



20 April 2015

## Introduction

The City of Darebin is pleased to provide the following submission in response to the exhibition of a proposed Development Plan for the former Amcor Paper Mill site in Alphington. This submission was endorsed by a resolution of the Council at its ordinary Council Meeting on 20 April 2015.

The following submission incorporates:

- General comments on the proposal
- An appraisal of several key issues of relevance to the City of Darebin
- Suggestions for opportunities for further input and collaboration with the City of Yarra and other stakeholders

The City of Darebin welcomes the opportunity to actively participate in shaping the future of this important urban renewal initiative.

## General Comments

The City of Darebin acknowledges that the former Amcor paper mill site is well established as a strategic urban renewal precinct under both local and state level planning policy directions.

### State and Local Policy Context

The City of Darebin notes the precinct's status as one of several identified urban renewal precincts in the Central Subregion in the *Plan Melbourne* metropolitan planning strategy. Under *Plan Melbourne*, growth and change in the Central Subregion is expected to support and consolidate the growing mix of capital city functions (including government, business, tourism, social, cultural and recreational institutions and assets) of the central city 'core' which now extends well beyond the Hoddle Grid. Although the Amcor site is situated on the north-eastern periphery of the subregion, it is well connected to the central city by freeway and arterial road links, as well as having prominent siting along the Yarra River.

The proposed Development Plan for the Amcor precinct is consistent with *Plan Melbourne* Directions 2.2.1 and 2.2.2 to deliver higher density mixed use development in identified urban renewal precincts in the existing urban area. This is seen as a key part of the solution for accommodating Melbourne's future growth needs as well as delivering greater housing diversity, jobs and additional community services. The City of Darebin supports these policy directions.

The proposed Development Plan is also broadly consistent with the '20 Minute Neighbourhood' (Direction 4.1) by providing residents with walkable access to a new neighbourhood centre with retail and community facilities for daily needs, as well as opportunities for local employment. The City of Darebin supports this policy direction but considers the proposed Development Plan response requires further resolution of issues with connectivity to the surrounding existing neighbourhood and prioritisation of active transport. Further discussion on this matter is provided in the key issues discussion below.



At local policy level, the City of Darebin notes the status of the precinct as a “strategic redevelopment site” in the Yarra Municipal Strategic Statement and the role of such areas to accommodate higher density residential development as a means to accommodate forecast increases in population. Specific directions for the Fairfield-Alphington neighbourhood at Clause 21.08-6 emphasises the ‘leafy, green’ residential character and significant amounts of open space along the Yarra River edge. Relevant strategies for this neighbourhood include supporting opportunity for convenience shopping and supporting development which maintains and strengthens the preferred built form character. Redevelopment of strategic redevelopment sites should contribute positively to the urban fabric and public domain of Yarra, and where subject to the Heritage Overlay, projects the heritage of the site and the area.

The City of Darebin broadly supports the MSS directions and specific Vision for the precinct’s redevelopment as set out in Schedule 11 to the Development Plan Overlay of the Yarra Planning Scheme (DPO11), and is keen to see the transformation of this former industrial site to a mixed use, predominantly residential precinct that can make a positive contribution to the Alphington and Fairfield area. In particular, the City of Darebin supports the focus on planning for a sustainable, high amenity neighbourhood which fosters a more cohesive community across Alphington and Fairfield and respective municipal boundaries. However, the City of Darebin has concerns about the scale of the proposed retail uses in the precinct, which appears to be at odds with both the local policy directions and DPO11 Vision for supporting ‘convenience shopping’ in this neighbourhood. Further discussion on this matter is provided in the Key Issues section below.

#### **Compliance with Development Plan Overlay requirements**

The proposed Development Plan is an extensive document of 17 parts designed to address each of the requirements set out in DPO11. The City of Darebin supports the comprehensive and vigorous information requirements of the Overlay given the potential impacts such a large scale redevelopment presents to the site and surrounds. The level of upfront detail provided for public exhibition ensures that the local community and other stakeholders are able to gain a fulsome appreciation of the proposal and have a degree of comfort that the decision making process will be thorough. The City of Darebin appreciates that the applicant has undertaken considerable work to respond to all of the information requirements in the overlay.

However, in reviewing the information, the City of Darebin has identified a number of areas where the proposal does not appear to achieve a satisfactory level of compliance with DPO11 requirements. These generally relate to the adequacy of management of traffic impacts on the local area, support for active transport, street level and street wall interfaces at Heidelberg Road and Chandler Highway and the scale of the proposed retail and commercial component. Issues of compliance with the DPO are covered in the following key issues discussion.

#### **Transport Network Considerations**

The City of Darebin has significant concerns around the traffic impacts of the proposal on the existing road network, and questions the adequacy of analysis around these impacts and prioritisation of active and sustainable transport modes in the precinct design to address the needs of the precinct.

#### **Accuracy of Traffic Modelling**

The City of Darebin has been advised the City of Yarra has commissioned an independent peer review of the traffic modelling presented by the applicant. We request that this peer review be made available for consideration and will withhold our comments on the accuracy and suitability of the traffic modelling until we have had an opportunity to consider this review.



Notwithstanding, we have undertaken a review of the traffic modelling report and the associated traffic impacts to Darebin and provide our comments on this below.

#### **Traffic Impacts**

There is currently a significant level of congestion and capacity constraint on the local street and arterial road network within this area of Darebin (in particular on Grange Road), which, even without the development of this site, is forecast to increase significantly by 2021. The Traffic Management Plan submitted with the application anticipates that at full development (2021) the site will generate over 11,500 vehicle trips to the adjoining road network per day and contribute to increased local traffic delays and queue lengths on the surrounding network.

The Traffic Management Plan anticipates that local traffic from the Amcor redevelopment will congest nearby intersections to the point where existing and future through traffic will find alternative routes. The redistribution of through traffic is expected to impact traffic levels on local roads and streets immediately surrounding the site that provide links to the arterial road network. These local streets may experience greater levels of 'rat-running' by motorists seeking to avoid congested areas and require enhanced levels of local area traffic management to mitigate adverse impacts of the redistribution. It is also likely alternative north-south routes within Darebin such as Station Street, Victoria Road and High Street would experience an increase in traffic demand and congestion as a result of the expected traffic redistribution.

The outcomes of increased traffic volumes include an impact on personal travel habits not only for occupants of the subject land but those living nearby and those which currently travel through the area which neither have an origin or destination in the precinct.

There is insufficient information and analysis in the Traffic Management Plan around the impact of anticipated traffic redistribution into the surrounding road network in Darebin. The extent, volume, location and potential impact of the anticipated traffic redistribution on Darebin residents and local travel patterns is currently unclear. Further information and analysis is required to enable a thorough assessment of these factors and any mitigating measures which may require action and investment by Council. However, Darebin believes the duplication of the Chandler Highway and grade separation of the Grange Road level crossing are required to facilitate the full development of the site and reduce the traffic impacts on the surrounding communities.

#### **Fit with Principal Transport Networks**

The subject site is bound by Heidelberg Road to the north and Chandler Highway to the west, both of which form part of the VicRoads primary arterial road network. Heidelberg Road serves as the southern boundary of Darebin municipality and the Chandler Highway leads directly into Grange Road, a key north-south entry point into Darebin and a preferred traffic route on the VicRoads SmartRoads hierarchy.

The site is also in close proximity to Alphington and Fairfield rail stations, both of which are within the City of boundaries. Heidelberg Road forms part of VicRoads Principal Bicycle Network (PBN) as does the Capital City Trail on the south side of the Yarra River.

The development site is well located and a good fit in relation to Principal Transport Networks and an opportunity exists for the development to support the intent of this network.



### Sustainable Transport

The projected number of sustainable modeshare trips generated by the site after full development (approximately 9,200) represents a significant increase in demand on the local public transport, pedestrian and bicycle network. In order to support and enable the transport management plan assumptions of a modal split for all trips generated on site of 55% car traffic and 45% public transport/active transport and demonstrate consistency with the modal hierarchy model, significant design and infrastructure improvements to provide for both pedestrian and cyclist priority and safety will be required, as outlined below. These improvements to active transport priority are required for both the on-site access network and surrounding pathways and desire lines from the site to local public transport facilities and activity centres, in particular Alphington Station and Fairfield Village neighbourhood centre.

Without these improvements, the projected level of sustainable transport modeshare may prove difficult to achieve, resulting in greater private vehicle use and therefore increased traffic impacts for Darebin residents as a result of site development. Public Transport Victoria and VicRoads need to work closely with all local authorities to plan and provide the necessary investment to accommodate this increase and ensure the existing levels of service for Darebin residents are maintained and improved.

The application is unclear on what sustainable transport options (new bus services, bus stops, signalised intersections, car share pods, shared paths, pedestrian crossings, etc.) need to be in place to support each phase as it is completed. Without this supporting infrastructure, new residents are likely to initially select driving as their default transport option – which may become ingrained travel behaviour and make the proposed 45% sustainable travel modeshare difficult to achieve, in turn creating a higher level of site-generated car traffic and congestion both on-site and for the surrounding transport network.

Heidelberg Road is part of the Principle Bicycle Network (PBN) and the Darebin Cycling Strategy 2013-2018 identifies Station Street and Darebin Creek Trail (linking into the Capital City Trail) as key cycling corridors. The proposal should identify how the site incorporates linkages and improvements to these components of the sustainable transport network commensurate with the likely increases in use.

In order to better understand the likely levels of infrastructure required to support the increased pedestrian, cycling and public transport use, it is important that desire lines and estimated volumes are provided for each transport type. This has not been included in the Integrated Transport Plan and without such an analysis, it is difficult to comprehend how the development has assessed the appropriateness of the measures included to date or the need for any further external measures in order to address the specific ITP requirement as stipulated in DPO11: *“The provision of a network of safe and convenient pedestrian and bicycle accessways through the site and connecting with the surrounding area, and encouraging the use of sustainable travel modes to local amenities.”*

Significant emphasis has been placed on ensuring that the mitigation measures associated with the traffic impacts have been thoroughly investigated however the same rigour has not been applied to other transport modes despite them reflecting nearly half of the anticipated total trips generated by the site. Put simply, the broad transport design shown on the development plan seems to give priority to motor vehicles which will amongst other impacts risk undermining the realisation of walking, cycling and public transport use to the level forecast.

### Active Transport Recommendations and Comments

To promote the use of active transport modes, we offer a number of recommendations and comments. Note these are limited by the lack of assessment and modelling of the future active transport modes and their associated requirements.



### *External intersections*

- Any alterations and improvements to the intersection of Heidelberg Road and Grange Road/Chandler Highway should prioritise bus movements and adequate provision should be made for bus routes to travel through the site in future.
- Where possible, bus stops should be located at intersections to ensure that they align with pedestrian crossing locations and desire lines.
- Consideration should be given to removing the loading access directly from Heidelberg Road to avoid conflict with pedestrians and cyclists using the nominated shared path.
- Pedestrian crossings should be provided on all legs of signalised intersections. The signalised site access intersections have pedestrian facilities on one of the legs only to allow traffic turning movements in conjunction with pedestrian movement. This is not consistent with the modal priority hierarchy contained in the ITP and impacts upon pedestrian pathways and desire lines.

### *Connections to Alphington and Fairfield Stations*

- Due to the high number of sustainable transport trips the site is forecast to generate, further information and assessment of the proposed walking and cycling routes from the site to Alphington Station and Fairfield Station along with any potential impacts on local area amenity and safety is required.
- The proposed walking and cycling route to Alphington Station via a signalised pedestrian crossing of Heidelberg Road and along Lowther Street (and potentially also Harker Street) to access the shared pathway running parallel to the railway line raises a number of concerns, including:
  - Safety and amenity for users of the shared pathway along the railway corridor, particularly at night;
  - Impact upon residents of Lowther Street of a significant increase in pedestrian and cyclist activity during the hours of public transport service operation along what is currently a quiet residential cul-de-sac used predominantly for local access;
  - Capacity of existing footpaths and other infrastructure to accommodate the increased usage; and
  - Access to Lowther Street along Heidelberg Road without a dedicated shared path facility.
- Although both Lowther Street and Harker Street offer access to the shared pathway adjacent to the railway line, a more appropriate route appears to be via Miller Street or Yarralea Street which allow pedestrians and cyclists direct access to the Alphington Station city-bound platform, the level crossing and pedestrian footbridge to the outbound platform. Miller Street would also be expected to experience an increase in car traffic accessing the station for kiss and ride, so a review of the bicycle requirements (bicycle lanes?), as well as upgrades to pedestrian footpaths, lighting and wayfinding are required ensure safety for all transport users.
- Safe sustainable transport access to Miller Street should be provided for by a dedicated shared pedestrian and cycle path along the north side of Heidelberg Road, ideally by widening the existing footpath to provide separation from other road users. This facility could be complemented by a similar pathway on the south side of Heidelberg Road between Yarralea Street and Park Avenue to provide safe and efficient access for sustainable transport users accessing the Park Precinct of the development. The southern shared pathway would link into the signalised crossing of Yarralea Street and Heidelberg Road and allow pedestrian and cycle commuters accessing Alphington Station an alternative direct link along Yarralea Street to the development site.



- The provision of facilities at Alphington Station such as adequate secure bicycle parking, DDA compliant kerbs and pathways, wayfinding signage, appropriate short term parking facilities for kiss and ride commuters, attractive and sheltered open space and meeting areas and high quality accessibility to all train platforms is essential to support strong integration and interconnection between all transport modes.
- Given that during Phase 1 of the development Fairfield Village neighbourhood centre will provide the closest service offering for residents of the site, the development of strong walking and cycling links to encourage access by sustainable walking modes is important. It is recommended that Council and the applicant work with VicTrack and other State Government agencies to investigate the provision of a shared cycle/pedestrian pathway on the existing VicTrack rail reserve (old spur line) running in a north west direction from the intersection of Heidelberg and Grange Roads and linking to Railway Place to improve access to Fairfield Village centre and station. This pathway should be complemented by improvements to lighting and wayfinding to provide a safe and high amenity access route.
- A direct pedestrian link is required between Parkview Road and Alphington Station. Pedestrians and cyclists from within the 'Gateway Precinct' and part of the 'Park Precinct' wishing to access the station to the east, must first walk west to access the Latrobe Ave/Heidelberg Road crossing point, making their journey longer and less direct. There is a danger some of these users will attempt to cross Heidelberg Road away from a controlled crossing point at the desire line leading from Parkview Road. This pedestrian link could be achieved through the introduction of a shared path along the southern side of Heidelberg Road connecting with the traffic signals at Yarralea Street as previously described.
- The establishment of a local bus route connection through the site would offer the potential to establish a more direct linkage with both Alphington and Fairfield Stations and a better integrated public transport network. Appropriate infrastructure needed to facilitate this route should be identified with PTV and implemented as part of the development.
- As many of the above alterations would need to be undertaken in consultation with the City of Darebin, VicRoads, PTV, VicTrack and Metro, it is recommended that a workshop be convened to develop an appropriate array of treatments to achieve the requirements of the ITP and facilitate convenient access to the external active transport network.

### *Internal Configuration*

- Given the estimated vehicular traffic volume on Latrobe Avenue (7200 vpd) the proposed internal roundabout should be amended to a signalised intersection incorporating a dedicated pedestrian phase. As proposed, the roundabout will prioritise traffic through the north-south pedestrian spine. Pedestrians and cyclists have no priority in roundabouts and this affects the level of service of the proposed pedestrian link between the roundabout and the Parkview Road.
- A direct pedestrian crossing should be provided at the corner of Main Street and Latrobe Avenue.
- Signalised intersections on Heidelberg Road and Chandler Highway should be configured to maintain the level of service of the proposed shared paths running around the site. The slip lane on the western gateway in particular is not conducive to providing safe and direct walking and cycling routes.
- An assessment of the likely pedestrian volumes across the proposed zebra crossings within the development should be undertaken to ensure that they are an appropriate treatment given the opposing traffic volumes.
- The ITP requirements outline the need to provide for wide footpaths and bicycle lanes on the internal road network yet no bicycle lanes have been provided on any of the roads. At a minimum, bicycle lanes should be provided on the nominated bicycle links illustrated in the DPO.



## Built Form and Interfaces

### Gateway Built Form Street Wall Treatment

Building street wall heights nominated in certain parts of the Gateway, Village, Artisan and Outer Circle precincts appear to depart considerably from preferred street wall heights expressed in DPO11 and are problematic.

DPO11 sets a preferred street wall (podium) height of 3 storeys in the Village Precinct, 6 storeys in the Gateway Precinct and 3 storeys in the Artisan and Outer Circle Precincts. The Built Form and Interfaces Plan at pages 114-115 of the proposed Development Plan show an alternative 'Gateway Built Form' street edge treatment applied in prominent corner locations to Heidelberg Road and Chandler Highway within these precincts. The Gateway Built Form allows for *all levels of the building to be built up to the boundary line*, as opposed to a specified wall height above which building form is recessed through setbacks.

The design philosophy offered in support of the zero street setbacks is that such buildings are responding to 'the wide road reserve and relatively less sensitive nature of the Chandler Highway and Heidelberg Road interfaces' (page 115). It is acknowledged and accepted that development along these road interfaces will be more robust in comparison to interfaces with the Yarra River and existing residential streets. However, the potential building heights that may result from the proposed design guidelines, in particular those which are documented in indicative section drawings at Figures 137 and 138 for the Village Precinct showing street wall heights of 14 storeys to Heidelberg Road, are considered inappropriate and too far a departure from the expectations set in DPO11. The existing paper mill buildings along Heidelberg Road, which stand well above any other buildings in the vicinity, only reach approximately 5 storeys. Further, the scale of the proposed buildings as they 'turn the corner' appears to replicate heights internally into the site onto key pedestrian environments, notably the 'main street' and the 'paper trail' promenade. This would not offer a comfortable pedestrian scale to these key pedestrian spaces, which are narrower than Heidelberg Road, and undermines the Development Plan aspirations to promote walking and activity at street level.

The gateway built form design response is likely to encourage excessive building scale and bulk to interfaces at Heidelberg Road and Chandler Highway (and extending into key pedestrian spaces off these streets), that will be highly discordant with the surrounding built form, insensitive to the existing and any future preferred character of the surrounding precinct and generally provide a poor streetscape experience, even in this 'robust' environment. Added to this is the fact that overall building heights are discretionary in the precincts along Heidelberg Road and Chandler Highway, which provides a further degree of uncertainty about the end result in 'Gateway Built Form' locations and whether these key interfaces will be well designed and respectful of their context.

The 'Gateway Built Form' street edge element in the proposed Development Plan should be modified to nominate resolved podium heights generally in accordance with the preferred heights set in DPO11. The City of Darebin can accept variations to the DPO podium heights to accommodate the retention of heritage buildings already exceeding the DPO heights. In addition, we acknowledge that some further variations may be sought to achieve differentiation of building form at corner or landmark locations, however stress the need for a proportional relationship between street and podium heights, and sufficient articulation of tower elements.



#### Heidelberg Road Pedestrian Share Path

The Landscape Design Principles (Figure 58 at page 79 of the Development Plan) includes a “safe pedestrian share path to Heidelberg Road” which is to be delivered in conjunction with retention of the existing trees and colonnade under the existing mill buildings (as shown in Figure 59 Indicative Landscape Design Response at page 81). There are some issues with this concept that require resolution:

- What would be the impact on the shared pathway should additional land for Heidelberg Road widening, as shown on the indicative framework plan be required? It is unclear how a safe shared pedestrian path will be maintained along with vegetation and building elements should a significant reduction in the footpath width occur.
- What is the impact of the proposed commercial loading zone accessed off Heidelberg Road (shown in Figure 32 at page 47 and in part at Figure 114 at page 107 of the Development Plan) on the safety and amenity of the pedestrian share path in this location? Guidelines for the loading zone “encourage design responses that minimise the impact on the public realm through screening and built form”. We question whether the design guidelines language is strong and specific enough, but also note that minimising visual prominence conflicts on one hand with the need for clear visibility and signalling to ensure safe pedestrian/freight vehicle interaction, particularly in a location close to a major intersection (noting our transport comments above).

#### Pedestrian Arrival Zone at Chandler Highway / Heidelberg Road

The ‘Precinct Interfaces and Transitions’ guidelines for the Village Precinct at page 125 of the Development Plan recommends that “at the main intersection of Chandler Highway and Heidelberg, Road, a generous pedestrian arrival zone should be created as a gateway.” No such treatment is shown on Figure 58 Landscape Design Principles nor on Figure 59 Indicative Landscape Design Response Plan (at pages 58 and 59 of the Development Plan). It is unclear what this arrival zone will constitute and whether or not it relates to the entrance to the Paper Trail.

#### Economic Impacts

The City of Darebin has concerns about the scale and impacts of the proposed retail component and the adequacy of information provided in support of the proposal.

#### Strategic Policy Fit

The Vision for the site outlined in DPO11 is for a predominantly residential precinct supported by ‘convenience retailing services and community facilities’. Further to this, DPO11 specifies that the Site Master Plan is to show ‘neighbourhood retail facilities’.

The proposed 19,300sqm (13,900sqm in core village precinct and 5,400 sqm elsewhere) of retail floorspace constitutes considerably more than the ‘convenience retailing services’ and neighbourhood role envisaged for the site. This is evidenced in the floor space comparison with competing centres provided in the Economic Assessment Report February 2015 prepared by MacroplanDimasi, showing the proposal is on par with gross leasable floor areas at Ivanhoe Activity Centre (15,000), Kew Junction (15,000), Heidelberg Activity Centre (20,500) and Northcote Plaza (19,000 as part of 27,000sqm total in Northcote Activity Centre), and Victoria Gardens in Richmond (21,000). These comparable centres are all formally designated ‘activity centres’ in *Plan Melbourne* and recognised as major destinations for retail and commercial activity and investment supported by increased residential densities in local planning schemes.



The establishment of an activity centre of this scale in the Amcor precinct is essentially at odds with strategic directions given in both *Plan Melbourne* and local planning schemes to support the established existing hierarchy of centres and any future plans for retail floorspace in existing centres.

There is no contemplation of an activity centre scale retail and commercial hub in DPO11 or any state or local policy provisions of the City of Yarra for this neighbourhood. There is also no specific provision within the urban renewal precinct status given to the site in *Plan Melbourne*. Planning policy has generally anticipated a 'neighbourhood centre' scale proposal, at the most, in this location which can be readily accommodated within the existing activity centre network.

The City of Darebin does not necessarily object *in principle* to the establishment of a new activity centre-scale precinct in the region. However, it is essential that the information provided in support of the proposal provides sufficient comfort that the proposal is a good 'fit' for addition to the existing activity centre network and will not jeopardise the long term viability of other centres, in particular the closest retail centre at Fairfield Village. At this point the information provided in the economic assessment of the proposal does not do this.

The following outlines key areas of concern we have with the economic assessment provided in support of the proposal.

#### **Trade Area Definitions**

The economic justification for the proposed scale of retail floorspace relies heavily on the assertion that there is existing "substantial under provision of retail facilities" and "a very substantial shortage of supermarket floorspace" (shortfall estimated at approximately 7,000sqm in 2013/14) within the identified main trade area (pages ii and 29 of the Economic Assessment Report by MacroplanDimasi).

It is however noted that within the defined trade area in the economic assessment report:

- the primary sector does not include Station Street Fairfield (Fairfield Village)
- the secondary east sector does not include Ivanhoe Activity Centre (but does include Ivanhoe East)

Omitting the supermarkets from these trade areas allows the report to address the under-provision of supermarket floorspace in the main trade area. Are the trade areas a true indication of shoppers' habits? Understanding current shoppers' habits will determine whether there is suitability for the proposed retail centre to function to provide primarily for the residential and worker market of the actual development.

#### **Impact on Fairfield Village**

Fairfield Village neighbourhood centre, less than 1.5km from the redevelopment site, hosts 14,397sqm of retail space employing over 500 people, as detailed in the table below. Fairfield currently accommodates an array of food and grocery offerings, not just the 3 independent supermarkets that were noted in the economic assessment. There is also an additional 1,300sqm of specialised food retailing which includes butchers, bakeries and fruit and vegetable stores.



Category	Gross Floor Area (sqm)	Number of Establishments	Employment
Supermarkets and grocery stores	2,384.10	6	64
Food retailing (butchers, bakeries)	1,317.0	8	63
Food and Beverage services (café, restaurants)	3,442.10	26	162
Other store based retail	4,274.4	25	125
Business and personal services	2,979	25	110
<b>Total</b>	<b>14,397</b>	<b>90</b>	<b>524</b>

#### Fairfield Village – Retail Floor Space Breakdown

Source: Darebin CLUE (Census of Land Use and Employment) 2014

Fairfield Village is large for what is formally recognised as a 'neighbourhood centre' and plays an important grocery and fresh food role in the region, with local policy support in the Darebin Municipal Strategic Statement for growth of this role. If an additional 13,900sqm of retail space (which includes 8,000sqm of supermarket) is to be positioned so close to Fairfield Village, existing businesses could lose their market share with the increased competition.

The Economic Assessment Report appears to understate the grocery and fresh food retailing role of Fairfield Village in the region. The use of supermarket floorspace alone to calculate market opportunity is not fully indicative of the degree to which Fairfield already caters to grocery and fresh food demand. The Economic Assessment Report therefore appears deficient in its assessment of the direct impact of Amcor proposal on the retail role and viability of Fairfield Village.

#### Employment projections

Table 5.1 in the Economic Assessment Report outlines the employment projections by sector for the development. It shows a total of direct employment of 1,698. Further information is required about when this on-site employment may occur, similar to the staging of the Precincts. More information is also required about the proposed office component. The economic assessment currently provides a strong business case in support for the supermarket and other retail portion of the employment. However, it is very short on facts regarding the viability of the forecast office space which has been attributed to create over 50% of the projected employment. There is no detail in the assessment about assumptions made for the office uses, such as the type of industry sectors anticipated to be attracted to the precinct and why.

Overall, the City of Darebin submits that before a decision can be made on the proposed Development Plan, a more fulsome impact analysis of the proposed retail and commercial land uses is required, in particular a more in-depth appraisal of the economic impact of the Amcor site on Fairfield Village.

The proposal represents a significant departure from the established activity centre framework for this part of Melbourne and will have considerable impact on the operation of, and planning for, existing activity and neighbourhood centres in the region. Without established strategic merit in either local or state policy for a new activity centre at this location, proceeding without further analysis would not constitute proper and orderly planning for the region.

If strategic justification for the proposed scale of retail offer cannot be satisfactorily fulfilled, then the quantum of floor space proposed should be reduced to 12,000sqm to be more in line with a neighbourhood convenience role as envisaged in DPO11.



## Community Infrastructure Provision

### Early Years and Education Facilities

The City of Darebin is fully supportive of the proposals for:

- an integrated community hub that includes early years facilities that support maternal and child health, child care and kindergarten and allied activities and community rooms and spaces; and
- the provision of a Prep to Year 2 junior school as a campus of the current Alphington Primary School.

Based on current patterns and the Darebin Early Years Infrastructure study it is not anticipated that significant numbers of Darebin families with pre-school aged children would make use of early years facilities on the Amcor site. However the City of Darebin would anticipate a growth in demand for facilities when Darebin children reach primary school age, noting the current capacity levels at Fairfield Primary.

The City of Darebin stresses the importance of the early years and school facilities being incorporated from the beginning of the development to ensure that families have immediate access to services that they may need. This will also alleviate pressure on Darebin resources. Currently feasibility work by Darebin in relation to Early Years Facilities in the southern part of the municipality has identified infrastructure requirements in Fairfield, but not within the immediate catchment area of the Amcor site.

### Leisure and Open Space Facilities

The City of Darebin is generally supportive of the proposed facilities in the precinct which will be sufficient to provide for local community needs and notes the following:

- The proposed multifunctional community spaces in the development will help address the currently high demand for meeting spaces/community rooms in this neighbourhood for a variety of uses including recreation for older adults. The proposed Prep to Year 2 school rooms should be designed in multifunctional way to maximise flexible use of space in addition to the community hub.
- It is preferred that the development does not include recreational opportunities already provided at Northcote Aquatic and Recreation Centre (i.e. major gym or learn to swim pool).
- Existing unmet demand for women's sporting facilities, including indoor court facilities, in the southern part of Darebin will be increased by this development. However, the City of Darebin is currently planning to develop some suitable facilities to address this issue and should cater to additional demand from this development.
- Outdoor sporting venues in the vicinity are limited and close to capacity however it is noted that the development does not have the space to deal with this issue. The City of Darebin is in the process of making its existing facilities suitable for higher level of usage subject to funding for lights and surface improvements.
- Linkages to cycle and walking paths from the development should be established to encourage informal recreation.
- Open space provided in the development should be accessible by all and not limited to residents. It should provide a range of seating, hardscape, softscape and vegetation (appropriate for the location proximate to the river) to enable a range of activities from pedestrian thoroughfare, resting, relaxation to active zones.



### Housing Diversity

The City of Darebin is supportive of the range of housing types and sizes proposed by the Development Plan, which is consistent with the recommendations of the Darebin Housing Strategy 2013 for the Alphington area.

The Darebin Housing Strategy encourages provision of new housing in Darebin that addresses the need for greater diversity of accommodation to suit changing demographic needs and improved levels of affordability.

The Housing Strategy forecasts relatively static population growth in the Fairfield and Alphington area of the City of Darebin, generally owing to limited opportunities for higher density housing development to occur in comparison to other neighbourhoods in Darebin. Substantial areas in Alphington in particular are affected by heritage, character and landscape controls which effectively limit housing development opportunities to incremental levels. Opportunities for affordable new housing supply in these areas subsequently focuses on identified opportunity sites, most of which in the Darebin municipality are located around Fairfield Activity Centre, Fairfield and Alphington Railway Stations and in underperforming industrial sites along Heidelberg Road which could be rezoned.

The Amcor site presents a major opportunity for improving the housing supply as well as boosting the diversity of housing opportunities in the Alphington and Fairfield areas, in particular the provision of smaller sized dwellings such as apartments or townhouses. The City of Darebin supports the initiatives in the Development Plan for providing new housing in a variety of configurations and densities.

Further consideration however could be given to provision of aged care facilities (ranging from retirement village style living to higher dependency facilities) within the precinct to support ageing in place and local downsizing opportunities that are highly likely given the demographic profile and future dwelling preferences assessed in the Housing Diversity Report accompanying the proposal. The proposed Development Plan does not appear to make any provision for such accommodation despite there being a growing demand.

The requirement under the DPO11 to provide 5% of total dwellings for the purpose of affordable housing development in association with an accredited housing association should continue to be pursued as an important initiative for ensuring that a wide range of people can benefit from living and working in the Amcor precinct. In addition to providing affordable, high quality accommodation for low income residents on pensions and other financial assistance, this housing model also benefits lower income key workers who are increasingly unable to find affordable accommodation in Melbourne's inner areas close to their places of employment.

### Further Input and Collaboration

The City of Darebin appreciates that consideration of the proposed Development Plan will be a highly complex task, both in terms of assessing the immediate merits of the proposed design as an attractive, high amenity neighbourhood and the broader and longer term impacts of the new precinct as it develops.

The City of Darebin therefore welcomes further opportunity to support the process through additional discussions as required to resolve issues, including those specifically raised in this submission.

Further to this, we also welcome opportunities for ongoing collaboration with the City of Yarra, Victorian State Government and other key stakeholders, and support collaboration in regional transport, land use planning and community infrastructure initiatives including:



### **Transport**

The City of Darebin is a member of a regional working group formed to focus specifically on traffic and transport aspects of the proposal and assist in assessing the development application. The group consists of representatives of the City of Yarra (lead), City of Darebin, City of Boorondara, Public Transport Victoria and VicRoads.

It is requested that this group continue to meet regularly throughout the development assessment and any subsequent construction phases of the project to enable effective coordination of sustainable transport initiatives, sharing of information around staging and future Chandler Highway project works, and a joint approach to other relevant transport impacts and actions relating to the project.

### **Land Use Planning for Heidelberg Road corridor**

The redevelopment of the Amcor site provides an opportunity to plan for the Heidelberg Road more strategically and holistically. As a municipal boundary area, the corridor suffers from lack of cohesive vision and ad hoc development. Strategic policy gaps are likely to be exposed as the area comes under greater development interest with activation of the Amcor site and the general transformation of industrial and commercial land holdings along the corridor.

The City of Darebin wishes to progress advocacy for a joint project with the City of Yarra (and potentially sponsored by State Government through the Metropolitan Planning Authority) to develop a strategic plan for the Heidelberg Road strategic corridor. The plan can address future land use and development, and transport task, role and priorities. Council requested that the MPA facilitate this process in July last year and there is potential for this discussion to be reopened with the progression of the Amcor urban renewal and Chandler Highway project.

### **Community Infrastructure**

The City of Darebin welcomes the opportunity for continued involvement in discussions around the planning and delivery of community infrastructure in the precinct, in particular the provision of the integrated community hub and primary school campus facilities.

We would also welcome the opportunity to participate in the recently established Community Infrastructure Assessment Working Group which facilitates ongoing dialogue with local community representatives about community infrastructure needs in the Alphington neighbourhood.

### **Conclusion**

The City of Darebin acknowledges the former Amcor paper mill site is an established strategic urban renewal precinct under both local and state level planning policy directions and supports reinvigoration of the precinct into a vibrant new community accommodating a mix of uses as envisaged by DPO11.

The proposed Development Plan as exhibited is commended for providing diverse and affordable housing opportunities into Alphington and for commitments to community and educational facilities that can benefit both existing and future residents.

However, the Plan contains a number of flaws which we believe require resolution before any approval can be made. The following issues are considered particularly critical:



- Inadequate information and analysis in the Traffic Management Plan around the impact of anticipated traffic redistribution into the surrounding road network and any mitigating measures which may require action and investment by City of Darebin. We look forward to providing further comment on this issue pending the outcome of the independent peer review of the traffic modelling presented.
- Inadequate prioritisation of active transport needs in the precinct, both in the internal street design and in connections to key local destinations around the precinct, to support the significant uptake of active and public transport in the precinct required by the Traffic Management Plan. Failure to deliver the sustainable transport modeshare will greatly increase traffic impacts for Darebin residents as a result of site development.
- Design guidelines allowing street wall interfaces to sections of Heidelberg Road and Chandler Highway which would not accord with the DPO and which will enable excessive street wall heights and visual impact relative to the surrounding neighbourhood.
- A large scale retail and commercial component which does not have existing strategic policy basis. The Economic Assessment in support of the proposal has some questionable assumptions and does not adequately recognise the strong grocery and fresh food role of Fairfield Village in the region and the subsequent direct impact the Amcor proposal, in particular the supermarket offer, will have on the viability of the Fairfield Village centre.

The City of Darebin trusts that the above and other matters raised in this submission will receive detailed consideration by the City of Yarra in making its assessment of the merits of the proposed Development Plan.

We look forward to working collaboratively with all parties involved to resolve issues and ensure the development of the precinct is resolved in a manner that will bring long term community benefit.