



Council Response

to

Moonee Valley Racecourse Master Plan submission

Prepared by City Works and Development

1 February 2012

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1. Introduction

On 25 October 2011, Moonee Valley Racing Club (MVRC) formally lodged a master plan and rezoning proposal to Council. This proposal was submitted with a range of associated supporting documents.

Council, as the planning authority, has undertaken an initial assessment of this submission, using both external independent consultants and in-house expertise. Council’s initial assessment looked into a range of matters in relation to the draft plan and rezoning proposal, and resulted in the development of six separate reports. These reports are listed in the table below. In addition, Council is also undertaking a heritage study for the racecourse site. The heritage study is a separate process so has not been included as part of this assessment.

Report Subject Matter	Author	Appendix Number
Development Guidelines	McGauran Gianni Soon Architects Pty Ltd (MGS Architects)	1
Traffic and Transport	CPG Australia Pty Ltd	2
Community Infrastructure	Macroplan Australia Pty Ltd	3
Public Open Space	Thompson Berrill Landscape Design Pty Ltd in association with Environment & Land Management Pty Ltd	4
Environment and Climate Change	MVCC Environment and Economic Development Department	5
Social Impact Assessment	Capire Consulting Group	6

This document summaries the key issues and recommendations in each report as well as outlining where Council requires further information from the MVRC. Each report focuses on implications or opportunities as a result of the proposed redevelopment for both the existing residents of the municipality and potential future residents who may live in the proposed master plan area.

In many cases, several consultants identified similar issues. To minimise repetition in the body of this document, common issues have been outlined in the most relevant section, where possible. This document should be read as a collation or summary of the attached reports. It is essential that this report be read in conjunction with each of the reports attached in order to gain a full understanding of the issues and recommendations.

Council supports the issues identified and recommendations outlined in the consultant’s reports. In summary, Council’s preliminary assessment found that there are significant gaps in the information provided by the MVRC. Council requests the MVRC to undertake more extensive analysis and provide substantial additional information where required.

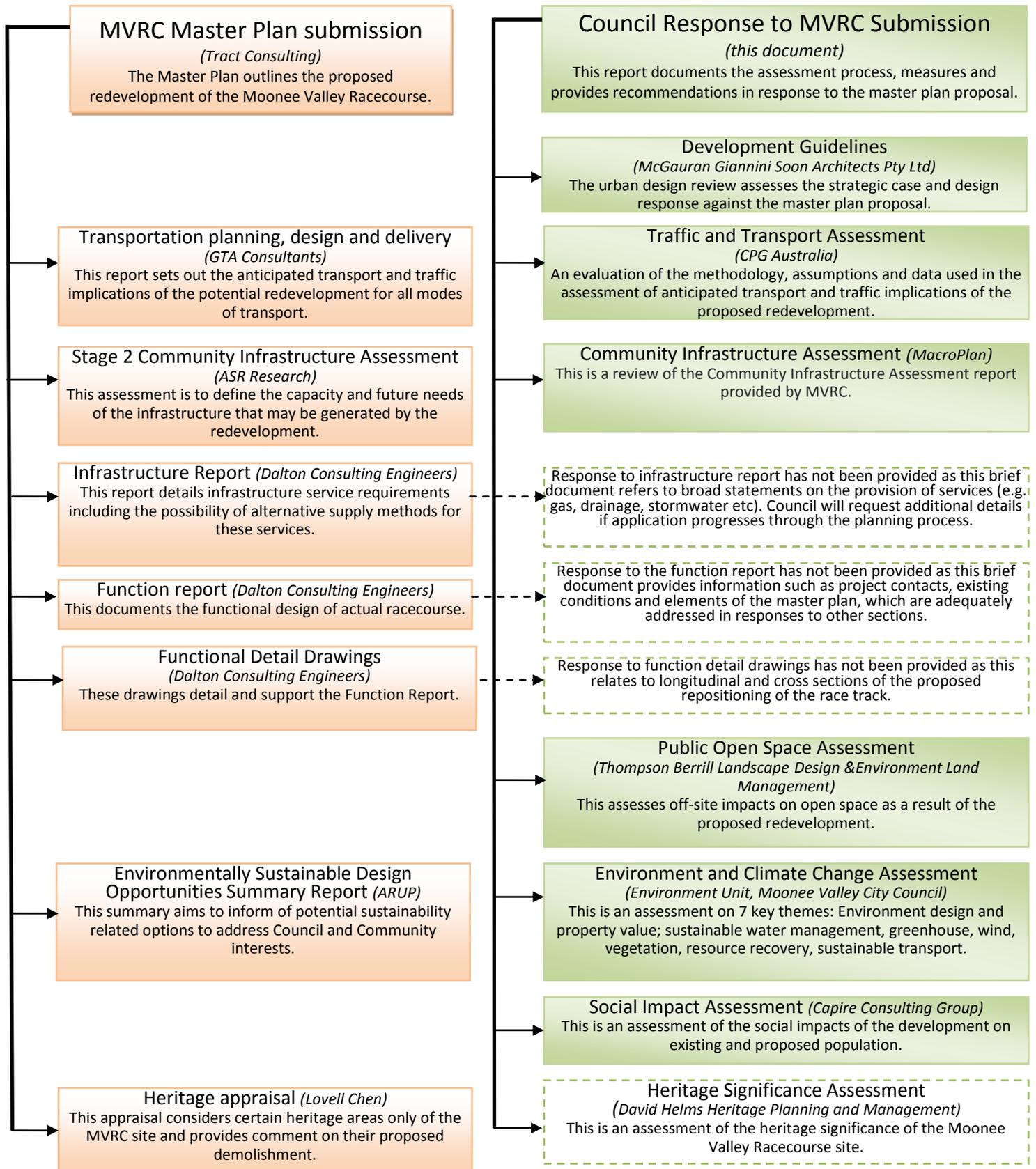
The table on Page 2 provides a summary list of the points of issues that the MVRC are requested to address and resolve.

1.1 Points of issues to be addressed

Points of issue	Reference Number
Population and dwelling assumptions	2.1.1
Operations	2.1.2
Grandstand	2.1.3
Built form and street character	2.1.4
Interfaces with surrounding areas.	2.1.5
Setbacks	2.1.6
Road network – access, capacity, traffic distribution and impacts	3.1.1
Car parking	3.1.2
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Impacts on existing facilities	4.1.3
Community infrastructure audit	4.1.4
Moonee Valley Open Space Strategy	5.1.1
Quantity of open space	5.1.2
Quality of open space	5.1.3
Active open space	5.1.4
Environmental design	6.1.1
Sustainable water management	6.1.2
Resource recovery	6.1.3
Size of population	7.1.1
Housing mix	7.1.2
Social housing	7.1.3
Affordable Housing	7.1.4
Crime, health, safety and amenity	7.1.5
Economic impacts on existing businesses	9.1
Geology	9.2
Rezoning	9.3

1.2 Documents Summary

The below diagram outlines the documents submitted to Council from the MVRC (on the left) and Council’s corresponding assessment reports.



2. Development Guidelines

A review of the Development Guidelines in the master plan proposal has been prepared by McGauran Giannini Soon Architects Pty Ltd (MGS Architects). Some comments have also been provided in this section as a result of the SIA report prepared by Capire Consulting and the Environment and Climate Change report prepared internally.

This review focuses on the following key themes.

- Existing conditions.
- Land use and configuration.
- Racetrack and event operations.
- Operations and design solutions.
- Master plan built form, street character and open space.

2.1 Key Issues and Recommendations

2.1.1 Population and dwelling assumptions

The MVRC has made assumptions based on their figure of a total number of 3,000 dwellings, with a residential population of approximately 6,000 people. These figures were provided within their ASR Community Infrastructure Assessment (page 18). More detail as to how this figure has been calculated needs to be provided.

Based on the building footprints and heights in the current master plan proposal Council's consultants, MGS Architects, have outlined that the MVRC may have underestimated their dwelling and population numbers. If this is the case, more work needs to be done on obtaining an accurate figure, and more detailed analysis would be required with an updated figure.

2.1.2 Operations

The master plan proposal suggests up to *'40 horse racing meets a year with a significant proportion devoted to Night Racing'* (page 9) and an increase of around 10 racing events per year. This does not include additional events such as corporate or other functions, which are likely to be held at the racecourse. More details are required from the MVRC in relation to events and operations, to enable a more accurate assessment of any potential impacts.

Loading zones and service entries for the proposed grandstand, mixed-use and residential developments also require clarification.

2.1.2.1 Racetrack Operations

There is a lack of detail provided regarding how the proposed racing operations, including event patrons, would interact both with residents and visitors living in the proposed master plan area. Some key concerns include:

- i) a lack of clear separation of patron and operations activities;
- ii) the movement and access for vehicles in racing event and grandstand event mode; and
- iii) how midweek events conflict with the adjacent school. The traffic report only deals with race mode traffic access in considering conflicts with the adjacent school.

More information should be provided as to how the racetrack would operate during ‘race mode’ including horse-related movements and separation with patrons. In addition, there should be better integration provided with local public transport.

2.1.3 Grandstand

It needs to be demonstrated how the relocation of the grandstand to the Wilson Street frontage would minimise the impact on the existing residential population. It is also recommended that guidelines be developed to show how conflicts between the interface of the proposed residential uses and the racecourse would be minimised.

The impact of the shift in operation, and the capacity of the public realm to cope with the operation of a grandstand/events facility at an interface with a modestly scaled residential street also requires resolution.

Greater detail should be provided on the impact of the various events on the surrounding community in moving the grandstand to its proposed location.

More detail needs to be provided in relation to the traffic, crowd and noise implications along Wilson Street and Dean Street with the proposed relocation of the grandstand, as well as proposed vehicle entries and taxi drop-off/pick up stations. Access and egress for the grandstand is not clear on the master plan proposal. In particular, access/egress by taxis and buses would require widening of the street and provision for vehicle movements within the setback zones. Clarification should be provided as to the access to the central car park from Wilson Street.

2.1.4 Built Form and Street Character

Massing and shadow diagrams should be produced to understand the limits of the built form and impacts on the surrounding residential area.

The MGS report (page 19) states that:

‘More developed designs of the proposed buildings are required, including detailed plans of building envelopes (podiums and towers), building heights (actual height dimensions, and/or floor to ceiling dimensions for residential and mixed-use) and the depth of tower setbacks from podium edges and an indicative development capacity for each development footprint. The current Masterplan’s Sub-Precinct Design Guidelines are too vague.

There needs to be a correlation between the built form in the Sub-Precinct Design Guidelines and the final illustrative masterplan.

Massing and site arrangements needs to be studied in 3D form to fully comprehend the proposed massing and built form, and to properly assess its impact from surrounding streets and locations as well as within the subject site.’

There is a lack of justification in terms of building envelopes, heights and bulk/massing. The MGS report (page 3) states:

‘The quality of the resultant streetscapes, the capacity of road networks to manage these transformations, the resolution of pedestrian networks, the adequacy of and accessibility of open space, the amenity of open space are not well argued.

We would be surprised if development of more than 4 to 12 storeys could be reasonably accommodated in this context given the limited capacity of surrounding road networks, off site impacts of built form on abutting residential properties.’

While there is a case for higher intensity development in the interface with the existing Moonee Ponds Activity Centre, the case for taller remote built form is less convincing.

Management of the visual aspect of the proposed podium car parking at ground level needs to be more clearly shown.

There is an opportunity for landmark built form on the corner of McPherson and Dean Streets to act as the 'gateway' to the proposed redevelopment.

2.1.5 Interfaces with surrounding areas

The interfaces between the proposed racetrack and the residential development (both existing and proposed), have not been clearly defined. Greater detail needs to be provided.

Greater consideration also needs to be given to the interface with the Moonee Ponds Central Primary School and the special needs associated with a facility that has constant activity for both children and parents.

To enable better integration with the built form in the existing area, the proposed redevelopment of housing along Dean Street, McPherson Street and Wilson Street edges should be semi-detached dwellings.

2.1.6 Setbacks

An insufficient setback has been provided on the northern abutments. The proposed grandstand and apartment buildings at this frontage also impose operational pressures and built form impacts on a modestly scaled street that are yet to be resolved.

The MGS Report (page 16) recommends, for proposed residential development, '*a minimum 6 metre building setback (at street level) for all residential and mixed-use buildings along the perimeter of the site to provide opportunity for decent foreground trees/landscaping at the interface with existing streets.*'

For the proposed grandstand, MGS recommends '*a minimum 30 metre street width to include street capacity (carriageway, easements and pavements), landscape vehicle drop-off and forecourt areas.*'

3. Traffic and Transport

A review of the traffic and transport implications of the proposed redevelopment has been undertaken by CPG Australia Pty Ltd on Council's behalf.

This review primarily examined the GTA consultants report ("the GTA Report") which was submitted to Council as part of the MVRC submission. This has been combined with preliminary comments from VicRoads and various departments within Council. Council is also awaiting comments from The Department of Transport, which are expected to be available to Council by the end of March 2012.

This review focuses on the following key themes.

- Road network – access, capacity, traffic distribution and impacts.
- Car parking.
- Integrated transport planning.

3.1 Key Issues and Recommendations

3.1.1 Road network - access, capacity, traffic distribution and impacts

The MVRC is a substantial venue. The proposed redevelopment would generate significant additional traffic within the area. Council is familiar with the level of traffic activity when events are held intermittently at the venue. Without more analysis and modelling, the proposed redevelopment has the potential to escalate existing traffic management issues.

Given the constraints of the neighbouring street networks, the MVRC are requested to seriously consider direct access to CityLink to the east of the site, to alleviate traffic pressures in the local area. Justification for not pursuing this option will need to be robust and clearly outlined.

3.1.1.1 Traffic event impacts

The GTA report states that the newly developed racing track, grandstand and related facilities would operate in a similar manner to the current arrangements and therefore has not been considered in any traffic assumptions or modelling. However, the MVRC have stated that there is expected to be an increase in the number of events held at the racecourse.

The MVRC is proposing substantial renewal of its facilities. It is therefore expected that there would be changes to the usage and frequency of events. This needs to be included in the traffic modelling to get a full appreciation of the impact of the racecourse in the area.

Further information on the current events held at the racecourse, including attendance, is required to present a base case scenario. Additional information is then required on the increase in events, including attendances for both racing and non-racing related events. This will assist in fully determining the extent of traffic and transport impacts on the surrounding area as a result of the master plan proposal.

Pedestrian access to the racecourse from the west through the proposed development is considered to be difficult in terms of wayfinding, and also has a significant potential to create amenity impacts. Measures to alleviate these issues should be outlined.

3.1.1.2 Traffic modeling

The review of the GTA Report reveals that, in most cases, the methodology used in the report is reasonable, although high level and low in detail. However, many of the assumptions and calculations are simplistic. Much of the background and source data used is either not referenced or lacking in supporting evidence and justification.

Specifically, there are concerns regarding the assumptions for:

- i) traffic generation and distribution;
- ii) mode share of non-car traffic;
- iii) future traffic conditions and the traffic impact on the local road network; and
- iv) future public transport use and the capacity of this infrastructure to cope with additional demand.

Council requests more justification to validate all assumptions.

VicRoads has indicated that the traffic growth estimated in the GTA model needs to be updated from its data. Council therefore requests the MVRC to provide all the base data used in its analysis. Council also requests that the MVRC information (and specifically the GTA report) be updated to address the following information.

- Traffic flow profile data at each intersection in the study area for both AM and PM peaks.
- Queue length profiles for both peak periods.
- A table/graph of fluctuation in travel times over the peak periods.
- Travel time data for routes 3 and 4 for the AM peak.
- Information showing the level and distribution of demand to/from the study area.
- Table/graph showing the existing distribution of travel distances for trips generated to and from the Moonee Ponds Activity Centre catchment area and comparing it with the other two catchment areas specified in the report.
- Discussion on the reasoning for using 4km as the radius for the areas used in the analysis.
- The Pattison St and Ormond Rd Intersection in the model.
- Detail of signal settings (such as, phasing, cycle and phasing timing, signal control logics, etc.) for the intersections.
- Input of traffic volume data in the MVRC report to check consistency.
- A plan showing the public transport routes and stops.
- The traffic volumes used in the modelling must be revised to with regard to future traffic conditions and traffic generated by the development.
- The models must be rerun with two separate input profiles and assignments for car and heavy vehicle traffic to more accurately reflect the on-street conditions.
- Calibration results for 7:00am - 8:00am, 4:30pm - 5:00pm and 6:00pm – 6:30pm.
- Adding a figure in the report showing the fluctuation of observed and modelled travel time over the simulation period.
- High pedestrian volume on the event day is to be modelled to replicate the interaction between pedestrian and vehicles and the possible impact on traffic.
- Check the feasibility of the proposed signal settings with the VicRoads Signal engineers.

- Travel time results from the option modelling to show how traffic diverted from routes 2 and 3 as a result of the changes to the road network are affected.
- Justification as to why the queue length on the existing road network would result in increased queuing along all approaches of the Moonee Pond Junction with the exception of the Pascoe Vale Road north approach.
- An analysis of traffic impacts on public transport operations.
- Revising the option testing to include five scenarios;
 - i) existing road infrastructure with existing traffic plus development traffic,
 - ii) as above but with the six proposed mitigating measures outlined in the GTA report Section 7.4.1,
 - iii) revised structure plan road infrastructure with existing traffic conditions,
 - iv) revised structure plan road infrastructure with existing traffic plus development traffic and
 - v) structure plan road infrastructure and the six proposed mitigating measures with existing traffic, plus development traffic.
- Justify the trip rates that have been used in the calculation of the development traffic and provide the source data.
- The sensitivity analysis should be a ‘worst case’ traffic conditions scenario that could be expected to occur on the network.
- Adjust traffic distribution in accordance with Department of Transport VITM Model or provide evidence to support the traffic distribution assumptions used.

The GTA Report provides a number of scenarios based on the proposed redevelopment and traffic conditions in the area. Council requests the MVRC to model a further two scenarios, as outlined below, to provide a better understanding of the proposed traffic implications.

- The current modelling shows that congestion on the road network would increase due to the proposed redevelopment and thus travel times and queuing at intersections would increase causing delays to traffic, trams and buses. There should be further analysis of the impacts of this increased congestion, including of public transport services, with recommendations on measures to negate these impacts.

The GTA report concludes that the increase in traffic caused by the proposed redevelopment would be managed by “appropriately developed and executed transport improvement measures”. However the report does not specify the form that these appropriate transport improvement measures would take and how they would alleviate increases in congestion. More information should be provided in this report.

- The GTA Report indicates that the construction of a roundabout is required at the intersection of McPherson Street and Alexandra Avenue and the intersection of McPherson Street and Coats Street. These are located in key pedestrian paths and may not be to a required standard from a safety and traffic point of view in times of high pedestrian traffic. There is a need to model the impact of high pedestrian usage on traffic movements in the areas affected.

3.1.2 Car Parking

The GTA Report does not specify sufficient detail on:

- i) Car parking arrangements for the proposed redevelopment;
- ii) The potential impact it would have on parking in the surrounding area; and
- iii) The alternative transport modes for the expected travel mode change.

The car parking data provided in the GTA Report has not been justified sufficiently and is of an unknown source. There are also no parking rates provided for the non residential uses proposed for the site. The justification for reduced car parking for the proposed residential development needs to be explained in detail, and the impacts of the reduced car parking needs further analysis. This should also include the impacts on the other modes of transport, including pedestrian movements that are expected to replace the vehicle usage.

The proposed redevelopment indicates that the car parking for race events would be substantially reduced from 3,400 to 2,000 car parking spaces inside the course and from 570 to 300 car parks under the grandstand. The GTA Report provides inadequate justification for the substantial reduction in car parking spaces for events on the site. The proposed improvements to the racecourse would increase the number of events and the attendances at the course. As such, the impact of the reduced car parking on site would need to be clearly understood, as well as the possible impacts this will have on the surrounding residential areas, and on the other transport modes expected to cater for the travel mode shift. General access arrangements to the course also need to be outlined in further detail.

The GTA Report acknowledges that the car parking assessment is to be used for preliminary planning purposes only, and that a more detailed assessment of car parking requirements is needed. The provision of car parking for the development is a critical aspect on how the development and the course operations would work in the future. It is therefore imperative to conduct a precinct level assessment of the car parking, with justification to the various assumptions made. Should there be overflow car parking into surrounding streets or impacts on the general transport network and environment, mitigating actions must be proposed.

3.1.3 Integrated Transport Planning

The City of Moonee Valley Integrated Transport Plan (2008) encourages and promotes the use of sustainable transport. The master plan proposal has embraced this overall concept. The site, being close to the Moonee Ponds Activity Centre and having a good choice of public transport alternatives, makes the objective achievable.

Although this is the case, Council advises the MVRC to develop its own integrated transport plan to ensure sustainable transport would be supported and encouraged.

The following technical data is required to be updated and re-evaluated as a minimum.

- Utilise trip rates calculated from VISTA to estimate generated trips and apply a simple mode choice model, which could be based on that of VITM, to forecast future public transport trips.
- Include an analysis of service levels and boardings/alightings of the different modes within the walking catchment of the development site should be included to provide some additional supporting evidence to the estimation of sub-mode share.

- Use VITM future year service assumptions and patronage forecasts in the assessment of public transport requirements, as well as information on likely future PT rolling stock and service levels.
- Present Figures from VITM for walking and cycling demand generated in the zone of the development site.
- Include supporting evidence or a clear justification for the assumption that public transport trip rates are double because of the proximity to public transport.
- Provide support, and update, if necessary, the assumptions regarding the time of day of PT trips – this could be based on an analysis of VISTA07 and/or Census06 data of an area with high PT mode share.
- Examine VITM future year matrices in combination with a review of current destinations based on sources such as VITM, VISTA or Census to provide a better indication of the geographic distribution of trips and include in the PT trip generation calculations.

3.1.3.1 Pedestrian and cyclist facilities

Pedestrian and cyclist facilities are fundamental in encouraging access to and from the site. The pedestrian connections to the activity centre and the public transport nodes are of particular importance and it would be necessary to ensure the connections are treated effectively to improve and promote this access.

Council requests further information on how the proposed redevelopment would treat and manage the integration of pedestrians and cyclists into the development, and how the development and surrounding area will be designed/upgraded to encourage access to and from the site from the surrounding walking and cycling networks.

The following information is required as a minimum.

- Generate public transport and cycling catchment areas by calculating journey times from/to the study site and compare with likely demand origins and destinations, which could be taken from VITM.
- Include additional details (e.g. frequency, capacity) of the public transport services in the area.
- Provide a table or graph showing the current usage of existing Cycle and Pedestrian Infrastructure near to the proposed development site.
- Indicate on the walk catchment map the assumed site boundaries or points used to generate the catchment area for greater clarity.
- Include references to data sources.

In addition to the issues outlined above, the report by MGS Architects recommends that linkages between the new western internal street network should interconnect the commercial hub of this area with the racetrack, rather than linking with the residential zone.

3.1.3.2 Future public transport use assumptions

The GTA Report states that if the site is fully redeveloped, the current train network would not be able to cope and more services would be required. In addition, there would be impacts on tram services. The GTA Report also makes no allowances for other potential development within the municipality or further north in the growth areas of Broadmeadows and Craigieburn, and the impacts this will have on the public transport networks.

The GTA Report relies on a number of assumptions to forecast the future public transport trips. Council requests more detailed assessments, including:

- i) Suitable modelling, which must include analysis of future demand for public transport services; and alternative transport modes and journey times to the destinations; and
- ii) Justification of any assumptions made in these assessments.

4. Community Infrastructure

A review of the community infrastructure needs has been prepared by Macroplan Australia Pty Ltd. This has been combined with internal feedback provided by the various departments within Council.

The review is primarily an evaluation of the ASR Stage 2 Community Infrastructure Assessment (ASR Report) submitted by the MVRC. The key recommendations in relation to community infrastructure contained within the ASR Report are as follows:

- On-site development of a small, multi-purpose facility of 1,500sqm plus 308sqm of outdoor area.
- Financial contribution to installation of public art off or on-site.
- Financial contribution to off-site pedestrian and bicycle trail infrastructure.
- Exploration of relocation options for the Sam Merrifield library and Civic Centre.

A number of gaps and key issues have been identified in the ASR report. In some instances what has been proposed by the MVRC is inadequate and has not taken into account the impact of the proposed redevelopment on the surrounding area. In addition, there are some examples where recommendations are inconsistent with Council's adopted strategies.

4.1 Key Issues and Recommendations

4.1.1 Library and Civic Centre

The ASR Report suggests that the relocation of the Sam Merrifield library and Civic Centre to the racecourse site should be explored. There are limited operational advantages in relocating the Sam Merrifield library or Civic Centre to the racecourse site.

It is not aligned with Council's direction as per the adopted Library and Learning Strategy 2012-2016 or the Moonee Ponds Activity Centre Structure Plan 2010. A key implementation objective of the Structure Plan is to develop a master plan for the City Place precinct. This is considered a more appropriate location for the Civic Centre and Library to remain.

It would be more appropriate for funding to be provided towards a library upgrade within Precinct A of the Moonee Ponds Activity Centre (City Place).

4.1.2 Meeting spaces and community services

While limited information is provided within the current proposal, a meeting space for 1-20 people is considered too small to cater for the population size proposed on the site and would create management issues.

Based on the current proposal and potential population size, the site should allow for a larger community meeting space.

The ASR report also underestimates the demand for neighbourhood house type services – which includes spaces for social support, self-help, multicultural events and cultural animation as well as learning.

Moonee Ponds provides the ideal location for the municipal provision of a youth facility (an ASR level 3) as envisioned by the Council's Community Facilities Plan, 2011. Contributions could be made by the MVRC to a potential facility of this nature.

4.1.3 Impacts on existing facilities

The impact of the potential additional population from the proposed redevelopment is not clearly identified in terms of both cost and capacity on existing nearby facilities such as at Queens Park Pool, Queens Park and Ormond Park. In addition, the alignment to sporting club based opportunities and potential projects such as a new skate area in Mt Alexander Road has not been identified (the skate project is in Council’s adopted Skate/BMX Feasibility Study, 2009).

4.1.4 Community infrastructure audit

The MVRC should review its audit of existing community infrastructure to more accurately determine the potential gaps. In addition to community infrastructure, there is a need to provide in more detail the expected impact of the proposed future redevelopment on existing nearby recreational services and facilities.

By undertaking a review of the audit, additional and more accurate information would be obtained, which could then better inform community infrastructure negotiations. As a starting point, the following services and facilities would be significantly impacted by the proposed redevelopment, and would require expansion, relocation or additional facilities.

- Dual Maternal and Child Health (MC&H) services.
- Early Childhood Intervention Services (ECIS).
- Community meeting spaces.
- Primary schools.
- Netball facilities.
- Aged care.
- Library services.

The rationale for the requirement of each of these services and facilities is outlined in more detail within the MacroPlan Community Infrastructure Assessment.

5. Public Open Space

A review of the open space needs and impacts for the Moonee Valley Racecourse proposal has been undertaken by Thompson Berrill Landscape Design Pty Ltd, in association with Environment & Land Management Pty Ltd.

This review takes into account Council's adopted Moonee Valley Open Space Strategy (2009). This adopted strategy provides recommendations relevant to the Moonee Valley Racecourse as follows.

- Municipal Open Space - Recognition that there is a gap in the provision of open space in Moonee Ponds. Section 3.1.2 of the Open Space Strategy also states that the need for Municipal open space (minimum 3 hectares) would only arise if there was a significant change to the land use associated with Essendon Airport and Moonee Valley Racecourse.
- Neighbourhood Open Space – Consideration of the need to deliver additional Neighbourhood open space (minimum 1 hectares) due to lack of any future development of large strategic sites in Moonee Ponds.
- Three additional Small Local open spaces are proposed in Moonee Ponds. All three are in response to the forecast future population growth planned with existing gap areas in open space distribution.

Section 19.4 within the Open Space Strategy notes *'At this stage, no residential growth is anticipated at the Moonee Valley Racecourse site. If this changes over the next 11 years there would need to be a review of open space needs with the outcome likely that the racecourse site would need to contribute some land area to open space.'*

The adopted Moonee Valley Open Space Strategy (2009) includes an open space contribution framework, with a minimum contribution of 5 per cent on larger redevelopment sites such as the Moonee Valley Racecourse. The option of levying a contribution of greater than 5 per cent applies to land only.

5.1 Key Issues and Recommendations

5.1.1 Moonee Valley Open Space Strategy

The ASR Community Infrastructure Assessment - October 2011 (The ASR report) does not accurately reference the analysis and recommendations of the adopted Moonee Valley Open Space Strategy (2009). The ASR report references the Moonee Valley Open Space Strategy – Towards 2020, however, this is no longer Council's adopted Open Space Strategy.

5.1.2 Quantity of open space

The conclusions within the ASR Report suggest that *'open space provision measures within activity centres need to be assessed in terms of quality, diversity and distribution criteria and standards rather than in terms of quantity'*. Council, however, would suggest that both the quantity and quality of open space provided within the proposed redevelopment is important.

Therefore, in terms of both quantity and quality, Council has significant concerns with the current open space provision within the Moonee Valley Racecourse Master Plan.

Within the Moonee Valley Racecourse master plan proposal only one of the open space reserves appears to meet the criteria for open space included within the adopted Moonee Valley Open Space Strategy (2009).

The largest open space reserve of 3,000sqm is labeled as 'Neighbourhood' Open Space within the master plan proposal. This is not Neighbourhood Open Space as defined within the adopted Moonee Valley Open Space Strategy (2009). It would be considered Local Open Space.

Based on the population estimates provided by the MVRC, a total of 0.79sqm of public open space per person would be provided, whereas current standards range from 20sqm to 24sqm per person. There is a clear deficiency in the provision of open space and it is unreasonable for the additional population on the proposed redevelopment to be accommodated in surrounding open space reserves, given the current capacity of these reserves.

Based on the standards set out in Council's Open Space Strategy (2009) the MVRC would need to provide Municipal (minimum 3 hectares), Neighbourhood (minimum 1 hectare) and Local (0.26-0.99 hectares) open space on-site. Further analysis is necessary to detail how standards can be met.

There is an opportunity to utilise the space within the centre of the racetrack for open space. As outlined in the Open Space Strategy, the Moonee Valley Racecourse site is the only opportunity for the acquisition of a large public open space reserve in Moonee Ponds.

5.1.3 Quality of open space

The final configuration of the open space would need to meet the criteria in Table 4-4 of the Moonee Valley Open Space Strategy (2009) including protection of mature canopy trees, heritage values, adequate sunlight access, passive surveillance and accessibility to the surrounding neighbourhood and any development on the site.

5.1.4 Active open space

Another key issue is the provision of active open space. The MVRC is proposing that the potential future residents living in the proposed master plan area would rely on surrounding open space for their sporting needs. However, these needs cannot be accommodated in the existing open space network without significant changes and impact on the amenity of the existing residential communities surrounding them. Some of the impacts would include increased noise, light spill and traffic movement.

6. Environment and Climate Change

A review of the environment and climate change impacts and opportunities has been prepared internally by Council's Environment and Economic Development Department. The review has been based on the principles and strategies in Council's Environmental Sustainability Plan 2007-2012, and related documents.

This review looked at the following key areas:

- i) environmental design and property value;
- ii) sustainable water management;
- iii) greenhouse;
- iv) wind;
- v) vegetation;
- vi) resource recovery; and
- vii) transport.

Many recommendations within this review relate to future operational issues or are more relevant to a permit stage. They have therefore not been discussed in the following section, but should be considered as part of the overall future development and operation of the racecourse site.

6.1 Key Issues and Recommendations

6.1.1 Environmental Design

This review recommends an environmental sustainable design precinct-wide approach to the proposed redevelopment to ensure that environmental initiatives are incorporated at an early stage into the master plan. This would ensure that streetscapes and buildings can be planned for climate change, and that principles can be identified for the incorporation of alternative energy, water and waste systems for all proposed buildings.

Wording within the master plan proposal is currently weak in relation to environmental design, stating that it would 'need to consider' and 'seek to improve'. Active support for these design initiatives is essential at the master planning stage, to ensure consideration and commitment throughout later stages.

The current general layout of buildings in the master plan proposal, particularly sub-precinct A to E, has an unfavourable solar aspect, with the majority of buildings and public ground level areas exposed to western sunlight and shaded from eastern and northern sunlight. This will result in higher energy demands for building heating and cooling, as well reduced amenity for streets and public open spaces which will tend to be shaded in the morning when sun is most desirable and exposed in the afternoon when sun is least desired.

The Moonee Valley Racecourse master plan proposal is generally deficient in the design for pedestrian wind effects around high-rise developments. There are serious concerns in regards to potential ground-level wind conditions. High walls directly adjacent to open space and streetscapes need to be avoided. Guidelines for tower setbacks from all sides of podiums, and greater articulation would be required to slow and deflect wind.

There are potential detrimental impacts as a result of the proposed built form and heights in sub-precincts A to E in terms of ground level winds. There may be ground

level winds generated in excess of widely accepted safety criteria within the proposed development. While the built form and height for sub-Precincts G and F are likely to cause less of an impact, it is likely that there would be abnormal wind patterns in the north-south walkways between the buildings. The principle of a 15 metre gap between buildings of 8 metres and 15 metres high is inadequate and is likely to result in high wind conditions.

It is also considered that wind from the built form and scale of the proposed development has the potential to compromise comfort of racecourse patrons.

As a result of the above, the MVRC are requested to provide wind modelling of the proposed development.

6.1.2 Sustainable water management

Sustainable water management should be applied across the whole site to best practice standards and in accordance with the principles and objectives of Council's adopted Water Strategy 2011. The MVRC infrastructure report makes a brief reference to this, however greater detail would be required.

A precinct water balance assessment should be undertaken for the site. This should describe base water flows and demonstrate scenarios for best practice water management.

6.1.3 Resource Recovery

A precinct-wide approach should be adopted in relation to waste and resource recovery. This should include a commitment to the highest standards of waste reduction.

The establishment of a 'reuse hub' within the precinct, and identification on the master plan proposal, would help provide a great service and resource for a potential future community on this site and would further improve on resource recovery.

7. Social Impact Assessment (SIA)

An assessment of the social impacts of the proposed redevelopment on the existing and proposed population has been undertaken by Capire Consulting Group

This review is primarily based on the Moonee Valley Racecourse Master Plan, ASR Stage 2 Community Infrastructure Report and the GTA Consultants Report as well as the outcomes of the consultation held with the community to date by both the MVRC and Council.

The SIA looked at the impacts on both the existing residential community as well as the possible future residents of the proposed development.

In particular the assessment provides a description of the impacts of the following:

- i) size of the local population;
- ii) housing diversity and demographic composition;
- iii) physical integration with the existing community;
- iv) transport and mobility;
- v) crime, health and safety;
- vi) local amenity;
- vii) housing affordability; and
- viii) social infrastructure and open space.

7.1 Key Issues and Recommendations

7.1.1 Size of population

The Capire Consulting report suggests that the population estimates would be in the order of 6,240 based on the MVRC 3,000 dwellings, or up to 8,900 under the maximum capacity calculated by MGS Architects. At the upper end, this increases the potential population on the site by 50 per cent, a significantly different figure than that proposed by the MVRC. Even at the lower end of the scale, the proposed redevelopment would lead to a significant increase in the local population.

There are concerns relating to negative impacts on the connectedness, cohesion and character of the local community, with possible increase in anonymity and rapid changes in community identity. This can impact both the existing population and new residents of the proposed development.

7.1.2 Housing Mix

It is currently unclear within the Moonee Valley Racecourse master plan proposal what the mix of housing would be, including:

- i) numbers of dwellings, composition and size of housing stock;
- ii) likely population segments apartments would be marketed towards to more accurately determine the potential demographics of future residents; and
- iii) time-line for development of proposed dwellings.

It is therefore difficult to determine how the proposed redevelopment at the racecourse would integrate with the existing community of Moonee Ponds. This also makes it difficult to fully appreciate the future demographics of the population, making community infrastructure planning more difficult.

The MVRC needs to provide greater detail regarding the composition of housing stock within the proposed redevelopment.

7.1.3 Social Housing

The provision (or lack) of social housing has not been articulated within the Moonee Valley Racecourse master plan proposal. The proposed redevelopment provides an ideal opportunity for the inclusion of social housing within the proposed redevelopment in a short distance of the CBD. The proposed redevelopment should include a provision of a 3.5 - 5 per cent target for social housing. This could be achieved through provision of partnership with a registered community housing provider.

7.1.4 Affordable Housing

Housing affordability is a key goal within Councils adopted Housing Strategy 2010 and within the Moonee Ponds Activity Centre Structure Plan 2010.

As with Social Housing, the site presents a significant opportunity to provide affordable housing in a location near to services and economic opportunities. The current master plan proposal only briefly touches on the provision of affordable housing and offers no firm commitment to its inclusion. It is recommended the wording surrounding affordable housing should be strengthened.

7.1.5 Crime, Health, Safety and Amenity

The potential for noise and general disorder in proximity to existing residential areas is likely to increase following the proposed relocation of the grandstand. Similar amenity impacts would be likely to affect new residents living within proposed residences in the west of the site.

Depending on the scale and nature of events held at the venue, the positioning of the grandstand would most likely have a negative impact on the Moonee Ponds Primary School operations.

More detail is required regarding events at the racecourse including types, numbers, times, expected capacity and management procedures.

It is recommended that the MVRC demonstrate how the proposed development has been designed to take into account the objectives and design suggestions of the Safer Design Guidelines for Victoria (Department of Planning and Community Development and Crime Prevention Victoria).

Ultimately it is recommended that a Social Impact Assessment be undertaken to identify and resolve any impacts and opportunities as a result of the proposed development.

8. Heritage

David Helms Heritage Planning and Management has been commissioned by Moonee Valley City Council to provide a detailed assessment of the heritage significance of the Moonee Valley Racecourse site.

8.1 Results of Assessment

A heritage scoping report has been prepared by David Helms Heritage Planning and Management. The heritage assessment is not specifically a review of the master plan proposal. This scoping report will be made available as part of the public consultation for the MVRC Heritage Study, which is a separate process to this review. The scoping report suggests more detailed assessment of the following.

- Alister Clark Rose Garden
- Main Tote
- Horse stalls, perimeter fence and mature trees in south-west corner
- S.R Burston Stand
- Club Secretary's house and garden
- Manikato Garden

Depending on the outcomes of the heritage assessment, alterations may need to be made to the racecourse master plan in relation to any buildings or places on the site that warrant heritage controls.

9. Further issues and additional information required

In addition to the matters presented in this report, the following key issues and further information should be addressed:

9.1 Economic impacts on existing businesses

The Moonee Valley Racecourse master plan proposal provides little detail on the commercial floorspace within the proposed redevelopment. It is necessary for additional information to be provided in relation to this, in order to more adequately determine the potential impacts of the proposed redevelopment on nearby business in the rest of the Moonee Ponds Activity Centre.

9.2 Geology

Future consideration and analysis will need to be given to the geology of the site.

It is recommended that a geotechnical report be prepared to identify any issues (including issues in relation to the proximity of the site to Moonee Ponds Creek) in relation to the proposed development and track realignment.

It is also recommended that MVRC, or their consultants, consult the relevant authorities to better understand any issues relating to Moonee Ponds Creek.

9.3 Rezoning

Council's review has identified a number of information gaps in the master plan proposal. Until the master plan proposal is at a point where all of the impacts of the proposal are adequately identified and addressed, it would be difficult to commence the preparation of any zone control. Furthermore, statutory public consultation without reasonable impact assessment, addressing all of the issues outlined in this review, could result in confusion, lack of transparency and potentially a drawn out approvals process. Objectives, requirements and guidelines for the precinct in a zone would likely be affected by any changes that may be made to the master plan proposal.

10. References

Moonee Valley Racing Club Documents – available at Moonee Valley City Council website (www.mvcc.vic.gov.au).

- MVRC Master Plan Submission (Tract Consulting), 2011
- Transportation planning, design and delivery (GTA Consultants), 2011
- Stage 2 Community Infrastructure Assessment (ASR Research), 2011
- Infrastructure Report (Dalton Consulting Engineers), 2011
- Environmentally Sustainable Design Opportunities Summary Report (ARUP), 2011
- Heritage Appraisal (Lovell Chen), 2011

Moonee Valley City Council Consultants Reviews (Appendices to this report) – available at Moonee Valley City Council website (www.mvcc.vic.gov.au).

- Development Guidelines review (McGauran Giannini Soon Architects Pty Ltd), 2011
- Traffic and Transport Assessment (CPG Australia), 2011
- Community Infrastructure Assessment (MacroPlan), 2011
- Public Open Space Assessment (Thompson Berrill Landscape Design and Environment Land Management), 2011
- Environment and Climate Change Assessment (Moonee Valley City Council – Environment Unit), 2011
- Social Impact Assessment (Capire Consulting Group), 2011

Moonee Valley City Council – other documents and policies– available at Moonee Valley City Council website (www.mvcc.vic.gov.au).

- Library and Learning Strategy, 2012-2016
- Moonee Ponds Activity Centre Structure Plan, 2010
- Community Facilities Plan, 2011
- Skate/BMX Feasibility Study, 2009
- Moonee Valley Open Space Strategy, 2009
- Moonee Valley Water Strategy, 2011
- Environmental Sustainability Plan, 2007-2012
- Tackling Transport – Towards 2020, Integrated Transport Plan, 2008
- Moonee Valley Housing Strategy 2010

Other – Available at the Department of Planning and Community Development Website (www.dpcd.vic.gov.au).

- Safer Design Guidelines for Victoria