

## **COUNCIL FEEDBACK - IN RELATION TO MOONEE VALLEY RACECOURSE RESPONSE TO FURTHER INFORMATION REQUEST**

### **2.0 Development Guidelines**

#### **2.1.1 Population and dwelling diversity assumptions**

The population and dwelling assumptions that Council is being asked to rely on are found in the master plan background consultant's reports, and are not clearly articulated in the master plan. The master plan should include a section that clearly states the anticipated population on the site and demographics of this population, how this information has been derived and implications of the demographics anticipated.

Council would like to see some certainty around what the dwelling numbers would be on the site. In this regard we will discuss with DPCD the possibility of including a cap on dwelling numbers on the site through the ACZ controls. This is a common occurrence in the Development Plan Overlay in the Moonee Valley Planning Scheme.

In terms of an appropriate number of dwellings on the site, this would be determined through the resolution of other issues raised in Council's previous response.

#### **RECOMMENDATION:**

- a) **Include a section in the master plan report outlining the population and demographics anticipated for the site.**

#### **2.1.2 Operations**

Council stands by comments made in the previous response in relation to the level of detail required for the operations of the site, in order to justify the level of change proposed for the site.

This is particularly important in order to justify that the racetrack realignment and grandstand location. Without this information Council cannot assess any potential conflicts with the various uses proposed for the site.

Further information on the Access Diagrams in the master plan would be welcomed.

The MVRC response states that:

*"The site layout, grandstand concept and access strategy provide a wide range of options for how the facility can be accessed and operated".*

It is because of this range of options and lack of clarity that Council is having trouble assessing the proposal. This results in the impacts of the proposal being unclear.

#### **RECOMMENDATION:**

- b) **More information in relation to operations, as outlined in Council's previous response to the MVRC (1 February 2012).**

### 2.1.3 Grandstand

Council maintains that there needs to be more justification and clearer recognition of the impacts of the proposed location of the grandstand on the road network, adjacent residential areas and the school.

Council would like to see the proposal articulate how the redevelopment would contribute to the public realm through the streetscape, shared paths and landscaping. This should be clearly outlined within the master plan.

The meeting between the MVRC and Council with Rob McGauran of MGS Architects on 2 March 2012 clearly outlined the implications and considerations that need to be given to the development of the grandstand in this location.

Council is being asked to approve the relocation of the grandstand without this additional information. It is not enough to rely on event management in the future to address potential key issues that may result from the location of the grandstand and potential operational issues. This has the potential to affect the community into the future, and needs to be addressed now to ensure that any impacts are mitigated. This includes identifying all impacts, and outlining strategies for how they will be addressed to give Council and the community some comfort that this is an appropriate location for the grandstand.

#### **RECOMMENDATION:**

- c) **Information in relation to proposed public realm improvements along Wilson Street to be articulated in the master plan.**
- d) **Justification for the location of the grandstand.**

### 2.1.4 Built Form and Street Character

Council is being asked to set parameters for how the site could be developed into the future. To ensure that these parameters are appropriate it is necessary to test them in relation to how these might impact on the existing community, and also to determine whether the development would be appropriate for the future population of the site.

Council does not expect that a detailed design be provided at this stage of the process. However, it is imperative to provide more information at this stage, to ensure that there is clear justification behind the development parameters that are being proposed.

It is difficult for Council to assess whether the development guidelines are appropriate when the impacts of the proposal are unclear.

As mentioned in the MVRC response back to Council, the role and function of the master plan is to inform the zone controls and be a guide for future development. Council agrees that this is the role and function of the master plan. However, at this stage the master plan does not provide enough justification for any zone controls to be implemented, nor does it provide enough detail to ensure that it could be used as a guide for future development.

Council has provided some clear suggestions in the previous response as to how the MVRC might better justify what is proposed. This mainly relates to providing the information outlined in Council's previous response to the MVRC, so Council can clearly assess any potential impacts.

**RECOMMENDATION:**

- e) **Clear justification and demonstration that the bulk and scale of the development is appropriate, including the more remote building forms. To provide this justification the following information is required:**
- **Shadow diagrams.**
  - **Massing diagrams.**
  - **More information on building envelopes and tower projections.**
  - **Building heights (which would be necessary for any planning scheme controls), including anticipated floor to ceiling dimensions.**
  - **Massing and site arrangements to be provided in 3D form.**

2.1.5 Interfaces with Surrounding Areas

This matter is discussed in detail in the following section – 2.1.6-Setbacks.

2.1.6 Setbacks

Since the proposed master plan has been submitted to Council, we have consulted on the draft Neighbourhood Character Study and Precinct Profiles. Of particular relevance to the Moonee Valley Racecourse site is that it is surrounded by land identified as being included within the Precinct Profiles - *Garden Suburban 1* and *Garden Suburban 5*. These draft Precinct Profiles are available on Council's website.

The Precinct Profile for Garden Suburban 1 identifies setbacks within this area as being between 2-4 metres. Therefore a two storey frontage with a 3 metre setback (as is proposed for Precinct D) would be consistent with this character. However, setbacks proposed in Precinct F, G and B (in relation to the four storey street frontage) are not considered to be appropriate, and are not consistent with the preferred character of this area.

Amendment C100 of the Moonee Valley Planning Scheme was recently adopted by Council. This amendment sets out specific requirements for where the activity centre boundary interfaces with a residential area. In that case the Rescode front setback standards were considered appropriate. It is acknowledged that these standards would not work for the racecourse site. However, the intent is clear in that setbacks at the activity centre edge should respect the predominant residential nature of the surrounding built form, and setbacks should correspond to this character.

Council would suggest the MVRC review the draft Neighbourhood Character Study (soon to be presented to Council for adoption and implementation) for consideration in relation to the proposed master plan.

**RECOMMENDATION:**

- f) **Clear justification and demonstration that the setbacks proposed (and corresponding street frontage building height) is appropriate in the context of the character of the areas and the residential interfaces.**

### **3.0 Traffic and Transport**

#### **3.1.1 Road Network – access, capacity, traffic, distribution and impacts**

- CityLink

Council is aware of previous discussions regarding a new access point to CityLink, however, has yet to see evidence that this cannot be physically achieved. In order to address this issue the MVRC should submit written confirmation from VicRoads and CityLink outlining their response to this issue.

**RECOMMENDATION:**

- g) **Written confirmation from CityLink and VicRoads outlining their response to any potential for access/egress to and from the site to CityLink.**
- 3.1.1.1 Event Impacts

There is still uncertainty surrounding the proposed renewal of the racecourse facilities and changes to the usage and frequency of events.

Relevant and detailed information is required in order to present a base case scenario, and adequate information is required on the potential increase in events, including attendance for both racing and non-racing events.

As such Council cannot fully determine the extent of traffic and transport impacts on the surrounding area as a result of the master plan proposal, in particular for major racing meetings.

Council welcomes the recommendation to fully articulate the access diagrams in Section 4.6 of the master plan to promote pedestrian/patron movement from the west and any measures to alleviate the issues.

**RECOMMENDATION:**

- h) **Clearer information in relation to event impacts, as outlined in Council's previous response to the MVRC (1 February 2012).**
- 3.1.1.2 Traffic Modelling

Council maintains that the findings made by CPG are relevant to the traffic modelling study. The recommendations should be incorporated into the traffic model in order to provide an accurate impact assessment of the proposed master plan.

Previous discussions and meetings with DOT and VicRoads have also raised issues and questions around the assumptions in the modelling, and the impacts in relation to public transport. Vic Roads, in their letter to Council dated 28 November 2011 also included a number of suggestions that could further strengthen the traffic and transport assessment.

It is noted that ongoing discussions with the transport agencies are still intended to occur to confirm and resolve the above issues.

**RECOMMENDATION:**

- i) **Revise the traffic modelling study as per Council's previous response to the MVRC (1 February 2012).**

**3.1.2 Car Parking**

It is acknowledged that over a 15-20 year period car parking requirements may change, and that numbers and configurations of car parking spaces should be left to the realm of planning permit applications for the site.

However, there are benefits of providing a broader approach to this issue. This should ensure a precinct-wide response about parking accommodation for the site that could be incorporated into planning scheme controls. It could also assist in identifying any opportunities and locations for share car arrangements, or designated parking areas that need to be identified at this stage of the process.

In relation to the comment by MVRC about permit zone restrictions, please note that 'Permit Zone' parking restrictions would only be reviewed by Council in line with the Municipal Parking Strategy, the objectives of the Demand Management Framework and the kerbside road space user hierarchy, and would not be based on the development.

**RECOMMENDATION:**

- j) **Incorporate guidelines in the master plan in relation to how (and where) car parking will be accommodated throughout the site for the various uses.**

**3.1.3 Integrated Transport Planning**

An integrated transport plan (ITP) is required to allow an informed assessment of transport mode choice, and infrastructure and service implications.

Council accepts that the basis of the ITP may be provided in the form of the GTA report and that further specific detail can be determined during future planning framework of the site.

**RECOMMENDATION:**

- k) **Subject to addressing other issues raised in relation to traffic and transport, no further information is required at this stage in relation to this point. A requirement for a more detailed Integrated Transport Plan would be incorporated into any planning scheme controls for the site.**

#### **4.0 Community Infrastructure**

It appears, from the response by the MVRC, that there is general agreement over the majority of the range and type of community facilities and services that may be impacted by the proposal, with the exception of primary schools and netball facilities.

In relation to netball facilities, this is better discussed through the open space requirements, and can be broadly incorporated into future discussions about active open space needs for the proposed population.

In relation to primary schools, Council notes that in a Greenfield development scenario 3,000 dwellings normally results in the provision of a primary school. Accordingly, Council has sought DEECD to undertake a Municipal Provision Plan to test ASR's assertion that a primary school would not be required. We will let you know the results of this plan once they are provided to Council.

The specifics for how to address the requirements for the range and type of community facilities and services have yet to be formalised. However, there is general agreement as to the range and type of facilities that must be provided on site should the proposed master plan be supported. This includes community meetings spaces and an early years service component.

It is difficult for Council to commence discussions in relation to potential contributions, when, in Council's opinion, there are still many questions that remain unanswered in relation to the proposal. As a result, this may affect any contributions sought for the site. It would be better to commence discussions in relation to contributions once agreement is reached on the proposed form of development for the site, to minimise any confusion.

#### **RECOMMENDATION:**

- 1) No further information in relation to this aspect is required at this stage of the process.**

## 5.0 Public Open Space

### 5.1.1 Moonee Valley Open Space Strategy

Council acknowledges that the MVRC will update the reference to this Strategy.

### 5.1.2 Quantity of Open Space

Council maintains that the open space proposed on the site is inadequate in order to meet the needs of the proposed population, and does not meet current best practice regarding open space provision. Council reiterates comments made in the previous response to the MVRC in relation to the type and quantity of open space that should be provided, in order to cater for the proposed population.

In relation to the Municipal level open space, the MVRC are expected to provide clear demonstration and justification as to why the centre of the racetrack could not be used for this purpose (with reference to any other options available in order to accommodate the car parking for the site). If this option could be demonstrated as being unfeasible, then Council would consider whether there may be other options to increase or improve the facilities in other reserves, which may then have flow on effects on increasing capacity of other reserves by encouraging movement of sporting groups.

With the open space currently proposed for the site, the existing population of Moonee Ponds would experience a reduction in access to and quality of existing open space available to them.

Thompson Berrill Landscape Design identify that, in order to retain a similar amount of open space per head of population that currently exists in Moonee Ponds, the MVRC would need to add an additional 15 hectares of open space. Council is not suggesting that this occur.

The open space suggested in Council's previous response (1 February 2012) to the MVRC is considered to be adequate in order to meet the needs of the proposed population on the site.

#### **RECOMMENDATION:**

- m) **Additional open space for the site, as outlined in Council's previous response to the MVRC (1 February 2012).**
- n) **Clear demonstration and justification if the centre of the racetrack is not to be used for municipal open space purposes (including any corresponding possible alternative options for car parking arrangements).**

### 5.1.3 Quality of Open Space

The criteria for open space set out in Council's Open Space Strategy is not relevant to the zoning of the land, or whether the site is located within an activity centre. It recognises that open space is to be provided so that people of all abilities can enjoy access to quality spaces for a range of outdoor activities.

It is acknowledged that the exact design and improvements to the future open space areas on the site would be the subject of future discussions and approval processes. However, thought also



needs to be given to the quality of open space at this stage of the process, particularly in relation to open space location. For example, the open space area proposed in the north-east corner of the site would in effect operate more as a wider nature strip given the relative lack of accessibility and poor outlook in this area.

In order for the development to be successful within the surrounding residential fabric the following needs to be considered, and should be clearly enshrined in development guidelines for the site: protection of mature canopy trees, heritage values, adequate sunlight access, passive surveillance and accessibility to the surrounding neighbourhood and any development on the site.

**RECOMMENDATION:**

- o) Guidelines that address the quality of open space.**
- p) Justification that the location of the open space can meet the guidelines for quality open space.**

**5.1.4 Active Open Space**

Council maintains that the analysis by ASR Research did not adequately consider all of the issues involved in relation to whether existing sporting reserves in Moonee Valley could accommodate the additional proposed population.

Areas not addressed in the ASR Report include:

- the number of sporting teams currently using the reserves;
- The fact that many reserves cannot hold training or events in the evenings due to amenity impacts (noise, light spill etc...)
- Upgrading facilities in reserves does not automatically increase the capacity of the reserves, as there are only so many sporting teams that can be accommodated at a certain point in time.
- Many of the reserves are already at capacity ( in particular Ormond Park).

To address this, Council has provided a recommendation for Municipal Open Space to be provided on the site. This is further discussed under Quantity of Open Space on the previous page.

**RECOMMENDATION:**

- q) See Recommendation n) above.**

## 6.0 Environment and Climate Change

One of the key opportunities for the Moonee Valley Racecourse is that, being such a large site, there is an opportunity to implement clearer site-wide initiatives that would provide greater benefits to new residents. It is envisaged that appropriate and specific ESD measures would need to be demonstrated at the time of any future permit applications for the site.

In relation to wind modelling, Council maintains that there is a need for this to occur at this stage of the process at a broad level. Whilst it is not expected that it would be based on detailed design parameters, it should provide justification for the proposed location and appropriateness of any tower forms on the site in relation to the building footprints and heights proposed. This should be addressed at an early stage of the process to ensure that the proposed would not create wind tunnels and unpleasant urban environments in the future.

Council acknowledges that the proposed master plan cannot commit to certain ESD technologies because by the time of implementing, new technologies may have emerged. However, the master plan has an opportunity to provide some clear direction for an overall ESD strategy for the site.

### RECOMMENDATION:

- r) **Broad level wind modelling to determine the appropriateness of the proposed location and heights of any tower forms proposed.**
- s) **The following variations to the Moonee Valley Racecourse Masterplan - Section 5.2, in order to provide consistency and structure to support environmental objectives outlined in the ARUP report:**

**Any planning application should have regard to the following ESD principles:**

#### 5.2.1 Energy

**The Moonee Valley Racecourse Master Plan supports:**

- **Demand-side energy solutions in the form of energy efficient dwellings, passive solar orientation and landscaping.**
- **Public lighting to comply with Moonee Valley's *Sustainable Public Lighting Guidelines*.**
- **Supply-side energy solutions such as the potential integration of low emission and renewable energy solutions such as co-generation or solar PV.**

#### 5.2.2 Water

**The Moonee Valley Racecourse Master Plan supports:**

- **Demand-side water saving solutions in the form of water efficient fixtures, fittings and appliances with a minimum 6-star rating.**
- **Supply-side water solutions such as the expansion of the existing stormwater harvesting scheme and provision of third pipe water supply in new and redeveloped buildings to allow for fit for purpose water use.**

- Improved health of Moonee Ponds Creek by meeting best practice stormwater management targets for the site.
- A precinct-wide approach to water management for stormwater harvesting and flood management. This will assist in finding an agreed use of additional harvested water for nearby community facilities such as schools and community green space.
- An integrated approach to water management. This should take into account climate change modelling, is to be applied as set out in Moonee Valley's *WSUD Guidelines*.

### 5.2.3 Transport

The Moonee Valley Racecourse Master Plan transport approach will seek to facilitate mode shift from private vehicles to public transport, pedestrian and walking options by:

- Providing convenient, direct and safe bicycle and pedestrian links within the precinct and surrounding area.
- Providing appropriate levels of car parking commensurate with supporting a shift toward alternative transport measures. This includes avoiding barriers to future use of car-share, recharge points for mobility aids, electric cars and bikes, bicycle service hubs.
- Providing bicycle parking and associated infrastructure to support cycling within and across the precinct.
- Where possible, better orienting the site to existing or soon to be enhanced public transport infrastructure such as the nearby tram and bus stops.
- Considering new options such as car share schemes and the integration of capacity for electric vehicles.

### 5.2.4 Waste

The Moonee Valley Racecourse Master Plan supports:

- The balance between manual and automated systems.
- Assessing potential waste management solutions at both the precinct and site level. This will consider new technologies and processes such as anaerobic digestion (for energy generation), composting, and reuse hub for local to swap and share.
- Separation of the waste management processes from normal site operations in order to enhance precinct amenity. 90% of demolition waste will be recycled.
- Precinct layout will consider the future movement of Council waste and recycling services to minimise disruption to the community during pickup, and promote convenience for business and residents.

### 5.2.5 Vegetation

The Moonee Valley Racecourse Masterplan supports:

- **Design and landscaping to maximise urban amenity and community wellbeing in a time of climate change. This considers heat wave, storm events, and nuisance flooding.**
  - **Building site, layout, design and landscaping to meet best practice wind considerations.**
  - **Opportunities for urban agriculture via balcony design, private open space layout and potential community garden spaces.**
  - **Landscaping will use stormwater harvesting opportunities to ensure future drought resilience.**
- **Specific Environmentally Sustainable Design requirements will be triggered at the planning permit stage in the future. Buildings would need to achieve at least Australian best practice standard for Green Star equivalent. For smaller building STEPS and SDS requirements would need to be met.**

## **7.0 Social Impact Assessment**

The purpose of this section of Council's previous response was to highlight potential impacts of the proposed redevelopment on the existing and proposed population on the site and surrounds.

The social impact assessment notes the potential impact on social connectedness and community cohesion that arises from the technical issues identified in Council's previous response to the MVRC (1 February 2012). The social impact assessment is intended to provide guidance that would assist in the long term liveability of the proposed development, which is of interest to both the proponent (in the shorter term) as well as Council (in the longer term).

As the development unfolds, strategies would need to be put into place to develop and maintain a sense of community.

The resolution of the technical issues would make the place more liveable, for both the existing and proposed population.

### **7.1.1 Size of the population**

This has been addressed previously.

#### **RECOMMENDATION:**

- t) **See Recommendation a) above.**

### **7.1.2 Housing Mix**

Council agrees that this is likely able to be resolved through any planning scheme controls for the site.

#### **RECOMMENDATION:**

- u) **No further information in relation to this aspect is required at this stage of the process. There will need to be further discussions should there be a progression to discussing specific planning scheme controls for the site.**

### **7.1.3-4 Social and Affordable housing**

In relation to affordable and social housing, Council acknowledges the MVRC's statement to support the provision of this form of housing on the site. Council would be encouraged if there was any information provided as to how this would be incorporated into the development.

#### **RECOMMENDATION:**

- v) **Provide information to Council in relation to how social and affordable housing may be achieved on the site and which housing providers may have been contacted in relation to this.**

#### 7.4 Crime, Health, Safety and Amenity

Council agrees that this is likely able to be resolved through any future planning permit processes for the site.

## **8.0 Heritage Assessment**

Council has made it clear in previous correspondence and meetings with the MVRC that it considers the resolution of heritage issues to be a significant matter that needs to be addressed independently of the master planning process for the site.

For any place on the site that is identified as having heritage significance there is an opportunity to reflect this in the master plan and to retain some of the heritage features of the site.

At a recent meeting with Mr Michael Browell, Council gave an undertaking to prepare a joint letter to the Minister for Planning to ensure that the proposed heritage amendment is considered in a timely manner to help clarify this issue for all parties.

### **9.1 Economic Impacts on existing businesses**

Council has yet to determine the most effective way in which to manage any commercial development proposed for the site. We need to ensure that it does not detract from the commercial viability of the commercial core of Moonee Ponds.

It is not appropriate to wait until the permit stage of the development to determine what is appropriate. There is scope to control the type and size of development through planning scheme controls for the site. If this does not occur, there would be a significant gap in terms of strategic intent for commercial uses on the site. This needs to be reflected earlier in the process, so that if it gets to a permit stage, there is a clear direction and intent in terms of what is envisaged for this site in relation to commercial development.

#### **RECOMMENDATION:**

- w) No further information in relation to this aspect is required at this stage of the process. There will need to be further discussions should there be a progression to discussing specific planning scheme controls for the site.**

### **9.2 Geology**

Council acknowledges that this issue can indeed be dealt with through any planning scheme controls for the site. However, this could be a significant issue for the MVRC, which could have an impact on yield and the location of certain uses. This could therefore impact on the layout of the proposed master plan.

We have had previous experience in how this can effect large-scale developments, particularly in relation to Ascot Chase and Kensington Banks. In those cases this involved significant earthworks and proved to be very costly. It also impacted on the layout of development on those sites:

#### **RECOMMENDATION:**

- x) A preliminary geotechnical/hydrological report be prepared that identifies any issues, outlines whether the proposed layout of the master plan is suitable, and identifies any mitigating measures that may be reflected in any planning scheme controls for the site.**