘to integrate the site with the surrounding neighbourhood’.
The OVGA report states:

(The OVGA) Encourages the further design consideration to interrogate the different type and scale of spaces that might be required for this new residential population, and capture, locate and elevate these through the site masterplan.

While this area is currently identified as open space for crowd movement during peak times, we recommend consideration be given to long term protection of this area as public open space to ensure the safe management of people in the vicinity of the gates and station platforms, as well as to retain a level of amenity for residents of the development.

We advocate for diversity and generosity in the public space network to provide good amenity for the residential population.

Council concurs with these statements.

In principle, the Flemington Racecourse development should be expected to support a high level of open space needs for the population, right across the spectrum of regional to local, whether this is met through direct provision of open space or through cash-in-lieu contributions for provision of open space services off-site.

The Committee has stated in their stage 1 report that the issues of public open space and development contributions require further attention made the following recommendations to the VRC:

Provide the following information in support of the proposal to the Committee by close of business on 23 February 2016:

a) Reconcile how the public open space contribution will be allocated and implemented.

b) Define the extent of development contributions required for the Project in consultation with the Cities of Melbourne and Moonee Valley.

The information in a) is scheduled to be provided at a date following the deadline for the submission. Council will continue to consider the matter and work with stakeholders as directed.

Without prejudice to any future outcomes Council would expect that the proponents should be required to contribute an appropriate amount of open space per capita expected on the site. If this is not provided, cash in lieu contributions could be used to construct infrastructure, allow for access to the Racecourse and or provide to connections to open space resources in the Maribyrnong River vicinity.

It is abundantly clear that the management of public open space would be more efficient and more easily managed if it were contained within one municipality. This is discussed further in this submission.
7.0 IMPACTS ON MVCC SERVICES AND SOCIAL INFRASTRUCTURE

7.1 Council’s Long Term Community Facilities Planning

Council is currently developing a Long Term Community Facility Planning Framework and Plan (LTCFPF) which aims to deliver community facilities more efficiently and effectively. It seeks to transition Council’s facility planning and delivery approach from a decentralised to an integrated model. The LTCFP Framework and Plan (including objectives and planning principles) is in draft form and is due to be presented to Council for consideration and consultation in 2016. Appendix 3 contains a detailed review of the Impacts on Council Services and Social Infrastructure. The objectives of Council’s LTCFP Framework are to:

- identify priorities for future community infrastructure (short, medium and long term)
- develop a consistent, collaborative and evidence based approach for community facility planning (through Service Infrastructure Profiles)
- provide a spatial analysis (through precinct planning) which identifies future population profiles, as well as existing and emerging commitments and opportunities
- inform decision making around planning, funding and delivery of community infrastructure (through shared principles, criteria and tools and adherence to defined planning processes)
- outline an approach to planning and delivery of future proposed community hub projects.

Seven planning precincts (Precincts) have been identified to guide community facility planning in Moonee Valley. The proposed Flemington Green site is located partially within Precinct 1.

Figure 4 Moonee Valley Community Facility Planning Precincts
7.2 Community facility needs in Precinct 1

The proposed Flemington Green site is located partially within Precinct 1, and the Epsom Road site is located adjacent to the Precinct boundary. Precincts boundaries were identified based on:

- Suburb boundaries.
- The collection areas used by the Australian Bureau of Statistics and council in population analysis.
- Resident movement patterns (considering natural and built form such as river corridors and train lines).

Figure 5 identifies existing community facilities in Precinct 1

Figure 5 Existing community facilities in Precinct 1

Facilities include:

- a key sporting precinct at Fairbairn Park and the Riverside Golf and Tennis Centre in the north-west of the precinct.
- two sporting reserves (Walter Street Reserve and Debney Park)
- a hockey centre in the east of the precinct.
- two libraries located in activity centres (Flemington Library on Racecourse Road and Ascot Vale Library on Union Road).
• Eleven early years services across seven early years and multi-purpose facilities (eight of the services are Council-operated).
• three neighbourhood houses/community centres (one of which is Council-operated).
• one leisure centre (Ascot Vale Leisure Centre).
• two community hall-for-hire facilities (Crown Street Stables and Canterbury Street Stables).

7.3 Expected demographic profile of Flemington Life residents

The proponent projects that the Flemington Life development will attract the following demographic profile:
• 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 area
• over two-thirds of the dwellings will be lone person and couple households
• over one-third of the dwellings will be lone person households
• families and children will live in between 16 to 18 per cent of the apartments and townhouses
• children are most likely to be very young children up to four years of age.

Precinct 1 comprises Ascot Vale, Flemington and Travancore. Travancore has a higher proportion of high density dwellings compared to Flemington and Ascot Vale. Therefore, in order to assess whether the population projections for Flemington Life are accurate, it is more useful to compare them against the Travancore population than Precinct 1 as a whole.

Figure 6 shows that the projected Flemington Life population profile is in line with population trends in higher density areas in Moonee Valley and therefore can be used to determine the likely demand for community facilities.
Figure 6 Comparison of the projected Flemington Life and existing (2011) Travancore population age profiles

7.4 Likely community facility demand generated from the Flemington Life development

The Flemington Life population profile suggests that residents are likely to require access to the following types of community facilities:

- libraries
- multi-purpose spaces
- early years services, particularly childcare
- informal sport and recreation facilities (leisure centres, pools and indoor recreation)
- informal social competitions (particularly indoor).

7.5 Community facility access for Flemington Life residents

Most of the Flemington Life development will be located within the City of Melbourne. However, user catchment maps (Figures 4 to 8) illustrate that residents living in the areas in which both Flemington Green and Epsom Road will be located will use Moonee Valley’s community facilities.

A number of Kensington residents also access facilities in Moonee Valley, particularly the Flemington Library, Flemington Community Centre and Ascot Vale Leisure Centre. This is also evident in the facility catchment maps.

These access patterns demonstrate that it is likely that Flemington Life residents will utilise Moonee Valley’s facilities.
Figure 7 Service Catchments of kindergartens located in Precinct 1
Figure 8 Ascot Vale Library user catchment map
Figure 9. Flemington Library user catchment map
Figure 10 Ascot Vale Leisure Centre user catchment map
Figure 11. Flemington Community Centre user catchment map
The quantum of additional demand generated directly by these facilities by the Flemington Life population is as follows:

- approximately one MCH consultation per week (MCH centres are assigned based on residential address, therefore most Flemington Life residents will attend centres in the City of Melbourne)
- 3 licensed sessional kindergarten places
- 18 long day care places
- additional 79 square metres of library floor space
- 2.2 outdoor playing ovals and fields
- 1.4 outdoor courts
- 0.6 indoor courts.

The City of Moonee Valley does not apply benchmarks to determine the need for multi-purpose spaces. In keeping with Council’s LTCFP principles, adaptable multi-purpose spaces will be provided in all future community facilities. The quantum, size and configuration of these will be determined at detailed feasibility stage.

It is likely that Flemington Life residents will require access to spaces for private, ad-hoc hire and will access some community programs. The development will therefore also generate some demand for multi-purpose spaces.
7.4 Capacity of existing community facilities in Precinct 1 to accommodate additional demand from the Flemington Life development

Council has considered the Capacity of existing community facilities in Precinct 1 to accommodate additional demand from the Flemington Life development. Table 1 assesses the capacity of existing community facilities in Precinct 1 to accommodate additional demand generated from the Flemington Life development, particularly with regard to the long term needs identified through Council’s LTCFPF process.

<table>
<thead>
<tr>
<th>Service/facility</th>
<th>Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Early years</td>
<td>No capacity. Council’s LTCFPF process has identified the need for an integrated early years facility in order to increase the capacity of existing services to accommodate future demand without the additional demand from Flemington Life.</td>
</tr>
<tr>
<td>Libraries</td>
<td>No capacity. Both Ascot Vale Library and Flemington Library have already been identified by Council as requiring additional floor space. Ascot Vale Library requires an additional 672sqm and Flemington Library requires an additional 214sqm.</td>
</tr>
<tr>
<td>Outdoor play ovals/fields</td>
<td>Fairbairn Park can accommodate the demand generated from the Flemington Life development if the capacity of fields is increased by realigning cricket wickets and ovals, investing in new field decks and installing field lighting.</td>
</tr>
<tr>
<td>Indoor courts</td>
<td>No capacity. Council is currently undertaking a feasibility study and business plan for the development of a highball stadium in Moonee Valley.</td>
</tr>
<tr>
<td>Leisure centre</td>
<td>Ascot Vale Leisure Centre can accommodate additional demand with the conversion of the group hall into program rooms.</td>
</tr>
</tbody>
</table>

Table 1 Capacity of community facilities in Precinct 1 to accommodate additional demand generated from the Flemington Life development
7.5 Assessment of proposed community facility development contributions

A number of community infrastructure contributions were proposed in the Flemington Life Social Impact Assessment Update (November 2015), assesses these proposals against Council’s community facility priorities for Precinct 1.

The Assessment Committee’s Stage 1 Report has required the proponent to:

Provide the following information in support of the proposal to the Committee by close of business on 23 February 2016:

a) Reconcile how the public open space contribution will be allocated and implemented.

b) Define the extent of development contributions required for the Project in consultation with the Cities of Melbourne and Moonee Valley, and determine the planning mechanism for this to be implemented.

In addition the Committee has required that the proponent prepare and submit

   An independent peer review report on social impact assessment, including commentary on public open space, development contributions and affordable housing.

Council will continue to work with the proponent on the extent of development contributions required for the Project. At this time it is not possible to ascertain how large facilities will have to be or where they will have to be located to address the needs arising from this proposal. The parties cannot agree on facility capacity or location absent a development proposal. None is before the Committee.

Until Council has had the opportunity to review this material Council will not be in a position to finalise its consideration and determination of what is an appropriate level of contributions.

These matters will also be affected by the Committee’s recommendation as to the appropriate municipal boundaries for the Flemington Green precinct, and what the ultimate site yield should be.

Council initial comments on the community infrastructure contributions proposed in the Flemington Life Social Impact Assessment Update (November 2015) and their relationship against Council’s emerging community facility priorities for Precinct 1 are in Table 2.
<table>
<thead>
<tr>
<th>Proponent Proposal</th>
<th>Alignment of proposal with Council’s community facility priorities</th>
<th>Council’s preferred development contributions from Flemington Life</th>
</tr>
</thead>
</table>
| Contribute to a new early recreation hub in Kensington. | Assuming this proposal refers to the redevelopment of the Kensington Community Recreation Centre, the centre is located 4km from Flemington Green and 1.5km from Epsom Road. Moonee Valley’s catchment mapping shows that 56 percent of children enrolled in kindergarten live less than 1km from the centre they attend and 88 percent live less than 2.5 km from the centre they attend. Moonee Valley facilities are closer to Flemington Green than City of Melbourne’s facility and approximately the same distance from the Epsom Road site. At this stage it is unknown which early years’ services the City of Melbourne will be developing at the Kensington Community Recreation Centre or if the development will progress as it has not yet been subject to feasibility. | Contribute to an integrated facility within the Union Road Activity Centre that will accommodate:  
- a larger Ascot Vale Library  
- integrated early years services  
- shared, flexible multi-purpose spaces. |
| Provide or contribute to a multi-purpose community hub. The facility should offer accessible, flexible and culturally appropriate community spaces. This may be located onsite at Flemington Green or at another location nearby pending discussion with Council. The facility should include:  
- A local e-resource centre  
- Areas suitable for ‘maker spaces’ for local art and cultural activities catering to an increasing youthful population in the area  
- Places that residents can hire for children’s parties and other social activities  
- Areas suitable for book clubs, study groups, table tennis | Council’s planning has determined the need for an increase in multi-purpose spaces in Precinct 1, therefore provision of such space is supported. However, Council’s priority is to develop an integrated facility that will also accommodate a library and early years services as the anchor uses. Multi-purpose spaces will not be a primary focus of the facility, but rather will support the anchor uses, as well as provide space for other services such as aged and disability programs. Locating these services at the Flemington Green site does not align with Council’s facility location principles. Specifically:  
- the facility will not be central to the catchments of the services to be accommodated on the site  
- the facility is not located within, or close to an area of community activity  
- the site is unlikely to have capacity for potential future expansion  
- Council’s historic visitation rates demonstrate that a library requires a ground level entrance and visual prominence in an area of high pedestrian activity | |
<p>| Contribute to new tennis and netball courts in the local area surrounding Flemington Green and Epsom Road. | Flemington Life is likely to generate demand for an additional 2 sports courts, therefore this proposal is supported. | Contribute to development of 2 new courts for netball and tennis at Riverside Golf and Tennis Centre. |</p>
<table>
<thead>
<tr>
<th>Proponent Proposal</th>
<th>Alignment of proposal with Council’s community facility priorities</th>
<th>Council’s preferred development contributions from Flemington Life</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>The Riverside Golf and Tennis Centre can accommodate additional demand through the development of additional sport-compliant courts for netball and tennis.</td>
<td></td>
</tr>
</tbody>
</table>

**Additional Council priorities not proposed by the proponent**

<table>
<thead>
<tr>
<th></th>
<th>Contribute to a capacity increase at Fairbairn Park (realigning cricket wickets and ovals, investing in new field decks and installing field lighting).</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Contribute to Ascot Vale Leisure Centre capacity increase – conversion of group hall into program rooms.</td>
</tr>
</tbody>
</table>

**Table 2. Council’s emerging community facility priorities for Precinct 1 and Proponent Proposal.**

It has been demonstrated that both elements of the Flemington Life proposal, (Flemington Green and Epsom Road) will significantly impact on Council’s community infrastructure. It is therefore expected that the land owner provide an appropriate level of financial contribution towards mitigating the impacts on community facilities, and that this be formalised in an agreement, pursuant to section 173 of the Planning and Environment Act, 1987. This is expected to be separate to any contribution towards transport mitigation or public open space.

Council’s service planning has identified community facility priorities for this part of the municipality. Further to this, it has undertaken additional analysis into the likely community facility demand generated from the Flemington Life development. In light of this we have identified preferred development contributions towards community facility priorities. Implementation is not, at this stage, advanced to the point whereby an exact dollar figure can be identified for the required mitigation needs.

However what is clear that the impacts will be substantial and, as such, a figure commensurate to the impacts must be agreed. Council considers that a minimum figure of at least $6,000 per dwelling must be agreed.

This figure is obtained by comparing the Flemington Life proposal against the Proposed Moonee Valley Racecourse development. In that instance, the relevant Advisory Committee found that the proposed development contributions amounting to approximately $6,000 per dwelling is reasonable.

This is considered an appropriate benchmark in that each proposal is for a large scale, high density/residential mixed use development on existing land utilised for racecourse purposes. Council is prepared to work collaboratively and productively on the identification of necessary local infrastructure upgrades and improvements, including mitigating works, for the agreed development.
8.0 INTERFACE WITH SURROUNDING LAND USES

8.1 Events

The proponents have identified the land as a major residential development site. However it cannot be presented as an unfettered or “brownfield” site and must be considered in the context of its surroundings. The Flemington Green site has three distinctive and differing land uses at its boundaries:

- Northwest – established low/medium density residential development.
- Northeast – Royal Agricultural Showgrounds (RAS). This venue has a range of events throughout the year, including concerts and the annual Royal Melbourne Show held over two weeks in September.
- Flemington Racecourse – regular race meetings, with the Melbourne Cup Carnival held annually in November.

The varying functions of the uses at the interface with the subject makes the proposal a significantly different proposition than many other straightforward residential rezoning requests. As such, the proposal creates its own set of unique challenges which must be given appropriate consideration which in the view of Council, makes the proposal unsuitable. Two of these are dynamic and in nature and each has the ability to impact on the amenity of future residents at Flemington Green. As such the impacts of these sites and their lawfully established uses must be a major consideration in the proposal to create high density housing on the doorstep of two of Melbourne’s signature event venues.

Table 3 outlines a list of events at each venue over the past three years. (A more detailed breakdown will be tabled at the forthcoming hearing). This shows that there was a combined attendance of over 3.5 million people over this time. Essentially, on an annual basis the visitor numbers in the precinct were equivalent to a quarter of metropolitan Melbourne’s population.

<table>
<thead>
<tr>
<th>Year</th>
<th>Events</th>
<th>Attendees</th>
</tr>
</thead>
<tbody>
<tr>
<td>2013</td>
<td>46</td>
<td>806,800</td>
</tr>
<tr>
<td>2014</td>
<td>43</td>
<td>912,100</td>
</tr>
<tr>
<td>2015</td>
<td>22</td>
<td>249,300</td>
</tr>
<tr>
<td>Total</td>
<td>11</td>
<td>1,968,200</td>
</tr>
</tbody>
</table>

Royal Agricultural Showgrounds

<table>
<thead>
<tr>
<th>Year</th>
<th>Events</th>
<th>Attendees</th>
</tr>
</thead>
<tbody>
<tr>
<td>2013</td>
<td>43</td>
<td>767,00</td>
</tr>
<tr>
<td>2014</td>
<td>41</td>
<td>676,975</td>
</tr>
<tr>
<td>2015</td>
<td>20</td>
<td>311,183</td>
</tr>
<tr>
<td>Total</td>
<td>104</td>
<td>1,755,158</td>
</tr>
</tbody>
</table>

Flemington Racecourse

<table>
<thead>
<tr>
<th>Events Precinct Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Year</td>
</tr>
<tr>
<td>2013</td>
</tr>
<tr>
<td>2014</td>
</tr>
<tr>
<td>2015</td>
</tr>
<tr>
<td>Total</td>
</tr>
</tbody>
</table>

These events are not limited to race meetings and can attract large crowds, and often operate during the day and night.
By way of example The Melbourne Barbecue Festival is scheduled to be held at Flemington Racecourse on Saturday, 6 February from 10am-10pm. It is anticipated that the event will attract 10,000 people. There are several major events scheduled over the next few months:

<table>
<thead>
<tr>
<th>Date 2016</th>
<th>Event</th>
<th>Venue</th>
</tr>
</thead>
<tbody>
<tr>
<td>6 Feb</td>
<td>Melbourne Barbecue Festival</td>
<td>Flemington</td>
</tr>
<tr>
<td>13 &amp; 14 Feb</td>
<td>ROC Race</td>
<td>Flemington</td>
</tr>
<tr>
<td>20 Feb</td>
<td>Black Caviar Lightning Day</td>
<td>Flemington</td>
</tr>
<tr>
<td>24 Feb – 29 Feb</td>
<td>Victorian Caravan, Camping &amp; Touring Supershow</td>
<td>Showgrounds</td>
</tr>
<tr>
<td>5 Mar</td>
<td>Australian Guineas Day</td>
<td>Flemington</td>
</tr>
<tr>
<td>12 Mar</td>
<td>Super Saturday</td>
<td>Flemington</td>
</tr>
</tbody>
</table>

Table 4 Events at Showgrounds and Racecourse Feb – March 2016

Many of these create negative amenity impact, which are currently experienced by residents of the area, especially if they are poorly organised, excessively noisy or run over time. Council's experience is that Moonee Valley residents' key concerns relate to excessive noise, antisocial behaviour and inadequate public transport and parking.

These impacts are also familiar to Council as additional resources are required to manage and clean up after major events. Additional noise complaints waste collections, traffic management costs are imposed on Council every year during event times.

It calls into question the expectations of the future residents that would reside in Flemington Green. As currently planned, the residents would face a regular influx of pedestrians and vehicles restricting and slowing access to their premises. Accessibility to community facilities will be severely restricted and there will competition for the available open space. Noise from events is known to impact on residents in the surrounding area.

The proponent has not articulated how these real issues would be addressed if the development were to proceed. Would the Body Corporate be responsible for cleansing and maintenance of the external areas during and following these regular events and race meetings?

It is considered that the Advisory Committee needs to fully consider potential impacts from surrounding uses, and the impact on amenity for future residents. Whilst the Amendment documents have clearly highlighted the role and function of the Racecourse, they do not outline how the externalities associated with its function should be managed.

The proponent should be able to demonstrate how the number and types of events at the Racecourse will be managed. This brings into question whether there should there be a concurrent amendment to the SUZ in the Melbourne Planning Scheme designed to limit event numbers and, or the type of events at the Racecourse, to provide some certainty for new residents on the anticipated accessibility to the Racecourse.

At present the SUZ 1 schedule requires that the Racecourse and must not be used for an event for more than 15,000 people or for a place of assembly for more than 15,000 people, unless an Event Management Plan has been approved by the responsible authority. Prior to approving an Event Management Plan the responsible authority must consider the views of a
Consultative Committee comprised of the Victoria Racing Club, Department of Sustainability and Environment, Melbourne City Council and Moonee Valley City Council.

Council considers that there should be a review, and lowering of the threshold level of 15,000 participants before an event management plan is required. This is as there would be a significant intensification of the residential population in proximity to the Racecourse proper and an increase events could reasonably impact on their amenity and accessibility. Council notes that in their decision of Bannister v Minister for Planning 2009, (P121/2009) the Victorian Civil and Administrative Tribunal stated that:

Firstly we consider the context must influence reasonable expectations of amenity. The owners of residential properties proximate to the Showgrounds and the Racecourse (both being recognised in the Scheme as major recreational and entertainment resources of State and Metropolitan significance) cannot expect the same level of amenity as might be found in an entirely residential area.

This case related to the proposal to allow for an increase in music events by the Royal Agricultural Society of Victoria Ltd at the Showgrounds, a site in obvious close proximity to Flemington Racecourse and proposed amendment sites.

The externalities associated with an increase in events are felt through the impacts of increased noise, traffic and parking, pre-event and post-event set up and take down, and street cleansing and the like.

The difficulties in managing the interface between events and high density residential precinct are exposed within the proposed CDZ Zone put forward by the proponent. It is suggested that as part of the requirements for Buildings and works Permit Requirements “a permit is not required to construct a building or construct or carry out works directly associated with the Victoria Racing Club Ltd and/or management of the Flemington Racecourse”.

This would appear to be totally unreasonable that works that would ordinarily require a permit, on land outside the racecourse would be exempt based on the fact that the works were being undertaken by the VRC. Once the land is excised the VRC should not expect to have control of land beyond the racecourse boundary.

8.2 Access and Parking

There is a limited availability of off-street parking in the vicinity of Flemington Green. There is increased demand during event periods at the Melbourne Showgrounds and/or Flemington Racecourse. In order to manage, the impacts of this demand, Council has established on street parking management regime that is triggered during events.

The two local roads directly impacted are Fisher Parade and Leonard Crescent. The parking restrictions on Fisher Parade are permit zones during major events at the Melbourne Showgrounds or Flemington Racecourse. The main demand for on-street parking is primarily from existing residential properties except during event times.

There are currently 131 dwellings with frontages to Fisher Parade. Of these, half (66) are not entitled to resident or visitor parking permits but are entitled to temporary parking vouchers. Over one third (46) are entitled to just one parking permit each and temporary parking vouchers and just less than one sixth (19) are eligible for more than one parking permit each. During major events, temporary parking vouchers can be used by residents with few or no parking permits to park on-street.
Leonard Crescent has sixteen properties fronting it. Of these, two are not entitled to parking permits, but can apply for temporary parking vouchers. At the moment, the on-street parking is unrestricted with the exception of a bus zone and taxi zone.

Any significant increase in dwelling numbers would be likely to have a significant Impact on parking demand in these streets. Should the demand be of a scale that warrants the introduction of timed or permit parking restrictions, which typically occurs when occupancy levels consistently reaches 85 per cent or more, the residents of Fisher Parade and Leonard Crescent who do not hold resident or visitor parking permits will be significantly affected and will lose the ability to park on-street.

In accordance with Moonee Valley City Council policy, no occupier of the Flemington Green Precinct site would be entitled to resident or visitor parking permits.

The Flemington Events Precinct is identified in below in Figure 12.

**Flemington events precinct**

Figure 12 - Flemington Events Precinct
Council’s Manager City Planning attends quarterly Community Reference Group meetings at the Flemington Racecourse and Melbourne Showgrounds and gathers a high level of understanding of forthcoming events held at both venues. From this, Council instigates event-based parking restrictions in the Events Area that are enforceable and where parking permits must be displayed. This requires good communication between the stakeholders, and imposes costs onto Council, in terms of sign and notification management, and parking enforcement.

Council recommends that the members of the Advisory Committee acquaint themselves with events held on the Showgrounds and Racecourse in order to appreciate the extent of impacts on the surrounding area.
9.0 AFFORDABLE AND ADAPTABLE HOUSING

9.1 Affordable Housing

The Committee in its Stage 1 Report stated that it considers that options to provide affordable housing needs to be further explored, and the VRC should include affordable housing as a topic for consideration and resolution at the Hearing.

Provide the following information in support of the Project to the Committee by close of business on 23 February 2016:

a) Work with the Cities of Melbourne and Moonee Valley to develop a proposal to identify reasonable affordable housing opportunities, and the planning mechanisms (or options) to implement such opportunity.

b) An independent peer review report on social impact assessment, including commentary on public open space, development contributions and affordable housing.

Council will continue to consider the matter and work with stakeholders as directed.

Affordable Housing is an issue that Council has been focussing on in recent times. The Moonee Valley Affordable and Inclusive Housing Action Plan 2014/15 is based on the City of Moonee Valley Affordable Housing Background Research Paper (October 2012). It is also guided by the Council Plan (2013-2017), the Moonee Valley Public Health and Wellbeing Plan (2013-2017) and the Housing Strategy 2010.

A new Housing Strategy is currently being drafted. While not yet adopted by Council it contains a number of supporting actions regarding Affordable and Adaptable Housing. These actions include developing an internal policy that requires large-scale developments to provide a Social Impact Assessment, which addresses the provision of Affordable Housing and to work with Community Housing Providers and developers towards a goal of 10 percent provision of Affordable Housing as part of new large-scale housing developments.

The Draft Moonee Valley Housing Strategy 2016 adopts the following definitions of Affordable Housing.

Affordable Housing is housing managed by the not-for-profit sector such as Community Housing Providers and cooperatives. Affordable Housing is offered to purchasers or renters at below market rates (usually capped at 25-30 percent of the household’s income).

There are three questions that require attention regarding the provision of Affordable Housing (in accordance with the above definition) as part of the proposed redevelopment of Flemington Green.

1. What is the right form of Affordable Housing to be provided?
2. What is the right amount of Affordable Housing to be provided?
3. How can the VRC be accountable for providing the agreed amount of Affordable Housing?

The State Government report Making Social Housing Work: Better Homes for Low Income Victorian’s (March 2014) highlights the need for the increased provision of Affordable Housing in Victoria. The report states that the demand for Social Housing is set to increase by 38% in Melbourne outstripping demand for private rentals at 27 percent between 2014 and 2024. Meaning the provision of Affordable rentals needs to grow faster than the private rental market.
The report concludes that social housing stock in Victoria needs to grow to between 5-6.5 percent of all housing stock in Victoria. Currently Social Housing (which includes Public Housing and Affordable Housing) accounts for 3.4 percent of total dwelling stock in Victoria (compared to 5.2 percent in NSW).

This would indicate that 10 percent is a reasonable provision of Affordable Housing in a project of the scale being proposed by the VRC as a contribution to the overall shortfall of Affordable Housing in Melbourne.

The provision of affordable rental stock is considered preferable over the provision of an affordable purchase due to the long term impact this stock has on the housing market. Affordable rentals, owned and managed by the non-for-profit sector have the ability to provide long term relief to people experiencing housing stress where as a dwelling offered for sale at a price below the current market rate provides a one off benefit to the purchaser. However, the long-term public benefit of the dwelling as a contribution to Social Housing is lost.

Through Amendment C134 the City of Moonee Valley pursued a policy position to require a minimum of 10 percent Affordable Housing as part of any new residential development of 10 dwellings or more. It is noted that the Panel presiding over the hearing for C134 recommended that Council re-word the proposed policy to ‘encourage the provision of affordable housing in developments of 10 or more dwellings’.

This was partly on the basis of the difficulties in ensuring that a quota of affordable housing is secured. Given the wind down of the Commonwealth NRAS program this relies on the involvement of a third party Community Housing Provider as the owner and manager of the housing stock.

Nonetheless there are several cases throughout Melbourne, including one in the City of Moonee Valley, where a minimum quota of 5 percent affordable housing has been supported via a site specific planning control for a major re-development site. This was achieved for the proposed re-development of the Moonee Valley Racecourse through Schedule 1 to the Activity Centre Zone.

How this minimum quota will be achieved by the MVRC has not yet been resolved but it should be possible to work through this issue in cooperation with the site developer and interested Community Housing providers.

There are potential social benefit to a ‘salt and pepper’ approach to the provision of Affordable Housing where the Social Housing component is indistinguishable from the private stock. However, it is understood that this may not suit the needs of a not-for-profit provider.

Many Community Housing Providers prefer to design and manage their stock from the beginning as this allows them to design to the needs and specifications of their clients (many of whom require Accessible Housing) and keep maintenance and body corporate fees low.

This being the case the preferred arrangement may be to hand over a portion of the site or completed development in a manner that best suits the Community Housing partner. An agreement between all parties could be entered into prior to the rezoning of the site to ensure any arrangement is secured.

Moonee Valley Council is willing to work with the developer, the Community Housing sector and the City of Melbourne to come to a mutually agreeable arrangement that meets the needs of all parties and provides a reasonable provision of Affordable Housing product somewhere in the range of 5-10 percent of the overall housing stock.
The draft Moonee Valley Housing Strategy also discusses the need to provide Adaptable Housing as part of the overall housing mix in new large-scale residential developments. This is further supported by the Moonee Valley Disability Action Plan (2014-2023) and the Moonee Valley Affordable and Inclusive Housing Action Plan 2014/15.

Approximately 20 percent of Moonee Valley residents will acquire a disability or experience a physical limitation during the course of their life. Most will acquire disabilities over time as a result of injuries or increasing mobility restrictions and physical limitations as they age.

The National Disability Insurance Scheme will become available in the Western Melbourne area from 1 October 2018. The scheme is set to financially assist people with a disability to find appropriate housing, which supports their independence where possible. This is expected to increase demand for Accessible and Adaptable housing.

There is a strong link between the need for increased Adaptable Housing and Affordable Housing as often those affected by a disability are also low-income earners. Many Affordable Housing Providers are aware of their clients’ needs and build to reflect this. However, increasing the percentage of Adaptable homes in the private market is required to cater for the increase in future demand and provide people with a disability with a variety of housing options.

Accessible Housing is housing that has been designed in a way which makes it easy for people with a mobility difficulty to enter, move around and to comfortably live in. For example by having wider doorways, step free entries and a bedroom on the ground floor. An accessible home meets the Australian Standard AS 1428.1-2001.

Adaptable Housing is housing that has been designed in such a way as to allow for lifestyle changes over time without the need for significant modifications. This may include aspects such as having contrasting colours between kitchen bench tops and cupboards to assist the visually impaired or having a clear circulation space in living areas for wheelchair manoeuvrability. The Australian Standard AS 4299-1995 specifies that housing be adaptable for a wheelchair.

It is therefore recommended that in addition to a quota of Affordable Housing the development should provide for a minimum of 10 percent Adaptable Housing. These dwellings may in part overlap with the provision of Affordable Housing but Adaptable Housing should be demonstrated in the design of a minimum of 5 percent of the private housing stock as well.

Council notes that in terms of Affordable Housing, the OVGA report considers that the proponents’ response to be “unconvincing”.

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10.0 HERITAGE

10.1 Bluestone wall

Flemington Green site is partially covered by HO272, which relates to Flemington Racecourse, Epsom Road and Smithfield Road. Of particular relevance to the proposed development are the bluestone walls along Fisher Parade to the south of the site (identified as F2 in the Victorian Heritage Register).

“Flemington Racecourse is architecturally significant for its collection of structures relating to racing in Victoria since the nineteenth century, which demonstrate the various stages of development of the course. The most significant of these are the remaining nineteenth century structures (the 1880s bluestone stand remnants and bluestone walls and the former Convalescent Jockeys’ Lodge), the 1920s Members’ Stand and betting ring, and the 1930s tote buildings. The remnant of the 1880s bluestone grandstand, though partly hidden beneath the Old Hill Stand terraces, is an interesting example of a nineteenth century grandstand and demonstrates building techniques of the period. The bluestone walls at the base of The Hill and along Fisher Parade and Leonard Crescent are also of interest as examples of nineteenth century bluestone construction.”

The Proponent’s planning report states the following:

VRC sought advice from Lovell Chen on the potential for development in the Flemington Green precinct. The advice of Lovell Chen included the following:

Setbacks to the heritage wall

- New development should be setback between 6-8 metres from the wall.
- Free space should be retained around the wall, to maintain its setting and presentation.
- Development on registered land area.
- Development in the eastern portion of the Hill Precinct is generally not constrained in heritage terms in regards to height and density.

It is considered that this advice from Lovell Chen does not provided sufficient justification for the proposed built form of 73.7 metres (with no setbacks), 6 metres to the north of the subject bluestone wall. It is not possible to ascertain why a setback of 6-8 metres from the wall has been identified as being a suitable separation

At present, the wall is clearly visible from the public domain and presents as a useful and identifiable heritage element in the built Environment.

It is considered that a full heritage assessment is required to determine an appropriate built form for Precinct B which would complement the character of HO272, especially the bluestone walls to the immediate south. Without a full understanding and appreciation of this, the heritage value of the wall is likely to be diminished, and lost if the development is constructed as proposed.

This should assist in developing the appropriate the built form provisions of the Comprehensive Development Zone as the maximum building height and minimum setback for Precinct B.
11.0 MUNICIPAL BOUNDARY REALIGNMENT AND RESPONSIBLE AUTHORITY STATUS (Planning and Environment Act, 1987)

11.1 Boundary Realignment

The Terms of Reference requires the Advisory Committee to produce a written report for the Minister for Planning. In addition to recommendations as to the appropriateness of the proposed Planning Scheme Amendments, the Report is to provide:

- A rationale in reviewing whether a municipal boundary re-alignment is required for the 'Flemington Hill' development site to ensure that the site is located within one municipality.

- An assessment on the current Responsible Authority status and whether the Minister for Planning should continue as Responsible Authority for the development sites.

These sites are generally surrounded by residential areas within the City of Moonee Valley. If the Amendments are to proceed in the manner proposed by the Victoria Racing Club, there will be significantly higher numbers of residents living in the Flemington Green precinct. The new residents within the City of Melbourne will essentially be disconnected from the rest of that municipality.

It is proposed to have an additional 1,100 residents in the area, with no significant upgrade or change to the provision of public transport in the area. Being contained within a single municipality would assist in creating a sense of community for new residents within the development, and assist in integrating with the surrounding neighbourhood.

As outlined within this submission there will be a significant impact on the surrounding community, particularly in relation to traffic, parking, community services, recreation needs and open space. There will also be an increased demand on the local infrastructure and services provided, which are generally managed by Moonee Valley City Council.

Including the Flemington Green site within the City of Moonee Valley would ensure that there is the ability and the authority to develop a comprehensive strategy for key issues and provide for increased service demands as a result of future development and events, rather than applying fragmented solutions, or depending on extensive cooperation between two councils, and other stakeholders.

This would allow for a single managed approach to the issues that the VRC/Greenland proposal will generate and required to be managed across two municipal areas, such as:

- Waste Collection,
- Parking enforcement,
- Street and road furniture provision and maintenance,
- Maintenance of public open space,
- Provision and maintenance of municipal social infrastructure and services,
- Environmental Health management,
- Co-ordination with infrastructure service authorities, and
- Event management.

Including the precinct within the City of Moonee Valley would have the following benefits:
Allow for a municipal approach to management, creating consistent decision making on development contributions, planning applications and events management.

- Improved amenity for residents surrounding the Events Precinct.
- Provide Council with greater control over future development in terms of site layout and built form, as well as ensuring more efficient ongoing management once development is completed.
- Allow Council to more effectively plan for increased service demands resulting from new developments.

### 11.2 Responsible Authority Status

Council considers that there is significant benefit in the Flemington Green site being incorporated within the City of Moonee Valley and that Moonee Valley City Council is also made the Responsible Authority in relation to the Planning and Environment Act, 1987.

Council has previously written to the relevant Ministers and the City of Melbourne advocating that Moonee Valley City Council be the Responsible Authority for the Flemington Racecourse and the Melbourne Showgrounds. This was not supported by either.

It is considered that the Moonee Valley City Council is effectively best placed to consider the impacts of any proposed development on the Flemington Green site, given the geographic location of the site, reliance on providing services and our understanding of the interests of the local community.
12.0 PLANNING CONTROLS

12.1 Recommended Changes

If the Advisory Committee is minded to recommend to the Minster for Planning to support the Amendments, Council considers that there will be changes required be made to the relevant Planning Scheme documentation. The Council’s recommended changes will be presented to the Advisory Committee at the Public Hearing.

This will allow Council the opportunity to review the information and consider all relevant material in advance of making recommendations for changes. This is considered advantageous in that it will eliminate the Advisory Committee receiving multiple iterations of proposed controls from various parties.

Notwithstanding this, it is clear that Clause 4.2 – Built Form Under ‘Exemption from notice and appeal’ requires amendment. It is recommended to remove the word ‘generally’. The building envelope plan must be very clear to be able to determine what is consistent or not. Council considers that maximum height limits should be mandatory.
13.0 OTHER MATTERS

The City of Moonee Valley held five separate information sessions to help the community stay informed of the Amendment process and to understand how to make a submission to the Advisory Committee. These events were well attended with over 200 people in attendance. Through these events a number of issues that are not addressed in the exhibition material or in the chapters above were raised by the community. These matters included:

- An analysis of the viability of economic impact of the new retail space that would be permitted as part of the development.

- A more comprehensive understanding of the wind impacts of any buildings permitted.

- Has there been a suitable consideration been given to issues with emergency vehicle access?