Draft Planning Scheme Amendment C233dare
120 Chifley Drive, Preston

Darebin City Council

Officer-led Submission

October 2026

Introduction

Darebin City Council officers welcome the opportunity to make a submission to draft Planning Scheme Amendment C233dare, which seeks to facilitate the development of the land at 120 Chifley Drive, Preston (the site).

Our feedback is based on an officer-level review, identifying high-level threshold issues for the amendment documentation and suggested improvements. It does not reflect a Council-endorsed view on the amendment.

The site is located within the East Preston (Northland) Major Activity Centre (MAC), which is recognised for providing a broad mix of retail, commercial, residential, leisure and other activities. The area also presents opportunities for urban renewal on underutilised and former industrial and commercial land.

The draft amendment has the potential to deliver significant housing and economic benefits for the area. However, the scale of development must be appropriate to the site's locational and environmental constraints and policy context to ensure it integrates with its surroundings and supports the long-term vision for the area.

Summary

A summary of the key officer-level comments include:

- General support for transitioning the site from its current use to a mixed-use outcome, recognising its strategic location within the Northland (East Preston) Activity Centre.
- Request for further strategic justification of the rezoning of restricted commercial land in a regionally significant commercial precinct as identified by State policy.
- The draft ordinance should provide clearer development expectations, should the Development Plan not proceed, or the site be sold, ensuring appropriate planning outcomes are secured through the planning controls rather than relying on future approvals processes.
- The proposed scale and density of development is not supported. Officers seek:
    - An overall reduction in the density of the proposed development.
    - Reduced building heights to a range between 6 to 12 storeys to better reflect the site's location with limited access to fixed rail public transport and creek-side environment.
    - A built form that better responds to the environmental significance of the creek interface and the landscape character objectives of the State's Significant Landscape Overlay (SLO).
- Details of proposed development contributions are lacking. Given the scale of development proposed with approximately 1000 dwellings, the development will place pressure on existing infrastructure and services, This, combined with the uplift generated through restricted commercial rezoning, justifies planning controls that require development contribution delivery mechanisms, such as a DCPO or Section 173 Agreement secured through the DPO, to ensure these commitments are defined, embedded, and enforceable.
- Consistent with the *Whole of Country Plan 2025-2035* prepared by Wurundjeri Woi Wurrung Cultural Heritage Aboriginal Corporation, Council recognises the importance of engaging Traditional Owners on matters affecting Country and cultural landscapes. Given that most of the site is within an area of Cultural Heritage Sensitivity (CHS), and that parts of the Darebin Creek interface may remain undisturbed, early engagement with the Corporation should inform consideration of cultural heritage values and the need for further assessment.
- General support for the provision of a 10% affordable housing contribution.

Land Use

Officers generally support transitioning the site to a mixed-use development, subject to further justification detailed below.

The proposed development has the potential to deliver a significant mixed-use outcome on a key strategic site in the Northland Activity Centre.

The economic assessment references previous work by Council on the Northland Urban Renewal Precinct, which envisaged a similar outcome across a broad area of industrial land, including the subject site. However, this work has not been progressed since 2018, is not a Council-adopted plan, and is subject to further analysis to understand economic and employment impacts.

Further strategic justification for rezoning restricted commercial land is required to fully understand the economic impacts of the proposal. This is particularly important given the site sits within land identified as a regionally significant industrial precinct (East Preston Industrial Precinct) (EPIP) under State Policy (Melbourne Industrial and Commercial Land Use Plan – MICLUP).

The EPIP has different characteristics to high-growth state significant industrial precincts further from Melbourne's inner-middle ring. It may enable business uses that benefit from proximity to local markets and/or service the needs of other nearby businesses.

The application should address what the economic impacts are on the demand and supply for employment land uses in the area, including large format retailing and service industries, and on opportunities for creative industries and new, emerging and innovative business that need affordable and well-located space to establish and grow. The applicant could explore opportunities to deliver economic benefit, such as subsidised affordable workspaces, to help offset the loss of dedicated employment land.

Furthermore, the application should analyse how the proposed rezoning will support employment activities and the overall success of the East Preston Industrial Precinct.

Key asks:

- Provide a robust strategic and economic justification for rezoning the site, including impacts on the supply and demand of employment land uses and the role of the East Preston Industrial Precinct.
- Explore opportunities to deliver economic benefits that help offset the loss of dedicated employment land.

Cultural Heritage

The Wurundjeri Woi Wurrung Cultural Heritage Aboriginal Corporation is engaged early and meaningfully throughout the planning process, with its cultural heritage, knowledge, values and Caring for Country objectives appropriately reflected in the proposal.

Recognising and empowering the knowledge, values and authority of Traditional Owners, including their rights to care for and speak for Country, is a key pillar of Plan for Victoria and reflects a broader commitment to self-determination for First Peoples within the planning system. The Darebin Housing Strategy (2025) also recognises the need for development to respond appropriately to areas of Aboriginal cultural heritage and environmental significance, including creek environments *(see Strategic Direction 7.5).*

Council's partnership commitments with the Wurundjeri Woi-wurrung Cultural Heritage Aboriginal Corporation further recognise the importance of Traditional Owner participation in decision-making, Caring for Country outcomes, cultural landscape management, truth-telling

and the incorporation of Wurundjeri cultural heritage, knowledge and values into planning processes.

The *Whole of Country Plan 2025-2035*, prepared by the Wurundjeri Woi-wurrung Cultural Heritage Aboriginal Corporation, seeks genuine and meaningful engagement with Wurundjeri Woi-wurrung People throughout planning and decision-making processes affecting Country. It also promotes the protection of Country, cultural heritage and waterways, recognising water as a "complex living entity" and seeking healthy waterways and water justice across Wurundjeri Woi-wurrung Country. Darebin Creek forms part of this broader cultural landscape and waterway system.

Considering the site's proximity to the Darebin Creek and the fact that much of the site is within an area of Cultural Heritage Sensitivity (CHS) the site is considered culturally sensitive. The creek corridor also represents an important cultural landscape and presents opportunities to support broader Caring for Country objectives through the protection and enhancement of Country, waterways and landscape values.

The Significant Ground Disturbance Assessment (Landskape, 2025) concludes that the proposal does not require a mandatory Aboriginal Cultural Heritage Management Plan (CHMP) as the land has been subject to significant ground disturbance previously. However, it is noted that it is unlikely that a CHMP has ever been prepared for the site, and it is also noted that parts of the site, particularly along the Darebin Creek interface, still appear to be undisturbed.

Key asks:

- Undertake early engagement with the Wurundjeri Woi Wurrung Cultural Heritage Aboriginal Corporation and determine whether a Cultural Heritage Management Plan is needed, having regard to the presence of potentially undisturbed ground within the site.

Housing and Settlement Planning

Subject to any economic impacts of the proposed rezoning, the site is considered an appropriate location to accommodate housing growth.

The Darebin Housing Strategy (2025) (the Strategy) outlines Council's vision for managing housing growth and residential development over the next 15 years. The Residential Development Framework (RDF) within the Strategy outlines the preferred locations for directing housing growth and development across Darebin.

The RDF identifies the land to the north of the site as Increased and Substantial Change Areas, where the highest level of housing change is anticipated. Using the same methodology that underpins the RDF, the site would be identified as Substantial Change, due to its proximity to Northland, a Major Activity Centre.

The development plan notes that student accommodation and aged care may be future residential uses to be included within the development. Further information is sought from the applicant as to the demand for these uses within the area, noting that the Tables within the Residential Land Use Analysis and Demand (pg.43 of the Development Plan) are not legible. It is also unclear whether these uses would be provided in addition to the approximately 1,000 proposed dwellings.

The proposed scale and density of development is not supported.

Officers support the introduction of residential uses on the site; however, the proposed scale and density of development is not supported and must be contextualised to the local area and level of public transport access. The State recognises the site's limited public transport access with a Public Transport Accessibility Level (PTAL) Category 2 score.

The *Darebin Housing Strategy (2025)* recognises that housing growth should be supported by appropriate infrastructure and accessibility outcomes, with development intensity responding to the characteristics and capacity of individual locations *(see Outcome 2)*.

Despite the site's proximity to Northland, which remains predominantly a bulky goods and retail destination, the area's current level of public transport accessibility is not commensurate with the intensity of development proposed. The site's creek-side location also introduces environmental and landscape considerations that distinguish it from other higher-intensity growth precincts.

In this context, the proposed dwelling density of approximately 308 dwellings per hectare is considered excessive. Council notes that the planning controls for the Preston Market precinct, which is considered to be a more appropriate location for such a scale of development, being adjacent to a train station, seek a lower dwelling density of approximately 235 dwellings per hectare.

This is discussed further in the Built Form and Design section.

It is also noted that Darebin has been advised by the Minister for Planning that the municipality is current meeting (and exceeding) its applied housing target, further warranting a reassessment of the proposed scale of development sought via the amendment.

The proposed 10% affordable housing contribution is welcomed.

The applicant has indicated that a 10% affordable housing contribution will be secured and delivered through a future Section 173 Agreement, as part of the site's redevelopment. However, officers are requesting at this stage, further details in the proposed Development Plan's Affordable Housing Statement, on the nature and quantum of the contribution, to ensure it delivers a meaningful outcome for the wider community.

The draft Development Plan's Affordable Housing Statement does not appear to meet the requirements of the proposed Development Plan Overlay Schedule (DPO). It should be updated to include information such as the intended methodology for delivery, proportion, tenure, management arrangements and dwelling mix of the affordable housing to be delivered. Consideration should also be given to providing a diversity of affordable housing typologies, including family-sized dwellings such as three-bedroom dwellings, to meet a broader range of housing needs.

While the expectations that this development provide affordable housing are apparent in the DPO, the affordable housing requirement in the DPO is unclear. It should be written in a way that does not rely on one future permit pathway being locked in, as development may not proceed. For example, it would be clearer to add the 10% affordable housing requirement to the Development Plan Overlay Schedule's 'Conditions and requirements to Permits'. This will account for a situation in the event the land is sold, or the permit does not go through the facilitation pathway, to lock in this requirement in any future development scenario to share the benefit of the rezoning's significant land value uplift with the community.

Furthermore, noting that the proposed rezoning would result in a significant uplift in land value, it is considered appropriate that opportunities be explored to increase the public benefit delivered by the proposal.

Key asks:

- Reinforce affordable housing delivery in the drafting of the planning controls by adding the 10% affordable housing requirement to the Development Plan Overlay Schedule's 'Conditions and requirements to Permits'.
- At the permit stage, provide a housing needs assessment that demonstrates how the proposed dwelling mix will deliver housing diversity, including family-sized dwellings, and justifies the need for specialised housing products such as student accommodation and residential aged care.

- Provide a detailed affordable housing statement in the Development Plan, outlining the proposed contribution, tenure, management arrangements and dwelling mix, and prioritise delivery as social housing rather than a cash contribution.

Draft Planning Controls

Overall, the draft planning controls do not contain sufficient detail to help guide consistent land use and development outcomes for a rezoning of this scale.

Council officers would expect further details are reflected in the planning controls about the outcome being sought through this rezoning. This would provide greater certainty about land use and development outcomes.

Much of the detail is located in the Development Plan. However, if the Development Plan does not proceed or the site changes ownership, the planning controls should include sufficient detail to secure appropriate planning outcomes for the site rather than relying on future approval processes.

As discussed throughout this submission, the draft ordinance should incorporate sufficient detail to guide future development outcomes, including but not limited to:

- Built form and design requirements such as maximum or preferred building heights, rather than indicative heights, interface treatments, setbacks, street wall heights etc.
- Development contribution requirements and delivery mechanisms.

Built Form and Design

The proposed building heights in the Development Plan are not supported and should be reduced to appropriately respond to the site's context.

While the site is in proximity to the Northland (East Preston) Activity Centre, it remains a location with limited access to fixed rail public transport and a continued reliance on private vehicle travel. It's low state-assessed Public Transport Accessibility Level (PTAL) category recognises its relatively low level of accessibility to public transport. It is also a sensitive creek-side location where heights should respect landscape character and view lines from the creek. Unlike Darebin's more established activity centres, such as Preston Central, the location lacks the level of accessibility that would justify the intensity of development proposed.

Without the transport infrastructure that underpins sustainable higher-density development, the proposal risks reinforcing car dependence and does not justify the scale of development proposed.

CASE STUDY 1: Draft Preston Market Development Plan

The State Government recently consulted on the draft Preston Market Development Plan. The planning controls for the Preston Market precinct seek a range of building heights across the precinct, with a discretionary maximum building height of 14 storeys (Schedule 1 to the Activity Centre Zone) (ACZ1).

The draft planning controls and proposed development plan at 120 Chifley Drive, Preston, seek building heights exceed the scale of development sought for Preston Market.

Given Preston Market's strategic significance, accessibility, and role as the commercial and civic heart of the activity centre, there is limited justification for a built form outcome on the subject site that surpasses the scale envisaged for a precinct like Preston Market. As such, the proposed heights are not supported in the context of the site's strategic role and location.

Comparisons have been drawn below with other large redevelopment site locations in Darebin, which demonstrate more contextual heights and densities, even where accessibility is higher.

As such, the building heights of 7 to 16 storeys, as identified in the proposed planning controls, are considered excessive for this car-based, creek side location and are not supported.

A maximum building height across the site in the range of 6 to 12 storeys is considered to be more appropriate, to ensure the development appropriately responds to its context, as well as the key creek interfaces, as discussed below. It is not just the highest 16 storey form that is of concern but the range of heights across the balance of the site should be reconsidered.

The proposed building heights in the draft planning controls do not appropriately respond to the key interfaces across the site, particularly the creek corridor.

Generally, the approach to the massing strategy that situates taller buildings along Chifley Drive and near the intersection with Murray Road, with building heights stepping down towards the creek, is a positive.

However, concerns are raised about the placement of 7-12 storeys directly adjacent to the environmentally and landscape sensitive creek corridor. Consideration should be given to further reducing the heights of buildings towards the creek. Although proposed landscaping and retention of remnant trees will provide screening, gaps in vegetation and the time required for new planting to mature mean that visual impacts will remain significant in short to medium term. Further, the Significant Landscape Overlay (Schedule 5) (SLO5) has been introduced to protect the environmental and landscape character of the Darebin Creek, including to ensure the visual impact of buildings and works is minimised when viewed from the waterway corridor. All buildings along this interface will be higher than the existing canopy line making their visual impact more pronounced.

The Darebin Housing Strategy (2025) emphasises the importance of protecting the environmental, landscape and cultural heritage values of creek corridors and ensuring new development responds sensitively to significant landscape interfaces. The Strategy also identifies the need for planning controls and design responses that protect and respect the environmental, landscape and cultural heritage significance of creek environs (see *Outcome 6, Strategic Direction 7.5* and *Action 30*). The existing Darebin Creek Design & Development Guidelines (David Lock, 2000) referenced in Schedule 2 to the Environmental Significance Overlay (ESO2) reinforce this approach.

Other key interfaces include external and internal streets (and associated landscape interfaces), the future plaza and the Strategic Cycling Corridor along Water Road.

Further details should be provided on how the proposed built form responds to key interface treatments and then reflected in the draft ordinance.

Specific requirements for the interface treatments, like Schedule 13 to Clause 43.04 Development Plan Overlay (Public Housing Renewal – Walker Street, Northcote) (DPO13) in the Darebin Planning Scheme, should be included. This would include interface requirements, reflecting building heights, minimum setback distances (ground / upper floor setbacks), maximum street wall heights and landscaping. This should be defined, illustrated and clearly referenced in both the Development Plan and draft ordinance, supported by a clear rationale.

A revised visual impact assessment should be undertaken to determine the impact the proposed building heights and massing will have on the creek interface and surrounding public realm.

It is noted that photomontages have been provided, however the documents note that the camera location and massing are indicative only.

A clearer visual impact assessment should be provided demonstrating the exact viewpoint locations, camera heights, framing and 3D modelling and include the proposed development layout to clearly identify the buildings depicted in each view.

The proposed building height appears to cast significant shadow over the future plaza.

While equinox shadow plans have been provided, winter solstice diagrams should be provided to consider the worst-case overshadowing impacts and demonstrate that the plaza will receive adequate sunlight to function as a usable and attractive public space throughout the year.

CASE STUDY 2: Walker Street Public Housing Renewal, Northcote (DPO13)

The Walker Street (Northcote) Public Housing site was redeveloped as part of the State's Public Housing Renewal Program, with construction completed in 2025. The project replaced 87 dwellings that were no longer fit for purpose with 250 new homes, comprising 99 social housing dwellings and 151 market dwellings.

The redevelopment was undertaken in accordance with the requirements of Schedule 13 to the Development Plan Overlay (DPO13). To ensure appropriate interface outcomes, DPO13 provides clear built form guidance, including specified building heights, setbacks and transition requirements at key interfaces.

These controls played a critical role in ensuring the scale and intensity of development responded appropriately to its surrounding context, with the completed development providing a 4-storey interface to the low-scale residential neighbourhood to the north, and a sensitive transition to the Merri Creek corridor, where building heights stepped down from 7 storeys to a 4-storey interface at the creek edge.

As a result, the completed development demonstrates how higher-density urban renewal can be accommodated without compromising surrounding neighbourhood character or environmental values, with the built form achieving a considered transition to adjoining interfaces through the application of clear and prescriptive DPO provisions.

Further, the scale of the Walker Street redevelopment is considered more appropriate in its context, given its location within an established inner-urban area with strong access to public transport, services and community infrastructure.

By comparison, the proposed development and development controls at 120 Chifley Drive, Preston seek a substantially greater scale and intensity of development in a comparatively less accessible location, where the surrounding infrastructure, transport connectivity and urban context do not provide the same level of support for such a significant increase in density.

Key asks:

- Reduce the overall building heights to 6 – 12 storeys, and no more than 7 storeys along the creek, as the current 7-16 storey heights are not sufficiently justified or appropriate for this context.
- Provide further detail on how the proposed built form responds to key interface treatments as identified in the Development Plan and reduce the overall scale of development adjoining the creek.
- Provide winter solstice shadow diagrams to understand the potential worst-case overshadowing impacts.

- Provide a revised visual impact assessment with clearer viewpoint locations, camera heights, framing and 3D modelling and include the proposed development layout to clearly identify the buildings depicted in each view.

Development Contributions & Community Infrastructure

Given the scale of the site and proposed development, the planning controls should clearly specify development contribution requirements and delivery mechanisms.

Darebin Housing Strategy (2025) recognises that housing growth should be supported by the infrastructure, services and community facilities required to meet the needs of existing and future residents *(see Outcome 2).*

For a site of this scale, development should make infrastructure and community contributions commensurate with the scale of change and increased demand it will generate. By way of comparison, the Preston Market redevelopment site, which anticipates a similar number of dwellings, is subject to a Development Contributions Plan Overlay. Where a Development Contributions Plan has not been finalised prior to permit approval for that site, alternative mechanisms such as a Section 173 Agreement can be used to secure development contributions.

Appropriate infrastructure contributions should similarly be required for this site through a clearly defined and enforceable mechanism. This could include a site-specific Development Contributions Plan or a Section 173 Agreement secured through the Schedule to the Development Plan Overlay. The draft planning controls should establish a clear framework for identifying, securing and delivering infrastructure required to support the additional demand generated by the proposed development.

A community infrastructure needs assessment should also be prepared to identify infrastructure needs arising from the proposal and inform an appropriate contributions framework. Preliminary analysis indicates there may be a need for additional kindergarten capacity, community meeting and activity spaces, creative or cultural facilities, and other local community infrastructure. The Development Plan should retain flexibility to accommodate the delivery of such infrastructure within the precinct.

Council expects to provide further input regarding infrastructure needs and appropriate contribution mechanisms as planning for the site progresses.

Key asks:

- Include clear development contribution requirements and delivery mechanisms within the draft ordinance.
- Prepare a community infrastructure needs assessment to identify infrastructure requirements arising from the proposed development.

Transport, Access and Movement

Officers are broadly supportive of the proposal to restrict movements at the Chifley Drive access, noting the existing full-movement arrangement has long been identified as problematic.

However, the proposal to retain the right-turn-out movement appears inconsistent with the intent of improving safety and reducing conflict, as outline in the Traffic Engineering Assessment (Traffix Group, July 2026).

Allowing right-turn-out movements will require drivers to negotiate both eastbound and westbound traffic streams on Chifley Drive, while also contending with opposing movements from the Northland Bulk Centre. This arrangement introduces multiple conflict points and increases the likelihood of risky gap-selection behaviour, particularly during peak periods

when traffic volumes are high. Furthermore, the proposal is not aligned with the *Austroads Safe System Infrastructure (2018) Research Report: AP-R560-18.*

It is recommended that restrictions should be placed on right-turning movements where minimum gap acceptance is unavailable. Rather, alternative access arrangements should be considered including implementing a left-in / left-out only configuration at Chifley Drive and directing vehicles requiring full turning movement options to Wood Street, where the existing roundabout provides safe and efficient access to all directions.

Additionally, consideration of permitting all vehicles, including service vehicles, to exit via Murray Road to access the arterial road network, should be given, noting that left-in / left-out movements at this location align with Austroads guidance for managing access on higher-order roads.

The proposed reduction in car parking across the site is not supported.

The site is located within a Category 2 location and, as such, minimum car parking rates apply, in accordance with Clause 52.06 (Car Parking). Based on the Public Transport Accessibility Level (PTAL) methodology, the subject site does not exhibit a level of public transport accessibility that would justify adopting a reduced residential parking rate.

Adopting a reduced rate may give rise to adverse amenity impacts on the surrounding area. While on-street parking in the vicinity is currently unrestricted, it would be inequitable and inconsistent to allow the development to rely on public street parking to compensate for an under-provision of on-site spaces.

Such an outcome would shift the burden of parking demand onto the broader community (and Council) and undermine the objectives of Clause 52.06 to ensure that parking supply is appropriately matched to local transport conditions.

As such, it is recommended that car parking rates in accordance with Clause 52.06 be provided for the Development Plan.

Opportunities for the development to contribute to, or facilitate, strategic active transport projects should be explored.

Water Road, immediately south of the site, forms part of the State's Strategic Cycling Corridor (SCC). The route is identified as a C2 Main Route within the network, highlighting its regional significance and role in providing high-quality, continuous active transport connections, across municipal boundaries.

The proposed development should respond sensitively to this interface, with design measures that recognise the corridor's strategic cycling function and anticipated increased pedestrian and cyclist activity.

Whilst this route is identified as part of the SCC, the site currently lacks safe and direct access to the Darebin Creek Trail, requiring cyclists and pedestrians to travel east along Murray Road to access the shared path network.

Improving this connection remains an advocacy priority for Council, including through the future delivery of a bridge connection between Darebin and Banyule, as identified within the SCC network map. Given the scale of the proposal and its proximity to this strategic route, opportunities for developer contributions, whether through infrastructure delivery, land provision or financial contributions, should be explored in consultation with Council to support broader active transport objectives.

In addition, Council's Your Street, Your Say – Group C Road Safety and Traffic Management Program identified a new shared path connection, including a formalised crossing at Chifley Drive, to improve pedestrian and cyclist access to the Darebin Creek Trail. These upgrades will strengthen local connections to the regional trail network and improve safety for vulnerable road users.

The scale of development proposed for the Centre will increase demand for public transport. The Strategy recognises the importance of aligning housing growth with access to public transport, active transport and supporting infrastructure *(see Outcome 2 and Action 11)*.

Existing bus services provide important connections. However public transport service levels remain limited relative to the Centre's role as a Major Activity Centre. Council has repeatedly advocated for improvements to bus service frequency, operating hours, east-west connectivity and service reliability through previous transport planning and bus network reform processes. These improvements remain important to support access to the Centre and accommodate future growth. Upgrades to bus stops and interchange facilities would also improve accessibility, comfort and safety for public transport users.

Key asks:

- Remove the proposed right-out-movement at Chifley Drive to ensure safe access and egress to the site.
- Ensure that car parking is provided in accordance with the minimum rates as specified in Table 1 to Clause 52.06.
- Ensure the development includes design measures to recognise that Water Road forms part of the State's Strategic Cycling Corridor.
- Explore opportunities for developer contributions, to support broader active transport objectives, including facilitating direct connection to the Darebin Creek Trail.
- Improve east-west bus connections, service coverage and access to major destinations across Darebin and adjoining municipalities.
- Increase bus service frequency, reliability and extend operating hours, particularly during evenings and weekends.
- Upgrade bus stops and interchange facilities to improve accessibility, comfort, safety and passenger information.

Environment and Landscape

A 10-metre vegetated buffer, in addition to the 30-metre waterway setback, is recommended to provide a sufficiently dense buffer between the creek corridor and the proposed development.

The Flora and Fauna Assessment (Nature Advisory, July 2026) recommends that an additional 10-metre buffer be provided on the site if Melbourne Water does not approve revegetation within the creek corridor. However, to minimise potential impacts on the creek environment from the proposed development, it is considered that buffer treatments should, at a minimum, comprise a 30-metre setback from the creek line together with an additional 10-metre vegetated buffer along the site's eastern boundary, regardless of this approval. This should be complemented by enhancement of existing vegetation and revegetation works within the creek corridor.

Further, provision of the additional 10-metre buffer would assist in achieving the landscape character objectives of Schedule 5 to Clause 42.03 (Significant Landscape Overlay) (SLO5), particularly by enhancing the role of the waterway as an integrated and continuous landscape corridor and reducing the visual impact of future development when viewed from the corridor.

The Development Plan's intention to retain trees along Murray Road and Chifley Drive frontages, as well as along the Darebin Creek interface is supported and expected to ensure the retention of all high-retention-value trees identified in the Arborist Report by John Patrick Landscape Architects.

Any removals should be subject to the requirements of Schedule 2 to Clause 42.01 (Environmental Significance Overlay) (ESO1), with a requirement to replace any tree removed with 2 Local Indigenous Trees.

Key asks:

- Provision of a 10-metre vegetated buffer along the site's eastern boundary in addition to the required 30-metre waterway setback.
- Ensure that any removal of trees be subject to the requirements of Schedule 2 to Clause 42.01 (Environmental Significance Overlay) (ESO1).

Sustainability

The Development Plan's Environmentally Sustainable Development (ESD) Strategy has good ambitions that align with Darebin ESD principles.

However, the strategy remains very high level, and its integration into the Development Plan is similarly high level, with several strategies incomplete or not fully aligned across the two documents.

For example, the stated net-zero ambitions note that buildings will be all-electric, may purchase renewable energy, and will implement onsite renewable energy where feasible. In practice, for apartment buildings, onsite renewables typically only meet common-area energy demand, with all residential demand supplied from the grid.

Neither document commits to offsetting the remaining operational energy demand with accredited green power, which is a fundamental requirement of achieving genuine Net Zero.

Given these gaps, it is essential that future development applications are supported by detailed Sustainability Reports, including Stormwater Management and Sustainability Management, and associated documentation to ensure the high-level ESD Strategy can be meaningfully implemented.

Key asks:

- Ensure future development applications are supported by detailed Sustainability reports, including Stormwater Management and Sustainability Management, and associated documentation.

Land Contamination

The development plan should consider findings from preliminary environmental assessments and any assessment carried out in accordance with the Environmental Audit Overlay (EO).

It is noted that any contamination management identified through these assessments may influence construction staging, particularly in relation to the management of and potential impacts on Darebin Creek.

Key asks:

- Contamination management should have consideration for potential impacts on development staging as well as the health of Darebin Creek.