

COMMENTS ON THE DAVID LOCK AND ASSOCIATES URBAN DESIGN REPORT

At the outset it is noted that matters such as contamination/ remediation, interface treatment, housing diversity needs, dwelling justification, traffic and transport considerations and service and facility provisions (e.g. open space, community facility and neighbourhood activity centre) will influence the urban design response. Therefore the comments below are preliminary in nature and generally only relate to urban design matters. Concerns and comments made in Council's request for further information in relation to matters such as information regarding staging, the size, location of the neighbourhood activity centre (NAC) and open space areas etc. still need to be addressed. As more information comes to light and planning for the precinct progresses, the below comments may need to be reviewed in the light of any proposed changes.

The submitted David Lock and Associates (DLA) report does go towards addressing Council's request for greater urban design justification. It is anticipated that the amendment package will be informed by the urban design advice of DLA and any other technical reports that are updated. This includes relevant changes made to the planning controls proposed e.g. amending maximum interface heights to two to three storeys rather than three to four storeys.

It is noted however that the DLA report still remains a higher level and overarching document. A more detailed response e.g. adding more depth to the character precincts identified by the Tract DP is expected.

Below are specific comments on the DLA report.

Policy context

1. Section 2.2 of the DLA report touches on the policy context highlighting a number of provisions in Council's Municipal Strategic Statement (MSS) not discussed in the Tract DP but does not go into the details of how the amendment addresses state planning policy, other local planning policy, or the strategic assessment guidelines. Given that the DLA report is an urban design report, this level of planning assessment is not required in the document but is expected to form part of the amendment package. Council has previously highlighted that section two, planning framework of the Tract Development Plan (DP) is lacking in this regard.

Interfaces

2. The DLA report identifies the external interfaces the precinct has and has highlighted design solutions and principles that can guide urban design responses along these interfaces. While it is acknowledged that this is an urban design report, the technical reports such the acoustic report and the pipeline study are expected to inform interface management and design responses. The amendment package should provide a resolution to how urban design, acoustics, vibration, legislative requirements such as setbacks, pipeline consideration etc. can be treated at the interfaces rather than making reference to background reports that require review when determining the appropriate design response along the interfaces. This will help provide more site responsive design principles than what is currently in the DLA report and Tract DP.
3. The pipeline interface along the northeastern boundary is not identified in figure 29 and should be as it can alter design responses along this interface.
4. The DLA report suggests that the D.J.E Palmer site is to remain Industrial 3 Zone (IN3Z) but is still affected by the amendment. The amendment package and the DLA report cannot disqualify this site from further consideration. Interface management along the freeway, pipelines and freight line require consideration. Key matters such as the link north to the Bradmill site must also be ensured by the amendment package. This is discussed further below.

5. Residential interfaces

- a. Interfaces of four storey along Blackshaws Road are not supported. Two to three storey is the Council position.
- b. Existing residential setbacks along Blackshaws Road and New Street should also be maintained by future built form to ensure that the precinct interfaces comfortably fits into the existing surrounding context and have appropriate regard for the existing neighborhood character. The neighborhood character of land surrounding the precinct emphasizes the need to maintain the open feel of the area, maintaining and strengthening garden settings, reducing the dominance of car parking structures and minimize the loss of front garden space.

6. Electrical terminal station

- a. Development hard against the edge of the terminal station as shown in figure 34 is not supported. A landscape setback is required.
- b. Future built form should locate primary living areas away from the terminal station interface as suggested by the Tract DP.
- c. This interface should also have regard to any requirements and setbacks outlined in the *Electricity Safety (Installations) Regulations 2009*.

7. The freeway, freight rail line and pipelines

- a. The matters development at this interface must address still require consideration irrespective of its zone or land use. The impacts of overshadowing, noise, vibrations, pipeline setbacks and odour from freight rail and the freeway on an industrial use need to be addressed in the amendment package.
- b. Similarly, connections to the north (to the Bradmill site) should be ensured by the amendment package.
- c. The design solutions applicable to this parcel of land require greater guidance than what is provided by DLA for the terminal interface.
- d. The amendment package should include recommending referral status to the various stakeholders along this interface to ensure their views are addressed.

8. Internal interfaces

- a. The DLA report identifies existing internal interfaces and future internal interfaces. These include the interface between existing industrial and future residential and future commercial (Mixed Use Zone – MUZ) and future residential. It is expected that the recommendations of technical reports such as the acoustic report will help inform the design treatments along these interfaces.
- b. The interface sections are not shown on figure 35. It would be beneficial to illustrate this.
- c. The community facility is not identified as an interface. While Council has previously stated that it does not have a view of what this should be or how it should look, it is an interface that requires consideration and should be identified as such.
- d. Industrial interfaces
 - i. The interface between 216 – 230 Blackshaws Road and the MUZ land/ NAC requires greater consideration if the NAC is to remain at this location given commentary in the request for further information. Currently DLA only focus on the future residential/ commercial interface in this area. It is noted that 216 – 230 Blackshaws Road currently includes an education centre, medical centre, children's play centre and gym. Therefore is not strictly an industrial interface e.g. similar to Form 700.

- ii. Consideration should be given to integrating this site with the NAC if the NAC is to remain in this location given previous comments in the request for further information.
 - iii. A hard residential edge along existing industrial uses such as that shown in figure 36 will not be supported. Landscaping and appropriate setbacks are required.
 - iv. Landscape areas and setbacks (including laneways) should be catered for within land that will be developed, not land to remain operating as industrial therefore not within the boundaries of the smaller New Street properties or Form 700 as the agent of change will be the incoming residential not existing industrial.
- b. Open space interface
- i. A clear delineation between the open space areas and surrounding development is supported as it helps reduce the open space areas being perceived as private spaces. Similarly, reducing overshadowing of open space areas is supported.
 - ii. However the DLA principles are broad and overarching. More specific design solutions are expected for the various open space areas, linear link and electricity terminal easement.
 - iii. Using height to create delineation between open space areas and surrounding development risks creating an enclosed open space area and is not a desired outcome.
 - iv. Council has previously advised that the heights proposed around the smaller open space areas are not supported. This is still the case. A clear framework is required to ensure that heights and density do incrementally result in an overdevelopment of the precinct because of the lack of certainty provided in the amendment package.
 - v. Front fences higher than 1.2m will not be supported.
 - vi. The open space principles provide an opportunity to integrate the heritage past of the precinct e.g. through interpretive play spaces; walking tracks etc. this should be further explored.
- c. MUZ/ NAC
- i. The suggested principles are basic. More detailed design principles that consider urban design, massing, interaction between residential and the NAC area and the NAC and 2-16 – 230 Blackshaws Road are expected if the NAC is to remain at this location given Council's comments in the request for further information.

Dwelling yield, density and height

- 9. The DLA report reviews a number of urban development sites and concludes that densities of 45 to 60 dwellings a hectare are acceptable. Based on 56.49 developable hectares, the precinct may cater for 2452 dwellings to 3389 dwellings and based on 67 hectares, the precinct may cater for 3015 dwellings to 4020 dwellings. Details are required as to how the amendment package will treat dwelling densities and how the dwelling densities will be capped if they are capped at 3000.
- 10. It is suggested that DLA also consider open space provisions available to the urban development sites they reviewed to give an indication of what is common in such instances.
- 11. The DLA report goes towards providing greater information on dwelling yields anticipated in the precinct. However, little justification is provided for the figures at section six of the report and the breakdown between two to three storey townhouses, three to four storey apartments etc. this is still required. It is noted that Council's road reserve has 18 three to four storey townhouses and 30 five to six storey townhouses. Other questions that require answering include:
 - a. what are assumptions underpinning the number of dwellings in each building (e.g. two to three storey versus three to four storey) are?

- b. what is the relationship between the proposed height, dwelling numbers and density?
 - c. details of whether the densities quoted in section six are gross or net?
 - d. what the basis is for the widths of the bands of five to six storey apartments in figure 43?
 - e. what, if any, is the relationship of the indicated densities in the DLA report and figure 33: Neighborhood and key interfaces character plan of the Tract DP?
 - i. The density table at section six anticipates yields for each parcel rather than the character precincts as per the Tract DP. A spatial representation of the densities in each precinct is required.
 - f. what is the justification for/ explanation for the five to six storey elements of the proposal?
 - g. what is the justification for/ explanation for three to four storey elements in the majority of the precinct? Aside from being transitional heights between the two to three storey interfaces and five to six storey element.
12. It is noted that acceptable density on the precinct will be informed by a range of matters including transport and service capacity. This is one of many considerations planning in the precinct has to have regards to.
13. Council has previously raised concerns regarding the sporadic distribution of density without e.g. around the smaller open space areas and has outlined the need for a clear framework and boundary to avoid the overdevelopment of the precinct. This is still required.

Urban design principles

14. The residential urban design principles and activity centre urban design principles provide a starting point to guiding future development in these areas. However they are still broad and overarching. Ideally the urban design principles would focus on the eight character precincts in the Tract DP, provide a more meaningful distinction and address interfaces including character precinct interfaces.
15. As we work through the amendment package, more comments may be provided on this.

Matters that require consideration in the urban design report

16. In addition to what is noted above, the following matters require further consideration:
- a. design principles addressing the following:
 - i. the integration of 216 – 230 Blackshaws Road, Altona North
 - ii. community facilities
 - iii. specific built form along the internal road network to reduce possible visual bulk
 - iv. possible future built form outcomes such as town house, shop top housing and apartments
 - b. justification for the delineation of the eight character precincts
 - c. the character and built form areas and principles as they are currently broad and generic so as to provide more prescriptive measures to establish a diverse residential neighborhood
17. It is noted that each of the case studies presented in the DLA report illustrate that a much greater level of detail is required for sites are that arguably less complex than what is presented for Precinct 15.
18. The DLA report does address some of Council's comment but does still illustrate an apparent standardised response along public interfaces.