

City of Darebin Submission

To

**The Social Housing Renewal Standing Advisory
Committee as part of the Public Housing Renewal
Program Walker Street Northcote**

21 August 2017

CONTENTS

| Item Number | Page Number |
|--|------------------------|
| EXECUTIVE SUMMARY | 3 |
| INTRODUCTION | 4 |
| 1. The appropriateness of the proposal in light of key strategies including Homes for Victorians and Plan Melbourne 2017 | 5 |
| 2. The appropriateness of the proposal against the objectives of the Planning and Environment Act 1987 and any other relevant provisions of the planning schemes. | 7 |
| 3. Whether the Minister for Planning should act as Responsible Authority for the development site and if this would expedite future planning approvals. | 16 |
| 4. Whether the proposed changes to the planning scheme and/or planning permits should be approved, subject to any recommended changes. | 16 |
| CONCLUSION..... | 17 |
| APPENDIX A..... | 18 |

EXECUTIVE SUMMARY

This submission to the *Social Housing Renewal Standing Advisory Committee* has been prepared to outline Council's response to the Terms of Reference (May 2017).

It sets out Council's position in respect of the matters for consideration in the Terms of Reference which relate to the appropriateness of the proposal against the Victorian Planning Provisions, the Victorian State Government's Housing Strategy, and Homes for Victorians and the metropolitan planning strategy, Plan Melbourne 2017-2050.

The submission has also delved into social matters which have arisen due to combining the planning scheme amendment process with the relocation of tenants. The matters concerning the public housing tenants and the broader community are of concern to Council and in the interest of good governance are tendered for consideration to the Standing Advisory Committee.

Notwithstanding Council's reservations about the process being undertaken by the Department of Health and Human Services, it welcomes the renewal of the Walker Street site to improve the living conditions for tenants.

Council supports the proposed amendment to the Darebin Planning Scheme to facilitate and guide the redevelopment of the Walker Street site based on the considerations raised in this submission.

INTRODUCTION

This submission to the Social Housing Renewal Standing Advisory Committee (the Standing Advisory Committee) is provided by Darebin City Council.

The submission responds to the Terms of Reference of the Standing Advisory Committee (May 2017). Darebin Council looks forward to presenting its case at a public hearing.

Abbreviations used in this report:

CPTED – Crime Prevention through Environmental Design

DELWP – Department of Environment, Land, Water and Planning

DHHS – Department of Health and Human Services

DHS – Darebin Housing Strategy 2013 – 2033 (amended 2015)

DPO – Development Plan Overlay

ERP – Estimated Resident Population

ESO – Environmental Significance Overlay

GRZ – General Residential Zone

MUZ – Mixed Use Zone

NRZ – Neighbourhood Residential Zone

PHRP – Public Housing Renewal Program

PO – Parking Overlay

PPN – Planning Practice Note

PPRZ – Public Park and Recreation Zone

PTV – Public Transport Victoria

RGZ – Residential Growth Zone

WSUD – Water Sensitive Urban Design

RZSAC – Residential Zones Standing Advisory Committee

SUBMISSION

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

Plan Melbourne 2017 and Homes for Victorians

Plan Melbourne 2017-2050 seeks to increase the supply of social and affordable housing to ensure that Melbourne remains livable as set out under Direction 2.3.

Council welcomes this forward thinking direction, as it has prompted the release of the Victorian Government's Housing Strategy, *Homes for Victorians*, which sets initiatives for increasing and renewing social housing stock. Innovative ideas and new approaches to address the public housing waiting list of nearly 34,000 as at December 2016 (source DHHS) is supported by Council.

Of the \$2.7 billion set aside for social housing and homelessness, \$185m has been allocated to the Public Housing Renewal Program (PHRP) through the Homes for Victorians initiative.

The PHRP aligns with Actions 1 and 3 of the City of Darebin's *Responding to Housing Stress: a local action plan 2013-2017* and Goal 3 of the *Darebin Housing Strategy 2013 (Revised 2015) (DHS)*¹. These documents indicate Council's policy direction which is to address housing affordability and social housing needs.

Council supports the identification of the Walker Street site in Northcote as a Stage One redevelopment site, given the rundown nature of the walk-up buildings and the lack of mechanical elevators which reduce accessibility, particularly for those with limited mobility, parents with young children, and elderly residents.

Council supports the redevelopment of these sites as catalyst projects to demonstrate exemplary public and private residential redevelopment to facilitate a greater supply of social and affordable housing in metropolitan Melbourne.

Notwithstanding these opportunities, the PHRP presents numerous social and planning issues which have arisen due to combining the planning scheme amendment process with the relocation of public housing tenants. As a result, the roll out of the PHRP has been unnecessarily confusing for the public housing tenants and resulted in considerable angst about their ability to return to the Walker Street site after the redevelopment has been completed.

Council contends the PHRP would have been more effective if the planning scheme amendment was separated from the relocation process. In this way more surety would have been given to tenants regarding their immediate future which would have allowed all parties to focus on the land use planning outcomes for the site. The current approach has resulted in concerns and anxiety about relocation being conflated with the separate and crucial work of regenerating the estate and increasing the social housing stock.

It should be acknowledged that Darebin Council has a strong history in driving and developing place based community programs and resources across public housing estates in Darebin. Community development programs at Walker Street in particular, are primarily led by Council, however, are delivered in conjunction with Jika Jika services, Your Community Health, Victoria Police, the Public Tenants of Victoria Association (PTVA), and the Metropolitan Fire Brigade (MFB).

¹ Available at <http://www.darebin.vic.gov.au/en/Your-Council/How-council-works/Organisation-and-Performance>

Tenants at the site currently benefit from a range of programs and community services which include a homework club, a bread program (donations made by local bakeries to tenants), support in cultural celebrations, and other educational workshops for tenants. Many of these programs and facilities provide the tenants with a strong sense of place and community, and are important aspects in their overall livelihoods and community participation.

Currently, the estate provides eighty seven (87) dwellings, which accommodates approximately 250 residents, some of which have lived in the estate since 1976. Given the number of years in which many of these tenants have lived in the estate, in addition to the particular personal circumstances in which they find themselves, it is significant to understand the potential impacts of relocating some of the tenants from familial surroundings. Council is currently unaware of how these issues will be dealt with by DHHS, and have been provided with very limited information on the process for relocating individual tenants. In redeveloping the site for a mix of public and private tenure, it is important that retention and enhancement of such public services and facilities are preserved, and such community facilities (such as the VPTA Meeting Room) be designed into any future development.

Council suggests that tenants should be accommodated in close proximity to Northcote during the relocation and redevelopment phases. This outcome will assist to minimise disruption and ensure that tenants' connections to their educational services and community networks remain. The health and wellbeing of the tenants at Walker Street should be foremost in any decision making process.

Response to an increase in social housing

The Victorian Government's announcement to require a minimum increase in social housing per site, to be at least an additional 10 percent above the existing number of dwellings is a positive step forward to achieving the goals of Plan Melbourne 2017-2050.

The redevelopment of the Walker Street site is an opportunity to deliver well located dwellings, provide housing choice and affordability in accordance with the Government's broader strategic aims. However, given that Walker Street is located in Northcote, an area where housing affordability is rapidly decreasing; an increase in the number of social housing units of at least 50 percent greater than the current number of dwellings is deemed appropriate.

Council submits this is a reasonable expectation given the Government's stated aims of creating liveable communities and neighbourhoods, and considering the land value uplift that will be realised through rezoning of the land and sale of the site to a private developer.

Council submits housing diversity can contribute to a sustainable development that will balance social, economic and environmental benefits to the community. This cannot be achieved if the majority of dwelling stock is one and two bedroom dwellings. There are many women and children who seek long term accommodation due to family violence, who will require three bedroom apartments to support their large families upon return to the Walker Street site.

At present, Council is aware that there are fifty six (56) three bedroom dwellings out of eighty seven (87), and all but four (4) of these dwellings cater for larger families. Council supports the objective of DPO13 *"to deliver buildings and spaces that are accessible and practical for people of all abilities and adaptable to respond to the future needs of residents"*.

Moreover attracting a wide range of people who are willing to invest at the Walker Street site, will facilitate a range of affordability options for Darebin's rapidly diversifying community and encourage participation in the community to build the social fabric.

Creating spaces “to foster social connections between residents and the wider community” as an objective of DPO13 is welcomed by Council and should be reflected through the provision of infrastructure and a reinstatement of community programs to meet the needs of the whole community.

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

This section outlines the prior housing work in Darebin which assessed the Walker Street site in Northcote as a Minimal Change Area and the appropriateness of the current proposal against the Darebin Planning Scheme.

Background – prior housing work in Darebin

Darebin Council's original application of the residential zones was informed by the Darebin Housing Strategy (DHS). The DHS was developed to guide housing development within the municipality. It identified a three tiered Housing Change Framework of 'minimal', 'incremental' and 'substantial' housing change. Housing change designations are based on locational attributes, such as proximity to public transport and activity centres, balanced against other considerations such as the preservation of valued neighbourhood or environmental character in identified locations.

The strategy has been used to broadly translate and implement the suite of residential zones introduced into the Victorian Planning Provisions in 2014. The most recent adopted version of the DHS was approved as a reference document within the Darebin Planning Scheme through approval of Amendment C138.

Stages 1 and 2 of the Residential Zones Standing Advisory Committee (RZSAC)

In 2014, Council participated in Stages 1 and 2 of the *Residential Zones Standard Advisory Committee* (RZSAC) process². This process resulted in new residential zones being applied throughout the municipality via Amendments C144 and C147.

In preparing Amendment C144, Council sought to apply the General Residential and Neighbourhood Residential Zones to land in accordance with the principles of the adopted Darebin Housing Strategy and the associated Housing Change Framework Plan. With some exceptions, the Neighbourhood Residential Zone (NRZ) and the General Residential Zone (GRZ) were applied to minimal change and incremental change areas respectively. The Walker Street site was supported by RZSAC to be zoned NRZ and this zoning was applied to the site with gazettal of Amendment C144 on the 30th of October 2014.

Council prepared Amendment C147 to apply the Residential Growth Zone to those areas identified as being substantial change within the adopted Housing Change Framework Plan. This approach was supported by RZSAC and approved with changes by the Department of Environment, Land, Water and Planning (DELWP) in 2015.

Managing Housing Growth

The City of Darebin is rapidly changing. Current estimates suggest 30,000 new households to be established in Darebin to 2036³, which is significantly more than estimated in the DHS, which was only prepared 5 years ago.

² Available at <http://www.yoursaydarebin.com.au/new-residential-zones-draft-amendment-c144>

³ Available at <http://forecast.id.com.au/darebin/population-households-dwellings>

The latest Estimated Resident Population (ERP) for Darebin in 2016 is 155,022, a 17.2 per cent growth or 132,299 new residents since 2006⁴. Profile id forecasts the largest population increase will occur in Preston from 2011–2036, however, Northcote will also sustain population growth of approximately 9500 people, or 63%, over the same period.⁵

The suburb of Northcote has changed significantly over the past ten years with significantly and rapidly rising housing prices, which is slowly changing the demographic profile of the area, and making housing less affordable.

There are more persons with higher educational qualifications than any other occupation, making up 55.6% of the workforce, up from 51.2% in 2006. It is in this changing environment that the provision of affordable and social housing should be encouraged, where those with limited financial means would otherwise be pushed out.

While council supports redevelopment aimed at increasing the amount of housing stock, it is important to ensure the renewal process does not undermine access to affordable housing for those on low to moderate incomes.

Response to designation from Minimal Housing Change to Substantial Housing Change

The Strategic Housing Framework Plan, located at Clause 21.03 in the Darebin Planning Scheme, specifies directions for residential land use and development in Darebin as set out by the DHS⁶. The framework plan identifies three Housing Change Areas which applies to all land in the municipality where a zone permits residential use. Those housing change areas are:

1. Minimal Housing Change – residential areas that have a limited capacity to accommodate future residential development.
2. Incremental Housing Change – residential and commercial areas that have the capacity to accommodate a moderate level of residential development over time.
3. Substantial Change Areas – residential, commercial and designated activity centres that have the capacity to accommodate substantial residential development over time.

It is noted that Minimal Change Areas were identified as areas where more intensive development was not considered desirable due to heritage or neighbourhood character considerations, interface with or proximity to areas of environmental or landscape significance, or relative distance from activity centres or public transport infrastructure.

The Walker Street site was identified as a Minimal Housing Change Area primarily due to its abuttal to the Merri Creek, an area of environmental and landscape significance. Other considerations included:

- Interface with the Heritage Overlay precinct (HO160) to the north;
- Interface with the Merri Creek to the south/west
- An Environmental Significance Overlay Schedule 1 (ESO1) which affects the entirety of the site
- The site's location in an area of Aboriginal Cultural Heritage significance (within 200m of a named waterway).

⁴ Available at <http://www.abs.gov.au/AUSSTATS/abs@.nsf/DetailsPage/3218.02016?OpenDocument>

⁵ Available at <http://forecast.id.com.au/darebin/about-forecast-areas?WebID=140>

⁶ Available at <http://planning-schemes.delwp.vic.gov.au/schemes/darebin>

Notwithstanding the environmental and landscape significance attributes, the size of the land parcel, at 1.06ha and the era and style of development on the site (three to four storey walk-up flats built around the 1960's-1970's), is at odds with the prevailing character of the area in which it is located.

Indeed, the description of existing character for Precinct A1 (in which the site is located), contained in the Darebin Neighbourhood Character Study 2007⁷, refers to the character of the precinct being derived predominantly from the strong presence of Victorian and Edwardian dwellings. The walk up flats located on the site are specifically noted as an exception to the prevailing character.

The three to four (3-4) storey building form on site is also at odds with the one to two (1-2) storey dwelling forms that are generally typical of and preferred for development in the NRZ. Development on the site is already anomalous with what is preferred under the purpose of the zone. .

Despite Council previously nominating the site as a minimal change area (with the support of RZSAC) to place the site within a minimal housing change area, it is acknowledged that the site has good access to a variety of public transport modes, including 350 metres to Rushall Station and within 260 metres of the Westgarth Neighbourhood Activity Centre, 180 metres of the Queens Parade Neighbourhood Activity Centre, and within 2 kilometers of the Northcote Major Activity Centre.

Assessment of the Walker Street site against the housing change areas is set out in **Appendix A**. Council asserts that the built form guidelines in DPO13 must ensure that any future development of the land does not adversely impact on the attributes of the immediate surrounding area. There is a clear need to strike a careful balance between the competing objectives of higher density development and the site's sensitive interfaces with the Merri Creek environs to the south west and the Heritage Precinct to the north, which resulted in its original inclusion in the minimal change area. It is deemed that the site is supported for substantial change based on an assessment of the site's proximity to services, facilities and infrastructure.

Response to the proposed rezoning from NRZ to MUZ

The purpose of the Mixed Use Zone (MUZ) is to enable new housing and jobs growth in mixed use areas. In accordance with the Planning Practice Note 79 (PPN79) – Applying the Residential Zones, the likely application is for areas with a mix of residential and non-residential development, and in local neighborhood centers undergoing renewal and around train stations, where appropriate. Further to this, the 'principles in applying zones' contained within the PPN79, states that the MUZ should be applied in areas encouraging a range of residential, commercial, industrial and other uses, and areas to provide for housing at higher densities and built form that responds to the existing or preferred neighborhood character.

Walker Street is located within a residential precinct, surrounded by land zoned Neighborhood Residential (NRZ). It is not located at the cusp of an activity centre and given the site's proximity to the Westgarth Neighborhood Activity Centre and the Queens Parade Neighborhood Activity Centre, Council does not envisage this site to support commercial activity, other than a small café or a similar commercial use to cater to the immediate surrounding residential catchment. To this end, council contends that it is important to retain the integrity of its existing retail precinct in the local neighborhood activity centres, and therefore questions the suitability of the Mixed Use Zone. If the intent is simply to provide a small commercial space for a café adjacent to the creek, it is possible to allow a non-residential use in the RGZ. For instance, a 'food and drink premise' is allowed as a Section 1 use in the

⁷ Available at <http://www.yoursaydarebin.com.au/new-residential-zones-draft-amendment-c144/documents>

RGZ with a leasable floor area of 100 square metres. Similarly, if the intent for the site is to provide building height greater than 4 storeys, this can also be scheduled into the RGZ.

Through the Planning Panel report prepared for Amendments C136, C137 and C138 (31 July 2014), application of the MUZ versus the RGZ was considered in some detail. In this particular case, the Panel commented (p.44 of the Panel Report), that:

While the MUZ and RGZ are both from the suite of residential zones, they have different purposes with different land use controls. The MUZ aims to provide a range of residential, commercial, industrial and other uses which complement the mixed-use function of the area. The RGZ is clearly more residentially focused and so a better zone for areas where a residential use is intended.

The Panel also highlighted the importance of ensuring that the DDOs and the schedule to the residential zones are carefully managed to avoid confusion. Schedules in zones should mirror the DDOs to avoid confusion on applicable heights.

Recommendations:

- Council submits that the planning report submitted with the exhibited documents does not adequately justify the strategic intent of the MUZ, and therefore, Council questions the suitability of the MUZ in the context of anticipated non-commercial uses for the site.
- Whether the MUZ or RGZ is used, it is recommended that certainty for setbacks and heights be clearly specified within the schedules to the zones, or within the proposed Development Plan Overlay Schedule, as appropriate.

Application of Development Plan Overlay

The Planning Practice Note 23 (PPN23) identifies the key operation of the Development Plan Overlay, which includes to:

- provide certainty about the nature of the proposed use or development
- remove notice requirements and third party review rights from planning permit applications for proposals that conform to plan requirements

Council's reading of the PPN23 is that the Development Plan Overlay must allay any potential impacts on the community by providing a level of certainty in the controls. This is particularly relevant as the surrounding community will not have third party appeal rights through the assessment process of the Development Plan, nor for any future planning permit applications.

This therefore places an even greater onus on the 'responsible authority' to balance the amenity concerns of existing residents with the need to efficiently develop the land.

Whilst Council broadly supports the objectives and requirements for a development plan within DPO13, Council raises the following concerns with regard to the specific drafting of the DPO:

BUILT FORM PLAN

Response to built form

Council is concerned about a number of discrepancies between the proposed DPO13 and the Design Framework document which underpins this planning control.

It is unclear as to the purpose of the Design Framework given that it currently sits outside of the Darebin Planning Scheme and holds no statutory status. The following concerns are not intended as an exhaustive analysis; instead they refer to the differences identified between DPO13 and the Design Framework, as well as concerns regarding the content of the proposed DPO13.

These concerns relate to the potential for uncertainty of built form outcomes for both Council and the community.

- Building heights and interface treatments in DPO13 (Table, p.2), should be expressed more clearly to provide assurance to the community about the likely built form outcomes. Consider changing the wording from “buildings that do not exceed the building heights and that do not encroach within the following interface treatments” from ‘do not’ to ‘must not’.
- The building height of five (5) storeys shown generally for Area 1 does not convey the maximum four (4) storey scale sought for the Walker Street interface (Design Framework, Section 1). DPO13 should distinguish between the maximum scale sought for the Walker Street interface, and the potential for slightly taller built form behind in Area 1.
- The form of the Walker Street interface elevations should be nominated in DPO13 at a scale of three (3) storeys, with further setbacks to the upper level(s) and conveyed in the illustrative sections of the ‘Interface Treatments’ and the Development Concept Plan. The Interface Treatment A diagram, in attempting to describe the interface for 2 differing scales (Areas 1 and 2) does not adequately convey the lower scale sought for the majority of Walker Street and should be separated into 2 diagrams. Consider including a revised version of Section 1 (Design Framework) in DPO13, updated to show correct setback dimensions.
- The street setback nominated in DPO13 for Area A differs from the Design Framework. The Design Framework indicates a 3m street setback and 3m upper level setback; whilst the DPO13 provides for 4.5m street setback and 4.5m upper level setback. The latter option is clearly preferable as built form would be less obtrusive onto Walker Street at the residential interface.
- The street setback to High Street Close for Area B, nominated in DPO13, differs from the Design Framework. The Design Framework indicates a 3m street setback, with no upper level setback required, and only a 2m deep ‘articulation zone’ indicated for this 8 storey form. This outcome is not considered acceptable, given the visually sensitive interface to the low-scale residential precinct with heritage overlay (HO160) to the north. DPO13 requires a further 3m upper level setback above 4th level which is preferred, relative to no setback, however greater moderation of form is sought, as follows.
- In general, a great transition in scale is sought for the 8 storey form nominated in Area 2 to the Walker Street interface and low-scale residential precinct to the north. The proposed setback of 4.5m at ground level and further setback of 4.5m above level 3 (Interface Treatment A) would create an abrupt transition to the single storey dwellings to the north, particularly in combination with the 3m ground level setback proposed from High Street Close, with further 3m setback above level 4 (Interface Treatment B). The form of taller development to the north-east corner of the site should be further considered in relation to the sensitivity of the adjacent low-scale residential precinct, and how the two differing proposed street interface forms would ‘meet’ at this corner.
- The Interface Treatment C with Merri Creek shown in DPO13 provides for a deeper ground level setback (5m setback) than the Design Framework (Section 3, 3m setback). Hence Council prefers the greater setback sought by DPO13.

- The proposed scale of 5-6 storeys adjacent to Merri Creek in Areas 1 and 3 is noted. An Environmental Significance Overlay (ESO1) applies to the site, and amongst other objectives, seeks to ensure that the scenic qualities and visual character of the waterway corridor are not compromised by the inappropriate siting of buildings. Given that proposed planning controls would permit development at double the height of existing buildings, consider incorporating design requirements that limit the continuous length of buildings along the Merri Creek edge and require adequate separation between forms.

Recommendations:

- Council submits that the wording of the DPO be amended to provide the community with certainty about the intended outcome of any future development plan, subsequent planning applications and ultimately the future built form. This could be achieved if the Design Framework is updated to reflect its intended outcome in the DPO13. The comments provided in the section above provide some detail with regard to discrepancies and a lack of clarity in the wording identified.
- Council submits that the Walker Street site should provide a legacy of high quality design of buildings; a level of Environmentally Sustainable Design, pedestrian friendly and activated streetscapes, and publicly accessible open spaces that can serve generations to come.

TRANSPORT AND TRAFFIC MANAGEMENT

Response to circulation and parking

The parking rates used in the proposed Schedule 1 to the Parking Overlay (PO1) for Walker Street Northcote and outlined in the Design Framework are supported given the local context. Council expects that the development plan will comply with the intention expressed in DPO13 to provide all resident parking within the site, and car parking for visitors on any internal roads or within the new buildings.

Furthermore, car parking will be located within basement levels or suitably concealed within buildings or behind features such as podium frontages. It is acknowledged that whilst on-street car parking exists in Walker Street and High Street Close, Council reserves the right to implement on street parking restrictions as deemed appropriate.

Council supports the location of a pedestrian path along the Merri Creek frontage of the site that connects with High and Walker Streets and midway with the internal road generally located as shown on the Concept Plan, as this would provide access to public open space and encourage active transport. Further, it would be ideal for this path to provide a connection to Merri Creek and under the High Street Road Bridge to the west and along Walker Street to the Rushall Station Bridge on the east side.

Notwithstanding these potential benefits, the proposed elevations in the Design Framework show parking structures for the first two storeys which treats the creek edge as the rear of the development which is contrary to the objective of DPO13 to achieve:

“Active frontages to High Street, Walker Street, Merri Creek...”

Ideally the buildings should be reconfigured and sleeved with residential dwellings that will provide residents with an outlook onto tree canopies, the creek and passive surveillance of the pedestrian path. This activation of spaces is important and there is an opportunity for a commercial enterprise such as a café to be located along the creek edge to ensure the pedestrian path feels safe to be used.

Council encourages application of Crime Prevention through Environmental Design (CPTED) principles to ensure passive surveillance of the pedestrian path.

Response to internal road/ path design and access

Council seeks clarification on the breakdown of the 16m road space, as the elevations provided in the Design Framework, show very wide road spaces and comparatively narrow footpath space, and no indication about how cycle priority will be provided.

A road width of between 5.5m and 6.5m would be sufficient, and anything above this is likely to increase speeds of vehicles using the internal roads, unless clear cycle space is intended to be marked within this area.

A parking bay width of 2.5m is sufficient and footpaths of at least 3m would be desirable. It is important that the road reserve contributes to a sense of being a public space in itself through design, planting and materials used. This will also contribute to a reduction in vehicle speeds through the site.

It is expected that these aspects will be addressed as part of an 'Integrated Transport and Traffic Management Plan' to ensure the "*provision of a safe and accessible pedestrian and bicycle network within the site and connecting to the external network*", that meets the needs of families and people with disabilities who could reside at the Walker Street site.

Response to traffic generation

The Traffic Engineering Assessment by TraffixGroup at Walker Street Northcote was conducted during a period of construction works in the surrounding local streets which may have impacted upon the findings of the report. Council has concerns about access to and from High Street from the subject site. It is recommended that a 'Keep Clear' area is sought on High Street to reduce the impact of right turning vehicles on tram movements and to improve community safety. In addition clarification is sought as to whether High Street is intended to be a primary vehicle access point for the site, as this would be supported by Council.

Council supports the focus on active transport in DPO13 and suggests that consideration should be given to off-site traffic management treatments on local streets to further enhance pedestrian safety and accessibility. For instance threshold treatments or kerb outstands where High Street Close meets High Street or where McLachlan Street crosses Cunningham Street. In addition traffic management devices on Walker Street and McLachlan Street would be desirable.

Response to bicycle access and parking

Council supports the objective of DPO13 to "*to prioritise pedestrian and bicycle access within the site*". It is expected that this should be reflected in the provision of traffic management in the local area, bicycle parking and design of the internal roads.

Furthermore Council welcomes the requirement for an 'Integrated Transport and Traffic Management Plan' for the site under DPO13, and is encouraged by the range of elements the plan must address.

The location of the subject site close to cycle connections and public transport provides for a range of travel choices for current and future residents. Council is pleased that its views will be sought as part of preparation of the Traffic Management Plan. In this regard Council will be seeking the provision of one dedicated bicycle parking space for each apartment with secure bicycle storage, given the significant car parking waiver sought under PO1. This is supported by the *Off-street Bicycle and Motorcycle*

Parking Review (March 2016) prepared by Phillip Boyle & Associates⁸ for the City of Melbourne which found that the current planning scheme provisions were not adequate and that the requirements for bicycle and motorcycle parking should be increased.

Response to Public Transport access and network improvements

Council notes that given the reliance on public transport, an upgrade to provide shelter and a seat at the tram stop on High Street are important to make this an attractive mode. Further if active transport is to be encouraged, access across Merri Creek on the High Street Bridge for pedestrians and bike riders requires a significant upgrade.

The public housing urban renewal project provides an opportunity to improve the surrounding transport network by creating a wider, safer and more attractive crossing to connect with the path travelling north along High Street. To this end, Council calls on the developer to work with Public Transport Victoria (PTV) and VicRoads to realise these potential opportunities. If Council was the responsible authority, options to leverage these outcomes would be explored through mechanisms provided in the *Planning and Environment Act 1987*.

LANDSCAPE AND OPEN SPACE

Response to the landscape design

Council welcomes the certainty provided in the DPO13 that the development plan should show or make provision for elements affecting landscape design and open space. Notwithstanding this requirement in DPO13, Council is concerned that the Arboricultural Assessment Report has identified a number of medium and high retention value trees that have been proposed for removal in the Design Framework, indicative built form plan. This appears to be in contradiction with the intent of the DPO13 which states:

“Retention of trees assessed in an Arboricultural Assessment Report prepared in accordance with this Schedule as having moderate or high retention value, unless it is demonstrated that their retention significantly affects the feasibility of development of the relevant area”.

Council's preference would be to retain all high retention value trees and some of the more significant trees listed as medium retention value (that is trees 10, 18-20). The design proposal does not currently appear to allow for successful retention of the trees marked for retention on the landscape plan. Furthermore Council requests that all trees proposed for retention must have suitable measures for retention listed with adequate protection zones clearly marked on all plans. The vegetation recommended for removal could be staggered with planned revegetation of indigenous species to improve environmental values as an important link to the Merri Creek habitat corridor.

Council supports the inclusion of the *Merri Creek Development Guidelines 2004* and the *Merri Creek and Environs Strategy 2009-2014* in DPO13 to ensure this project enhances the protection and integrity of the Merri Creek landscape. It is noted though, that the overriding objectives of DPO13 has overlooked the Merri Creek when considering “*to integrate with the surrounding area by responding to existing or preferred neighbourhood character, enhancing the public realm and existing networks and delivering ‘good neighbour’ outcomes*”. It would preferable to see the inclusion of the Merri Creek as a character attribute of the area.

⁸ Available at <http://www.melbourne.vic.gov.au/about-council/committees-meetings/future-melbourne-committee-meetings/meetingagendaitemattachments/718/182/apr16-fmc1-agenda-item-6-3.pdf>

While provision is sought in DPO13 for “*appropriate landscaping buffer and treatments along Merri Creek to be provided and vegetation protection and enhancement and proposed landscaping*”; clarification is sought at the earliest stage of the planning process to ensure “maintenance responsibilities” are addressed in any ‘landscape and open space plan’. The DPO13 states that the pedestrian “...*path may be located wholly or in part on public land...*” which indicates the importance of resolving this matter at the outset.

As a valued community asset, Council requests that “maintenance responsibilities” for the Merri Creek environs, needs to be addressed moving forward. Moreover it highlights the need for Council to remain the responsible authority and consideration given to zoning the land as Public Park and Recreation Zone (PPRZ) to protect and conserve Merri Creek.

Response to open space

The provision of open space, particularly within a social mix model, brings public and private tenants together from different cultural backgrounds. To this end Council is encouraged by the intent of DPO13 to provide “*for a new centrally located open space area accessible to all residents, generally located as shown on the Development Concept Plan.*”

Knowing the landscaped open spaces actually promote the success of the social mix model⁹ Council seeks greater assurance about the size of the public open space that will allow for an adequate range of potential uses.

Ideally the space would accommodate a playground as indicated in the Design Framework, a through-path to the new pedestrian trail along the Merri Creek and space for other resting or communal activities. Council asserts that whilst Merri Creek is open space it does not negate the need for the future private developer to provide a neighbourhood park as per the Darebin Open Space Strategy 2007-2017¹⁰ as they serve two different roles. Merri Creek has a more conservation role and is less capable of meeting social and community needs than the new public open space would achieve.

More particularly the Design Framework indicates that communal open spaces could be located on top of the parking podium; however DPO13 currently does not reflect this aspiration. Additional communal space is desirable as it provides key outlooks from surrounding apartments and should ideally be well maintained to minimise the occurrence of anti-social behaviour.

Response to Ecologically Sustainable Development

The ecology of the site is important and Council welcomes the requirement for an Ecologically Sustainable Development plan in DPO13.

An effective approach to achieving sustainable development is through energy efficiency. Ideally Council would expect to see a holistic and measurable process for minimising energy usage and implementing on-site renewable energy; such as solar energy with battery storage as a viable alternative to expensive centralised energy infrastructure. This type of approach combined with a minimum NatHERS 7 Stars average per building and a minimum of 5 Stars Certified Green Star would ultimately facilitate greater local community engagement and ownership of the project.

⁹ Jama, Abdullahi and Shaw, Kate (2017) “Why do we need social mix?” Analysis of an Australian inner-city public housing estate development.

¹⁰ Available at <http://www.darebin.vic.gov.au/en/Your-Council/How-council-works/Organisation-and-Performance>

Council supports the requirement of the development plan to address wider features such as maximising natural light and ventilation within apartments, corridors, carparks and communal spaces of the multi-unit residential development. This includes non-toxic materials, energy and water fixtures and fittings with a high star rating, outside clothes drying, bike parking for all residents, easy access to waste and recycling, access to communal and edible gardens, are all elements that will improve the health of residents while reducing utility bills. Storm water and water sensitive urban design (WSUD) features that will improve the water quality run-off is vital for the ecological condition of Merri Creek which is reflected in the environmental objectives of ESO1.

This approach supports Council's commitment to zero greenhouse emissions by 2020 for both Council and the community in accordance with the Draft Darebin Climate Change Action Plan March 2017 and the Climate Emergency Plan 2017¹¹. Overall Council recommends an integrated management approach to energy efficiency is achieved for the site with the goal to achieve a zero emission precinct.

3. *Whether the Minister for Planning should act as Responsible Authority for the development site and if this would expedite future planning approvals.*

Response to Minister for Planning to act as Responsible Authority

Council submits Darebin Council should maintain its status as the Responsible Authority for the Walker Street moving forward. Darebin Council submits that it is the best informed to "efficiently administer and enforce the planning scheme". Council can appreciate that DHHS would seek to expedite the redevelopment of the land and request the Minister to be the Responsible Authority, however Council submits that it has established close connections with the community, understand the importance of facilitating safety in design, and would be best placed to reach positive outcomes for all in being the Responsible Authority.

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

Response to the proposed planning scheme changes

In response to the proposed planning control changes applying to the site, which the amendment seeks to affect the Darebin Planning Scheme, Council makes the following statements.

Council does support:

Council supports the designation on the Strategic Housing Framework Plan in Clause 21.03-1 from 'Minimal Housing Change Area' to 'Substantial Housing Change Area';

Council supports applying the 'Areas of Urban Intensification' designation on the Housing Strategic Framework Plan in Clause 21.01-6 and amendment to the Strategic Housing Framework in Clause 21.03-1;

Council supports adding a reference to the redevelopment of the Walker Street site in Clause 22.05 (High Street Corridor Land Use and Urban Design);

Council supports applying a Development Plan Overlay – Schedule 13 (Walker Street, Northcote) (DPO13). Noting that at present the Design Framework sits outside of the Darebin Planning Scheme and there is insufficient content translated across to the DPO and notable discrepancies between the

¹¹ Available at <http://www.darebin.vic.gov.au/Your-Council/How-council-works/Organisation-and-Performance>

two documents. Consideration should be given to ensuring the Design Framework is amended to align with DPO13 and is included as an Incorporated Document to provide it with sufficient statutory weight.

Council supports applying a Parking Overlay – Schedule 1 (Walker Street, Northcote) (PO1).

Although Council supports rezoning the land from the Neighborhood Residential Zone (NRZ) to a higher density residential zoning control, Council raises concerns over the suitability of the proposed Mixed Use Zone (MUZ), as any commercial activity (other than a small café that would cater to the immediate surrounding residential catchment), would potentially undermine the existing viability of existing neighborhood activity centres surrounding the site.

Council does not support:

Council does not support the Minister for Planning as Responsible Authority in the Schedule to Clause 61.01.

CONCLUSION

The proposed planning scheme amendment change proposed by DHHS to the Walker Street site in Northcote, provides the positive benefit of improving the living conditions for public housing tenants with the construction of new buildings and increasing the provision of social housing.

Notwithstanding the potential benefits which can arise from an urban renewal project of this scale, Council has reservations about the methodology of combining the planning scheme amendment process with the relocation of tenants.

Council and the community hold broader concerns about the quantum of the public housing mix (public and private) and whether, and more importantly how, housing diversity will be provided on the Walker Street site. It is acknowledged that these considerations sit outside of the narrow Terms of Reference established by the Minister for Planning however these are relevant and important issues which have arisen during the stakeholder engagement process.

Council respectfully asks that the Standing Advisory Committee considers all matters set out in Darebin Council's submission as being valid concerns which affect the public housing tenants and the surrounding community.

Council submits the requested changes to the planning provisions at the Walker Street site are broadly supported, based on the considerations raised in this submission, including that the City of Darebin maintain its status as the Responsible Authority.

APPENDIX A

Strategic Housing Framework Plan – Clause 21.03 - Housing

| Housing Change Framework Criteria – Minimal Change Area – Walker Street public housing estate - assessment | Yes | No |
|---|-----|----|
| <i>Minimal Change Areas are sites and precincts that generally display one or more of the following characteristics:</i> | | |
| Are Heritage Overlay precincts | | X |
| Are identified in the Darebin Neighbourhood Character Study (2007) as 'potential Neighbourhood Character Overlay areas'. | | X |
| Have a highly intact pattern of subdivision in favour of detached dwellings on individual lots, generally evidenced by more than 80 per cent of housing stock having this attribute. | | X |
| Have a strong neighbourhood character, evidenced by a high degree of consistency in architectural style and streetscape, in particular where 80 per cent of more of the housing stock is consistent with precinct descriptions in the Darebin Neighbourhood Character Study (2007), and where restoration of original housing stock is prevalent. | | X |
| Have identified environmental or landscape significance, including land with frontage to Creek bodies. | X | |
| Excluding heritage precincts are located: | | |
| <ul style="list-style-type: none"> • outside an 800m walkable catchment of an activity centre | | X |
| <ul style="list-style-type: none"> • generally outside an 800m walkable catchment of train, tram or SmartBus service | | X |
| <u>Comment:</u> The Walker Street site was initially identified as a Minimal Change Area due to the identified environmental significance of its location adjacent to Merri Creek and the existence of an ESO1 applying to the site. | | |

| Housing Change Framework Criteria – Substantial Change Area | Yes | No |
|---|-----|----|
| <i>Substantial Change Areas generally display one or more of the following characteristics:</i> | | |
| Have an evolving character where there is an eclectic mix of new and old forms of architectural style and housing typologies. This includes more recent apartment developments at higher densities and in mixed-use formats. | X | |
| Are identified locations for increased residential densities to support economic investment and growth in the La Trobe National Employment Cluster? | | X |
| Are within or immediately adjacent to activity centres that possess superior access to the Principal Public Transport Network. | X | |
| Have a frontage to a strategic corridor. | X | |
| Are generally within 400m of a train station or tram route. | X | |
| <p>The scale and intensity of residential growth will differ across Substantial Change Areas depending on their strategic capacity to accommodate municipal growth and future housing needs as described at Clause 21.01-6. Generally, residential growth in Darebin adheres to the following hierarchy:</p> <ul style="list-style-type: none"> • Preston Central and Northland East Preston Activity Centres • Reservoir and Northcote Activity Centres • Neighbourhood Centres • Strategic Corridors including Plenty Road and St Georges Road • Other substantial change areas as identified in the Strategic Housing Framework Plan. | | |
| <p><u>Comment:</u> The Walker Street site has strategic/location advantages that would, inter alia, support its inclusion in a substantial change area.</p> | | |