

APMAG

ALPHINGTON PAPER MILL ACTION GROUP...THE VOICE OF THE COMMUNITY

Alphington Paper Mill Action Group Inc. No: A0052813D

PO BOX 5027

ALPHINGTON VIC 3078

admin@apmag.org.au

www.apmaa.org.au

Alphington Paper Mill Development Plan APMAG Submission

Authors APMAG Committee:

Melissa Thyer, Jeff Katz, Tiffany Crawford, Fiona Currie, Kieran Quinn, Louise Hayward,
Leena Green

Date: March 31 2015

Table of Contents

- A. Executive Summary 4
- APMAG Key Recommendations 4
- 1. Design Guidelines 4
- 2. Heritage..... 5
- 3. Landscape / Open Space..... 5
- 4. Economic Assessment..... 5
- 5. Housing Diversity: 6
- 6. Ecological Sustainable Design 6
- 7. Traffic Management 6
- 8. Riverfront..... 6
- 9. Community Infrastructure 7
- B. Background and Introduction 8
- Overview/Criteria – where are we coming from? 8
- Criteria: 9
- C. Detailed Responses to Key Areas 11
- 1. Design Guidelines 11
- 2. Heritage Report..... 15
- 3. Landscape / Open Space..... 17
- 4. Economic Assessment..... 22
- 5. Housing Diversity 24
- 6. Ecologically Sustainable Development 28
- 7. Traffic Management Plan 30
- 8. Integrated Transport Plans..... 34
- 9. Riverfront..... 38
- 10. Community Infrastructure Report 42
- D. Conclusion 45

- APPENDIX A..... 47**
- ECONOMIC ASSESSMENT REPORT & HOUSING DIVERSITY REPORT 47
- Summary 47
- Infrastructure and Services 47
- HOW big is this going to be? 49
- Provision for Community Service space 50
- Urban Social Environment 50
- Sustainable Environmental Impact 50

Solution - integrated diversity	51
APPENDIX B	52
HOUSING DIVERSITY REPORT	52
Summary	52
Current housing infrastructure - Local market analysis.....	52
What is 'affordable'	53
The second paradox.	55
Solution: Integrated diversity	55
Environmental Sustainability.....	56
Building social capital on existing foundations.....	56
APPENDIX C	58
Survey Results	58

APMAG - Submission to Amcor Development Plan

Report Structure

The following submission is the consolidation of a review by APMAG committee of the proponents Development Plan and Technical Report Planning submission and both community meetings and survey inputs.

The submission will comprise:

- A. Executive Summary including Key Recommendations
- B. Background and information
- C. Detailed responses to each of the key areas
- D. Appendices

A. Executive Summary

The Amcor paper mill site in Alphington is the largest urban renewal site in inner Melbourne, which interfaces with an existing residential area and Melbourne's Yarra River. The obvious site constraints, also provide an exciting opportunity to work with the existing community of Alphington to integrate the development and build on the existing social capital. The Alphington Paper Mill Action Group (APMAG) has made a number of key recommendations that we believe are essential to achieve an outcome that can show case best practice urban infill development in Australia. Whilst third party rights were removed when the planning control changed, it is APMAG's viewpoint that an exemplar residential development can be achieved if there is a willingness from both Council and the developers to engage with the existing and new community. Success of this project will be measured by ongoing community participation.

Having surveyed members and considered all planning issues APMAG has identified the following areas of the Amcor development plan to be addressed and made a set of key recommendations for consideration by Council.

- 1. Design Guidelines
- 2. Heritage Report
- 3. Open space /Landscape
- 4. Economic Assessment
- 5. Housing Diversity
- 6. ESD
- 7. Traffic Management
- 8. Riverfront
- 9. Community Infrastructure

APMAG Key Recommendations

1. Design Guidelines

That Yarra Council seek further independent advice following peer review of the Housing Diversity Report to ensure that the housing density and design guidelines are sufficient to meet community's expectations surrounding height and density.

There is no justification for building heights stipulated and recommended by the DPO to be exceeded, as proposed. In particular, building heights along the sensitive river-front demand special attention.

Heights proposed along the northern (Heidelberg Road) boundary of the site are also excessive, and are not justified on the heritage grounds offered.

Density of the site must not be allowed to exceed the capacity of infrastructure and services, existing and introduced, that can support it in the long term.

That Yarra Council introduces an audit review of the design phase which involves both the re-institution of the Design Review Panel and a mechanism for the community involvement, to achieve a quality built form outcome that meets what has been promised in the Amcor development plan.

2. Heritage

That Yarra Council ensures that the community is engaged to consider potential options for the adaptive re-use of the 1921 APM building (No 1 and No 2 paper machines) and the Boiler House Turbine Building for community use such as a public gallery, library, and community facility or performing arts space or even an employment hub for new and emerging industries.

The heritage significance given by the development plan to the Heidelberg Road façade is not justified as holding neither local nor regional significance.

3. Landscape / Open Space

That the landscape concept plan is reviewed to deliver functional open spaces that are within the public realm and are not privately owned and managed under a body corporation.

Open space provision must be in keeping with DPO requirements at a minimum. The Yarra river corridor and so-called “linear parks”, which are actually thoroughfares, should not be included in the mandatory open space provision.

Open spaces must provide for both such active and passive uses that are demanded by the residents and users of the new development. The existence of existing open spaces adjacent to the development site does not in any way obviate the need for open space to be provided on-site, and should not be taken into account in the meeting of that provision.

That a detailed design landscape concept plan needs to address permeability both within and through the site including more generous road widths to provide better access and integrate the new, with the existing community of Alphington.

4. Economic Assessment

That the economic assessment look beyond evaluating the business case for supermarkets to the economic impact of the development on the current and proposed community.

That the economic assessment for supermarkets be revised with accurate geographical and existing service data.

That a more diverse food retail environment be fostered, with an emphasis on fresh, independent, local food, resilient systems, genuine competition and low duplication with other big-box duopoly mall environments.

That supermarket floor space be limited in the Village Precinct to support this.

The City of Yarra as the Responsible Authority should have carriage of the conservation processes in relation to the 1921 APM boiler house and the Turbine Building. Moreover if the City of Yarra is responsible for the ongoing management and decision making rather than the developer it will ensure the adaptive re-use of these buildings for new and emerging businesses to grow organically and pay lower rent.

5. Housing Diversity:

That and strong focus on integration and diversity be brought to the site plan to soften the demarcation between 'affordable' and prestige dwelling types, caused by stark zones within the development

That affordable housing consciously include the family market

That the definition of affordability for apartments be measured against apartment benchmarks

6. Ecological Sustainable Design

That an integrated approach to energy management for the development be requested from the proponent (i.e. an Integrated Energy Management Plan, as with Transport). We would expect, for example, that a holistic and measureable process for minimising energy usage, and implementing on-site renewable energy would be available at this stage of the project, in order to ensure future decisions are reflective of an agreed, optimal approach from the outset.

That an overall integrated management approach to energy efficiency is achieved for the site with serious consideration given to a zero emission precinct, facilitated via an energy services company.

7. Traffic Management

That Yarra Council undertake a peer review of the Traffic report and require an independent analysis and detailed design solution to the aspirations and goals presented for the site by development plan.

The Transport and Integrated Transport Plans that form part of the development plan we consider to be flawed in that they do not provide adequate modeling of the existing or new traffic situation and cannot be relied upon for informed decision making.

Solutions for safe pedestrian or bicycle movement throughout the site and linkages to the broader transport network and must also be a requirement of the final approved Development Plan.

8. Riverfront

That Yarra Council should take ownership of the 30 metre setback from the river edge and consider a mechanism such as S173 Agreement to levy the developers for the cost of any landscape works associated with managing this important community asset.

That Yarra Council should involve the community with any decision making about the riverfront given the Yarra River is a valued community asset.

Any use or improvement of the river corridor must:

- Respect and enhance the ecological significance of the river and environs
- Ensure maximum accessibility by all

9. Community Infrastructure

That independent, detailed analyses be undertaken to assess both capacities and current patronage of existing social and community infrastructure supports, and realistic, robust projections made to ensure delivery, as a condition of approval of a development plan, of additional educational, recreational and other facilities and services necessary to address and anticipate the long-term requirements of the significantly more populated Alphington/Fairfield locale that will result from the development. Such infrastructure must include (but is not limited to) primary and secondary school accessibility, early-years services, community services and facilities (e.g. Alphington Community Centre), multi-purpose indoor sports courts, active and passive open spaces and recreational facilities, aged care services etc.

That Yarra Council puts in place, as a condition of approval of a development plan, processes for ongoing detailed consultation with the community, including and beyond the scope of the Council auspiced Amcor Community Needs Analysis Working Group.

B. Background and Introduction

The Alphington Paper Mill Action Group (APMAG) is an Incorporated Association established in 2009 to represent the interests of 5000 nearby residents in regard to development of the former Amcor paper mill site in Alphington. With over 800 subscribed members, and widely recognised throughout the Alphington/Fairfield community as the key proponent of community and wider stakeholder interests with respect to the proposed development, APMAG is in a unique position to offer an insight into the community's needs, concerns and issues as to the Amcor development plan or the 'Alphington Paper Mill development' as referred to by the developers Alpha Partners and Glenvill.

Since its inception APMAG has consulted regularly with its members and with the wider community. Through member updates, public meetings, surveys and social media, key community concerns have emerged and remained consistent to the present time. These concerns are:

Protection of the riverfront, ensuring a diversity of housing stock, effective traffic and parking management within and external to the site, the size and impact of any proposed retail and commercial floor space and size, location and design of open space.

Based on community concerns, APMAG developed 4 key platforms to reflect the majority of local residents' views as to what is required in any development of the Amcor paper mill site. These are;

- Protection of the riverfront
- Educational services
- Community infrastructure and services
- Ecological Sustainable Development

On 16 December 2014, APMAG raised the issues of housing diversity, retail floor space and the proposed 'Riverside Park' at the Yarra Council meeting, when Council authorised the public exhibition of the Amcor Development Plan, subject to finalisation of the reports to comply with the requirements of the DPO schedule.

During the public exhibition period, APMAG held a public information session on Thursday 5 March that was attended by over 65 residents. APMAG established an online survey that was completed by 99 residents and the results are set out in Appendix C

APMAG has prepared its submission on the Amcor development plan to the City of Yarra through the lens of community discussion at our information session and results obtained from the online survey, as well as listening to our members over the past years.

APMAG has reviewed the Amcor development plan and critiqued the supporting documents based on the issues felt most strongly by the community. These issues are addressed in the main body of the submission and further detail is provided within the appendices to the submission. These include;

- A. The Economic Assessment Report
- B. Housing Diversity Report

Overview/Criteria – where are we coming from?

The vision for the Amcor site, as outlined in the DPO Schedule 11 is to become a sustainable, *predominantly* residential community. APMAG strongly supports this vision and notes that the DPO Schedule provides the mechanism to achieve an exemplar residential development that integrates the new development with the existing community of Alphington.

However, APMAG considers that the proposed vision outlined in the development plan extends beyond the Council's vision of a predominantly residential community. Instead the magnitude of the retail and commercial precinct is indicative of a Major Activity Centre rather than a Local Neighbourhood Activity Centre. APMAG believes that it will cause enormous detriment and change the nature of the surrounding residential area. The impact can be measured by traffic volumes, high number of visits to the site and demand for public transport. Further, it will change the surrounding predominantly residential neighbourhood character of Alphington. It can further be expected that pressure will be placed on the surrounding residential area to acquiesce detached single dwellings and consolidate lots for townhouses and apartments. For these reasons we anticipate that the quantum of retail and commercial space will irrevocably change the neighbourhood character of Alphington.

It should be noted that in APMAG's view, the Alphington community has, for the most part, indicated a willingness to accept change and the vision set out in the development plan to provide a predominantly medium to higher density residential development, however, this has always been conditional upon the delivery of appropriate and sustainable community infrastructure, concomitant with the needs of the larger community, in the long term.

The limited information contained in the Development Plan has given the community little confidence that the delivery of community infrastructure is a serious component of the plan and that will actually be delivered. A visionary approach would seek to ensure that the intangible links that can be harnessed through investment in community infrastructure and services that can help to build on the existing social capital of the established Alphington community, allowing integration with new residents, empowered to share it, to the enhancement of a better, larger local community. Instead, the development plan as it stands appears poised to denigrate and diminish existing social capital that has been built over a very long period of time.

Beyond the provision of services, many other opportunities for integration of new residents with existing communities can be seized. For example, with thoughtful subdivision layout. It is the informal pedestrian permeability at present that enables people to wander down to the river that contributes to the area being such a desirable place to explore. The proposed development plan has unfortunately overlooked the opportunity to link east (Alphington) to west (Amcor site), despite the indicative framework plan of the DPO Schedule clearly requiring an east west pedestrian and bicycle link through the site. Instead the proposed development plan shows that the only permeable sub precinct is in 4A from Alphington Park into the site. Pedestrian linkages are instead linear and focused on north – south with no destination at the end of the trail. Further, the linear trails have no setback from the imposing built form, particularly evident in the north-west corner, which will to create a wind tunnel, rather than a desirable place to gather and walk. The subdivision layout is an obvious approach to link, connect and integrate the new community with the existing community of Alphington and is a missed opportunity in this plan.

To this end APMAG has formulated a set of criterion to evaluate those elements of the development plan that are the most heartfelt by the community.

Criteria:

A development that integrates the new with the existing Alphington community as one.

To achieve this we submit that the following be considered by Council as minimum standards against which the development plan be considered, alongside the DPO and other relevant planning schemes;

- a. Provision of infrastructure and services to meet the needs of the whole Alphington Community - both new and existing;
- b. A sustainable development to balance social, economic and environmental elements; and
- c. An excellent urban environment that preserves and enhances the existing social capital of the Alphington community and provides opportunities for continued enhancement of social capital.

The information and data obtained from the oral submissions gathered at APMAG's information session and online survey results, provides the evidence that these attributes are important.

C. Detailed Responses to Key Areas

1. Design Guidelines

The DPO Schedule 11 sets out the design guidelines and principles for the site which the Amcor development plan has responded to. The Design Guidelines are a comprehensive outline of each precinct and the planning for each development lot, the purpose of the Design Guidelines is to articulate the vision for the development outcomes of the mixed use village and residential development. They are stated as being the result of the design outcomes from Planning Report, Site Master Plan and Landscape Plan. The Design Guidelines also consolidate the recommendations of the technical reports including the Traffic Management and Integrated Traffic Plan.

The Building Heights Plan is also set out in the DPO Schedule 11, which provides an indicative density for the site. In APMAG's survey heights and density emerged as a key issue of community concern through the consultation period. APMAG has additionally received a range of submissions expressing concern about the impact of the development including sun shadow and the heights of the corner development. 77 percent of respondents to APMAG's survey indicated that the building heights proposed were too high whilst only 1 percent (1 person) indicated that the buildings were not high enough. Whilst the DPO Schedule building heights plan provides indicative densities for the site, APMAG is concerned that the proponent's Design Guidelines are limited and do not provide enough strength to deliver the built form outcome that will meet the community's expectations of an exemplar residential development.

In APMAG's survey 46 percent of respondents rated the Design Guidelines as 'poor' on the basis that they don't give the community enough assurance about the quality of the final built form. APMAG has formed the view on the basis of the survey results and its own scrutiny of the Design Guidelines that they are not sufficient and provide the opportunity for creative licence when interpreting these guidelines. APMAG wants to see development of the Amcor site as an exemplar residential development and it is evident from the community's perspective that what has been promised in the development plan for each precinct, needs to be overseen and monitored at a much higher level than local government.

In particular APMAG contends that the private and communal informal open spaces are not adequate. The open space nominated for multi storey, high and medium density dwelling stock averages 6m² of balcony areas, and those residential dwellings located on the river front are so designed that rather than open space on ground level their open space is nominated as roof gardens. This designation of medium density and lack of private space does not reflect the existing Alphington character where even the two storey walk-up units of St Bernards Road have garden areas and open spaces available to communal use.

The urban streetscape of the Gateway Precinct is suggested to comprise mainly residential usage and respond to the language of the adjoining residential streetscapes. What is unclear is how a four storey plenum with an additional 3 storey setback will respond to the single storey dwellings opposite on Parkview Road. (As illustrated on Fig 133 on Page 125 of the Development Plan report.) Indeed the shadow diagrams of Section 5.10 only show the 2pm equinox, which illustrates that shadow will only cover about half of Parkview Grove. These diagrams could be further extended to show the times when

shadow will impact on adjoining singles storey residential areas and the adjoining parklands and the times at which these residences will be fully shaded.

The suggested footprints and sections shown throughout the report show the apartments and town houses indicative footprints – these include apartments and town houses. A number of these show internal rooms without natural light or ventilation, this is of concern to the community in that this style of dwelling is unhealthy and provides inadequate living conditions.

The location of the pocket park at the base of the Village Precinct Tower is of concern as the north south wind tunnel created by the proposed pedestrian link through the precinct will render this area almost unusable and unpleasant, especially as a suggested park and playground.

The community has voiced a range of concerns about the Community Precinct nominated as part of the Village Precinct zone. These concerns include

- *Concerns about a high rise school*
- *How the community facilities link with the residential areas both proposed and existing*
- *Why the community facilities have been relocated from the Park Precinct adjacent to the existing parkland and closer to the existing community*
- *A range of comments also are negative about the height of this corner feature.*

The Riverfront Precinct or area 7B is of key concern in that it comprises banks of residential apartment that generate an almost 100 percent site coverage. Other developments along the river banks have been limited to lower site coverages and increased public access or pedestrian permeability into the riverfront precinct. Of concern also is that the open space suggested within the plan for these apartments is roof gardens – an illustration of the proposed dense nature of this precinct dwellings. This density again risks further alienating and privatizing riverfront

Local community concern about the density and lack of facilities is articulated in a number of the survey responses

- *Current density in the area is 30 people per hectare. (8578 ppl /288.5 Ha - ABS 2011) Indicative densities are 290 people per hectare. (4,800 ppl/16.5Ha) A tenfold increase in density is extreme.*
- *the interface between the site and the rest of Alphington, and surrounding roads, is the big question ... The site itself seems not so bad to me ...*
- *The population density is real a concern. To be doubling the population of our wonderful suburb is disturbing.*
- *Density is too high. Open public space is too little.*

In light of APMAG's three criteria for assessing the integration and provision of an exemplar development each of the criteria are reviewed below;

- a) **Provision of infrastructure and services to meet the needs of the whole Alphington Community both new and existing;** the infrastructure and services proposed within the Design Guidelines include the educational, community facilities and early learning centre. It is commendable that these aspirational provision have been included within the plan and proposed as part of the services of the site. The concerns about integration and maintenance are not resolved in detail within the report – who will own and run these facilities?
- b) **A sustainable development to balance social, economic and environmental elements;** the sustainable balance of social and environmental needs has been

discussed in detail across the Design Guidelines, the one key criticism of the proposal is that private and communal informal open spaces are not adequate, roof gardens on the riverfront and 6m² balconies for single bedroom dwellings do not reflect the high residential amenity aspired to by the development.

- c) **An excellent urban environment that preserves and enhances the existing social capital of the Alphington community to foster social capital.** The Alphington community is cognisant that Melbourne's population is growing and urban infill is the optimum solution for managing that increase. The community has expressed extensive concerns about the density and high proportion of 1 and 2 bedroom dwellings that are proposed and the lack of facilities then provided for those residents. Assessments of the Housing Diversity reports suggests that assumption based on the need for smaller dwellings is based on incorrect or inadequate data and that the opportunity for larger dwellings within the more densely developed precincts would improve opportunities for enhancing the social complexities and indeed the social mix and variety that makes Alphington today.

APMAG recognises that the Amcor development plan has gone through two formal reviews and one informal workshop with the Design Review Panel of the Office of the Victorian Government Architect. To this end APMAG recommends that another step is introduced into the planning application process, an audit review of the design phase. This could be achieved by reconvening the Design Review Panel to review and monitor the proposed plans from the super-lot subdivision stage to approval of the planning permit application by Council. APMAG contends that balance has not been achieved in the development plan. The proposal goes too far and seeks to maximise financial returns at the cost of good design, sympathetic treatment of the Yarra River, functional public spaces and open space. This level of transparency is required, to give the community a level of assurance that the design guidelines as outlined in the development plan will actually produce a high quality built form outcome.

APMAG also requests that the community is involved in the audit review of the design phase alongside the Design Review Panel given that a DPO is not the most ideal planning control if it significantly affects third party interests and adjoins established residential areas, as noted by the VPP Practice Notes. The community quite reasonably is concerned about the privately owned and publicly use spaces which should be in the public realm; permeability within and through the site and delivery of open spaces that we know will be determined at the super-lot subdivision stage and therefore the community should be consulted.

It is APMAG's contention that the measures of an audit review of the design phase needs to be agreed to before the development plan is approved by Council. Reasonably the proponent will need to be given sufficient time to amend the plans before the planning application is submitted for approval. The introduction of these steps is critical to give certainty to both the community and the developers given there is a likely possibility that other parties will be introduced to the site when the sub-precincts are sold off in the super-lot subdivision phase and the developers will lose an element of control. If these measures are introduced the developers will be to showcase the Amcor site as best practice urban infill development in Australia, as they've indicated to APMAG is their intent.

Recommendations:

1. The Design Guidelines be reviewed to increase and alter the amount and quality of open available to each resident

2. The design of each dwelling should reflect the best standards for living with natural light and ventilation provided to all habitable rooms.
3. The dwelling mix be reviewed not just on the stated market demands but after a review of the Housing Diversity Report and an increased understanding of the variety of existing dwellings existing within the existing neighbourhood. Although there are many single detached dwellings the number of unit and townhouses within the precinct are increasing and extensive.
4. Open space designs be reviewed to ensure that the linear open spaces proposed are modulated in design and not the private access mews for the use of residential access.

Key Recommendations:

That Yarra Council seek further independent advice following peer review of the Housing Diversity Report to ensure that the housing density and design guidelines are sufficient to meet community's expectations surrounding height and density.

That Yarra Council introduces an audit review of the design phase which involves both the re-instigation of the Design Review Panel and a mechanism for the community involvement, to achieve a quality built form outcome that meets what has been promised in the Amcor development plan.

2. Heritage Report

The DPO Schedule requires a Heritage Assessment Report that must assess the cultural heritage of the site and identify any sites, buildings or structures of significance.

The reuse of materials, incorporation of machinery as site markers and interpretive signs, to retain links to the site's industrial past, is welcomed. Remnants of the branch line to the western edge of the No 4. Boiler House should also be retained in situ as part of the sites industrial history. We note the comments of Lovell Chen that one approach is to retain buildings and conserve rather than restore them. The rationale for a conservation policy is that these buildings are of primary historical importance and provide the context and key to understanding the heritage significance of the site. APMAG would be delighted to see the adaptive re-use of the 1921 APM building (No 1 and No 2 paper machines) and the Boiler House Turbine Building for community use such as a public gallery, library, and community facility or performing arts space or even an employment hub for new and emerging industries. APMAG would recommend involvement of the local community to consider potential options for adaptive re-use of these buildings. If the buildings were in public use it would ensure their long-term viability as an important local cultural / community facility in order to retain the buildings heritage values and fabric, and provide exciting, interesting public places of note in the area.

APMAG is concerned however about the legitimacy of the proposal to retain selected buildings. Two buildings in particular are presented as possessing questionable heritage value, presumably in order to maximize height and bulk:

1. Heidelberg Road (machine room 6 orange building) This building presents an inhospitable and dominating façade along Heidelberg Road and has no setback from the footpath. Its retention limits opportunities to create a welcoming and more aesthetically pleasing entrance to the new development. The developers have indicated Council requires the retention of this building and if this is the case, we ask that this be reexamined.
2. 1954 Boiler House. This building is one of the largest on the site and sits in very close proximity to the river where it would not otherwise be permitted. Its retention is a dangerous precedent for the construction of high buildings close to the river, which is not supported in the Yarra Planning Scheme or by the State Government and its protection of the river corridor. The reinterpretation of this building and especially the curtain glass wall will undermine any heritage value. The building has questionable aesthetic appeal and is inappropriate in its riverside context now that factory operations have ceased.
3. In the event that the Boiler House is retained, we note that one of its heritage values is the existing glazing and frosted, industrial glass – a distinctive feature of curtain wall architecture. In the event the building is retained, we ask that Council ensure such heritage aspects are reinstated as the existing materials have been variously destroyed, damaged and vandalized and require replacement.
4. APMAG also questions the location of the Industrial Heritage Piazza at the end of the Riparian Link, which is not located adjacent to the industrial buildings proposed to be retained. That is; 1954 Boiler House, Turbine Building and 1921 APM Building. As outlined, opportunities should be explored with the local community to consider options for the adaptive re-use of existing significant industrial heritage buildings.

Key Recommendation:

That Yarra Council ensures that the community is engaged to consider potential options for the adaptive re-use of the 1921 APM building (No 1 and No 2 paper machines) and the Boiler House Turbine Building for community use such as a public gallery, library, and community facility or performing arts space or even an employment hub for new and emerging industries.

3. Landscape / Open Space

The DPO Schedule 11 sets out the requirements for a Landscape Concept Plan. In addition the Yarra Planning Scheme requires 4.5 percent contribution of either land or cash towards open space. Yarra Council endorsed a 4.5 percent land contribution, which is approximately 0.75 hectares in area. The proposed landscape plan provides open spaces in two formats – “Public and publicly accessible space”... The *Linear Plaza* and *Paper trails* are listed a publically accessible whereas the plaza in the *Industrial and Heritage precinct*, *River Park* and the *Heritage Riparian walk* are proposed as Public pace. In APMAG’s survey 79 percent of respondents stated that they believed the plan was insufficiently serviced for open space to service the needs of residents on the site and surrounding area. Less than 3 percent of respondents thought the area was over serviced for open space.

APMAG is disappointed that the development plan has not provided more open space. Importantly, we note that the riverfront has been included within the public open space calculations of the development – this cannot be supported as the River area is not part of the development and is required under the DPO to be set aside in any event. This land must be handed over to the authorities and is not part of the development but rather adjacent open space that can be accessed in the same manner as Alphington Park. In addition the river-front is mostly a 30% sloped area from the escarpment to the water’s edge.

However there are a number of concerns about the quality of the open space proposed. The Linear Park or Riparian Corridor is a 10m wide pathway bounded by 10m (approx.) high townhouses, whose front access is directly from the pathway, the dimensions of the space are 10m and 150m long with no modulation or variety within that space. It is a corridor with limited opportunities for sunlight which will limit the growth of any planting proposed within the zone and limit the healthy growth of the proposed swale plant species.

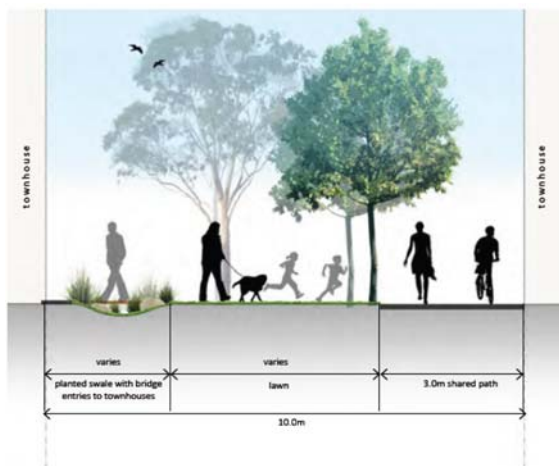


FIG. 82: RIPARIAN HERITAGE LINK: SECTION

Figure 82 from Page 91 of the report shows people using the Riparian Corridor shared path where the people and path scales are not matching – the people are too small and the illustration indicates the aspirations for the landscape planting that do not match the practicalities of the proposed space limitation.

The Linear Plaza is located at the Main Street Entry from Heidelberg Road at and is designed to act as a retail interface rather than a community gathering place, again its dimensions of 15m wide and around 120m long do not encourage that passive gathering and social activity that can be found around the BBQ’s in Alphington Park. The design is

one that offers linear pathways and plazas that encourage movement through the space rather than a place to stop, gather and encourage community interaction.

The Landscape Plan and suggested designs state that they wish to emulate that Alphington traditional streets however the existing street patterns include informal pedestrian linkages across the north/south street network – these informal micro scale of pedestrian permeability is not duplicated in the street layout or block designs across the development. Indeed the density of the proposed development will exclude possibility of linkages to the river and parklands.

The Yarra River bank is not a Park – **it is the riverfront, flood zone and riparian zone and bush land but NOT a PARK space!** The Landscape Plan appears to be illustrating mown lawn and cultivated retaining walls be incorporated into the existing remnant (although degraded) bush land along the river. The houses that front the river front appear to be offered private access to river front through the shared pathway that links their river frontages and the access paths suggested. If public pedestrian access was provided through permeable links in the structures and dwellings this risk of “private” riverbank would be eliminated. Indeed the statement is made that. “The design of the interface also considers the obvious need for individual **private** riverfront access to the River Park” Why is that private access obvious?

In addition the Landscape plan suggest links to the surrounding open space network in that they are mentioned by lacks detail on how interpretive links to Alphington Park and other river spaces would be created. The plan lists locations like the swimming pool but then does not address them – it appears to be more a marketing ploy than a design no link interpretation.

One key question that is not answered within either the Landscape Plan or any of the technical reports is details of who will develop and manage the river park?

In general the pedestrian access routes proposed are the Paper Trail and Riparian Link these are proposed as pedestrian access route between apartments and village shopping precinct. However the Paper Trail has no direct link to Heritage Precinct and River. Pedestrian access routes require drivers for use – a destination, an access requirement or to be part of a travel route. The Paper Trail in particular with the stepped access down to cross roadways and no priority treatment at that crossing point, and its termination without linkage to the Heritage precinct appears to lack the drivers for success. – Yes there will be residential access off them – but they do not have the incidental or destination purpose that the main street spaces may contain?

Ecological analysis of the proposed design is also not a requirement of the Development Plan however with the extreme sensitivity of the Yarra River adjacent to the site this should be undertaken by council as part of the review of the plan. In addition trees identified as significant from Arborist report - are not identified or delineated on master plan or precinct plans? There is no detail on how are they to be retained and integrated into new landscape?

Reviewing the above information and statements in the light of APMAG’s three criteria and aspiration to have an integrated community we find that

- a) **Provision of infrastructure and services to meet the needs of the whole Alphington Community both new and existing**

To best serve the infrastructure needs of open space within Yarra communities the City of Yarra Urban Space Strategy requests

- Opportunities for extending the feel of open space using pedestrian/green link
- Incorporate accessible design principles into design of public spaces
- ...additional links – both pedestrian and bike to open corridors

The argument that the *Heritage Riparian Walk* and *Paper Trail* are acting a pedestrian or green links that extend the open space is lost in the dimensions of the site – the *Heritage and Riparian Walk* is 10m wide and 150m long and offers entry to the front residential dwellings. There is no modulation in within the extent of the walk – no link to Alphington Park (open space) nor is there a generation of the perception of open spaces; it is an access way pedestrian street to access the dwellings not a thoroughfare for visitors to link the river and remainder of the site.

The Paper Trail is an elevated walkway again giving access to private dwelling entries, but more importantly does not provide accessible design standards to users – rather there are stepped transitions between the walkway and road crossings. In addition there is no suggestion of pedestrian priority or refuge or protection at these street crossing points especially over Main Street.

Lastly, addressing the City of Yarra Urban Space Strategy, additional links to open space have also only been provided to the river at the *Industrial and Heritage Plaza*. The opportunity for permeability through the dwellings into the river front with pedestrian mews or passage ways as offered in the residential areas of the Park Precinct 4A has not been developed in the river front. The only areas offering links into the open space are the housing within the Park Precinct areas where small lanes and roads actively lead to Alphington Park

Yarra River frontage is a Riparian Zone and flood plain – the proposed imagery of the landscape plan is for that area to be a mown lawns and freestone retaining walls. The Development Plan acknowledges that the 30 meter river precinct is to be ceded to City of Yarra or other authority and suggests a range of treatments without addressing long term maintenance or who will fund the proposed works within this area.

b) A sustainable development to balance social, economic and environmental elements;

To be truly sustainable, a balance must be kept between the social, economic and environmental aspects of all part of the proposed development.

Within the landscape plan the social aspect of the design sustainability has been to provide the *Linear plaza* as the village center – that village comprising the retail service area and community hub. It is regrettable that as a space some 15 metres and 120 metres long and located adjacent to Heidelberg Road and the vehicle entry to the site, the *Linear Plaza* will be noisy and traffic affected, and isolated from the rest of the development by Main Street. This Plaza cannot be seen to balance the environmental or social needs of the community – it will be a hard paved area used as an entry area to the retail areas – lacking softer landscaping and passive modulated pedestrian links into the development and other foci of the site.

The riverfront is a sensitive ecological precinct of great environmental value – it is that environmental value that makes its contribution to both the economics of the development

and the social values of the site. Further, it is the fantastic riverfront environment that contributes to making Alphington so special. The development plan has not capitalised on this unique context in the creation of public spaces, for example by recreating leafy, bush-land environments through the site and particularly in the public areas.

The linear open spaces and pocket park do not offer sustainable open areas within the development, the linear spaces are too narrow, bordered by multi storey dwellings to allow a reasonable variety of plant materials to thrive – their fragmentation also by the vehicle paths also break any opportunity for the linear parks to act as wildlife corridors.

The pocket park in addition is located at the foot of the 14 storey buildings with a north south passage adjacent and leading into it. This will act as a wind tunnel, funneling wind through the paper trail entry off Heidelberg Road and into the pocket park; not a sustainable space for either people or planting.

By elevating the paper trail and offering this as planted open space bounded also by multi storey dwellings there is limited opportunity for depth of planting medium that is required to establish or allow larger trees to thrive. This is in contrast to the sections and diagrams included within the proposal. Further, as publically accessible sites rather than public spaces, these areas are unlikely to be maintained to a standard necessary for public access in perpetuity. This role properly sits with Council and as such, APMAG considers that all land that is publically accessible should be public land rather than owned and controlled by owners' corporations.

c) An excellent urban environment that preserves and enhances the existing social capital of the Alphington community to foster social capital.

It is recognised that good quality open space is important for community mental and physical health, and that open space should not only comprise sporting facilities but public plazas, playgrounds and wooded areas. There is evidence associating the presence of attractive public open space with enhanced mental health for adults, and that access to nature and green space assists with children's mental health.

The proposed development has lost the opportunity to provide the complimentary open spaces to the adjacent Alphington Park sporting facilities and the wooded areas of the river.

The open public spaces within the precinct appear to be pedestrian "street" based corridor access ways to the dwellings and the retail plaza. There is not a clear Hub or community central zone linked with continuous pedestrian links into the residential precincts. Indeed the privately owned publically accessible open spaces such as the Linear Piazza and linear paths should form part of the public realm and a critical issue for the community will be access to the publically accessible buildings and facilities.

An assumption appears to be that Alphington Park will provide sufficient passive open space for the new community. The lack of variety in the open passive areas within the development will further inflame the current conflicts that 52 weekends each year of sporting use of the oval and about 48 weekends a year use by the dog training club mean the only "passive open space" within Alphington Park is the BBQ area and riverfront.

Thus the proposed development cannot be found to meet the open spaces needs of either the new or existing Alphington Community that are required to foster social capital.

Recommendations:

That the landscape concept plan is reviewed to deliver functional open spaces that are within the public realm and are not privately owned and managed under a body corporation.

That a detailed design landscape concept plan needs to address permeability both within and through the site including more generous road widths to provide better access and integrate the new, with the existing community of Alphington.

4. Economic Assessment

The DPO Schedule 11 requires an economic assessment report to consider viable employment generating uses for the site and the viability of a neighbourhood activity centre on the site. In APMAG's survey 48 percent of respondents indicated that the proposed retail and commercial floor space *over services* the needs of the site and the surrounding suburbs. Only 8 percent of respondents believed that the proposal did not provide enough retail and commercial floor space.

a) Provision of infrastructure and services to meet the needs of the whole Alphington Community both new and existing

It is APMAG's conclusion that the economic assessment report is unfortunately a business case for supermarkets in Alphington and does not question the impact of supermarkets versus other retail channels or discuss any other economic impacts of developments other than supermarket income. The development proposes 9,000m² of supermarket floor space alone, plus as much again in other retail floor space. Alphington's primary retail catchment area includes the strip shopping centre of Station Street, Fairfield and Ivanhoe Plaza, Heidelberg Road. Wilsmere, East Kew, which provides 1,000m² retail floor space is not within Alphington's primary retail catchment. The community avoids crossing the Chandler Highway Bridge to travel south for retail shopping, hence inclusion of this area in the economic analysis is a misguided and has allowed MacroPlanDimasi to misconstrue their findings. The proposed development plan has ignored the DPO Schedule requirement to deliver a viable neighbourhood activity centre on the site, which is found in the diverse localised shopping experience offered in Station Street, Fairfield with fresh and independent food retail acting as the anchor and independent cafes and restaurants generating day and night vibrancy to the neighbourhood.

b) A sustainable development to balance social, economic and environmental elements;

The analysis contained within the economic assessment report has occurred from one prism and successfully created a business case for supermarkets at the expense of considering social, economic and environmental elements. The business opportunities from a social perspective are endless. One obvious example to create spaces for small businesses to organically grow. Existing industrial heritage structures such as the original 1921 APM boiler house or the Turbine Building could enable light industries such as textiles, to flourish and grow. These spaces are vital for new and emerging industries and the adaptive re-use of these buildings provides a wonderful link to the site's industrial heritage as a paper mill.

The economic benefits of encouraging adaptive re-use of the site's industrial buildings is the obvious creation of new and emerging jobs for the residents of Yarra. It will generate much needed diversity which is absent in the development plan with employment currently confined to the Village Precinct in basic service industry roles whilst APMAG's suggestion would enhance the rich social fabric which already exists in Alphington and is essential to the growth of any new community.

The environmental benefits of a creating local jobs for local people is an obvious benefit. Many new businesses are forced to relocate to Melbourne's outer suburbs where land and rent is much cheaper yet these businesses are disconnected from the services available in the inner city. The ability to connect with potential sales markets within the inner city is an obvious environmental benefit with reduced travel time and costs. The proposed

development should be creating these business opportunities for the new residents of Alphington and draw on our highly qualified skill set where 27 percent of existing residents have either a technical or higher education qualification (ABS Census 2011) which is 5 percent greater than the State average for Victoria.

<http://www.censusdata.abs.gov.au/census_services/getproduct/census/2011/quickstat/SC20015?opendocument&navpos=220>

c) An excellent urban environment that preserves and enhances the existing social capital of the Alphington community to foster social capital.

The proposed development plan has missed the opportunity to build on the existing social capital of the Alphington community, which is offered for instance through the localised shopping experience found at Johnny F's Fruit and Veges or Bill the Butcher opposite Alphington Train Station. An extension of these retail forms such as the provision for Farmer's markets is what the community desires rather than seeking opportunities for multi-national retail Franchises such as Gloria Jean's Coffee, is an essential element to integrate the new with the existing community of Alphington. APMAG is not confident that this will occur. In fact the economic assessment report is demeaning in that it confines employment benefits to the low paid, low security nature of retail service work and implies that supermarkets create social or community hubs. APMAG encourages the developers to come along to a Friday night at the Bowls Club during summer or fairy floss at the school fete and we'll show you a community hub and this is how social capital can be fostered.

Recommendation:

The City of Yarra as the Responsible Authority should have carriage of the conservation processes in relation to the 1921 APM boiler house and the Turbine Building. Moreover if the City of Yarra is responsible for the ongoing management and decision making rather than the developer it will ensure the adaptive re-use of these buildings for new and emerging businesses to grow organically and pay lower rent.

5. Housing Diversity

The DPO Schedule requires that a Housing Diversity report must be prepared for the site. In APMAG's survey, respondents were given a breakdown of the proposed number of residential dwellings and types and asked their view about this in terms of housing diversity within the development and in the context of the broader area. Less than 4 percent of respondents believed that the proposed development was adequately diverse whilst 70 percent of respondents believed instead that the proposal was heavily concentrated.

a) Provision of infrastructure and services to meet the needs of the whole Alphington Community both new and existing

APMAG has formed a position that housing diversity is a high priority for the Alphington community but acknowledges that it contains a stark paradox. Local people look at the development proposal and see an overwhelming majority of one and two bedroom apartments which feels radically out of step with their lived experience of Alphington's current character. The Housing Diversity report looks at Alphington and sees an area with an overwhelming majority of expensive detached family homes that requires a large volume of smaller, more affordable homes to balance and provide diversity. Both the local community and the developers think housing diversity is an important goal. Both parties think improving affordability and access is important. Both parties may be right, but the developer has missed an important opportunity to deliver affordable *family* housing.

The provision of infrastructure and services to meet the needs of the whole Alphington Community, both new and existing, requires the delivery of diverse housing typologies that cater for all segments of the community. APMAG believes that housing diversity cannot be achieved if 88 percent of the dwelling stock is one and two bedroom dwellings. Housing diversity is a broad range of housing typology and this development is so big it not only can deliver housing diversity but it must. The best case is that the developer attracts a genuinely wide range of people who see themselves investing and living in Alphington for a while, at both the affordable end, and at the middle and high end of the residential market. These segments should be present in both the medium and high density zones. This will prevent a 'ghetto versus millionaire's row' problem across the north and south ends of the development as well as to prevent a self-created glut in anyone segment both in buying and selling within this market.

b) A sustainable development to balance social, economic and environmental elements;

Housing diversity can contribute to a sustainable development that will balance social, economic and environmental benefits to the community. A socially diverse community avoids the scenario of a high proportion of one and two bedroom units which is attractive to the international wholesale market, who rent to young couples, who all get onto the 7.49am train to the city, all have babies and hit the early learning centre within 5 years and all realise they cannot raise their kids in an apartment and leave in a synchronised wave. This is a problem and the answer is diversity.

Housing diversity can deliver economic benefits through the provision of affordable housing. In fact the DPO Schedule actually requires a criteria for determining affordable housing stock. Affordable housing typically means 80 percent of market value. The developer argues that "a significant release of new stock to market with a price range

between 50 – 70 percent of the current median price” more than meets DPO affordability requirements. This is a bogus analysis. The median price in Alphington does not buy a one or two bedroom apartment, it buys a 3 bedroom detached house with land. The median **Unit / Apartment** price in Alphington is \$490,000, which therefore makes an ‘affordable’ unit / apartment in Alphington worth \$400,000. The Alphington community has expressed a strong stated concern for housing affordability, driven by a sense of social justice, inclusion and a desire to live in a balanced and interesting community.

The environmental benefits of providing diverse housing assist to create liveable communities and neighbourhoods. Plan Melbourne, Metropolitan Planning Strategy identifies the Amcor site Alphington in the Central Subregion as an urban infill site, which is a unique opportunity to deliver suitable housing choice and affordability within a medium to high density development. APMAG recognises that a more compact city will ensure better use of transport infrastructure and encourage active forms of transport such as walking and cycling. Having said that there is an expectation that these newly created neighbourhoods leave a legacy of high quality design of buildings that include diverse housing stock and pedestrian friendly streets and places that will serve generations to come.

c) An excellent urban environment that preserves and enhances the existing social capital of the Alphington community to foster social capital.

Alphington has a spectacularly engaged community. Councils and Developers the world over are trying to identify what it takes to make cohesive and engaged communities, and we think we have the secret sauce. We are keen to preserve and build this most treasured aspect of Alphington by welcoming and engaging new residents, so the divide between ‘new’ and ‘old’ Alphington is healed as soon as possible.

Deep social capital is a big part of what local residents love about Alphington, and we feel that this deep engagement is because a large proportion of the community see themselves living here for the long term.

APMAG recognises high density development in urban infill sites is important for sustainable growth. It’s cost effective for infrastructure, and preserves green space. While houses make up a large proportion of the development’s physical space, however, a large proportion of the people will be living in apartments. APMAG would like these people to also see themselves living in the community for the long term, and actively participating in its social fabric, rather than seeing a flat as temporary until you get a ‘real house’ in the ‘burbs.

The opportunity is to create higher density homes that are a genuine long-term home that makes you feel it’s worth really joining the community. To achieve this, and to contribute to family affordable housing, is to actively explore quality high-density family living: Apartments that are a genuine and desirable option to detached housing some 5-10km further from the city and its services. This site is a world-class opportunity to paint a desirable, sustainable and viable picture of success.

While the ‘new’ segments of aging empty nesters and couples without children are growing, families remain an important segment: not only in sheer volume, but because young children – particularly primary school aged - often activate people to participate in community and social structures.

The impact for the Alphington community is a higher proportion of new residents interested in putting down roots and participating in our strongest social wellsprings.

Of course there are many types of social capital in Alphington, and not all are family based, but we submit it is effective to build on strong existing foundations, rather than establish a new contrasting culture from scratch. The strong social capital structures in the area tend to be about volunteering in adult and children’s sports, the primary school community, and Darebin and Yarra parklands. It is not, for example, a culture based on, say, café/restaurant/bars, and conspicuous consumption or high production events.

Summary

The analysis (p34) – while based on an inappropriate comparison, shows Yarra North has higher semi-detached and apartment proportions than the Melbourne norm. Yarra North has a fairly even split between detached houses, semi-detached town houses and flats, and at 23%, Alphington has more flats than the Melbourne average (15%).

This illustrates that while Alphington gives the impression of liveable family homes, there is a surprising proportion of medium and higher density dwellings. This is achieved through well-integrated housing types - rather than starkly demarcated zones, and is characteristic of older suburbs evolved under market forces. It will take a skilful framework to create a similar outcome in a planned community, and this is what we propose.

The current master plan is far blunter, and lends itself to a highly stratified site:

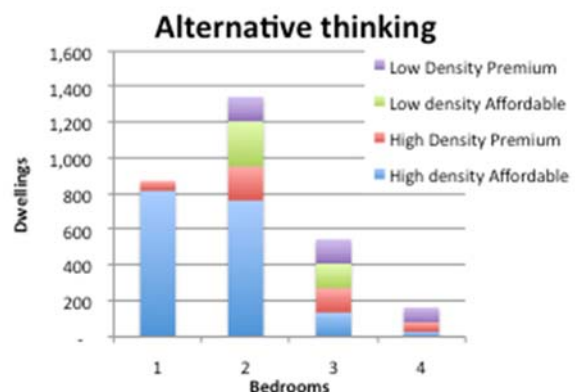
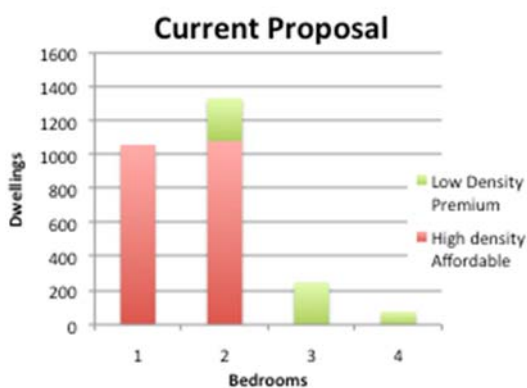
- A high volume of low value apartments on the noisy roads or near the mall for people who rent, or buy and then sell in 3-6 years.
- Houses are premium. They are the only option for families – and yet 3 bedrooms is considered large and many appear to have internal rooms with no natural light.

The alternative recommendation is a diverse range of stock that is socially and physically integrated.

Such as:

- some affordable family townhouses with optional 2nd car spaces & bathrooms, and a second living area that’s outside, located amongst larger blocks and diverse density types
- genuine higher density apartment home options for families, with 2nd living areas and liveable 3rd and 4th bedrooms,
- Some average and some amazing high value apartments, townhouses as well as houses for empty nesters and other childless households.

Delivered across the site, as a suburb that has evolved under market forces would; as opposed to compartmentalised zones of starkly different social & physical form



Recommendations:

APMAG recommends that a strong focus on integration and diversity be brought to the site plan to soften the demarcation between 'affordable' and prestige dwelling types, caused by stark zones within the development. Yarra council is in the position to have a holistic view and by requiring integrated, diverse housing, can prompt Glenville, Alpha and all subsequent building parties to think outside the box, avoid the 'cookie cutter' apartment mentality, and develop homes that people will want to live in for the long term.

That affordable housing consciously include the family market, delivering more family homes in general, and more affordable family homes in particular. This can be achieved through a greater mix of housing around the average, and recognising that a family home is not always a family house.

That the definition of affordability for apartments be measured against apartment benchmarks

6. Ecologically Sustainable Development

The DPO Schedule requires an Ecologically Sustainable Development (ESD) Strategy that considers and responds to the major components of the proposed development.

The APMAG warmly welcomes the use of the UDIA EnviroDevelopment tool is warmly welcomed by APMAG and we look forward to receiving public confirmation of the project being registered, and viewing the details of how the development will achieve five out of six elements, throughout the subsequent development stages. However, we question the decision of the developers to choose the EnviroDevelopment tool over and above the Green Star Communities Tool, and would appreciate a detailed response in this regard. In APMAG's survey 41 percent of respondents said that they felt the plan was committed to ESD principles and design; 4 percent thought the plan was highly committed whilst at the other end of the spectrum 10 percent felt the plan was poorly committed. Arguably the developers will need to communicate their ESD strategy more successfully with the new residents.

ESD Strategy: Energy Efficiency

One approach to achieving a sustainable development to is through energy efficiency. There does not appear to be an integrated approach to energy management for the development (i.e. an Integrated Energy Management Plan, as with Transport). We would expect, for example, that a holistic and measureable process for minimising energy usage, and implementing on-site renewable energy would be available at this stage of the project, in order to ensure future decisions are reflective of an agreed, optimal approach from the outset. Given solar power has already reached 'socket parity' in the residential market, we are surprised to see it is only considered for townhouses and detached homes, as opposed to multi-unit residential buildings. The opportunity to reduce the developer's costs, through diminished grid augmentation and/or centralised energy infrastructure upgrades, could be facilitated via a third-party owned energy services company deploying distributed energy and energy efficiency measures. Battery storage technology costs are expected to reach economic viability in late 2015 and, for this scale of development, we would expect it to be considered alongside solar power as a viable alternative to expensive centralised energy infrastructure, installed at the developer's cost. Furthermore, the consideration of cogeneration for pool heating would appear economically unviable, given the current state of the energy market, and distinct likelihood of "spark spread" risk, due to plateauing electricity prices and drastically increasing gas prices.

On this basis, we would like to see serious consideration given to a zero emission precinct, facilitated via an energy services company, with the potential for the local community to invest in these clean energy services – this type of initiative would also facilitate greater local community engagement and ownership of the project, thereby increasing local support for the wider development. APMAG further notes that such an approach is consistent with Council's Zero Net Emissions goal by 2020. This goal cannot be achieved without ensuring development on this scale within its municipality embraces on-site renewable energy. APMAG anticipates that Council will liaise with the Yarra Energy Foundation in this regard and obtain its input on the development.

In terms of the wider features, we would expect individual building architects to maximise natural ventilation within corridors of the multi-unit residential development (and for example requiring significant breaks in built form along the river interface to maximise cool river winds in summer),, and to reduce or eliminate mechanical ventilation within car-parking, by

maximising the opportunity to utilise natural ventilation through good design, in the first instance. Again, an integrated energy management approach, potentially combined with a third-party energy services company designing a business model around community participation and/or ownership of the energy infrastructure, could facilitate a cost-effective approach to these types of issues.

We note also that green roofs are being considered in the stormwater and water sensitive urban design section. Their inclusion would also complement the inclusion of solar PV within the multi-unit residential development, with solar panels working optimally at 28 degrees, and green infrastructure maintaining the ambient roof temperature, a combination of the two is likely to represent a sensible precinct-wide approach.

ESD Strategy: Transport

We are surprised to see only a single bicycle space per two apartments, and believe it would be an 'easy win' for the developer to provide at least one bicycle space per apartment/home within the development. Indeed, the per capita bicycle ownership in Alphington must surely exceed that of many surrounding areas!

Recommendation:

That an overall integrated management approach to energy efficiency is achieved for the site with serious consideration given to a zero emission precinct, facilitated via an energy services company.

7. Traffic Management Plan

GTA Consultants has produced a Traffic Management and Integrated Transport Plan as required under the Yarra Planning Scheme Development Plan Overlay Schedule

APMAG has considered these reports together and acknowledges the complexity of the consultants' task. It is not our intention to critically analyse all the data provided or to provide alternative sources of information. Rather, our concern is whether the information in the reports satisfies the DPO requirements and demonstrably addresses repeated community concerns.

Traffic has emerged as a major issue of community concern through the consultation period and AMPAG has received a range of submissions expressing concern about traffic and the impact of the development. We are concerned that the size and design of these technical reports may preclude members of the community having a genuine opportunity to analyse and respond within the public exhibition period. APMAG would welcome further consideration of the public consultation process for these reports.

We note the intention of The Hon. Fiona Richardson M.P. to require Vic Roads to consult broadly regarding the proposed improvements to Chandler Highway, the intersection of Heidelberg Road and Chandler Highway and the Grange Road railway grade separation. We recommend that the Traffic Management and Integrated Transport Plans be reviewed again as this process proceeds to ensure it remains accurate and relevant.

The Traffic Management report provides in excess of 40 charts and diagrams providing data for its Traffic Impact Appraisal. APMAG has been advised that there are a number of flaws in the VITM system including use of poor quality data and the risk that data can be manipulated, and APMAG considers that the GTA report reflects that lack in data.

The GTA report is missing data calibration, in that the report is lacking simulations of the existing traffic to enable adequate modelling of the proposed additional traffic from the development. In addition there are no alternative modeling proposals that include the Chandler Highway Bridge duplication or the grade separation of the Grange Road rail crossing. Thus, although these developments are outside the scope of the project and site, their impact and amelioration or otherwise on the site traffic should have been included in the modeling submitted in the report.

In summary there is no adequate modelling of traffic included in the report. Rather the report, which should be illustrating how traffic will be managed through the site, does not provide models that support any of the suppositions included.

The report does not convincingly demonstrate that its Traffic Management Plan mitigates the effects of an estimated **1600 – 2900** vehicle trips in any given peak hour. More specifically, the Traffic Impact Appraisal (p22) quotes 1610 vehicle movements in AM peak, 2592 in PM peak and 2913 midday Saturday peak.

Worryingly, the report notes that the increased traffic activity and existing constraints of the road network will necessarily influence transport decisions prior to completion of the Chandler Highway Bridge duplication, the redesign of Heidelberg Road and Chandler

Highway intersection and Grange Road underpass. The report estimates that at least one of these projects will be delivered prior to the completion of the redevelopment.

APMAG notes that the lack of information about and confirmation of these network major projects, and especially the co-construction of these projects or their likely completion prior to the delivery of the Development is a major community concern, expressed at public meetings, information sessions and through surveys.

The Consultants suggest that traffic generated by the development will force traffic to other routes, such as Burke road, Punt Road, Bulleen Road and Princess Street, all of which have severely limited capacity to absorb more traffic. APMAG is concerned that this forced choice of an alternative route will also mean greater use of quiet neighbourhood streets as alternatives, with the resultant increase in risk to pedestrians, children, cyclists and other vehicles.

A local resident – Brad Marsh has reviewed the report and advises that he considers that the propositions of the report “...are incorrect as they significantly overestimate:

- *The amount of existing through traffic that will divert away from the site post development*
- *The % of trips to and from the site that will use forms of transport other than car (public transport, bike, walk)*
- *The number of trips that will be contained within the site”*

APMAG conducted a member survey of key issues during the public exhibition period. 93.73% of respondents stated that the Developers’ plan to address increased traffic flow was insufficiently addressed (51.56%) or not addressed at all (42.19%).

APMAG survey respondents provided the following comments

- *It is ridiculous if the developer is able to have approved a plan clearly requiring major infrastructure improvements, without concurrent approval from the responsible authority for those improvements,*
- *The Developers have only thought of the ideal locations of roads within the site and not whether they are complimentary to the existing roads. I.e. locations of traffic intersections.*
- *Alphington on the South side already has traffic issues. This area is compromised by two main roads and a river, plus a single lane bridge which remains unchanged and a significant traffic issue.*
- *Currently it takes up to 30 minutes travelling from Kew over the freeway and the Chandler Bridge during morning and afternoon peak hour traffic. You don't want to be in a hurry! Extra traffic in peak hours entering the Chandler 'Highway' is a nightmare scenario. This development is going to exist into the foreseeable future. Unfortunately the traffic survey of the area was incredibly inadequate. This needs to be done over a long period of time and at different times of the day and year. Many car accidents happen along that stretch which are not reported.*
- *The Chandler Hhwy widening is crucial and the plans should not proceed unless it's settled*

- *It's hard to take them seriously when they want to stop me turning right out of my street! The amount of traffic will be horrendous, especially when I'll have to do a U-turn every time I go to Kew or the fwy! Turning right from Red Ave as suggested is suicidal.*

Consistently, the report's conclusions rely on the duplication of the Chandler Hwy Bridge, improvement of Heidelberg Road and Chandler Highway intersection and rail crossing underpass at Grange Road to mitigate the increased traffic flow.

The report refers to negotiations with Public Transport Victoria (PTV) regarding increasing bus services, however doesn't estimate what the expected bus demand will be. The report expects that some 50% of people in this area work in the CBD, suggesting a significant uplift in demand on the existing train and bus network.

The report includes details of train availability on the Hurstbridge line, however does not address the recognised capacity constraints of the network and whether or not it can accommodate the higher patronage. Whilst the report references possible upgrades to the Alphington Station, which do not include increased station capacity, it does not acknowledge the need for increased frequency of services required to support such an increase in users.

Reviewing the above information and statements in the light of APMAG's three criteria and aspiration to have an integrated community we find that:

- Provision of infrastructure and services to meet the needs of the whole Alphington Community both new and existing;** has not been addressed by the proponents Traffic Management Plan. Rather the plan is missing critical modelling and uses incorrect data in its assumptions about alternative modes of transport. The traffic plan does not provide the infrastructure and services that will service the proposed site development, let alone allow for the integration development in to the existing Alphington Community
- A sustainable development balancing social, economic and environmental elements.** It is not possible for APMAG to assess this criteria based on the lack of information within the technical report from GTA.
- An excellent urban environment that preserves and enhances the existing social capital of the Alphington community to foster social capital.** The concerns raised by local residents about traffic that the site will generate and that may compound the existing traffic woes of the area cannot be seen to preserve and enhance the existing social capital that is generated by a community being able to use the open space and circulation networks.

Recommendations

That a comprehensive peer review of the Traffic Report be undertaken by Council that includes analysis of GTA data modelling.

That the proponent be required to submit additional traffic modelling reflecting revised data and include adequate and accurate traffic modelling for the site.

That Council require a more comprehensive executive summary be submitted by the proponent that more accurately details; the likely traffic impacts, resultant traffic management measures and signalisation, with the upgrades to Chandler Hwy etc.

That Council require a review of the staged development of the site to align to the completion of these projects.

That Council review the Traffic Management and Integrated Transport Plans in conjunction with VicRoads proposals for Chandler Hwy etc.

8. Integrated Transport Plans

GTA Consultants has produced an Integrated Transport Plan as required under the Yarra Planning Scheme Development Plan Overlay Schedule

APMAG has considered these reports together and acknowledges the complexity of the consultants' task. It is not our intention to critically analyse all the data provided or to provide alternative sources of information. Rather, our concern is whether the information in the reports satisfies the DPO requirements and demonstrably addresses repeated community concerns.

Traffic has emerged as a major issue of community concern through the consultation period and AMPAG has received a range of submissions expressing concern about traffic and the impact of the development. We are concerned that the size and design of these reports may preclude members of the community having a genuine opportunity to analyse and respond within the public exhibition period. APMAG would welcome further consideration of the public consultation process for these reports.

As reviewed in our comments on the Traffic Management Plan we are concerned that neither report contains adequate modelling of traffic. This lack of modeling makes any commentary on the proposals for other modes of transport difficult, as we have no understanding from the reports of the actual resultant vehicle activity that will impact on integrated transport.

The report contains no designs or proposals of how transport modes will be integrated across the site, which is the integration of pedestrian, bicycle and vehicle transport. The Development Plan and technical reports articulate the ideals to provide an integrated plan but do not provide information how this would be achieved.

A local resident, Mr Brad Marsh also has advised that the GTA report includes incorrectly based assumptions in the assessment alternative transport modes.

*“One of the critical assumptions used to build the post development traffic model that I consider to be grossly overstated is the % of trips to/from the site that will use forms of transport other than car i.e. Public transport, bike, walk, etc. This is called this **mode share**.*

In determining the mode share assumption for the development site they have presented mode share data from 2011 for the Yarra LGA, the Alphington Suburb and the wider Metropolitan Melbourne. They have then projected these figures to 2021 with and without the development and added their assumption for mode share for the development site itself.

Putting aside whether Alphington suburb is going to have 3.7% of car traffic switch to another form, I question why they have used a mode share split that is similar to Yarra LGA rather than being similar to Alphington Suburb when the transport options for the development site are more like the Alphington suburb than Yarra LGA.”

For the majority of Yarra LGA (excluding the small Fairfield/Alphington exception where the development is located) Yarra is close to the CBD, has dedicated bike lanes with safe cycling, close and abundant public transport options including bus, trams and trains and

transport options that include both north/south and east west links making cross city transit easy.

Mr Marsh continues in his analysis;

“These things make City of Yarra quite proudly one of the highest non-car mode travelling localities in Victoria.

In comparison, the development site in Alphington shares none of these features.

- It is much further from the city, walking is not a commute option, only an exercise or adventure option*
- There are not safe direct cycling lanes for commuting along either Heidelberg Rd, or Chandler Hwy even though many cyclists brave these routes*
- The public transport options are extremely limited. There is only Alphington station approximately 700m away servicing city – Hurstbridge. There are no trams. The only semi regular bus is the 546 which really only duplicates the train to Clifton Hill or Heidelberg in the other direction. There is no regular public transport of any sort going south to provide access to the South or the South East. Anyone wishing to go this way pretty much has to take a train all the way to Flinders St before being able to change to a train going East.*
- In this way, the development site shares far more in common with the Alphington Suburb rather than the Yarra LGA and a Mode share more similar to Alphington than Yarra would be more appropriate.*

A mode share assumption closer to 70% than 50% car trips would be a more appropriate assumption, and this would result in many more cars trying to enter the Heidelberg Rd and Chandler Hwy that shown in their modelling.”

Cycling

The history of serious injury at the Heidelberg Road/Chandler Highway (P17 of the GTA report) lists that 30% of the 20 casualty accidents in the past 5 years in the vicinity of the site have involved cyclists. And that 3 of those incidents have involved major injury. This raises key concerns that any recommendations contained in the reports should address ways to mitigate and eliminate these risks especially in the vicinity of the Chandler Highway and Heidelberg Road intersection. These recommendations and actions by the proponent are a key element missing from this technical report.

Heidelberg Road is nominated by Vic Roads as priority bicycle route and yet the proposed new left turn slip lane along Heidelberg Road is in direct conflict with the provision of safe passage for cycles travelling west along Heidelberg Road. The development proposal of a shared cycle path along façade and colonnade of the building the will also put this shared path users in conflict with the loading dock access paths and then required are to navigate the Heidelberg Road/Chandler Highway intersection. These obstacles will actively discourage commuting cyclists from the shared path and onto the road lanes where although designated as bicycle lanes placed the cyclists at risk from slip lane merging traffic.

The community responses have included similar concerns including the following statements about the different modes of transport.

- ...Traffic issues have not been properly addressed. Cycling on Heidelberg Road near the intersection of Chandler Hwy will become even more dangerous. New separated (Copenhagen) bicycle lanes should be installed for this section of Heidelberg Rd.
- Not adequately addressed. The Alphington railway station is also going to be 'developed', the bus line is really very very inadequate. There needs to be a 'larger picture' look at what else is happening in the neighbourhood.
- Many of the trails already exist. Increased traffic on Heidelberg Road will place cyclist using existing routes along the road at much greater risk. Need to separate cars and bikes on this section of road

Pedestrian Network

The internal pedestrian network map on page 30 of the GTA report shows the priority areas for pedestrians around the proposed Main Road and access points. What is missing is the prioritization of the pedestrian traffic from the Paper Trail pathway across the proposed Main Street into the village and external network connections – these pedestrians appear to be abruptly stopped! It is also suggested that the Paper Trail and Linear Park be used by cyclist seeking off road or shared path access north south, The Linear part in particular at 10m wide with shared pedestrian pathway of 3m is too narrow for safe shared access and the Paper Trail details show stepped access with cycle wheel channels for access up onto the trail – this neither are a satisfactory or adequate solution or provision for off road cycling connections in a north south across the site.

Proposed road widths do not provide sufficient space for people. The road widths are insufficient to provide active safe pedestrian pathways separated from car or bicycle traffic. The pathways not designed to offer shelter and easy access to desirable destinations. It is suggested that pathways need to be about 2m wide. Informal cycle paths are a suggested as an aspiration of the road design yet the road widths of the current design do not facilitate that type of use

Summary of integrated transport shown in figure 4.8 raises some additional concerns

- The proposed pedestrian crossing at the new signals at the corner of Heidelberg Road and Latrobe Avenue only has pedestrian access to the west and south of the intersection – the opposite side from the shortest path to the station
- The loading zone access on Heidelberg Road will cater for 19m heavy vehicles entering and exiting the site, there is no illustrations of the swept path and road space these vehicles will require.

Bicycle parking

Bike parking is included in the design proposal to current standards (refer Table 4.3 of the GTA report) however current evidence is that residents of medium density housing especially, own multiple bikes it would be better to provide bike parking at the ideal rate of 1 park per person but it might be acceptable at 1 bicycle park per dwelling – not 1 park per 5 dwelling. Although compliant with current standards this low rate of secure parking does not support active transport modes.

Conclusion

So in light of APMAG's three criteria for assessing the integration and provision of an exemplar development each of the criteria are reviewed below;

- a) **Provision of infrastructure and services to meet the needs of the whole Alphington Community both new and existing;** the Integrated Transport Plan provides aspirational guidelines for the services and infrastructure but does not

detail how these will be provided. The low bicycle parking ratios per dwellings will not encourage alternative bicycle use or ownership and the narrow road formats do not allow adequate space for safe pedestrian and cycle movement combined with the vehicle movements. Section 3 of the report articulates the aspirations including

- Providing an attractive environment for walking within the site including shade, shelter, seating, adequate lighting, and supporting infrastructure – however none of these aspirations are detailed either in this or other technical reports.
- Ensuring the urban design encourages passive surveillance and supports CPTED principles – again these aspirations are again not detailed in this or other reports
- Providing links to allow direct safe access to external land use attractors such as Alphington Railway Station and Capital City Bike Trail – the proposed link at the signalised intersections does not optimise the opportunities that could be made by providing pedestrian crossing points to all four access side of the Heidelberg Road/Chandler Highway intersection not on each of the three sides of the Latrobe Avenue/Heidelberg Road interaction. The cycle links are also tenuous and require other external input for successful implementation.

b) A sustainable development to balance social, economic and environmental elements; integrated transport is a crucial component of a sustainable development and the report although full of aspirational goals misses the opportunity to clearly articulate a successful integrated transport solution for the site. Details such as road widths, low cycle parking ratios and external links to network modes that do not provide optimum access out of the site are all examples of this lack of adequate resolution and reporting.

c) An excellent urban environment that preserves and enhances the existing social capital of the Alphington community to foster social capital; The location of the *Linear Plaza* adjacent to the main entry to the site and adjacent one of the main site vehicles entry/exit points puts pedestrians and users of plaza in close proximity to the queuing traffic and exhaust emissions and also at a point in the vehicular journey where the focus of the driver is on the intersection not on the pedestrians within the plaza and their transit. The narrow design of the plaza suits the retail fringe location but does not provide a community hub linked to the majority of the site dwellings.

The design and building density of the proposed development does not facilitate or enable easy pedestrian movement or pedestrian permeability across the site in an east west direction nor allow permeability to the riverfront.

Recommendation

APMAG recommend that Council undertake a peer review of the report and require the proponent to submit further details for peer scrutiny of the detail design solution that can be made from this reports aspirations and goals. It is suggested that the current Transport and Integrated Transport Plans do not provide solutions for safe pedestrian or bicycle movement throughout the site nor linkages to the broader transport network and that this be a requirement of the final approved Development Plan.

9. Riverfront

The Yarra River surrounds are a long-cherished jewel in Alphington's crown – for many, it has been the river that has anchored them to the area and provided them with respite and reprieve from otherwise busy lives and the stresses and noise of inner city life. The river environs provide quiet relief for Alphington and Fairfield residents alike. What is so remarkable about the area is its proximity to the city, yet natural bush land feel - one could in fact be in the bush. The area is populated by kookaburras and a plethora of native bird life and other native flora and fauna - even turtles and platypus have been spotted on early morning walks.

The protection of the river-front has always been one of APMAG's key platforms. It is an absolutely critical part of Alphington, and broader Melbourne and the Yarra River corridor. As such, it must be protected and properly respected by the development plan.



However, the development plan has not appropriately acknowledged the area's qualities or reflected the requirements set out within the DPO. There is no ecological impact assessment of the proposed development on the riverfront to both the subject site but also up and down stream. This lack of ecological investigation and reporting within the plan is evident in nature of the proposed landscape treatment – it is a developers' response to a natural asset – not a responsible and sustainable development adjacent to the riverfront.

For example, we note that the Development Plan Overlay provides for protection of the river corridor. It requires well-articulated buildings with height no greater than two storeys at the river interface, and no greater than three storeys in precinct E (precinct 7A and 7B in the Development Plan), views across the site and breaks in built form. The development plan ignores these requirements and seeks to significantly exceed these clear limits. For example

Development Plan Proposal	DPO Requirements	APMAG Comment
2/3 storeys of built at the Yarra River interface	2 storeys along river	Any height in excess of two storeys along the river interface is unacceptable.
Allow up to 100%. Site permeability may be 0%	Articulation and breaks in built form Viewlines from the Yarra River (north side from the portion of the path in Willsmere Park opposite the Amcor Site), Chandler Highway, Heidelberg Road and Parkview Road. To ensure new buildings are well spaced and offset to distribute access to outlook and sunlight between built forms and manage overlooking between habitable room windows where possible; To ensure that building heights provide an appropriate transition to site interfaces; Built form and articulation should avoid long and continuous facades;	Any deviation from the site coverage requirements along this most sensitive interface must be rejected. Such site coverage ignores important ESD principles, prevents appropriate sensitive planting and revegetation, prohibits air flow to the remaining site noting that the air from the Yarra is natural air-conditioning, and inconsistent with Yarra's vision for the area.
Inclusion of wing walls, spas and fence within the additional 10 metre setback.	Setback (10 metres) from crest line of the Yarra River	This is an attempt by the Developer to build onto areas that are not intended to include built form such as wing walls.
Built Form consistent with massing and height of the existing boiler house buildings (either through reuse or replacement with interpretation of the existing building form and heights.)	Maximum building height of 3 storeys in section E	The 1954 boiler house is at least 8 storeys high and has no relevance within the heights and built form stated in the DPO. Replacement with a new building must not be permitted.
Precinct 7A is to be predominantly residential, with a limited opportunity for small-scale retail or hospitality uses .	An interface with the Yarra River that: <input type="checkbox"/> - Enhances the bush land character of the river corridor; Maintenance and enhancement of the natural landscape and native vegetation	Retail / hospitality is inconsistent with the bush land character of the river corridor & does not maintain not enhance the natural landscape. Any proposal to include such uses along the river must be set back from the riverfront precinct and carefully reviewed by Council to ensure they do not detract from the area's character.

The language and proposed treatment of the term 'river park' is at odds with the quiet bush land character of the area as emphasised in the DPO and Yarra Planning Scheme, and as valued by the Alphington and surrounding community. This includes:

- BBQs within the sensitive 30 metre setback from the river;
- A Pontoon;
- Intrusion into the additional 10 metre private setback zones with spas, boundary wing walls and fences indicated;
- The suggestion of grassy lawn areas below and on the escarpment;
- Direct river access from private residences; and
- The lack of integration of the abutting land with the river side/bush-land context.

AMPAG is concerned that such aspects will fundamentally change this very special area and fail to integrate it with the surrounding areas to the East to the golf course and West up to Rudder Grange.

We note that the Design Principles indicate a very alarming proposal for 100 per cent site coverage along the river -front. This is unacceptable for many reasons;

The Yarra Planning Scheme sets out in Clause 54.03-3 Site coverage objective ... ensure that the site coverage respects the existing or preferred neighbourhood character and responds to the features of the site.

Standard A5

The site area covered by buildings should not exceed:

- The maximum site coverage specified in a schedule to the zone, or
- If no maximum site coverage is specified in a schedule to the zone, 60 per cent.

The Riverfront coverage we consider does not meet the Site Coverage Objective of the Yarra planning scheme. The density also does not comply with a range of ESD principles including environmental standards such as water permeability and social equity. As such we would recommend that breaks in built form along this sensitive river edge must be encouraged. Such an imposing built form along the river's edge will prevent adequate planting and integration with the Yarra River environs. The proposal along the river precinct is entirely inconsistent with the Yarra Planning Scheme.

As noted earlier, AMPAG is most concerned that the developer has 'borrowed' from the DPO requirement to set aside 30 metres of riverfront land and used this as its contribution toward the 4.5 percent open space contribution. This approach is extremely disappointing and illustrates that the developer has not listened to the community during its consultation. Beyond any policy consideration on this, we ask that Council seek guidance from its legal advisers about the legitimacy of this inclusion.

There is a lack of clarity in the DPO and development plan about how the land will be treated post-development in terms of ownership and transfer, and who will rehabilitate the land. These issues require much greater certainty, communication with the surrounding community, and continued consultation outside of the development plan assessment process.

In relation to the rehabilitation of the land, we request that Council place very strict requirements on the process and make the area's protection and rehabilitation a continued priority. AMPAG is aware from its members that the land rehabilitation process below 1-3 Rex Avenue, and Riverwood at 9-23 Rex Avenue has been largely unsuccessful. The land below 1-3 Rex was filled with large boulders and rocks during the excavation process by its developer and the rocks could not be removed without great expense and hazard. This

land is now unable to be effectively planted. While by contrast the land below 9-23 Rex has begun to be more successfully rehabilitated, we understand from the Owners' Corporation of Riverwood that the three year period of care and rehabilitation works required by the developer has now expired. Clearly there is much more work to be done and the site's south facing aspect means plants grow slowly. For these reasons, we suggest a ten-year rehabilitation care plan is more appropriate. We further suggest that Council must take every possible action to prevent a re-occurrence of the damage at 1-3 Rex.

AMPAG requests that the Council continue to consult with APMAG in relation to any riverfront issues including:

1. Transfer and ownership of the 30 metre river precinct;
2. Design principles, height and built form along the river escarpment and 10 metre setback;
3. How the land will be rehabilitated and by whom;
4. The master-plan for the river corridor including shared pathways, bike paths, and any proposed 'activation' of the area, which we oppose.

In conclusion, APMAG is steadfast in its view that the Yarra River environs must be protected and cared to ensure its relevance for current and future generations, and to continue to support native flora and fauna.

Recommendations:

That Yarra Council should take ownership of the 30 metre setback from the river edge and consider a mechanism such as S173 Agreement to levy the developers for the cost of any landscape works associated with managing this important community asset.

That Yarra Council should involve the community with any decision making about the riverfront given the Yarra River is a valued community asset.

10. Community Infrastructure Report

Background

The DPO Schedule prescribes that the site be: ...redeveloped to provide a predominantly medium to higher density residential development, providing homes for a diversity of households including affordable housing, supported by convenience retailing services and *community facilities*.... (3.0, p2).

The DPO requires also that the completion of development plan include a “Community Facilities Audit and Analysis ...which identifies a number the following”:

- Existing and planned services in the surrounding area and the impact the development of key elements.the site will have on these services.
- The need to provide additional community facilities on site or whether any existing community facilities in the local area should be upgraded or extended;
- The location of any new community facilities on site or in the surrounding area;
- Funding and implementation mechanisms for the provision of appropriate community infrastructure **and services to meet the** including developer contributions (monetary or building) towards the upgrading or extension of existing community facilities; or provision of new facilities in the surrounding local area; and
- Timing of the provision of any required community facilities coordinated with the overall development of the site.

The City of Yarra “Design & Development Principles” for the Amcor site (2009) provide for Social & Community Facilities as follows:

There are opportunities to provide community facilities in the north east of the site, opposite the Alphington Bowls Club and Alphington Park. This location would be adjacent to any convenience retail service precinct and integrate with the existing facilities on the adjacent parkland.

- There are opportunities in the adaptive re-use of heritage buildings to provide for cultural and/or artistic uses.
- The existing schools and early childhood facilities servicing the local area, particularly Alphington Primary School, are presently at capacity. Further increases in population over time and due to any new residential development of the Amcor site, would place increased pressure on existing community infrastructure.
- The Amcor site provides the State Government, through the Department of Education and Early Childhood Development (EECD), with an excellent opportunity to plan for the future needs of **the whole Alphington Community** residents by purchasing or reserving land for future health, care and educational needs, which appear to be mainly for pre-school and primary school children.
- If it is determined that future development of the site warrants additional social and community infrastructure, the developer of the site will be required to contribute to any new or enhanced facilities.
- A community hub which includes the co-location of community, social and educational facilities, may be considered for the site.
- The streets of the site should be considered key social and recreational facilities, and be designed to create opportunities for people to walk, cycle, jog, and skate, meet neighbors, play games etc.

Discussion

As discussed elsewhere in this submission, and as is envisaged and mandated by the documents referred to above, the redevelopment site is a unique and rare opportunity, which will never be repeated within the Alphington/Fairfield locale, for an inner-urban in-fill site to integrate new housing stock within an established residential neighbourhood which enjoys quality amenity and social cohesion. There are many examples, in inner-Melbourne and elsewhere, of in-fill developments neglecting to seek to integrate with surrounding communities, with a myriad of negative social and economic consequences, for both new and pre-existing communities. The social wellbeing and mental-health impacts of such developments are well documented.

It is essential, to avoid the erosion and degradation of existing amenity and cohesion, and to include the residents of newly developed housing into a community, that integration with surrounding community infrastructure, and its upgrade as necessary, is prioritized. The opportunity provided by development of the former Amcor site must be seized to expand and enhance the existing amenity to a broader community base. The sheer scale of the proposed development, and the introduction of close to 5,000 new residents within an immediate area that currently provides homes, and infrastructure and services, for 2,344 people ("Fairfield-Alphington small area", 2011 ABS Census) creates enormous risk of current facilities being overwhelmed.

It is a basic tenet of the DPO and City of Yarra vision for the site, as documented above, that services and community infrastructure must be ensured to serve the needs of both new and existing residents. It has always been a fundamental concern for the Alphington community, and for APMAG, that the development of the Amcor site ensures that services and infrastructure are provided, in line with community needs AFTER the development is complete. Given the scale of the development, it is inevitable that these needs will be considerably greater than currently. Therefore given the scale of the Amcor development any proposed public amenity such as the delivery of sporting or community facilities should involve community consultation and this should be a collaborative effort.

ASR Report

The Community Infrastructure report undertaken by ASR Research as part of the development plan focuses, by its own admission (p2) entirely on early years services, community meeting spaces and learning centres, recreation facilities and education facilities. It neglects to consider anything else (e.g. aged care), and even within its narrowly defined scope, gives only scant attention to anything other than early years and education needs.

The report appears to analyse service requirements based on a projection that the subject and other developments will lead to the population of the immediate area increasing from 2,700 in 2013 to 6,500 in 2031, that is, an additional 3,800 people (p22). This projection is clearly flawed. The Amcor site itself will generate a population increase in excess of 3,800. After inclusion of other developments (e.g. Jika site, Alphington Station), and normal population growth, the figure will be significantly higher. ASR acknowledges in a footnote that population growth will "most likely be revised upwards, in light of the final development plan approved for the Amcor site" (p22), but nevertheless proceed to base their analyses on an acknowledged inaccurate assessment of population numbers.

We assert therefore that the analyses undertaken, and conclusions and recommendations drawn by ASR, are quite simply unreliable, and might provide no meaningful guidance as to the actual post-development community infrastructure needs.

Education & early years services

We are not in a position to confirm or refute the analysis undertaken by ASR of additional school and pre-school places that will be created. Presumably Council has access to accurate data, and the submissions made by education providers in the area (Alphington Primary School, Yarralea Children's Centre etc) will pay due attention to this. The ASR assertion that current services are at or near (and in some cases beyond) capacity prior to any population increase is widely accepted. Their estimation that the development will generate an additional 140 primary and 100 secondary school enrolments (pp38 – 39) is far more questionable. It is hard to imagine any demographic mix (however unbalanced the proposed housing diversity) that an estimated 5,000 new residents will include only 240 school-aged children (less than 5 %). Likewise, the additional stress to be placed on the early-years facilities in Alphington/Fairfield by the development can assumed to be grossly understated.

That said, the ASR conclusion that additional education and early-years facilities will be required to cater for population growth as a result of the development is welcomed, if self-evident, and we support their recommendations for their provision.

Recreation facilities

It is not apparent from their report that ASR have undertaken any analysis at all as to the current mix of available recreation resources, or their capacities. The underlying assumption appears to be that enhanced existing facilities will meet whatever additional recreational needs arise. Alphington Park is treated as a kind of "terra nullius" that is unused and conveniently available and adequate to absorb the demands of the new development, whatever they may be. Current uses and capacities are assumed non-existent.

No consideration is given to the possibility of the provision of additional facilities within the 16.5ha site to be developed. The proposed "open spaces" on the site (i.e. "linear parks" that are actually thoroughfares, and the "riverside park", a narrow, ecologically sensitive area below the escarpment) go no way to addressing any of these issues.

The report relies upon broad, generalized assumptions drawn from Australian Sports Commission statistics as to the ratio of population known to participate in various sporting activities (p71), and drawn vague and entirely self-evident conclusions that the "proposed development is likely to significantly increase the demand for formal and informal outdoor recreation including organized outdoors sports such as AFL, cricket, tennis and soccer." (p44)

The solution offered, that there be "facility enhancements at the adjoining Alphington Park" to cater for these additional needs (p44), is just as vague and bereft of any meaningful proposal.

Just as self-serving is the conclusion that "the demand estimate is too small to suggest any significant impact on the capacity of local facilities to accommodate additional indoor recreation centre demand generated by the proposed development." (p40). It is not at all clear how this conclusion is reached. Any audit of existing facilities would reveal that there are no existing "indoor recreation centre" facilities in the area, though they have long been in great demand. The only data provided is reference in the Appendices to two City of Yarra Indoor Sports Centre Feasibility Studies (p65) which are so old (2003 & 2006) as to be of questionable contemporary relevance, and which in any case concluded, quite

inconsistently with what ASR have apparently drawn from them, that there was a “sufficient level of demand to warrant the development of indoor sports facilities...”

S173 Agreement

The development plan rightly recommends that “a more detailed community infrastructure plan be developed that will form the basis of, what is likely to be, a Section 173 agreement...” (p45). It goes on to suggest that “Yarra City Council maintain a flexible approach to what community infrastructure items should form the basis of a Section 173 agreement...”

It is our assertion that any approval by Council of the development plan should be subject to and conditional upon a comprehensive and coherent s173 agreement first having been agreed, that makes adequate and realistic provision for the myriad of community facilities that will be needed to cater for the local community growth that will be created by the development.

Conclusion

We are hearted by, and commend Council for it’s initiative in establishing a Community Needs Analysis Working Group, and trust its analyses, considerations and recommendations will be more credible than those informing the development plan as it currently stands. The existing Alphington/Fairfield community (our constituents) have taken a mature approach in supporting development of the Amcor site and welcoming the resultant population growth, but always on condition that concomitant services, facilities and infrastructure will be introduced to meet additional needs. This is not an optional luxury that can be dispensed if inconsistent with the whims or willingness of developers to compromise their financial modeling, but an essential tenet of sensible, sustainable, community-embracing urban development.

Recommendation

That Yarra Council, Alpha Partners and peak sporting bodies explore all avenues to deliver additional recreational facilities such as a multi-purpose indoor sports courts, to balance the impact of a doubling of Alphington’s population on the local community’s existing active open spaces and recreational facilities.

That Yarra Council continue to lobby for the delivery of the proposed educational campus.

That Yarra Council and Alpha Partners ensure ongoing detailed consultation with the community continues to occur beyond the scope of the Council auspiced Amcor Community Needs Analysis Working Group, to determine how ongoing use and access to the school, community facilities and public places such as Linear Piazza and linear paths will be addressed in the proposed development.

D. Conclusion

APMAG has formulated our submission based on the oral submissions gathered from our information session held on 5 March and our online survey completed by 99 respondents as well as listening to our members over recent years. With over 800 members on our database, APMAG is in a unique position to offer an insight into the community’s needs, concerns and issues in regard to the Amcor development plan. It is through this community lens that APMAG has made its assessment of the Amcor development plan based on those issues felt most strongly by the community. The criteria applied has sought to

strengthen the depth of our analysis and highlight the need to build on the existing social capital of the established Alphington community, and integrate this with the new residents, who will be empowered to share it, to the enhancement of a better, larger local community.

In principle APMAG supports the vision of the site to deliver a predominantly residential development, however we believe there are a number of substantive issues that must be addressed before the development plan is approved by Council. For this reason APMAG identified a series of key recommendations based on nine areas which are in equal importance and fundamental to the success of any redevelopment of the Amcor paper mill site in Alphington. We request that Council seriously consider the issues highlighted in our submission and request to be heard at any public hearing that may be held to consider submissions about the Amcor development plan.

APPENDIX A

ECONOMIC ASSESSMENT REPORT & HOUSING DIVERSITY REPORT

Summary

The basic thrust of the Economic Assessment doc is that population growth drives the need for supermarket shopping facilities. As such, this document is merely a business case for supermarkets in Alphington, and does not question the value of supermarkets as compared to other retail options, or discuss any other economic impacts of developments on communities other than supermarket availability. As such it is narrow and deficient to DPO requirements.

APMAG does not feel this document successfully assesses the economic impact of the proposed development on the Alphington community. Just as there is a benchmark level of supermarket infrastructure required for Alphington, we expect there is a benchmark level of health, education, public transport, roads etc services required by the new, expanded population. There will also be new public rates income to fund these services. This economic assessment is missing, and would more accurately show the economic impact of the development on the community.

If we accept this document is to be purely an investigation of the economic impact of supermarkets, it should assess the flow of economic benefit and services of supermarkets as *compared to* broadly diversified or independent retail environments.

- Which more efficiently transfers economic benefit to the local community (local ownership, institutional vs local reinvestment of profits, balance of quality vs casualised employment etc)
- Which tends to deliver healthy food outcomes to communities – fresh, high nutrient, low production
- Which is more resilient and constructive to local food production systems
- Which delivers choice and the benefits of competition vs duplication
- Which tends to effectively contribute as a ‘social hub’ that builds genuine social capital – both formally (support local sports and organisations) and informally (a genuinely pleasant place to be)

None of this analysis is forthcoming from the developers, but should weigh heavily in the judgement of community representatives.

In short, tenanting the 63% of the Village Precinct with 9,000sqm of supermarkets will create a homogeneous packaged mall environment, and prevent the opportunity to create a vibrant fresh food market to complement the Queen Victoria, Prahran and South Melbourne market zones.

Infrastructure and Services

The Primary Service area holds 9.5k residents today, growing to 13k after the development. When secondary areas are included, the expected population is to be ~40k people by 2026. At 330m2 per 1000 people we could expect the whole of the primary and secondary

catchment to have 13,200sqm of supermarket space in 10 years. Almost half the resident community feel this is excessive

The development proposes to build over 10 years' worth of capacity in 2 years – which is a level of over supply for this form of service (retail) that is not matched across other (less profitable) services.

Analysis of existing supermarket infrastructure is obviously selective:

- it has excluded Ivanhoe & Northcote, where locals actually shop, yet included a tiny supermarket on the far side of the Chandler Bridge, which is obviously not realistic. Re-analysis excluding Willsmere and including Ivanhoe Plaza (15,000 sq.m) will reflect actual shopping travel patterns.
- it only considers supermarkets, and ignores strip, specialist and independent retail – who sell the same goods to the same people. This report shows Alphington people buy more fresh fruit and vegetables than the norm, probably because we have good access to fresh fruit and vegetable shops
 - A green grocer and butcher in Alphington.
 - A large green grocer and a number of butchers and bakers in Fairfield.
 - A green grocer, deli, baker, butcher and fish monger in Ivanhoe Plaza
 - 2 green grocers, a baker and a butcher in Clifton Hill

These are excluded from analysis, but they deliver food access for consumers AND for local fresh food systems to survive and build resilience outside the supermarket duopoly.

If we re-assess with these 2 factors changed, Alphington has 28,000sq.m of retail serving the area – well in excess of the target 13,200 sq.m.

Over supply of supermarket service will not generate new economic benefit (jobs, and food supply) it will migrate benefit from the Fairfield strip. It does not provide greater choice or competition, it duplicates existing choice and competition.



HOW big is this going to be?

13,900sq.m of retail space is bigger than Warringal in Heidelberg (10,500sq.m) or The Hive in Abbotsford (10,000sq.m) but smaller than Northcote Plaza (19,000 sq.m) or Victoria Gardens 21,000sq.m).

The total development's commercial area of ~30,000sq.m is bigger than the whole of Northcote (27,500sq.m) – including the Plaza (19,000sq.m) and the shopping strip (8,500sq.m).

	Village & Gateway Sq.m	Dispersed Elsewhere Sq.m	Total
Supermarket (Coles)	8,200	-	8,200
Mini-major (Aldi)	600	-	600
Specialty			7,000
Hospitality	5,100	5,400	3,500
<i>Sub total - Retail</i>	13,900	5,400	19,300
Commercial		11,500	
Community		1,500	
Total	13,900	18,400	32,300

8,200sq.m for one Coles is extraordinary. In comparison, the Coles in

- Fitzroy is 3,500 sq.m,
- Victoria Gardens is 4,190sq.m.
- Northland is 4,220
- Warringal is 3,470
- Ivanhoe Plaza is 3,940

We can only assume there will in fact be 2 supermarkets, plus an Aldi and it will be the same Coles / Woolies combination, providing no new competition or choice.

Provision for Community Service space

1,500sq.m is earmarked for 'Community' purposes. Elsewhere this is listed as Junior School Campus (Grade Prep, 1 and 2), an Early Learning Centre and Community Activity Rooms. It is assumed other Community Service examples - Medical Services, Gymnasium, Office, Small Showroom Spaces, and Hospitality & Performance Space - will in fact be provided by for-profit providers, not the development.

1,500 sq.m is not sufficient to provide all these services at the scale required by either the new development's residents, or the resulting total Alphington Community. It is assumed this is marketing puffery and until a more concrete proposal is available, they cannot be considered as a benefit of the development.

Urban Social Environment

There is a tangible difference between shopping experiences in Station Street, Brunswick St or Kew High Street, or a market like South Melbourne, Prahran or Preston, from the experience of a mall like Northcote Plaza or Northland. They have an open and diverse feel with few national brand franchises and a localised feel. Mall developments, in contrast, have a highly built form, with artificial light and surfaces and a strong focus on brand chains. As a result they have a sameness. The 'choice' they provide is a choice of the same options as any other mall, and there is little opportunity to foster new business ideas or models.

A strong cultural hallmark is the dominance of big box supermarkets – which set the tone for subsequent tenant development.

Station Street is a beloved localised shopping experience with fresh and independent food retail acting as the anchor, and independent hospitality thriving. **Station Street is 23% supermarket**, and that supermarket presence is made up of 3 independents plus a sizable greengrocer and a selection of butchers.

Kew is 35% supermarket, one of which is independent and an open air independent shopping strip with relatively few chain franchise brands.

In contrast **Northcote Plaza is 70% supermarket. Ivanhoe Plaza is 52% supermarket.**

Alphington Village precinct is going to be 63% supermarket. We fear it will feel homogeneous and neon and deliver more of the same old 'mall' experience and culture.

Sustainable Environmental Impact

The supermarket industry in Australia is a duopoly that has harsh impacts on the viability and resilience of localised food systems and a strong preference for high production, high package, and high transport goods. Continuing to structurally preference supermarkets actively erodes local economic resilience and food system viability, and tends to sacrifice environmental outcomes.

Supermarkets need massive monoculture and huge food miles. They actively push food producer quality and margins to their most brittle.

Solution - integrated diversity

A better solution would be one supermarket, plus a collection of small and owner-run green grocer & food retailers with robust connection to fresh and local food suppliers, and a vibrant speciality food retail area – think something like the permanent retail zones of Queen Vic markets, South Melbourne or Prahran markets – with open (*non-linear*) - space to support the increasingly popular Farmers market movement.

This can be provided within an integrated space – one car park & one trolley – removing market friction and driving competition.

(i.e. it is easy to buy from many suppliers in one visit, so I buy my veggies from the best grocer, and my deli goods from the best deli and my meat from the best butcher. The outcome is genuine competition)

Think a diverse and resilient microcosm of real food retail, not a homogeneous duplication of big-system production brands

And finally.

It's deficient to discuss employment as a benefit and ignore the low paid, low security nature of retail service work. Those jobs won't be local jobs because those jobs don't buy houses.

Supermarkets are not social or community 'hubs' – come and I'll buy you a drink at the Bowls club on a summer Friday evening or a fairy floss at the school fete and I'll show you a decent community hub.

APPENDIX B

HOUSING DIVERSITY REPORT

Summary

Housing Diversity is a high priority issue for the Alphington community, but contains a paradox.

- Local people (70%¹) look at the development proposal and see an overwhelming majority of 1 and 2 bedroom apartments, which feels radically out of step with Alphington's character of family homes. Alphington has high growth and value, and is tightly held, so clearly the market agrees.

They presume Developers want to build apartments because that's what developers always build to make fast money, that apartment buyers are typically investors who don't join the community, and that apartment tenants don't tend to feel invested in community structure over the long term – particularly because you can't raise kids in an apartment and the school is a key community hub.

- The Developer looks at Alphington and sees an area with an overwhelming majority of expensive detached family homes that requires a large volume of smaller, more affordable homes to provide balance and diversity.

I suspect they presume Alphington people object to apartments because they are ugly and different, because local residents always do, and anyway it is up to the market to determine housing mix.

Yet both parties agree housing diversity, affordability and access is important. Both parties are right.

The Housing Diversity report talks about the need for affordable family dwellings and current levels of housing stress, and it is this intent we would like to support. While empty nest and lone person households are new segments, families still make up about half of all households.

Unfortunately this Development assumes all affordable homes are 1&2 bedroom apartments. This implies family dwellings are not affordable, and don't need to be. This is a poor solution to the paradox. We need to do better.

APMAG wants to see more family homes in general, and more affordable family homes in particular.

This can be achieved through a greater mix of housing around the average.

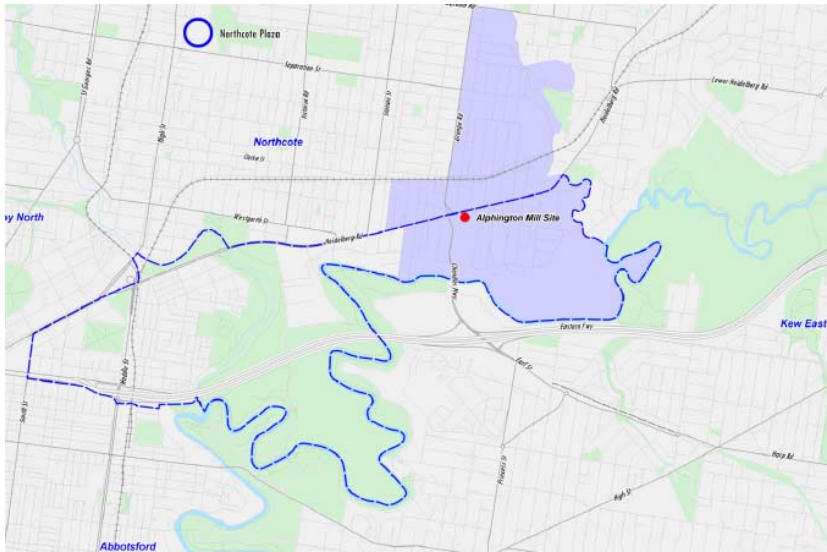
Current housing infrastructure - Local market analysis

The analysis is focused on SA 20607 – Yarra. Once again, the analysis area selected is self-serving and doesn't reflect local reality.

This analysis needs to be reconsidered, including Alphington proper and the geographically near areas (20602 areas of Alphington Fairfield, Northcote and Ivanhoe), not the governmentally near (City of Yarra) or analytically near (SA2). Yarra Bend Park and

¹ APMAG community survey Q1

bushland should also be excluded from population density calculations as it understates density and so overstates capacity for growth.



The excluded areas have had noticeable growth in apartment development in recent years, and different home ownership and rental profiles.

That said, the analysis (p34) shows Yarra North already has higher semi-detached and apartment proportions than the Melbourne norm. While Yarra North has a fairly even split between detached houses, semi-detached town houses and flats, the rest of Melbourne have more houses and less townhouses and flats. In fact – at 23%, Alphington has more flats than the Melbourne average (15%).

This illustrates that while Alphington gives the impression of liveable family dwellings, there is in fact a surprising proportion of medium and higher density dwellings.

Well integrated housing types - rather than starkly demarcated zones - are a characteristic of older, evolved suburbs. It will take a skilful framework to create a similar outcome in a planned community, and this is what we propose.

Given the size of this development, it is likely that many builder and development parties will ultimately be building and developing within the area. There will be limited co-ordination between the parties, and it is likely that the commercial arrangements and expectations have already been laid down.

As a result there is no party other than council responsible to create and enforce a framework that will deliver integration to prevent stark and fractured zones within the development character. The main tool Council has to enforce this framework is the current process.

APMAG recommends a strong focus on integrated diversity, as opposed to ‘block like’ characterisation, to prevent ghettoization between ‘affordable’ and prestige zones with little middle ground.

What is ‘affordable’

The Development gives indicative price points as:

- 1,058 one-bedroom units at \$350,000-\$500,000
- 1,334 two-bedroom units at \$400,000-\$600,000.

‘Affordable’ typically means at 80% of market value. The developer argues that “a significant release of new stock to market with a price range between 50-70% of the current median price” more than meets DPO affordability requirements. This is bogus analysis.

The median price in Alphington does not buy a 1 or 2 bedroom apartment; it buys a 3-bedroom detached house with land.

The median **Unit / Apartment** price in Alphington is under \$500,000 – making an ‘affordable’ unit / apartment in Alphington worth \$400,000.

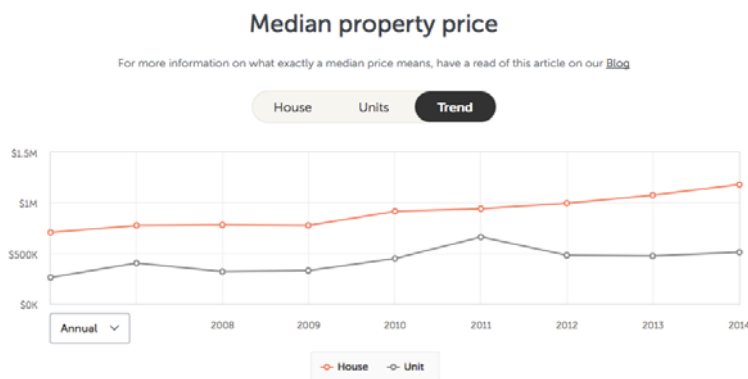


Figure 1. Source: Realestate.com.au & RPData. 14/3/15

On a like for like basis, the indicative price points **do not** contribute to affordable housing stock – for family or non-family buyers.

A better comparison is the chart on p31 – copied below – showing median apartment prices in a more appropriate comparison suburb set. In this context, a starting price of \$350,000 is expensive.

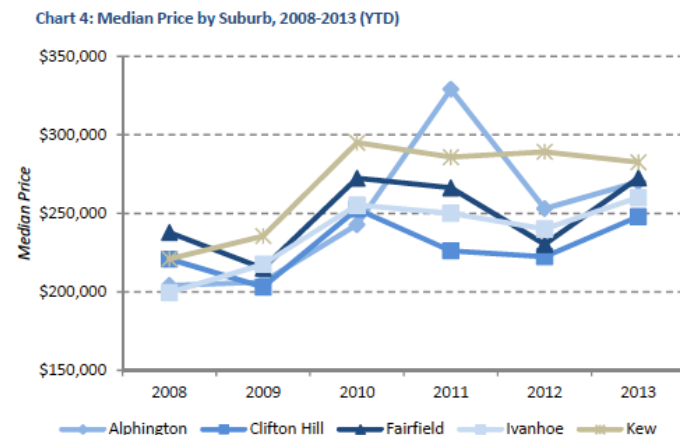


Figure 2: Source: Alphingtonpapermill.com.au Housing Diversity report 14/3/15

Given this is a median measure, half of all units and apartments trade hands on the open market for below these values – but none of the proposed development will.

A median measure also does not indicate range. In reality there are a high proportion of units below, but near the median, and a longer tail of high value dwellings significantly above the median. This is a typical distribution within the real estate market and a result of long term market forces which the development would do well to emulate.

Q: APMAG would like to understand the distribution of stock around the median / within the range.

The second paradox.

The Alphington community has expressed a strong concern for housing affordability, driven by a sense of social justice, inclusion and a desire to live in a balanced and interesting community.

There is also a concern that a massive influx of poor quality apartments will depress local property values and therefore the material wealth of current residents – both in depressing average value, and compromising the urban social environment – like social amenity, community engagement and liveability – that make Alphington so attractive and tightly held.

So the community wants housing diversity and affordability, but don't want to lower average property values. How can that work?

Solution: Integrated diversity

Actual housing diversity – a broad range around the average – is required, and a development of this size not only can deliver a real range of stock, but must.

The best case is that the developer attracts a genuinely broad range of people investing and living in Alphington for the long term, at both the affordable end, and at the middle and high end of the residential and commercial market.

These segments must be present and integrated across the site, in medium and high-density zones.

This will prevent a 'ghetto vs. millionaire's row' problem across the north and south ends of the development, as well as prevent a self-created glut in any one segment – across the lifecycle of buying into, living in and selling out of the Development.

e.g. the fear is 1 & 2 bedroom units are sold at volume to the international wholesale market, who then create a flood of rentals to a finite market of young professionals, who all get on the 7:49 train at the same time, all have babies and hit the kinder in a space of 5 years, all realise they can't raise kids in an apartment and leave in a synchronised wave.

The alternative is a diverse range of stock that is socially and physically integrated.

Think

- some affordable family houses with optional 2nd car spaces & bathrooms, and a second living area that's outside,*
 - genuine apartment options for families with 2nd living areas and liveable 3rd and 4th bedrooms,*
 - as well as some average and some amazing high value apartments for empty nesters and other childless households.*
- NOT compartmentalised zones of starkly different social & physical form (cheap singles apartments in the north and expensive family houses in the south)*
-

The current master plan lends itself to a highly stratified site. It's easy to foresee a simplified picture - Apartments are cheap, are on the noisy roads or near the mall, and are intended for people who rent, or buy and then sell in 3-6 years.

Houses are premium. They are the only option for families – and yet 3 bedrooms is considered large and many appear to have internal rooms with no natural light. They don't solve the dilemma of choosing between a renovators delight in Reservoir, or a new home in Wollert.

Environmental Sustainability

Australia has not really mastered the idea of higher density family living yet, and this site is a world class opportunity to paint a sustainable and viable picture of success.

Families want to live in Alphington. Half the target market is families, yet only 20% of stock will suit them – if they are wealthy.

If we can create apartment stock that is desirable, not as a flat you buy until you move out to a 'real house' in the 'burbs, but as a genuine option for a home with primary and even high school aged children, we can cost effectively invest in existing infrastructure and services capacity -rather than building new support in new locations metro fringe.

Of course it means that this investment must *actually* be made. It is cheaper to add an extra train to the Hurstbridge service than build a train line extension beyond Hurstbridge. It is cheaper to build a 2nd campus of an existing school in Alphington than build a whole new school past Wollert. It is more sustainable to add quality base load public transport infrastructure to the inner suburbs where it is used by locals and commuters than to build more roads and car oriented communities at the city fringe.

It is not acceptable, however, make no new investment at all. Yarra council, as our representatives in the public realm, will be expected to advocate o behalf of the growing community for these services.

Building social capital on existing foundations

Half the market - empty nesters and young professional households - are well considered because they are relatively new. The half that are families are not.

While the 'new' segments of aging empty nesters and couples without children are growing, families remain an important segment. Families are important not only in sheer volume, but as the arrival of young children – particularly joining primary school - often activates people to participate in community and social structures.

Alphington has a highly engaged community and deep social capital is an important part of what we treasure about Alphington.

Councils and Developers the world over are trying to identify what it takes to make cohesive and engaged communities. We think we have the secret sauce, and it is an important part of welcoming and engaging new residents so the divide between 'new' and 'old' Alphington is healed as soon as possible.

Of course there are many types of social capital, and not all are family based, but we submit it is easier and more effective to build on strong existing foundations than establish a new contrasting culture from scratch. The strong social capital structures in the area tend to be about volunteerism and engagement at the school, adult and children's sports and the

natural features of Darebin and Yarra parklands. It is not, for example, a culture based on, say, café/restaurant/bars, conspicuous consumption or high production eventism.

APMAG submits that, as the council represents the community in future development and planning, principles of diversity, integration and family affordability continue to be enforced.

While the developers may contend that 'the market' will determine housing stock mix, thus far the market has crafted a suburb with a strong border framework of family homes, interspersed seamlessly with a mix of smaller homes, semi-detached and unit dwellings, featuring close ties to social and environmental hubs.

In reality, choices like the decision to market to investor vs owner occupier, and wholesale vs retail buyers will heavily skew which segments of the market are heard.

Similarly the decision to sub-parcel development zones or bulk build slabs of homogeneous stock will shape stock outcomes, and an overly simplistic master framework of 'nice bits' and 'affordable bits' will limit new ideas on how a range of diverse housing options can

- meet a broad market into the future while preventing over-supply in any one niche,
- foster social cohesion and engagement within the development and across the resulting new Alphington community, and
- build growth capacity in an environmentally sustainable way.

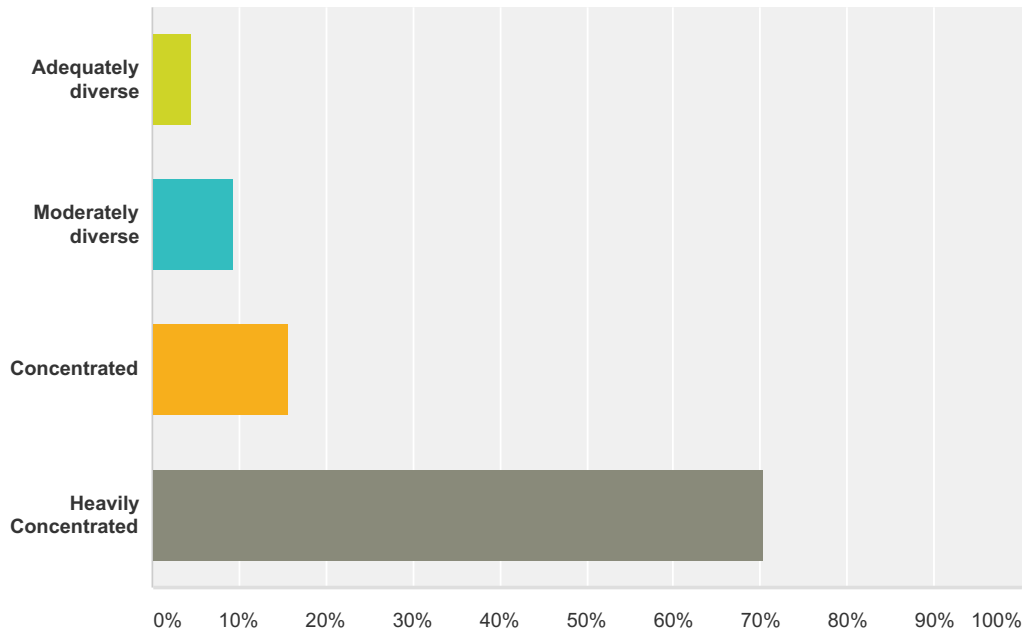
APPENDIX C

Survey Results

Q1 The development plan proposes 2,500 residential dwellings, housing up to 4,800 people in 948 one bed, 1224 two bed, 251 three bed and 77 four bed residences.

While these numbers are not yet finalised, how do you view this in terms of housing diversity in the development and in the context of the broader area?

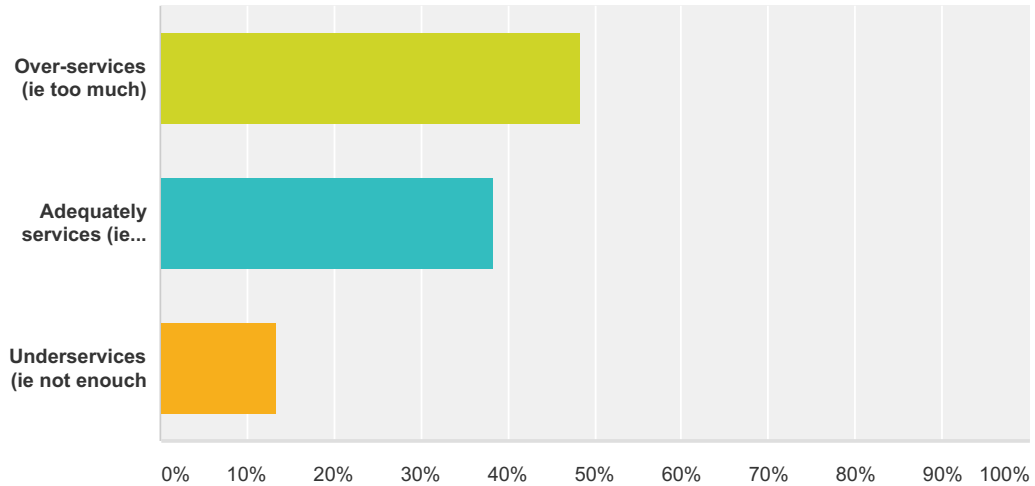
Answered: 64 Skipped: 0



Answer Choices	Responses
Adequately diverse	4.69% 3
Moderately diverse	9.38% 6
Concentrated	15.63% 10
Heavily Concentrated	70.31% 45
Total	64

Q2 The development plan proposes 19,300 sqm of retail floor space and a further 11,500 sqm of office floorspace focused northern areas of the site. How do you view this in terms of servicing the needs of the site and the surrounding suburbs?

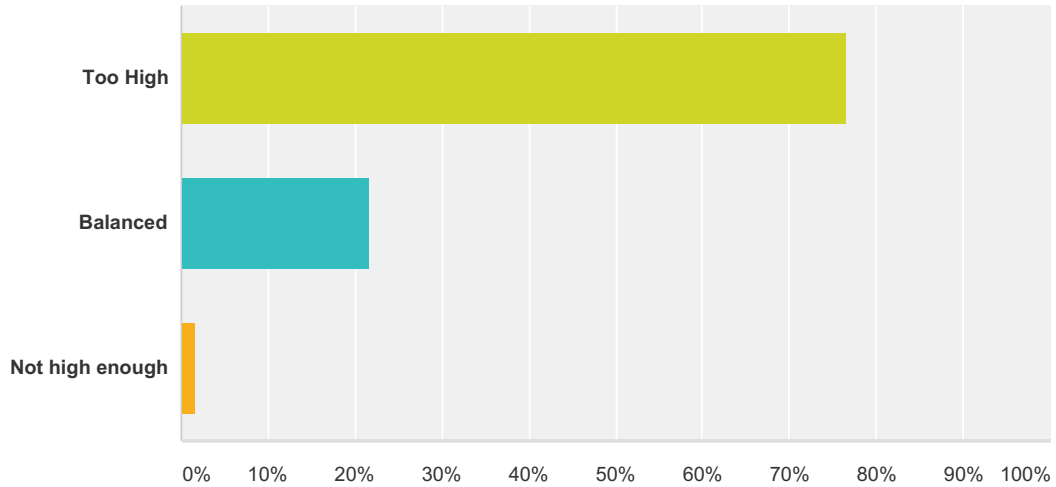
Answered: 60 Skipped: 4



Answer Choices	Responses
Over-services (ie too much)	48.33% 29
Adequately services (ie correct balance)	38.33% 23
Underservices (ie not enough)	13.33% 8
Total	60

Q3 The Development Plan Overlay sets out preferred and maximum building heights for the precinct, which provides indicative densities for the site. How do you view the building heights in the development plan?

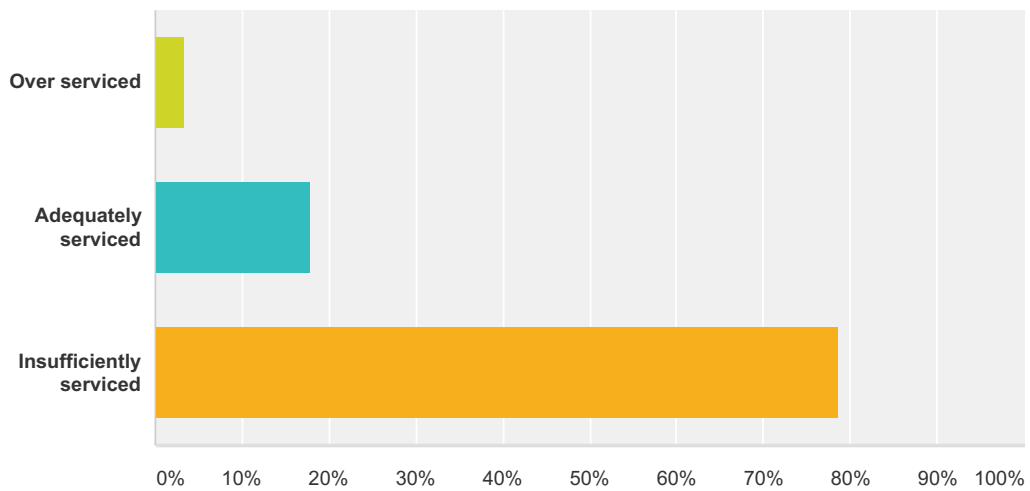
Answered: 60 Skipped: 4



Answer Choices	Responses
Too High	76.67% 46
Balanced	21.67% 13
Not high enough	1.67% 1
Total	60

Q4 Yarra Planning Scheme requires 4.5% contribution of either land or cash towards open space. Yarra Council endorsed a 4.5% land contribution which is approximately 0.75 hectares in area. The plan proposes open space predominantly in the Riverside Park, Heritage/Riparian Link and the Paper Trail Linear Park. How do you see the plan for open space servicing the needs of the site and surrounding suburbs?

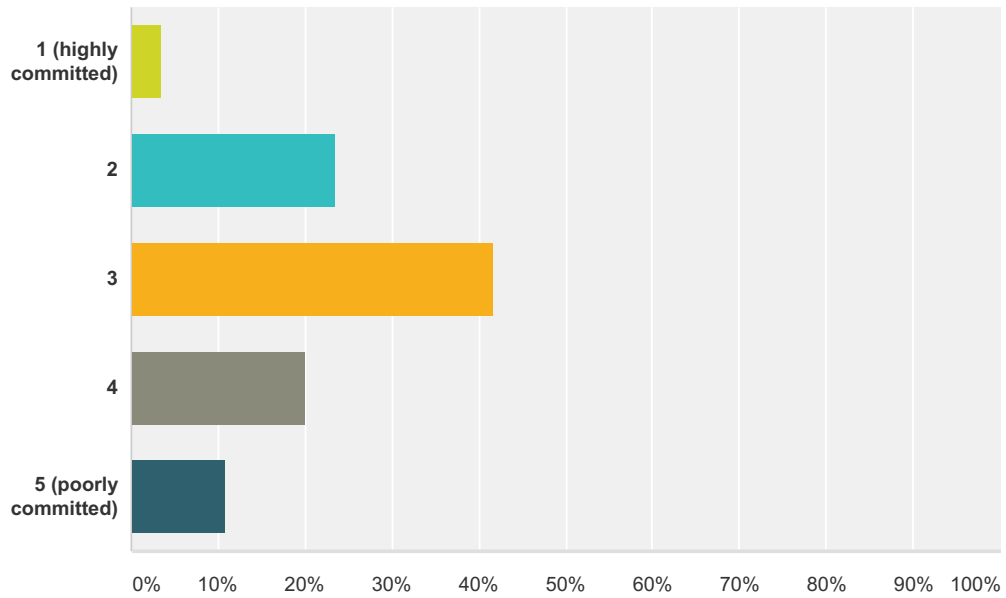
Answered: 61 Skipped: 3



Answer Choices	Responses
Over serviced	3.28% 2
Adequately serviced	18.03% 11
Insufficiently serviced	78.69% 48
Total	61

Q5 The plan outlines a number of Ecologically Sustainable Design (ESD) initiatives and commits to achieving at least 5 of the 6 possible elements using the Urban Design Institute of Australia (UDIA) EnviroDevelopment rating tool. How do you rate the plan's commitment to ESD principles and design?

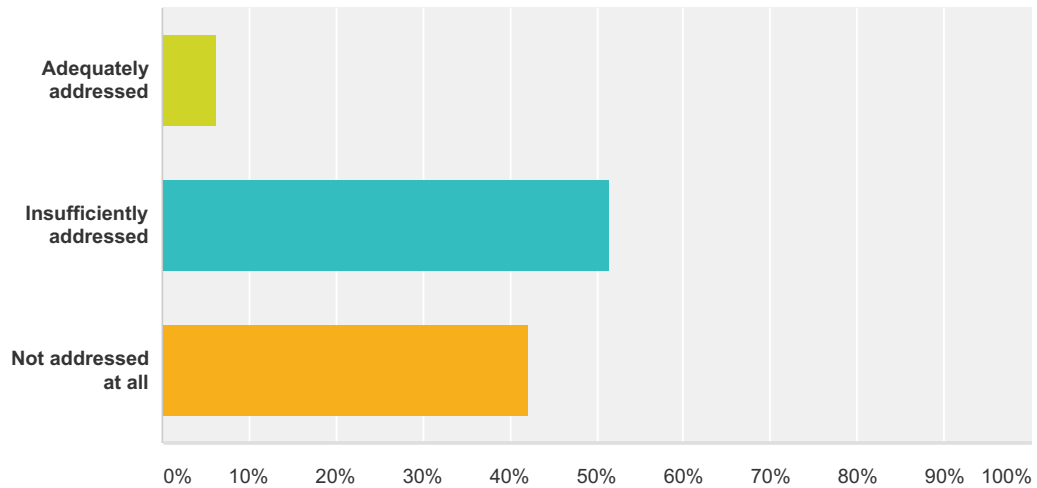
Answered: 55 Skipped: 9



Answer Choices	Responses
1 (highly committed)	3.64% 2
2	23.64% 13
3	41.82% 23
4	20.00% 11
5 (poorly committed)	10.91% 6
Total	55

Q6 How do rate the developers plan to address the increase of traffic flow both on the surrounding arterial roads and the internal connector roads? Bearing in mind that the widening of the Chandler Highway and the bridge over the Yarra is a matter for the State Government and Vic Roads.

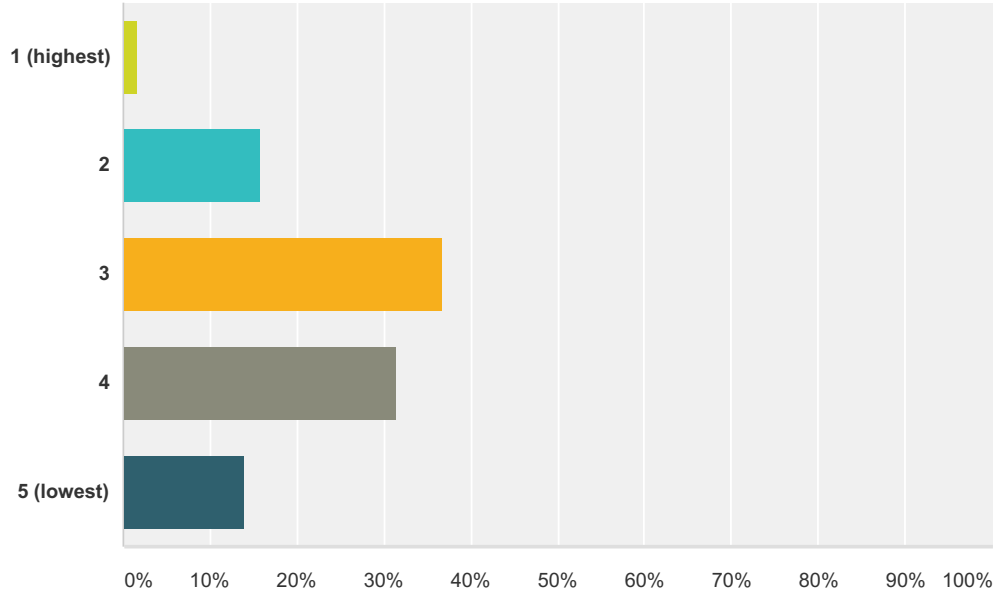
Answered: 64 Skipped: 0



Answer Choices	Responses
Adequately addressed	6.25% 4
Insufficiently addressed	51.56% 33
Not addressed at all	42.19% 27
Total	64

Q7 How do you rate the development plan's plan for the integration of sustainable travel means (walking, bike paths etc)?

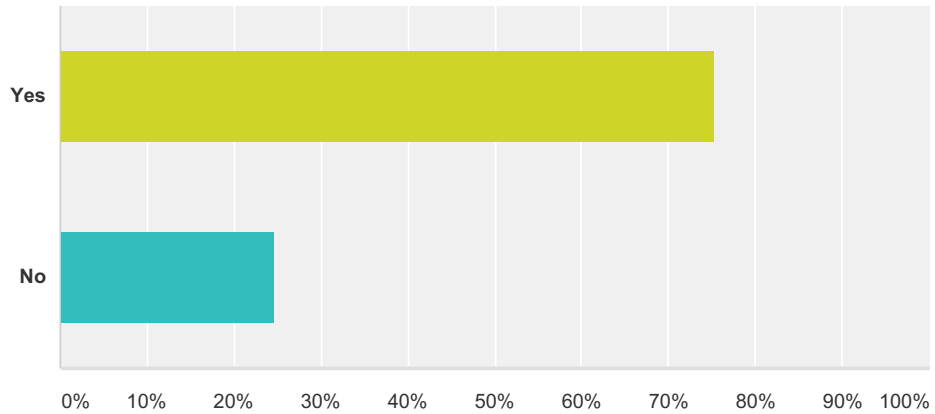
Answered: 57 Skipped: 7



Answer Choices	Responses
1 (highest)	1.75% 1
2	15.79% 9
3	36.84% 21
4	31.58% 18
5 (lowest)	14.04% 8
Total	57

Q8 The plan proposes adaptive re-use of existing industrial buildings to acknowledge the industrial heritage of the site. Do you think that the plan is responsive to the site's heritage?

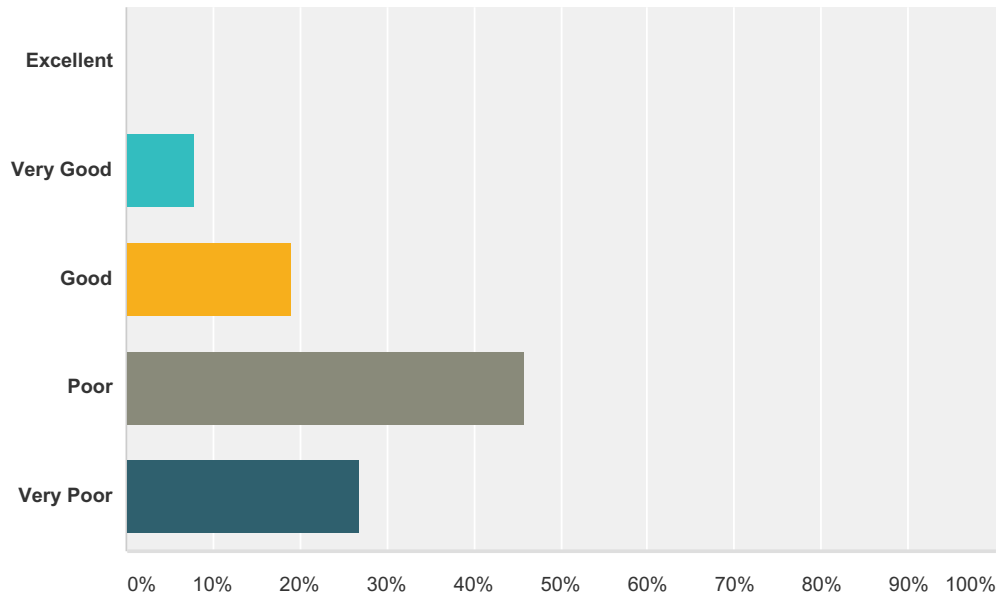
Answered: 61 Skipped: 3



Answer Choices	Responses
Yes	75.41% 46
No	24.59% 15
Total	61

Q9 Bearing in mind that building designs have not been produced or finalised, how do you rate the concept and overall vision for the site? Do you think the design guidelines give the community enough assurance about the final built form?

Answered: 63 Skipped: 1



Answer Choices	Responses
Excellent	0.00% 0
Very Good	7.94% 5
Good	19.05% 12
Poor	46.03% 29
Very Poor	26.98% 17
Total	63

**Q10 Please provide any further comments
that you wish to address.**

Answered: 25 Skipped: 39



South Alphington & Fairfield Civic Association Inc

Registration number A0035915M
PO Box 5027, Alphington, Vic, 3078

31 March 2015

City of Yarra
Via website

SUBMISSION REGARDING PROPOSED DEVELOPMENT OF FORMER AMCOR PAPER MILL SITE

SAFCA Inc., representing residents of Fairfield and Alphington, has concerns about the Development Plan for the former Amcor mill site. This document lists those concerns. We have deliberately kept this document as brief as possible. That may mean information or analysis relevant to Council may have been omitted. If any clarification or information about our analysis or opinions is required, please contact us. We also advise our wish to be further consulted if there are any material changes to the Development Plan.

SAFCA's concerns

We are concerned about the lack of specific commitments in the Development Plan. We consider the plans are in some ways more “concept plans” than “development plans” and would encourage Council to seek more specific commitments from the developer appropriate to a Development Plan before approving the plan.

We refer to information provided at the public information nights as examples of the lack of specificity. For example, at the public meeting of 17 March, questions about residential density and relative numbers of different sized apartments were answered by saying all such figures were non-specific and will be determined based on market conditions at the time each stage of the development is completed. Also, the developers stated that the open space requirement will be more than met, even excluding the Yarra River riparian zone, but that is not evident on the plans.

Our specific concerns are:

1. Inadequate consideration has been given to the impacts on the surrounding area of what we consider overcrowding on the site. From an initial estimate of 3,000 new residents during prior consultations, it is now proposed there be 4,000-4,500 new residents. We expect even more. While traffic, infrastructure and open space problems are foreseen, the high proportion of 1 and 2 bedroom apartments is the outstanding problem. All nearby residential land in the City of Yarra is zoned R1Z (Residential 1 Zone) and having a substantial area of higher density accommodation is inconsistent with the purposes of that zone – the Development Plan pretends that the residential density of an area like, say, Southbank can be placed into Alphington while ignoring that many of the services and facilities available to residents of densely populated areas are not available in the Alphington area nor will be in the proposed development.

2. Insufficient provision for car parking will mean crowding of nearby residential streets and reduced amenity to existing residents. We encourage Council to set realistic minimum provision of parking, put in place actions to prevent parking overflow to nearby streets and require that at least 95% of residential parking within the development be “off street”.
3. The impact of increased traffic in Heidelberg Rd and the Chandler Hwy has been greatly under-estimated. The potential problem is effectively ignored in the relevant expert’s report – it suggests that excess traffic will find other routes when no such practical routes exist. We consider this problem will be magnified by the relatively large area of proposed retail space, for which we consider the justification is weak. A meaningful plan for dealing with the increased traffic is needed before any permit should be granted, including consideration of reducing the retail space to that which is reasonably necessary.
4. The plan identifies certain community infrastructure needs but fails substantially on two issues: it fails to provide for any satisfactory provision of such infrastructure and fails to identify numerous important impacts on existing community infrastructure. All impacts must be properly assessed and a workable plan developed on how to manage them effectively.
5. There is no worthwhile plan for re-development of the Yarra River riparian zone into an effective river park that well serves the community. It seems the developer is keen to just divest this space because they cannot build on it. However, it is part of their land and appropriate redevelopment consistent with the existing Environmental Significance Overlay for the Yarra River Environs should be included in their plan. By way of example, we would refer the developer to the works over the last 15 years to “restore” the wetlands, partly funded and carried out by SAFCA, at the southern end of Alphington Park.
6. We consider the retention of the whole of the brick walls facing Heidelberg Rd is unnecessary from a heritage perspective and inconsistent with a new major development creating a quality urban landscape. We suspect the retention of almost the whole of the walls is principally to allow the developer to maximise floor space and avoid the set-backs that would likely be mandatory if the walls were demolished. We also note many consider them unsightly. If the heritage value of these walls is accepted, we suggest retaining the building between Parkview and Latrobe Streets and demolishing the building between Latrobe St and Chandler Hwy. Another benefit of such a change would be additional land for widening of Heidelberg Rd.

Additional information on each aspect of concern is attached.

Your sincerely,

David McKenzie

President, SAFCA Inc.

On behalf of SAFCA Inc. and the residents of Fairfield and Alphington

OVERCROWDING

SAFCA considers that the proposal to provide residences to accommodate 4,000-4,500 people and possibly in excess of 5000 people will result in serious overcrowding of the site. While we recognise the development must have some impact on the surrounding residential areas, we consider the increase above the previously indicated “3,000 residents” will result in excessive impacts on the local community. While the threats from overcrowding are many and some are covered within our five other major concerns, the aspects of most relevance to overcrowding are:

- (a) An unacceptably high proportion of one and two bedroom apartments
- (b) Excessive retail space
- (c) A substantial inconsistency between the existing character of the Alphington neighbourhood and the proposed development
- (d) Insufficient open space for community use within the development, and
- (e) Exacerbation of the existing traffic problems

Unacceptably High Proportion of One and Two Bedroom Apartments

The proposal is for 39% of the dwellings to be 1 bedroom, and 49% to be 2 bedroom, together making 88% of the total number of dwellings. Thus:

- (i) A large proportion of dwellings will be most attractive to investors rather than owner/occupiers
- (ii) 1 bedroom apartments are often occupied by transient tenants, so tenants and owners are less likely to become involved in the community than families.
- (iii) At the proposed price range, even the 1 bedroom apartments are unlikely to be affordable to low income tenants. We can find no evidence that the development will provide any “affordable housing”.
- (iv) 1 bedroom apartments offer no space for young couples to provide sleeping space for a child, and inadequate sleeping space for a single parent and child. Nor do they provide adequate sleeping space for a young adult child visiting older parents.
- (v) Small living and cooking spaces, making it less likely that the occupiers will entertain family, friends or neighbours. (ref i and ii above)

Excessive retail space

Based on our the analysis and the analysis of one of our committee members who proposes to lodge a personal submission with details of his analysis, the expert’s report substantially over-estimates the need for retail space within the development. We consider the proposed 18,000 m² of retail space to be a prime example of overcrowding on this site.

We can appreciate that many retailers would be very keen to secure space in a large Greenfield site that is close to a freeway. To be successful, the proposed retail space will have to draw a substantial number of customers from outside the development and the immediately surrounding area. We expect most such customers will access the site by car, un-necessarily adding to the severe traffic congestion that already exists in this area. We recommend that council only permit sufficient retail space for which there is a demonstrable need by the development and the immediately surrounding area, say within

2 km of the site. We expect that will be in the order of 5,000 m². If council does decide to allow more than 5,000 m² of retail space, we request building of such space be deferred until both the duplication of the Chandler Hwy bridge and the grade separation of rail and road in Grange Rd are completed.

Substantial inconsistency between the existing character of the Alphington neighbourhood and the proposed development

Alphington is principally a residential area. All nearby residential areas in the City of Yarra are in the R1Z zone, which is General Residential. We appreciate this allows for some development activity. While Alphington already includes a mix of traditional family homes and blocks of 1 and 2 bedroom units, the residential nature of the area remains intact. The schools and facilities are principally “family focussed” and we strongly believe that should remain largely unchanged.

In contrast, the substantial number of 1 and 2 bedroom apartments will likely most appeal to singles and couples without children. We expect such residents to look for different facilities than exist in Alphington such as theatres, bars and nightclubs. Areas with multiple multi-storey residential developments such as Southbank, Docklands and parts of Richmond are more suited to such a demographic. Alphington isn't as it doesn't include substantial retail or commercial leisure facilities and we consider putting such facilities in Alphington to be bad planning policy.

We recommend Council recognise the essentially residential nature of the Alphington area, allowing for commercial use along Heidelberg Rd, and ensure that the number of residents, the demographic appealed to and the facilities provided are consistent with the current family biased nature of the suburb.

Insufficient open space for community use within the development

We are concerned that the proposed amount of open space will itself be insufficient and ineffective. While we further consider this issue in the section about community infrastructure, it is of key relevance to overcrowding – the more of the site that is covered by buildings, the less open space there will be.

The Development Plan has limited information about open space and seems to rely principally on one “linear park”. We propose that the open space within the site include separate open spaces, which we would call “mini-parks”, fully available for passive non-commercial community use.

We ask Council re ensure that the open space requirements mean that there will be genuine open space for residents to use and that the Development Plan complies with the DPO and applicable planning standards.

Exacerbation of the existing traffic problems

Chandler Highway and Heidelberg Road already have severe traffic problems, recognised the community, the RACV and the government. At the 17 March public meeting, a VicRoads representative said the duplication of the Chandler Highway bridge was proposed but that government funding had not been committed and the project would take an estimated four years to complete from when funding was committed. While the

developer cannot control government improvements to the road and rail network, Council should ensure that the development is staged such that additional traffic impacts are minimised until both the Chandler Highway bridge duplication and the Grange Rd rail-road grade separation are achieved.

We are also concerned about maintaining ready access to Heidelberg Rd for existing residents and additional traffic and parking in nearby residential streets.

We propose that the simplest way to minimise the overall negative traffic impacts is to reduce the number of planned residents on the site.

CAR PARKING

The Proposal and attached Consultants Report titled *Traffic Management Plan* acknowledges that the standard Yarra City Council Planning requirement is for the provision of 4662 car parking spaces on the site (Table 6.1). The report then considers (on the basis of selected publicly available data) the anticipated demand for parking on the site and finally in Table 6.7 recommends the following “standard” for the provision of parking spaces

Type of Dwelling	Category	Number of Bedrooms Or Size	Statutory Parking Rate	Number of Spaces Required	Proposed Parking Rate	Number of spaces Suggested
Residential	Apartments or Townhouses (residents)	2182 1 br or 2 br	1	2182	1	Less than 2182
Residential	Apartments or Townhouses (residents)	243 3 br	2	486	2	486
Residential	Apartments or Townhouses (visitors)		0.2	485	0.12 or 0.15	322
Residential	Detached Houses (residents)	75 3 br	2	150	2	150
Residential	Detached Houses (visitors)		0.5	37	0.5	37
Retail/Commercial	Shops	12100 m ²	0.04	484	0.023	278
Retail/Commercial	Supermarket	8200 m ²	0.05	410	0.045	369
Retail/Commercial	Offices	11500 m ²	0.035 (of net space)	402	0.035	402
Community	School	9 teachers	1	9	5	45
Community	Child care centre	80 children	0.22	17	0.19	15
Total				4662		4286

The Consultant’s report is not clear enough to determine the number of car parking spaces which it recommends, but by marginally reducing some statutory rates, arguing (probably erroneously) that residents in affordable housing won’t own cars and making other questionable assumptions, the best guess as to its recommendation is a reduction of at nearly 400 parking spaces below the minimum statutory requirements as shown in the last column of the table above.

The consultant argues that detailed parking plans will be presented at a later stage of the design and approval process. This is all very well but the suggested number of spaces is completely unsatisfactory to SAFCA. We already believe that the site is overcrowded and will provide a catastrophic burden to local infrastructure. The problem with parking spaces is symptomatic of the whole approach to this design. The developers’ argument that they are seeking to produce a design which is modelled on the streets of Alphington is specious at best and deliberately misleading at worst.

It is clear that the developers intend to use the roads inside the AMCOR site to meet the planning application parking requirements. This will push considerable parking onto the nearby streets of Alphington. The ultimate effect will be to make the roads around Alphington Park a traffic and parking gridlock.

It should be in the developers' interests to provide adequate off-street parking. Without appropriate and adequate car parking the development will not meet the standards that apply in the rest of Alphington and selling the dwellings at an appropriate price is likely to be difficult.

Apart from the number of parking places provided in the plan, the clarity of the proposal leaves much to be desired. The consultant's report contradicts the suggested layout of the site by referring to underground car parks only in Precinct 1 and "angled parking" and "angled on-street parking", inter alia, in Precincts 2, 3, 4, 5 and 6 in the first paragraph of Section 2.4 and in Figure 2.6. While, confusingly, in Fig 32 of the Master Plan Precincts 1, 2, 3, 6 and part of 7 are designated as having "consolidated" parking. In addition, Table 6.3 which relates only to ABS figures for residential parking suggests that residential car ownership is likely to exceed the statutory residential demand by possibly as much as 500 places. This is not addressed in the proposal.

For all of these reasons SAFCA urges the City of Yarra

- To set a realistic evidence based minimum requirement for off-street car parking which meets the statutory minimum for resident parking
- To put in place actions to prevent parking overflow into nearby streets, particularly around Alphington Park, perhaps through a traffic and parking management plan
- To require a minimum of 95% of mandatory parking to be off-street to compensate for the multi-use nature and size of the streets in the development

TRAFFIC MANAGEMENT AND TRANSPORT

SAFCA believes that the overcrowding in this development raises many concerns regarding traffic management and transport and SAFCA questions the assumptions upon which the traffic management plan is based.

The report suggests that an additional 1600 to 2900 vehicular trips in peak hour will be generated by the development and argues that this increased traffic is likely to influence current travel behavior. The supposition that the traffic volumes will reduce because of congestion and increased travel times is contrary to logic and ignores the unique location of the proposed development.

The argument proposed is that non-local traffic will find other routes and cites the development in Doncaster as an example of this. SAFCA believes this is not a useful analogy. The locational situation of the Amcor site is very different from that of Doncaster. The modeling ignores the fact that the Chandler Highway is the only river crossing which funnels traffic north-south in the immediate area. It is approximately 5km to the Burke Road Bridge and even further to the Burnley Street or Punt Road bridges. In addition, there is no east-bound entry to or west-bound exit from the Eastern freeway at Burke Road.

Other problems are

- The proposed new exit road from the development into Chandler Highway with traffic lights will create queuing problems and exacerbate congestion in Chandler Highway. The planned new intersection will encourage non local traffic to take short cuts through the development.
- The Chandler Highway is considered by the RACV as the second most congested bottleneck in Melbourne.
- The report fails to take into account impacts on surrounding roads e.g. queues waiting to cross the Chandler Highway Bridge in a Southerly direction can, at present, back up in Heidelberg road to Station Street, Grange Road to Darebin Road and westbound traffic in Heidelberg Road at morning peak. Extending these queues will impact heavily on surrounding traffic flows.
- The duplication of the Chandler Highway Bridge, not taken up in the study, is currently unfunded and appears to be only at the discussion and preliminary design phase. No clear time frame has been identified. The Grange Road grade separation of the railway crossing is also unfunded.
- There is no detailed planning in the document as to how public transport capacity (i.e. Bus and Train and bike routes) will be able to cope with the increased demand.
- There appears to be no dedicated cycle paths proposed on the site, only shared pathways which can be dangerous for pedestrians and cyclists
- The specialty retail and supermarket developments will generate extra traffic.
- There are currently two very large supermarkets in Ivanhoe and other retail nearby but the survey draws its boundaries in such a way that these are not included, thus erroneously attempting to justify the large retail space in the development.
- The proposal to ban right turns from the Northern end of Coate Ave is a totally unacceptable imposition on residents of Coate and Rex Avenues. It will mean substantial inconvenience for those wishing to travel east or south. Direct access to Chandler Hwy southbound from Rex Ave is already not practical due to traffic flows. Further, if traffic must turn left out of Coate Ave, there are no practical U-turn facilities until the lights at Station St, and the room for queuing there is already limited. If traffic will not be permitted to turn right out of Coate Ave, there must be an effective U-turn facility provided within a short distance, say 100 metres.

In addition to the specific problems and suggestions above, in summary, SAFCA suggests a reduction in the density of residential and retail space to help to reduce traffic congestion. This reduced density could be used to create a more valuable environment for residents in the development.

COMMUNITY INFRASTRUCTURE ASSESSMENT

The report by Consultants ASR Research for the AMCOR development identified the following needs for the new residents:

- * Child care / kindergarten
- * Primary School
- * Maternal health care
- * Community meeting rooms
- * out-door recreation

The proposed solution is for a community hub that will provide maternal health care, kindergarten rooms, child-care and community meeting rooms. There is a proposed

improvement of Alphington Park facilities without any specific improvements being listed. This falls short of the DPO requirements (page 8) of providing funding and implementation mechanisms for the identified shortfalls in facilities.

The recognised need for informal recreational spaces will not be met by the so called 'linear parks' which seem more to be thoroughfares and not parks as we typically know them. Despite the developer claiming at the public meeting of 17 March that the planned open space exceeds the required minimum, even excluding the riverbank area that cannot be built on anyway, we can find no evidence of such open space on the plans.

As detail isn't provided, we wonder in relation to "linear parks" whether they are what we typically know as open space. Can one sit and have a picnic there, have a BBQ or use a playground? By way of example, Arthur St between Heidelberg Road and the river is approximately 25m wide and is a "no through road". Bikes can be ridden and people can walk along it but this area is not "open space" like Fairfield Park or Alphington Park and simply being available to the public doesn't make it a "park" or of significant use as open space. Pathways have to be provided anyway so people can access their homes but we wonder whether the plan isn't including at least some access pathways as "open space". We consider that open space should be primarily separate to regular pathways and footpaths and ask Council to ensure that the proposed linear park and any other proposed open space is indeed genuine "open space" for public use. That should exclude any component used for commercial purposes, such as cafes.

The riverbank area that is called outdoor space is in parts very steep and much is unusable for recreational purposes.

Alphington Park is heavily used by the existing residents, for walking and informal games and the playground and BBQ facilities are also heavily used. The oval is well used by local schools and sporting teams and the open area south of the oval committed on Saturday's to a dog obedience club. The Bowls club greens are heavily used in summer and the rooms are used most days.

While Alphington Park is a substantial piece of open space, existing commitments mean there would be inadequate informal open space after the expected increase in population, which will result in a substantial loss of amenity to the existing residents.

The report recognises the need for more out-door formal recreational facilities on page 9 but does not address any solutions to this issue. On page 40 of the report, the consultants state that the demand would be too small for a multi-purpose stadium or aquatic centre but that there is a need for formal outdoor recreation. Again, no solution is offered.

The Development Plan makes no provision for formal recreational spaces even though the City of Yarra is at capacity with the use of sporting facilities, with many clubs having to use venues outside Yarra. The local Aquatic and Leisure Centres (Ivanhoe, Northcote, Fitzroy, Kew and Collingwood) are heavily used in summer and the lap lanes are extremely full during peak times. The exercise classes run at peak times at these facilities are also full and turn people away.

Indoor basketball courts and netball courts are also at capacity with some teams having to use facilities outside the area and have training times heavily reduced. In particular,

SAFCA considers that provision of such courts is essential within the development. There is insufficient space within Alphington Park unless existing facilities are given up.

The government Primary and Secondary Schools in the area are at or close to capacity. These are Alphington Primary, Fairfield Primary and Northcote High, Kew High, Fitzroy High, View Bank Secondary College and Thornbury High. The report noted a lack of government schools in the area and the development is expected to house 140 primary and 100 high school students. This is an excessive burden for the schools in the area.

In conclusion, the report recognises that the existing community infrastructure is inadequate but there is no clear plan in particular for providing for the informal and formal recreational needs of the expanded population. The proposed improvement of Alphington Park, additional outdoor court infrastructure (page 9 of consultant's report) cannot be an effective solution when the spaces are already fully utilised. Playing field enhancements does not mean that more teams can play when the grounds are fully used already.

SAFCA believes that a detail plan is needed to ensure there is no loss of amenity by the existing community.

The report also urges DET to purchase land for the provision of a Primary School campus and we urge Yarra Council to support this proposal.

The report states there will be 'minimal impact on established local indoor recreational facilities' (page 9) and that the demand is considered to be too small to have any significant impact. SAFCA strongly disputes these assertions. We consider the assessment is totally inadequate as it does not provide workable solutions to the problems that a population increase of this magnitude will cause. In particular, we consider that the plan does not provide what is required in the DPO.

YARRA RIVER

The DPO for the site has the following requirements:

- Provide first 30 metres of land to maintain ongoing public access, protect riparian vegetation and maintain landscape values.
- Construct pedestrian and bicycle path connecting with existing pedestrian and cycle access ways
- Protect and enhance the Yarra River environs
- Enhance the bushland character of the river corridor
- Integrate with planting along the Yarra River

The riverside within the 30 metre zone includes remnants of the Runnymede garden terracing, rubble pushed down from the industrial site and storm water and other piping inlets and outfalls into the river. Its character is defined by large trees, sometimes on steep slopes, including both indigenous and non-indigenous species but it is not bushland in the way that the Alphington Park riverside to the east is. Consideration should be given to replacing inappropriate non-indigenous species with appropriate riparian zone vegetation and managing weeds effectively.

The existing path along the river was opened up to the community about 10 years ago following some replanting in the Runnymede area which was done by Amcor and the community. The report reads as though riverside access will be opened up by the development – that isn't the case.

Towards the Chandler Highway end, the river water level is, we estimate, 5 to 10 metres below the flatter area along the riverbank. The plans describe boat launching, a jetty and other water activities. To facilitate these would require significant earth works which would be inconsistent with maintaining the riparian environment and the existing steep slopes up to the buildable area. We recommend these ideas should be dismissed as impractical and detrimental to the river environs. However, we consider the continued existence of unnecessary water inlets and outlets to the river is inappropriate: they are both unsightly and dangerous (they are currently fenced off) and should be removed by the developer.

If river access is required, we believe that would be better sited in the vicinity of the old swimming pool at the western margin of Alphington Park, where the nearby land is around 2 meters above water level. Maybe the developer would consider funding the provision of access to the river for canoes and boats at that location?

The plans describe bikeways leading east and west – in both cases these do not give connection to existing formed bike paths leading into or out of Alphington. Current bicycle use is principally by those with “mountain” bikes seeking “off track” experiences. Why would a commuting cyclist go down to the path at Chandler Hwy only to climb up at Alphington Park (or vice versa)? They wouldn't. Commuting cyclists are likely stay at road level and go through the development. We consider there is no need for a paved bicycle path, but recommend the construction of separate unpaved pedestrian and bicycle tracks along the riverside to improve pedestrian safety – we suggest that is preferable to a shared path.

The high density and number of people on the site will inevitably put pressure on the river environs – the council should ensure that anything proposed for the riverside is consistent with the Environmental Significance Overlay for the Yarra River Environs in the Yarra Planning Scheme – particularly the Objective in 2.0 of providing “a linear passive open space link along the waterway including the provision of a shared use path”, noting our prior comments about shared paths.

Overall, as the land currently belongs to the developer, we consider that the developer should fund appropriate works so that the site is suitable for longer term use by the community before ownership is handed to any public body.

HEIDELBERG RD FACADE

Lovell Chen have produced a lengthy and detailed document about heritage issues. One matter in that report is of concern to us, namely the proposed retention of 100% of the façade to Heidelberg Rd.

For many years, all users of Heidelberg Rd have endured viewing the brick façade of the mill properties. Many regard it as unsightly, if not ugly, and see the mill redevelopment as

an opportunity to replace it with structures that fit much better with the streetscape and add to the visual amenity of the precinct.

The consultants have justified the façade has heritage value. Their justification includes reference to the definition of heritage. We are deeply suspicious that the need to refer to the definition of heritage implies that any heritage value is not readily apparent to a casual reader of the document or casual observer of the building.

We are further suspicious that the underlying reason for classing this building as of sufficient heritage value to retain the whole façade is to allow the developer to construct floor space immediately abutting almost the whole of Heidelberg Rd to a height of 4 or 5 stories, something we expect would not be permitted in a new building.

We agree that the structure is not a common one in Melbourne and there is a degree of heritage related merit in retaining some of the structure. However, we strongly question the need to retain the whole of the Heidelberg Rd façade, especially when it is only the façade that will be retained – any heritage value of the overall structure will be dispensed with if the balance of the buildings is not also retained.

We submit that retaining such a stark and high façade along Heidelberg Rd is inconsistent with the character of the Alphington area. We don't accept that the heritage value of these buildings is sufficient to totally ignore having appropriate setbacks and reasonable visual amenity in the future along Heidelberg Rd.

If Council agrees that the façade has heritage value, we ask that be recognised by retaining the building abutting Heidelberg Rd between Parkview and Latrobe Streets but that the developer be required to amend their plans on the basis that the building between Latrobe St and Chandler Hwy is demolished and replaced by buildings more sympathetic to their location and the streetscape. This would also provide additional flexibility in planning vehicle, bicycle and pedestrian pathways in the vicinity of the corner of Heidelberg Rd and Chandler Highway.

WEST ALPHINGTON RESIDENTS, INC.

Introduction and Executive Summary

West Alphington Residents Inc (WAR Inc) has formed in response to the unique issues that the potential development of the Alphington Paper Mill site poses for the large number of residents who live to the West of Chandler Highway.

For the most part, the Development Plan fails to consider the significant population that exists to the West, and instead focuses on the 'sensitive' interface to the East. However, there are sensitive interfaces to the West also, including Chandler Highway, Rex & Coate Avenues, Margaret Grove, Yarraford & Tower Avenues, and Perry Street. In fact, this residential area, which is characterised by single storey 1920's residential housing and unit developments, sits in the 'shadow' of the proposed development more than any other area, and as such, we ask that Council consider the distinctive issues of concern for this existing and growing community.

Overall, the Development Plan completely fails to achieve the Council's vision set out within the DPO, including most significantly that the area be a sustainable, predominantly residential community.

Summary

By way of summary, the issues relevant for the west Alphington population include:

Item	WAR Inc Proposal
1.0 Chandler Highway Bridge duplication	<i>West Alphington Residents Inc. requests that the Yarra Council advocates for a duplication of the Chandler Highway Bridge to the East to minimise the impact on the residents of West Alphington.</i>
2.0 Built Form Along Chandler Highway	<i>West Alphington Residents Inc. requests that the Yarra Council strictly observe the limits stipulated in the DPO on the Chandler Highway boundary (3 storeys at street front to a maximum of 5 storeys) to ensure the local community is not adversely affected by the proposed built form.</i>
3.0 Retention of 1954 Boiler House & Machine Room 6	<i>West Alphington Residents Inc. requests that the Yarra Council review the decision to keep the 1954 Boiler House, as its heritage value is questionable; we request that the height restriction specified in the DPO (3 storeys) is strictly adhered to in this section of the development as it has an interface with the Yarra River environs.</i>

	<i>West Alphington Residents Inc. requests that the Yarra Council review the decision to keep the façade of Building 6, as its heritage value is questionable and it provides for no setback from Heidelberg Road.</i>
4.0 Proposed changes to the Entry/Exits of Adjacent Streets	<i>West Alphington Residents Inc. seeks reassurance from the Yarra Council that no change will be made to vehicular access in and out of Coate & Tower Avenues and Perry Street and that residents will be able to continue to turn right onto Heidelberg when exiting the area, and turn right into these streets when entering from Heidelberg Road.</i>
5.0 River front	<i>WAR Inc requests that the Yarra Council strictly enforces the limits clearly stipulated in the DPO on the river interface to ensure the amenity of this sensitive area is maintained for the benefit of all for generations to come.</i>
6.0 Traffic	<i>The traffic plan presented by the developer is totally inadequate and does not address the current gridlock in the area, nor provide solutions for the significant increase in traffic that will result from the development. WAR Inc requests that the Yarra Council commissions an independent study to ensure this important issue is considered with appropriate long term planning introduced into this process.</i>
7.0 Retail Commercial	<i>WAR Inc. note that the developer seeks to double the allowance for commercial space from that stipulated in the DPO. WAR Inc seeks reassurance from the Yarra Council that the limit specified in the DOP will not change.</i>
8.0 Community Facilities	<i>WAR Inc requests that the Yarra Council stipulates that the developer must provide adequate community and recreation facilities to serve the existing and new community that will reside there.</i>
9.0 Open Space Provision	<i>WAR Inc notes that the developer has not provided any allocation for open space instead borrowing from Alphington Park (at capacity) and the obligatory river environs, and the river walk, and setting out linear walkways which are at best passive by nature and are really private thoroughfares.</i> <i>WAR Inc requests that the City of Yarra stipulates that the developer must provide further open space in keeping with the expected population size that will occupy the development.</i>
10.0 Lack of Housing Diversity	<i>WAR Inc notes that 88% of homes will be 1 & 2 bedroom. WAR Inc. requests that the City of Yarra stipulate improved housing diversity to address the need for family accommodation in keeping with the local neighbourhood character of Alphington.</i>

Conclusion

As set in this report, West Alphington Residents, Inc. is concerned with the immediate local issues that will impact our homes, streets, and neighbourhood character. In addition, we consider that the developer has missed a wonderful opportunity to provide quality urban infill for new residents complimented by great design, excellence in community facilities and open space and a town heart and centre for Alphington.

We request that Council:

1. Seek peer review of all technical reports;
2. Require a new, properly prepared traffic report based on adequate assumptions about existing and new traffic conditions;
3. Continue to consult with residents of west Alphington and West Alphington Residents, Inc. in relation to any changes to traffic flows into and out of our local streets;
4. Support West Alphington Residents, Inc. in its position that the duplication of the Chandler Highway Bridge should be on the eastern side;
5. Require the developer to reassess the Development Plan by:
 - a. Respecting the provisions of the DPO in relation to built form along Chandler Highway and the River precinct both in relation to heights and site coverage;
 - b. Demolishing the 1954 Boiler House;
 - c. Set aside more open space within the site;
 - d. Significantly reduce the retail and commercial component to better align with Council's vision set out in the DPO.
6. Liaise with the community, the developer and the State Government to make better provision for community facilities on the site.

Yours sincerely,

Eve Williamson & Tiffany Crawford-Lane
On behalf of West Alphington Residents, Inc.

1.0 Duplication of the Chandler Highway Bridge

West Alphington Residents Inc. recognises that the greater community is demanding the expansion of the Chandler Highway Bridge to accommodate the very high existing traffic flows and to relieve congestion. We acknowledge this is not an issue within Council's immediate jurisdiction; however, it is an issue Council can liaise and advocate strongly on. The development of the AMCOR site allows for some well considered forward planning regarding this important arterial road. For these reasons we include it in our submission.

We strongly believe that Council should advocate on behalf of the community and urge the developer to make a provision of land for the expansion of the bridge. *We believe that positioning a bridge on the East is the best outcome for the community as it will:*

- minimise the impact on existing residences that abut the existing bridge to the West;
- have a similar cost to placing the bridge on the West;
- land can be compulsorily acquired from the developer to allow for the work (formerly the land was government-owned railway sidings); and
- allows for maintenance of the pedestrian and cycling paths on the Western side of the existing bridge.

In 2014, VicRoads were seriously pursuing a proposal to expand the bridge to the East of the Chandler Highway and undertake a public land acquisition from the developer so that the bridge could be placed to the less sensitive side on the East. The Melbourne Water sewer upgrade has removed the previous cost and practical impediments that prevented the location of the duplication to the East.

2.0 Built Form along Chandler Highway

The Development Plan Overlay clearly provides for preferred heights at the Chandler Highway street interface of three storeys at the road interface, rising to a possible five storeys in "section B". It requires well-articulated buildings, views across the site and breaks in built form. The Development Plan clearly ignores these requirements and seeks to significantly exceed these clear limits. The table below provides quotes from the Design Principles and DPO to highlight the clear disparities.

West Alphington Residents Inc. requests that the Yarra Council strictly observe the limits stipulated in the DPO on the Chandler Highway boundary to ensure the local community is not adversely affected by the proposed built form.

Issue	Development Plan	DPO	Comment
Chandler Highway Interface Built form	<p><i>5-8 storeys with the possibility for more height</i></p> <p><i>Apartments - 5 storeys preferred, with possibility for additional height with planning approval.</i></p> <p><i>3 storeys preferred, potentially higher along the Chandler Highway interface.</i></p> <p><i>Consider the composition of higher roof forms</i></p>	<p><i>3 storeys at street wall</i> <i>5 storeys in Section B</i> <i>3 storeys in Section E with 2 storeys at the river interface</i></p> <p><i>The development will provide a transition in the scale of buildings from Heidelberg Road and Chandler Highway stepping down to the Yarra River in the south and Parkview Road as appropriate.</i></p> <p><i>The development will protect and enhance the Yarra River environs.</i></p>	<p>The developer is requesting to more than double the preferred heights specified in the DPO. This is far in excess of the former AMCOR built form and is not reasonably in accordance with the heights expressed. The proposed heights will overshadow the community located to the West.</p>
Site coverage Chandler Highway Interface	<p><i>100% site coverage</i></p> <p><i>The Outer Circle Precinct will contain long north south aligned buildings acting as a built form edge to Chandler Highway</i></p> <p><i>East-west permeability through the Outer Circle precinct is limited</i></p> <p><i>Allow up to 100%. Site permeability may be 0%</i></p>	<p><i>Articulation and breaks in built form</i></p> <p><i>Viewlines from the Yarra River (north side from the portion of the path in Willsmere Park opposite the Amcor Site), Chandler Highway, Heidelberg Road and Parkview Road.</i></p> <p><i>To ensure new buildings are well spaced and offset to distribute access to outlook and sunlight between built forms and manage overlooking between habitable room windows where possible;</i></p> <p><i>To ensure that building heights consider and respond to the over shadowing effects within the site and on adjoining land;</i></p> <p><i>To ensure that building heights provide an appropriate transition to site interfaces;</i></p> <p><i>To provide wind climate design to ameliorate adverse wind conditions at street level, public spaces, balconies and adjoining properties;</i> <input type="checkbox"/> <i>To provide acoustic design treatments that addresses the impact of existing and potential noise particularly from road traffic;</i></p> <p><i>Built form and articulation should avoid long and continuous facades;</i></p>	<p>The developer is planning limited articulation, which undermines the DPO requirements. This will result in:</p> <ul style="list-style-type: none"> - no viewlines across the site from the west looking east - impermeable interface for sunlight in the morning and evening - overshadowing on adjoining land - poor building height transitions - wind tunnelling & sound reverberation onto the adjoining residential neighbourhood. <p>This will clearly have a negative impact on the community living to the West of the site.</p>

3.0 Retention of 1954 Boiler House & Machine Room 6

West Alphington Residents Inc is skeptical of the intent to retain selected buildings within the development. We suggest that these buildings are in fact being retained because they offer an opportunity for the developer to maximize height and built form where it would not otherwise be available within the DPO.

West Alphington Residents Inc. requests that the Yarra Council review the decision to keep the 1954 Boiler House, as its heritage value is questionable; we request that the height restriction specified in the DPO is strictly adhered to in this section of the development as it has an interface with the Yarra River environs.

West Alphington Residents Inc. requests that the Yarra Council review the decision to keep the façade of Building 6, as its heritage value is questionable and it provides for no setback from Heidelberg Road.

1954 Boiler House.

This building is one of the largest on the site and sits within the river precinct where a building of such height would not otherwise be permitted. The claim as it having heritage value is spurious. Its retention sets a dangerous precedent for the construction of high buildings close to the river, which is not supported in the Yarra Planning Scheme or by the State Government and its pledge to protect of the river corridor.

The necessary physical reinterpretation of this building (to remove asbestos), especially for the curtain glass wall, will certainly undermine any heritage value. The building has questionable aesthetic appeal, has now been vandalized extensively, and includes significant asbestos in its construction. The building is totally inappropriate in its riverside context now that factory operations have ceased.

In the event that the Boiler House is retained, we note that one of its heritage values is the existing glazing and frosted, industrial glass – a distinctive feature of curtain wall architecture. If retained, we ask that Council ensure such heritage aspects are reinstated as the existing materials have been variously destroyed, damaged and vandalized and require replacement. We further ask that Council ensure no overlooking occur of the adjoining residential area to the West.

Heidelberg Road (machine room 6 (orange building))

This building presents an inhospitable and dominating façade along Heidelberg Road and has no setback from the footpath. Its retention limits opportunities to create a welcoming and more aesthetically pleasing entrance to the new development. The developers have indicated that the Council requires the retention of this building and if this is the case, we ask that this be re-examined.

We further note the comments of Lovell Chen that one approach is to retain buildings and preserve rather than restore them. Such preservation lends itself to public spaces

and uses. We would be delighted to see the encouragement of the retention of such space/s and for them to be given over in original form to the public for use a public space whether as a gallery, library, or community facility.

4.0 Proposed changes to the Entry/Exits of Adjacent Streets

West Alphington Residents Inc. seeks reassurance from the Yarra Council that no change will be made to vehicular access in and out of Coate & Tower Avenues and Perry Street and that residents will be able to continue to turn right onto Heidelberg when exiting the area, and turn right into these streets when entering from Heidelberg Road.

A proposal to eliminate the ability to turn right into/out of Coate Avenue is discussed in the Road Safety Audit as a recommendation on page 17 of the GTA report. This proposal is strongly opposed by residents of Coate and Rex Avenues. It will lead to significant detriment and traffic impost on our local streets and must not be supported by Council.

It is stated that eliminating the staging from Coate Avenue turning right into Heidelberg Rd would increase storage for the right hand turn into Chandler Highway.

However, if the right hand turn from Coate Avenue was eliminated it was noted by GTA that eastward heading traffic from Coate Avenue could exit from Rex Avenue and turn right at Heidelberg Rd. Our experience shows that this turn is difficult and extremely dangerous because the heavy traffic leaving the Chandler highway Bridge speeds up past Rex Avenue.

Even with changed traffic conditions on Chandler Highway with any new intersections, Rex Avenue is a tiny single lane street that was originally a sewerage easement. Further, Coate and Rex Avenues have undergone considerable change over the past 4 years with significant new developments adding over 100 new residences. As a result, the traffic flows are considerable. Rex Avenue is not able to absorb all of the traffic that would otherwise seek to turn right onto Heidelberg Road. Further, there is no mechanism for a resident of Coate Avenue or Rex Avenue wanting to head south over the bridge to achieve this without a U-turn.

West Alphington Inc. further notes that it is the *same traffic consultants* (GTA) who commented to Council and VCAT in their sworn expert evidence that Rex Avenue could absorb the new traffic introduced by Riverwood and 1-3 Rex Avenue *because* it had a right turn out of Coate onto Heidelberg Road. They further acknowledged the near impossibility of right turns into Chandler Highway from Rex Avenue due to the heavy and constant traffic.

It was also noted by GTA that the right hand storage for Chandler Highway could be virtually doubled by eliminating the Coate Avenue right hand turn. It is difficult to see how eliminating the single car staging from Coate could achieve this. (p17 of 34)

Further, the report notes, “that alternative and (safer) access to Coate Road [sic] is safely provided by a signalised U-turn at Chandler Highway”. This is not the case currently, and did not work successfully in the past because slip lane traffic did not stop for U-turning cars. In fact, the staging option was developed about 20 years ago to eliminate this unsatisfactory, traffic impeding and dangerous U-turn when the Coate Avenue exit was moved to the west.

It is absolutely imperative that the right hand turn into Coate Avenue be retained for existing residents. The possible removal of this basic entry way to our streets is very concerning. A U-turn is an outrageous proposal and would very significantly add to travel times and stress in getting to our homes even for basic trips to Station Street, the doctors or supermarket, to pick up kids or home from work. The negotiation of merging across lanes of traffic after executing a u-turn at Heidelberg Road is also unacceptable.

The traffic consultant has noted the suggestion of the u-turn but considered on balance that it is unnecessary. **We are concerned that changes will be made despite this recommendation. We seek Council’s assurances in this regard and expect to included in any ongoing consultation.**

For example,

1. In the final staging diagram, the plans for the slip lane from Heidelberg Rd to Grange Road include a blue/black work line across the traffic island that eliminates the staging for the right hand turn out of Coate Avenue. This would eliminate the right hand turn from Coate Avenue by default because the staging is the only way the right hand turn works in practice. That is, no cars turning right from Coate Avenue could traverse the three lanes heading west and into a space heading east without the staging in the traffic island. Noted also on Appendix B (not numbered)
2. On every plan where Coate Avenue is included, there is a left hand turn arrow marked only. A right hand turn arrow is never included. These include the plans on page 12, appendix B (not numbered), Appendix G (staged work plan C)
3. We are also concerned that current residents from Tower Avenue, Perry St, Yarraford St and Alphington St will have their access to right hand turns into Heidelberg Road curtailed, thus adding significant travel time to their local trips and reduced safety and traffic impedence from U-turns.

5.0 River Front

The Development Plan Overlay provides for protection of the river corridor. This area and its natural bushland character are of great importance to west Alphington residents, and others, and must be protected. WAR, Inc. is concerned by the lack of information provided within the Development Plan about the riverfront, but notes some elements set out are at odds with the DPO and the area’s quiet, country

character. For example, a pontoon, BBQs, even grassy plains and pathways from private residences to the river.

The DPO requires well-articulated buildings with height no greater than two storeys at the river interface, and no greater than three storeys in precinct E (precinct 7A and 7B in the Development Plan), views across the site from Chandler Park and breaks in built form. The Development Plan clearly ignores these requirements and seeks to significantly exceed these clear limits. The table below provides quotes from the Design Principles and DPO to highlight the clear disparity.

WAR Inc requests that the Yarra Council strictly enforces the limits clearly stipulated in the DPO on the river interface to ensure the amenity of this sensitive area is maintained for the benefit of all for generations to come.

Issue	Development Plan	DPO	Issue
Use	Precinct 7A is to be predominantly residential, with a limited opportunity for small-scale retail or hospitality uses.	An interface with the Yarra River that: <input type="checkbox"/> - Enhances the bushland character of the river corridor; Maintenance and enhancement of the natural landscape and native vegetation	Retail / hospitality is not at all consistent with the bushland character of the river corridor & does not maintain not enhance the natural landscape
Boiler house	Consistent with massing and height of the existing boiler house buildings (either through reuse or replacement with interpretation of the existing building form and heights.)	Maximum building height of 3 storeys in section E	Existing 1954 boiler house is at least 8 storeys high – this is totally inconsistent with the requirement for built form stated in the DPO
Built Form – River Interface	2/3 storeys at river interface	2 storeys setback (10 metres) from crest line of the Yarra River	This is an attempt by the Developer to exceed a limit specified in the DPO
Site coverage at river interface	Allow up to 100%. Site permeability may be 0%	Articulation and breaks in built form <i>Viewlines from the Yarra River (north side from the portion of the path in Willsmere Park opposite the Amcor Site), Chandler Highway, Heidelberg Road and Parkview Road.</i> <i>To ensure new buildings are well spaced and offset to distribute access to outlook and sunlight between built forms and manage overlooking between habitable room windows where possible;</i> <i>To ensure that building heights provide an appropriate transition to site interfaces;</i> <i>Built form and articulation should avoid long and continuous facades;</i>	This is clearly an attempt by the Developer to exceed a limit specified in the DPO It is completely unacceptable. ESD principles are of particular importance along this most sensitive interface. 100% site coverage will prevent light and air movement, views through built form from and into the development, and is generally a very poor design approach.

6.0 Traffic

The traffic plan presented by the developer is totally inadequate and does not address the current gridlock in the area, nor provide solutions for the significant increase in traffic that will result from the development. WAR Inc requests that the Yarra Council commissions an independent study to ensure this important issue is considered with appropriate long term planning introduced into this process.

Traffic issues for West Alphington residents are already considerable due to the congestion caused by the Chandler Highway Bridge being over-capacity.

Exiting right turns out of Coate Avenue, Tower Avenue, Perry Street, Yarraford Avenue and Alphington Street are already long waits, particularly in the morning peak. Right turns out of Rex Avenue onto the Chandler Highway are nearly impossible and extremely dangerous at any time of the day.

The traffic waiting to turn from Heidelberg Road into Grange Road in the morning peak is regularly backed up over 700 metres past Station Street, blocking cars from being able to turn out of these streets toward the east. Cars are frequently hanging out of small gaps with city-bound traffic streaming toward them.

To this congestion, the development plan indicates that the development will add an additional **10,000 trips** per day.

It is therefore critical that the likely traffic generation and likely traffic impact resulting from the development is understood, a requirement of the development overlay, **and in this respect the Traffic Plan has failed and should not be considered.**

It has failed to provide the likely traffic generation and likely traffic impact due to the flawed selection of three critical assumptions used in the traffic modelling.

The critical assumptions that are flawed are:

- Significant overstatement of the likely use of public transport or active travel versus car for the development site (*mode share*)
- Significant overstatement of the likely internal trip reduction factor for the development site
- Significant overstatement of the likely redistribution of thru-traffic away from the site

The result of this overstatement of critical assumptions used in the traffic modelling is that the Traffic Generation and Traffic Impact presented in the Traffic Plan are in fact *unlikely*.

As an example, due to the flawed assumptions the Traffic Plan comes to the *unlikely* conclusion that there will be 58 fewer car trips on the arterial roads around the development in the AM peak, despite the additional 5,000 residents.

It comes to the *unlikely* conclusion that Eastbound Traffic on Heidelberg Road will decrease by 33 seconds despite the estimated 10,000 additional trips generated by the development each day.

It comes to these *unlikely* conclusions even without factoring in the future possible duplication of Chandler Highway.

For residents of West Alphington, no decision on the development plan should be made until the traffic impact is understood, and a solution to allow residents in West Alphington to be able to safely drive out of our streets onto Heidelberg Road, the only arterial road that we have access to, and in particular to travel toward Chandler Highway, the Eastern Freeway and the suburbs of Kew and beyond is identified and implemented. It is unacceptable that residents in Western Alphington should be impacted detrimentally and asked to absorb unreasonable changed traffic conditions.

7.0 Retail/Commercial Space

West Alphington Residents Inc. note that the developer seeks to double the allowance for commercial space from that stipulated in the DPO. WAR Inc seeks reassurance from the Yarra Council that no change will be made to the allowance for commercial infrastructure in the development.

The size of retail and commercial space proposed is overwhelming and completely out of step with the Council's vision of a *predominantly* residential community supported by retail and commercial aspects. While West Alphington Inc. welcomes a component of retail and commercial space, we note that the sheer size of the supermarkets (both principal and secondary) exceed anything in the surrounding suburbs. When combined with the remaining retail space, this community is fearful such significant commercial elements will detrimentally affect the residential nature of the West Alphington area, which are immediately to the west of the supermarket locations.

The magnitude proposed will create almost a gateway retail space, which goes beyond simply providing for the new and surrounding residents (as set out in Council's vision) – this will attract significant business from elsewhere, which of course brings with it traffic. While we recognise that the retail/commercial limits in the Mixed Use Zone were removed under the previous State Government, Council is, in our respectful view, obliged to consider also the policy requirements of the DPO for the site and temper the size of this commercial component with the residential emphasis.

Further, the developers have misread the existing demographic and to this end, the potential demographic it could attract to the area. For the most part, residents in Alphington cherish farmers' markets and the open air village strips in Station Street and Wingrove Streets – not fluorescent lit, indoor arcades that will fail to integrate with the surrounding area and do not enhance community.

Alphington is unusual in having no infrastructure associated with a town centre at present. Whilst current residents use Fairfield and Ivanhoe town centres, the opportunity to provide a centre associated with the development that could bring coherence to Alphington has been missed. The proposed open piazza area will not be sufficient to provide a town centre. A collection of interrelated civic buildings where council and other services are co-located would remedy this concern, and possibly retail space that seeks to create a open air, village-like feel.

8.0 Community Facilities

West Alphington Residents, Inc. considers that to a degree, Alphingtonians and others have been willing to adapt to the notion of development of the site and urban infill, but on the promise that with such development would come new and badly needed community facilities.

We note that:

- The population of Alphington will be doubled with this development and yet there are only vague plans for meeting rooms, and part-time occasional care and maternal and child health nurses in the proposal. The provision of a P-3 primary school adjunct to Alphington Primary School is even vaguer with no evidence of the requisite central support from the education department.
- Community infrastructure provided locally by Yarra City Council is currently insufficient for local needs.
- Community facilities located outside the local area and currently used by Alphington residents almost invariably require car trips and are often at capacity.
- The Collingwood gym and swimming pool is at capacity with people being turned away with filled classes at many times. Existing demand cannot be met and yet this plan doubles our population with no further facilities being offered by the developers or council at reasonable prices.
- Alphington residents currently use Northcote, Fairfield and Ivanhoe library facilities because they are accessible, in contrast to Yarra library facilities. The services used by Alphington residents are provided by Darebin and Banyule councils, consistent with state-wide requirements governing access to library services. Yarra provides no local library services to Alphington.
- There is no local indoor sports facility for team games such as netball, basketball, volleyball, cricket and futsal. Outdoor facilities other than the Alphington Park oval are meagre and poorly maintained. Outside tennis courts and netball courts at Clifton Hill are at capacity.
- The infrastructure report limited discussion to four areas only, significantly ignoring the needs of people most likely to occupy the one and two bedroom residences. I.e. gyms, team sports, fitness and health support. There are a number of small local privately owned and run “fitness” gyms along

Heidelberg Rd in Fairfield and Alphington at present but they are costly compared with council services.

- There are higher numbers of older people already in the area (compared with the rest of Yarra) and there are no community facilities. Elderly people use Darebin's facilities in Fairfield.
- Naming the development "Alphington Park" implies a connection with the existing "Alphington Park" facility that is both erroneous and confusing.

9.0 Open Space

West Alphington Residents, Inc. is disappointed that the Development Plan fails to provide any new real open space within the development, instead borrowing from Alphington Park (at capacity) and the river walk, and setting our linear walkways which are at best passive by nature and are really private thoroughfares.

We are further concerned that the river front has been included in the calculation of the open space provision. This demonstrates a lack of respect for the river precinct, which is already a public space and required under the DPO to be handed back to Council or other authority. The developer should and must make better provision for open space within the site, both passive and active.

Conclusion

As set out above, West Alphington Residents, Inc. is concerned with the immediate local issues that will impact our homes, streets, and neighbourhood character. In addition, we consider that the developer has missed a wonderful opportunity to provide quality urban infill for new residents complimented by great design, excellence in community facilities and open space and a town heart and centre for Alphington.

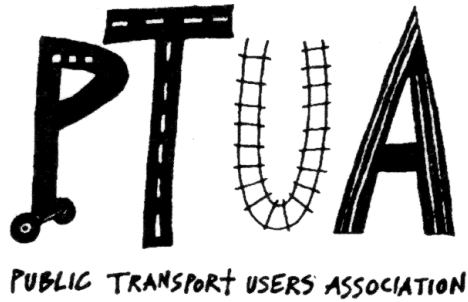
We request that Council:

1. Seek peer review of all technical reports;
2. Require a new, properly prepared traffic report based on adequate assumptions about existing and new traffic conditions;
3. Continue to consult with residents of west Alphington and West Alphington Residents, Inc. in relation to any changes to traffic flows into and out of our local streets;
4. Support West Alphington Residents, Inc. in its position that the duplication of the Chandler Highway Bridge should be on the eastern side;
5. Require the developer to reassess the Development Plan by:
 - a. Respecting the provisions of the DPO in relation to built form along Chandler Highway and the River precinct both in relation to heights and site coverage;

- b. Demolishing the 1954 Boiler House;
 - c. Set aside more open space within the site;
 - d. Significantly reduce the retail and commercial component to better align with Council's vision set out in the DPO.
6. Liaise with the community, the developer and the State Government to make better provision for community facilities on the site.

Yours sincerely,

Eve Williamson & Tiffany Crawford-Lane
On behalf of West Alphington Residents, Inc.



Public Transport Users Association
Ross House, 247 Flinders Lane
Melbourne VIC 3000

2 April 2015

Yarra City Council
Strategic Planning Unit
PO Box 168
Richmond
VIC 3121
Email: strategicplanning@yarracity.vic.gov.au

Dear Sir/ Madam

SUBMISSION ON DEVELOPMENT PROPOSAL: ALPHINGTON PLACE PROJECT

The Public Transport Users Association is the recognised consumer organisation representing passengers of all forms of public transport in Victoria.

The PTUA appreciates the opportunity to make this submission which principally addresses transport-related issues which in our view need to be resolved as part of this project.

We would be pleased to discuss the contents of this submission at your convenience, and would welcome the opportunity to meet with Councillors and Officers to discuss the detail of our submission.

Yours sincerely,

Tony Morton
President

Att.

SUBMISSION BY PTUA ON DEVELOPMENT PROPOSAL: ALPHINGTON PARK

Overview

Putting new housing in existing suburbs is desirable if it will mean better use of existing services, including public transport.

However, where public transport is inadequate or already full, more services need to be provided to reduce new residents' car-dependency.

The redevelopment of the AMCOR site is a significant infill *development* opportunity, but the public transport services in the area must be upgraded *before the new residents and businesses move in* if this large-scale redevelopment is to be workable.

The City of Yarra is known and admired as a leading and successful advocate of better active and sustainable transport. It is vital for the wellbeing of existing and future residents that this advocacy continues.

Summary of conclusions

Without marked improvement in local public transport, walking and cycling infrastructure the Alphington Place development will be highly car-dependent.

This will generate significant increases in traffic on the local, arterial and freeway road systems; and it will impose collateral costs on neighbours and the local environment, and put greater pressure on the already clogged Eastern Freeway and Hoddle Street corridors.

Recommendations

The City of Yarra should campaign for upgraded public transport services and infrastructure serving Alphington Place directly as well as filling major gaps in public transport services which contribute to traffic congestion in the local area. The Cities of Darebin, Banyule and Boroondara should be invited to participate in this campaign.

Key demands of this campaign should be:

- Provide higher-frequency train services on the Hurstbridge line, including outside peak hours and on weekends;
- Provide seven-day-a-week services on the 350 route bus (La Trobe University to the CBD on Chandler Highway), with evening services at least on weekdays and no less than 10-minute frequencies during peak hours;
- Provide seven-day-a-week services on the 546 route bus (Heidelberg to the CBD on Heidelberg Road), with evening services at least on weekdays and no less than 10 minute frequencies during peak hours;
- Provide a more direct route for the 609 route bus (Hawthorn railway station to Fairfield) with services seven days a week and 10 minute frequencies during peak hours;

- Extend route bus 624 from Harp Junction in Kew to Alphington Station via Earl Street and Chandler Highway to provide a key north-south connector in the East Yarra and Darebin area;
- Immediately preserve the median reservation along the Eastern Freeway for a rail service to Doncaster, and undertake to plan and build this train line with a station at the Chandler Highway, on the south of the site;
- Declare Heidelberg Road, Grange Road and Chandler Highway as bus priority roads under VicRoads *SmartRoads* program, and provide associated signalling and lane priority.

Yarra City Council should commission modelling to assess mode shift and relief to traffic congestion to be gained from upgrades to public transport services and walking and cycling infrastructure serving the Alphington Place project and surrounds, to inform its planning and advocacy.

On the site itself, car parking should be kept to an absolute minimum and walking and cycling infrastructure maximised.

BACKGROUND INFORMATION AND DISCUSSION

Current and prospective transport patterns

Car ownership is high and increasing in Alphington. Comparisons of journey to work data from the 2011 Census show that a significantly lower proportion of journeys to work by Alphington residents are made by public transport (20%) compared with residents of other inner northern Melbourne suburbs. For example, 26% of Clifton Hill residents and 24% of Thornbury residents take public transport to work. Journeys to work from suburbs such as South Yarra, Brunswick and Richmond where public transport is superior is higher still. (See *Integrated Transport Plan* (GTA, February 2015) at www.alphingtonpapermill.com.au)

Travel to work data from the 2011 Census shows that a very large proportion of the residents of Northcote to the immediate west of Alphington travel to work to locations to the south-west of the site. In fact about 45 % of residents work in the City of Melbourne, City of Yarra or the City of Port Phillip. These comprise 11,603 journeys to work each day. About 24%, (or 6,327 journeys daily) work in Darebin itself or in locations generally to the north of Alphington Park.

Analysis included in the Integrated Transport Plan concluded that 52.5% of Alphington Park's residents would be employed in Melbourne with 12.3% employed in the City of Yarra.

Because most travel to work occurs during the morning and evening peak periods when transport infrastructure and services are most stretched, analysis of travel to work data is a valuable indicator of gaps in the current transport system. To the degree that this data may mirror the likely travel behaviour of residents of Alphington Park it also provides valuable guidance on the additional pressure the project is likely to place on existing infrastructure and services.

Most recent publicly available average daily traffic counts in road segments adjacent to the Alphington Park site are shown in Table 1 below. Overall it shows 38,000 vehicles per day on Chandler Highway and 23,000 to 26,000 vehicles per day on Heidelberg Road.

Road segment	Average daily traffic count, 2013
Chandler Highway between Yarra Boulevard and Heidelberg Road, north bound	20,000
Chandler Highway between Yarra Boulevard and Heidelberg Road, south bound	18,000
Grange Road between Heidelberg Road and Separation Street, north-bound	11,000
Grange Road between Heidelberg Road and Separation Street, south-bound	11,000
Heidelberg Road between Station Street and Chandler Highway, east-bound	12,000
Heidelberg Road between Station Street and Chandler Highway, west bound	14,000

Heidelberg Road between Chandler Highway and Lower Heidelberg Road, north-east bound	11,000
Heidelberg Road between Chandler Highway and Lower Heidelberg Road, south-west bound	12,000

Table 1: Daily traffic counts, Chandler Highway and Heidelberg Road

Source: VicRoads, annual average daily traffic volumes, freeways and arterial roads 2013

According to the *Traffic Management Plan* (GTA February 2015), Appendix C, Alphington Park will generate an aggregate 18,650 additional vehicle movements per day on weekdays. About half of these are expected to be generated by residents and about 7,600 by the retail outlets. These are expected to include 1,610 vehicle movements in the AM peak hour and 2,592 vehicle movements in the PM peak hour on a typical weekday. This would constitute a substantial extra load on the arterial road network, as the great majority of these vehicle movements can be expected to feed into Heidelberg Road and the Chandler Highway corridor.

Proposed duplication of Chandler Highway and Grange Road grade separation

The Victorian government has promised major road works in the area, including the duplication of the Chandler Highway bridge and the grade separation of the Hurstbridge railway line crossing in Grange Road in Alphington. These projects are the "status quo" approach to dealing with traffic congestion - simply to build additional road capacity - which has been repeatedly demonstrated to not be a durable solution to the problem of increasing motor car use.

There has been no genuine attempt by past governments to effect significant mode shift from the private motor car to sustainable modes, including public transport, in this part of the Melbourne metropolitan area. These two projects would at best provide temporary respite from the current congested conditions on Chandler Highway and Heidelberg Road. Existing congestion concentrated on the Chandler Highway is likely to be relocated into Princess Street in Kew and in Grange Road in Alphington, as well as into Heidelberg Road.

Current and required public transport

The public transport capability in the area is poor and if current service standards were to persist it is certain that Alphington Park will be highly car dependent, adding even further to growing road congestion in the area.

Rail services

Current public transport services include the Hurstbridge rail line which, outside peak hours, runs a twenty minute service on weekdays and weekends, with 30 minute services from mid to late evening seven days a week. This compares poorly with better quality services elsewhere on the metropolitan rail network, especially on the Frankston, Dandenong and Ringwood corridors where off-peak and weekend services are much more frequent, including 10 minute services during the day on weekends.

Route bus services

The *Integrated Transport Plan* notes (p. 16) there are four route bus services in the neighbourhood, the 609 from Hawthorn railway station to Fairfield via Kew on the Chandler Highway corridor, the 546 from Heidelberg to Victoria Market on the Heidelberg Road corridor, the 340 from La Trobe University to Melbourne CBD on the Chandler Highway corridor, and the 508 from Alphington railway station to Moonee Ponds. It said that these services operate only on weekdays and quite rightly assessed the 609, between Hawthorn railway station and Fairfield, to not meet acceptable standards for public transport provision.

It should be noted, however, that the 340 service was absorbed into the 350 service from 27 July 2014 and the 508 service in fact operates seven days a week, not only on weekdays.

The 609 service takes a very indirect route which increases travel time and therefore renders the service less attractive than it would otherwise be, and runs only five services a day. It would not be a realistic transport option for residents or visitors to Alphington Park, even though it is the only route bus that provides a service north and south of the Eastern Freeway on the Chandler Highway corridor.

The 624 service between Oakleigh railway station and Kew would also assist in filling the gap in north-south public transport services if it were to be extended to Alphington railway station. It would complement the service provided by an upgraded 609 service if it were to operate with an increased service span and frequency on weekdays and weekends.

The 350 route bus service from the Melbourne CBD to La Trobe University, Bundoora, runs on the Grange Road, Chandler Highway, Eastern Freeway, Hoddle Street and Victoria Parade corridors. It has a fairly consistent headway of about 20 minutes throughout the day and service concludes very early in the evening with final departures just after 6.00 p.m. The most recent publicly available data from Public Transport Victoria showed that combined average weekday patronage for the 340 and 350 services was 1092 in 2010-11 and 1027 in 2011-12.

Increases in frequency, together with the upgrading of bus lanes on Hoddle Street and Victoria Parade, now underway, would significantly increase the attractiveness of this service. Currently, it takes up to 33 minutes in the morning peak for the trip from Grange Road to Melbourne Central (Lonsdale Street) in the Melbourne CBD. This should be able to be reduced with the imminent introduction of dedicated bus lanes in Hoddle Street and Victoria Parade.

The 546 service has a relatively short service span from about 6.30 a.m. until 6.30 p.m. Monday to Friday with service frequencies of about 30 minutes throughout the day. There are no weekend services.

The 508 service between Alphington railway station and the Moonee Ponds interchange has a much superior service span from about 5.30 a.m. and 9.30 p.m. with service frequencies of 15 minutes on Monday to Friday, 6.00 a.m. to 10.30 p.m. and 30 minute frequencies on Saturdays. Services run between about 8.00 a.m. and 10.00 p.m. with 40 minute frequencies on Sundays.

It is important to note that under VicRoads *SmartRoads* program which classifies the arterial road network for preferred uses neither Heidelberg Road nor Grange Road/ Chandler Highway are shown as bus priority routes, but as preferred traffic routes. However, parts of Separation Street and Darebin Road are bus priority routes. In the City of Boroondara, the northern section of Princess Street which connects with Chandler Highway is not shown as a bus priority route either.

Changes introduced on 27 July 2014 to route bus scheduling for CBD services on the designated Chandler Highway Belmore Road corridor to Box Hill and Doncaster Hill activity centres is likely to have resulted in a significant increase in public transport patronage on the corridor. The 302 and 304 services to Box Hill and Doncaster Hill now run on a 15 minute headway on weekdays and about every 10 minutes during peak hour times, with 20 minute services on weekends.

This experience is highly instructive of what could be achieved with improved bus services on the Chandler Highway north of the Eastern Freeway and on Heidelberg Road. In fact, there is good reason to believe that the potential patronage growth could be very substantial given the services would be operating in areas of significantly greater population density than in northern Boroondara, which is also an area of very high car ownership.

Doncaster rail

In the lead-up to the recent state election campaign, the City of Yarra campaigned alongside community groups for a rail service to Doncaster. This followed the effective dumping of the project by the Napthine government, after promising it in the 2010 election, and its subsequent embrace of the East-West Link project.

A rail service to Doncaster Hill via Victoria Park railway station on the Eastern Freeway reservation would doubtless attract substantial patronage, and particularly by those travelling to and from work during peak times. The rail service would take significant numbers of cars off the Freeway and free up traffic on the on and off ramps at Chandler Highway. The train service, with a station at the Chandler Highway, would attract significant patronage from residents in the south western area of Alphington Park. Regrettably, the Public Transport Minister, Jacinta Allan, was recently reported to say that the Doncaster rail service would not be built for at least the next 11 years (*Manningham Leader*, Monday, March 23, 2015, p. 8).

An immediate task for the City of Yarra and other public transport campaigners, therefore, is to secure a commitment from the Victorian government that a rail service will be planned for and built and that it will immediately guarantee that the reservation on the Eastern Freeway is secured for that purpose.

Green travel plans and the Chadstone parallel

It is noteworthy that La Trobe University, Bundoora Campus, which is the terminus for the 350 service, increased parking fees and tightened access by car to its Bundoora campus from the beginning of 2015 for the express purpose of encouraging staff and students to travel to and from the campus by more sustainable means, including by public transport.

This demand management measure should reduce car trips to and from the campus each day, and in so doing stimulate passenger demand for route bus services including the 350 service. Interestingly the University expects the operations of its car parking to be cash flow positive in future, and this revenue is to be devoted to sustainable transport initiatives. This is a very useful message for the proposed "green travel plan" for the redevelopment of the Alphington Park project.

Several potential initiatives for a future Green Travel Plan for the development are identified in the Integrated Transport Plan (para. 4.4.3, pp. 45, 46). Interestingly, it includes the establishment of an internal bicycle users group to improve facilities for cyclists and to encourage cycling, but there is no recommendation for an allied group to work for improvements to public transport.

The proposed initiatives to stimulate use of public transport are weak and are essentially "educational" in character. It would not be unfair to say that initiatives of this nature in other development settings, whether they be commercial, retail or residential in character, have been largely ineffective.

This has been the case at Chadstone Shopping Centre, for example, which was first established in 1960 with a business strategy that relied entirely on cheap motorised transport and free parking. It is probably now the most car-centric destination in Metropolitan Melbourne, apart from Melbourne Airport, and singlehandedly generates major road congestion on Warrigal Road and Princes Highway in Chadstone and Malvern East.

Chadstone's 2003 Green Travel Plans for visitors and staff focused primarily on information assistance for public transport users (see Chadstone Integrated Transport Plan 2003, pp. 42, 43). The PTUA opposed a major expansion of the Chadstone Shopping Centre at that time principally on the grounds that Chadstone, a Principal Activity Centre under Melbourne 2030, was isolated from the major public transport networks; major upgrades to public transport were required to bring access to Chadstone up to standard; and because it was counter-productive to permit large-scale increase in area at Chadstone before public transport improvements are in place. The PTUA opposed yet another car-centric expansion of Chadstone Shopping Centre in 2012, broadly along the same lines. Regrettably, this project also proceeded with the full support of the Stonnington City Council. The Chadstone experience should be avoided at all costs at Alphington Park.

Car parking at Alphington Park

Residential parking

The scale of car parking to be provided at Alphington Park is an important consideration for the development, both in terms of the transport modal mix (i.e. sustainable transport use as opposed to motor cars) at the site and its influence on housing affordability. In general terms, the less car parking that is provided the more conducive the development will be for sustainable transport modes and the more affordable the housing stock.

The provision of on-site parking is very expensive, both in terms of construction costs and the opportunity costs of alternative use of space foregone in a development such as this, whether it be for additional housing, commercial or residential space, or public space.

For instance, two level underground car parking is estimated to cost between \$1,490 and \$1,605 per square metre or between \$47,700 and \$51,400 per car, whilst a three-storey car parking station of open-sided construction is estimated to cost \$590 to \$635 per square metre or between \$16,500 and \$17,900 per car (Rawlinsons, Edition 31, 2013, p. 51).

From the perspective of prospective purchasers of properties at Alphington Park, these costs are reflected in the sale price of the property. Thus, a purchaser of a dwelling in a multi-occupancy development with two car parks may, without having regard for land costs, pay about \$100,000 more than she would if the dwelling was not provided with car parking.

The transport behaviour consequences are also very significant. Residents who are required to "invest" \$100,000 in two car parking spaces with their dwelling will almost certainly buy two cars and use these vehicles for most of their trips.

The likely situation here is somewhat analogous to the situation with developments everywhere, whether they be on the urban fringe or closer to the centre of Melbourne. Householders compelled to incur significant fixed costs in the form of parking, and in the absence of viable public transport options, will make most trips by car. However, just as with the new housing investments on the urban fringe, good quality public transport must be made available at the time the development is sold and occupied for the transfer of trips to public transport, cycling or walking to be maximised.

It is also understood that at this time the project proponents have as yet not been successful in signing up a business partner for the relatively small "affordable housing" element of the project (i.e. to comprise only 5% of the 2,500 dwellings to be constructed), which is anticipated to have relatively little car parking associated with it. A boost to the affordable housing component of the project would be likely to reduce the volume of on-site car parking on site.

Retail parking

The project will provide 19,300 square metres of retail premises with a supermarket as the anchor tenant. At the community consultation held at the Alphington Bowling Club on 17 March, representatives of the proponents were unable to say how much car parking would be assigned to the retail element of the project. Timely introduction of high quality public transport to serve Alphington Park and surrounding areas would significantly reduce the pressure for larger volumes of parking for the commercial and retail elements of the project.

It is notable that the trade area for the retail component of the project is relatively extensive and includes parts of Clifton Hill, Kew, East Ivanhoe and Northcote and most of Fairfield. In this respect, it could be expected that the retail offerings will attract trade away from smaller local retailers with a more localised customer base. The net effect, therefore, is to increase average customer trip length which, if unless made by sustainable transport modes, would further increase traffic congestion across a substantial area of the inner north and north-eastern suburbs .

Impact of Alphington Park on the wider road network

Hoddle Street

One of the major points of debate associated with the Baillieu-Napthine governments' controversial East-West Link was the assessment of how much, if any, assistance it would provide in relieving congestion on Hoddle Street. The informed view is that it would have provided relatively little assistance given that inner Melbourne, including the Melbourne CBD, are the major destinations for traffic on the Eastern Freeway. However, Hoddle Street will remain heavily trafficked and traffic originating in the north, including on Heidelberg Road, makes a significant contribution to traffic numbers on the most heavily trafficked segments of Hoddle Street.

Thus, effective measures to convert motor car trips to public transport trips in the north, including from the Cities of Darebin and Banyule, would significantly benefit Hoddle Street. On average an estimated 27,000 vehicles enter and exit Hoddle Street on the Heidelberg Road ramps each day, with an estimated 31,00 vehicles per day on Hoddle Street each day in the road segment between Heidelberg Road and the Eastern Freeway on ramp. The most heavily trafficked segment of Hoddle Street is immediately south between Alexandra Parade and Johnston Street, with an estimated 79,000 vehicles per day.

It should be concluded, therefore, that solid improvements to route bus services on the Chandler Highway corridor that then travel to the Melbourne CBD on the route of the 350 service, together

with an upgrade of the 546 service on Heidelberg Road to serve Alphington Park would have such an impact. This would be assisted by upgrades on the Hurstbridge rail line.

North-south traffic movements

As pointed out earlier, there are no worthwhile route bus services on the Chandler Highway linking major destinations in the Cities of Yarra and Darebin in the north with the City of Boroondara in the south. Such services could make a major contribution to relieving congestion on the Chandler Highway.

Other regional influences increasing the demand for transport

There are several other trends and forces at play in the area which are already impacting on the demand for transport in an area that is underserved by available public transport and active transport infrastructure. The matters listed below are not exhaustive but each is significant in its own right. Of greatest concern is that under current policy settings, they are set to complement Alphington Park as sources of growing volumes of motor car traffic.

Population

The first of these influences is population growth. The population of the City of Darebin, for example, has been growing very strongly since 2005, at an annualised rate of about 1.45%. The population of the City of Yarra grew strongly in 2012 (2.6%) and 2013 (3.2%).

Residential zones

The new residential zoning applied in the City of Darebin is likely to facilitate further population growth and demand for transport services as a relatively small area of the residential areas of the municipality was classified as Neighbourhood Residential Zone 1, which of the three residential zones most strongly constrains higher density development, relative to other municipalities .

Ivanhoe structure plan

The Ivanhoe Structure Plan, which was adopted by the Banyule City Council in December 2012, is likely to facilitate increased commercial development in Ivanhoe, which is located on the Heidelberg Road corridor, as well as larger residential developments.

The Austin Health Complex

The Austin Health Complex which has a staffing complement of about 6,500 is understood to be responsible for about 20,000 traffic movements each day. Relatively few staff or visitors to the Austin use public transport despite being located next to Heidelberg station and on several bus routes, including the 903 SmartBus.

Environmental issues

Traffic noise

Current traffic congestion in Heidelberg Road and Chandler Highway tends to reduce traffic noise because of lower vehicle speeds. Any expansion of capacity on Chandler Highway which increases vehicle numbers and average speeds may well increase traffic noise levels in the area.

The project proponents propose to retain high walls on the western (Chandler Highway) and northern (Heidelberg Road) perimeters, in large part to maintain the heritage value of linking Alphington Park to its industrial past. This would provide some protection from traffic noise for those who live or work at Alphington Park.

Buildings on the opposite sides of these two roads, primarily residences with some small business premises in Heidelberg Road, are low scale and are likely to remain so. They will be increasingly exposed to the noise effects of any increases in vehicle numbers and vehicle speed.

It is understood that no work has been undertaken to assess the reflected effects which might also be caused by the high walls to be maintained on the Chandler Highway and Heidelberg Road perimeters of the site. This work should be undertaken.

Air pollution

People who live near heavily used road corridors, such as Heidelberg Road and Chandler Highway/Grange Road are at risk of illness from air pollution, including particulate emissions from internal combustion engines.

Light spill

The incidental exposure to artificial lighting at night can have adverse health effects. Potentially, those most likely to be affected include residents in close proximity to Chandler Highway and Heidelberg Road.