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**AMENDMENT C269 TO THE
YARRA PLANNING SCHEME**
EXPERT WITNESS STATEMENT – SARAH ANCELL
CLIENT: YARRA CITY COUNCIL

Project number and date	2619 210920
Prepared by	Sarah Ancell, Principal Urban Planner



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1. Introduction

1. I have been instructed in this matter by Maddocks who acts for Yarra City Council. Amendment C269 to the Yarra Planning Scheme was prepared by and made at the request of Council, and they are also the Planning Authority for the Amendment.
2. I have been asked to consider the following matters:
 - My opinion in relation to Amendment C269, including the Amendment as exhibited and Council’s Panel Preferred version, and the appropriateness of the PPF translation.
 - My response to the key issues raised by submitters (and the Council’s response to those submissions) insofar as they relate to my area of expertise, including the following:
 - the proposed boundaries and ‘designation’ (e.g. Neighbourhood Activity Centre or Local Activity Centre) of Activity Centres;
 - the location of residential development, including the designation of specific change areas (ie. High, Moderate, Incremental or Minimal change areas);
 - affordable housing;
 - balancing residential growth in and around Activity Centres with the commercial and cultural roles of these Activity Centres;
 - ‘form and content’ issues associated with the Amendment, such as key terms used in the built form policy elements of the Amendment (e.g. references to ‘mid-rise’ development); and
 - the appropriateness of the equinox when considering overshadowing of public open space, as exhibited, compared with the winter solstice.
3. In preparing my assessment I have had regard to the following documents:
 - The exhibited version of Amendment C269 by Yarra City Council
 - Council’s Panel Preferred version of the Amendment documentation which was prepared as a post-exhibition document and which is dated 3 August 2021
 - Maddocks brief dated 17 August 2021
 - Activity Centres Roles and Boundaries (October 2019) prepared by City of Yarra
 - Strategic Economic and Employment Strategy (August 2018) prepared by SGS Economics and Planning

- Yarra City Council Housing Strategy (September 2018) prepared by City of Yarra
- Building for Diversity – Yarra’s Social and Affordable Housing Strategy (November 2019) prepared by City of Yarra
- Ordinary Meeting of Council Agenda and Minutes (26 November 2019)
- Ordinary Meeting of Council Agenda and Minutes (3 August 2021) including the officer’s response to submissions
- Submissions 19, 147, 163, 208, 222, 231, 234, 255, 260, 266, 279, 289, 290, 292, 293, 297, 302, 311, 312, 324, 334, 336, 339, 348, 350, 351, 357, 372, 377, 379, 381, 395, 396, 405, 409, 411, 416, 420, 424 and 429
- Yarra Planning Scheme
- The Ministerial Direction on the Form and Content of Planning Schemes
- Ministerial Direction No. 9 Metropolitan Planning Strategy
- Ministerial Direction No. 11 Strategic Assessment of Amendments
- A Practitioner’s Guide to Victorian Planning Schemes (Version 1.3)
- LPPF Translation Manual (Version 2.0)
- Planning Advisory Note 71: Amendment VC148
- Planning Advisory Note 72: Amendment VC148
- Planning Practice Note 13 – Incorporated and Background Documents (March 2020)
- Planning Practice Note 58 – Structure Planning for Activity Centres (September 2018)
- Planning Practice Note 60 – Height and Setback Controls for Activity Centres (September 2018)
- Victoria in Future 2019 ‘Data for Local Government Areas (LGA) and Victoria in Future Small Areas (VIFSA)’ Excel file
- Plan Melbourne 2017
- Draft Inner Metro Regional Framework Plan August 2021

2. Expert Witness Statement

The name and address of the expert.

Sarah Ansell of Echelon Planning, 3 Prentice Street, Brunswick 3056.

The expert's qualification and experience.

Sarah Ansell holds a Bachelor of Arts (Geography) from the University of Canterbury and a Master of Regional and Resource Planning from the University of Otago. She is a member of the Victorian Planning and Environment Law Association and the Property Council of Australia.

A Curriculum Vitae is included as Appendix 1.

The expert's area of expertise to make this report.

Sarah has a broad range of experience in planning and development matters with a sound understanding of statutory planning provisions and significant experience in strategic planning and policy development enabling her to comment on a wide range of planning and development issues.

Other significant contributors to the report.

Not applicable.

Instructions that define the scope of the report

Sarah Ansell has been instructed by Maddocks who acts for Yarra City Council. The specific instructions are set out in paragraph 2 of this statement.

The identity of any person who carried out tests or experiments upon which the expert has relied on and the qualifications of that report.

Not applicable.

The facts and matters and all assumptions upon which the report proceeds.

Sarah Ansell relies upon the reports and documents listed in section 1 of this report.

Documents and other materials the expert has been instructed to consider or take into account in preparing her report, and the literature of other material used in making the report.

Sarah Ansell has reviewed and taken into account the reports and materials listed in section 1 of this report.

A summary of the opinion or opinions of the expert.

A summary of Sarah Ancell's opinions is provided for within section 3 of this statement.

Any opinions that are not fully researched for any reason.

Not applicable.

Questions falling out of the expert's expertise and completeness of the report.

Sarah Ancell has not been asked to make comment on any matters outside of her area of expertise. This report is a complete statement of evidence.

Expert Declaration

I have made all the inquiries that I believe are desirable and appropriate and no matters of significance which I regard as relevant have to my knowledge been withheld from the Panel.



Sarah Ancell
20 September 2021



3. Summary of evidence

4. The following is a summary of my opinions in relation to the principal matters that I have addressed in this statement.
5. I have reviewed the planning merit of Amendment C269 (including Council's Panel Preferred version) and am of the view that it is consistent with State and Regional Planning Policies.
6. I am generally comfortable with Council's preferred version in Attachment 5 to the Council minutes dated 3 August 2021 and updated with further changes consistent with Council's resolution from that meeting (herein referred to as the 'Panel Preferred version') of Amendment C269, as in my opinion it incorporates changes that make the Amendment easier to interpret and/or more consistent with the relevant planning guidance.
7. I generally support the changes made to the Yarra Planning Scheme by the most recent version of Amendment C269 (being Council's Panel Preferred version), with the following exceptions where I would recommend further changes:
 - Amend the Activity Centres Roles and Boundaries report to:
 - include reference to the Rathdowne Street Neighbourhood Activity Centre at pages 4 and 9
 - use the term "Rathdowne Street north" for the Local Activity Centre north of the Rathdowne Street Neighbourhood Activity Centre
 - insert a separate assessment of the Johnston Street Neighbourhood Activity Centre at Section 8 and update Map 3 to include the boundaries of this
 - Extend the Rathdowne Street Neighbourhood Activity Centre boundary to include 418 to 430 Rathdowne St.
 - Reclassify 104-118 Queens Parade as a minimal change area.
 - Prepare a guidance note such as an update to its existing document "Policy Guidance Note: Affordable Housing Outcomes at Significant Developments" to confirm how the affordable contribution is to be calculated (land, completed dwellings etc).
 - Amend the second building height strategy in Clause 15.01-2L as follows:

*Ensure that development reflects the predominantly low-rise character of the area, except in the following locations **where a range of building heights should be provided that respond to their context and role:***

- Amend the PPF as follows:
 - Clause 11.03-6L Vic St East Precinct – The first objective should be removed as it repeats elements of the objectives from Clauses 12.03-1S and 12.03-1R.
 - Clause 12.03-1L River corridors – The final strategy ("Support development that creates or enhances public access to the Yarra River") should be removed as it repeats elements from the strategies of Clause 12.03-1R.
 - Clause 13.07-1L Caretaker's houses – Some of the existing planning scheme policy wording should be retained for the strategy. The proposed wording seeks to prevent prohibited dwellings, which the zoning controls provide for. The strategy should be reworded as "Protect business and industry by ensuring that caretaker's houses are legitimately associated with a commercial or industrial use".
 - Clause 13.07-1L Interfaces and amenity – I defer to the evidence of Mr Jim Antonopoulos of SLR Consulting in relation to acoustic matters, but note that from a drafting perspective the following should be amended:
 - Move the hours of operation strategy to the policy guidelines.
 - Delete references to the Acoustic Reports and Waste Management Plans from the policy guidelines. The LPPF Translation Manual states that application requirements do not form part of the PPF, and that such requirements should be located within local schedules, or if it cannot fit into a schedule format, can be set out in a Council information sheet or other ancillary document for permit applications. These could potentially be located in the incorporated document associated with this clause.
 - Delete any policy guidelines that directly reflect the EPA noise requirements under the Environment Protection Act 2017, as these are referred to in Clause 13.05-1S.
 - Clause 12.03-1L River corridors - The final strategy ("Support development that creates or enhances public access to the Yarra River") should be removed as it repeats elements from the strategies of Clause 12.03-1R.
 - Clause 15.01-1L Signs – Heritage – The Clause should be moved into Clause 15.03-1L. The Practitioners Guide states that if a sign policy solely relates to the appearance of signs within a heritage area, it can sit with Clause 15.03-1 Heritage conservation.
 - Clause 15.01-2L Landmarks – I have no issues with the clause itself but note that the primary views are repeated elsewhere in the planning scheme within schedules to the Design and Development Overlay (e.g. DDO21 – Bridge Road Activity Centre). It would be preferable for these overlays to be updated to provide cross references to the primary views in Clause 15.01-2L to avoid repetition of material throughout the scheme.

- Clause 16.01-2L Location of residential development - Strategy bullet point "That respects character of the street" should be deleted as this repeats Clause 15.01-5S.
- Clause 16.01-4L Housing affordability – A reference to hospitality, arts, child care, cleaning and laundry workers should be inserted into the key workers definition to match the background policy document (Social and Affordable Housing Strategy 2019).
- Clause 17.01-1L Employment – The material on built form outcomes (i.e. 4th strategy onwards) should be moved into the Urban Design policy (Clause 15.01-1L).
- Clause 17.02-1L Retail – The 2nd and 3rd bullet points should be moved to the Building Design policy (Clause 15.01-2L).
- Clause 18.02-1L Sustainable transport – The two "Support the upgrade and establishment of paths along the Yarra River..." strategies in walking and cycling should be combined into one strategy in the sustainable transport clause.
- Clause 19.02-6L Open space – The objective and first and third strategies should be deleted as these repeat elements of Clause 19.02-6S.
- Clause 19.03-3L WSUD – The examples of measures to improve stormwater quality and prevent litter being carried off being should be moved to the policy guidelines.
- Clause 19.03-2L Development contributions - The first strategy should be deleted as this repeats elements of objective from Clause 19.03-2S.



4. The Planning Scheme Amendment

8. Amendment C269 seeks to introduce a new Municipal Planning Strategy (MPS) and local planning policies within the Planning Policy Framework (PPF) to replace the existing Clause 21 Municipal Strategic Statement and Clause 22 local planning policies. The Amendment includes both new and policy neutral content (refer to Table 1 below), with the former being informed by a range of new, updated and previously adopted documents relating to activity centres, housing, heritage, and noise impacts (which will be included in the planning scheme as incorporated or background documents). The Amendment also replaces the schedules to Clause 52.06 (Gaming) and 72.04 (Documents Incorporated in this Planning Scheme), and introduces new schedules to Clause 72.08 (Background Documents) and 74.01 (Application of Zones, Overlays and Provisions).

Table 1: New and policy neutral content of Amendment C269

Clause	Content of Amendment
Clause 02.01 (Context)	New
Clause 02.02 (Vision)	New
Clause 02.03 (Strategic Directions)	New
Clause 02.04 (Strategic Framework Plan)	New
Clause 11 03-1L Activity centres	Largely new
Clause 11.03-6L Vic St East Precinct	Policy neutral
Clause 12.01-1L Biodiversity	New
Clause 12.03-1L River corridors	Updated
Clause 13.03-1L Flood management	New
Clause 13.07-1L Caretaker's houses	Policy neutral with minor changes
Clause 13.07-1L Interfaces and amenity	Updated
Clause 13.07-1L Licenced premises	Policy neutral
Clause 15.01-1L Signs - Heritage	Updated
Clause 15.01-1L Signs	Updated
Clause 15.01-1L Urban Design	Updated
Clause 15.01-2L Building Design	Updated
Clause 15.01-2L Landmarks	Updated
Clause 15.02-1L ESD	Updated
Clause 15.03-1L Heritage	Updated
Clause 15.03-1L WHEA	Policy neutral
Clause 16.01-2L Location of residential development	Largely new
Clause 16.01-3L Housing diversity	New
Clause 16.01-4L Housing affordability	New
Clause 17.01-1L Employment	Largely new
Clause 17.02-1L Retail	Largely new
Clause 17.04-1L Tourism	Largely new

Clause	Content of Amendment
Clause 18.02-1L Sustainable transport	Largely new
Clause 18.02-3L Road system	Largely new
Clause 18.02-4L Car parking	Largely new
Clause 19.02-1L Health precincts	Largely new
Clause 19.02-2L Education precincts	Largely new
Clause 19.02-6L Open space	Updated
Clause 19.02-6L POS contribution	Policy neutral
Clause 19.03-2L Development contributions	New
Clause 19.03-3L WSUD	Policy neutral
Clause 19.03-5L Waste	Largely new
Clause 52.28 Gaming	Policy neutral
Schedule to Clause 72.04 Documents incorporated in this Scheme	Updated
Schedule to Clause 72.08 Backgrounds docs	Updated
Schedule to Clause 74.01 Application of Zones, Overlays	New

9. Amendment C269 was exhibited from August to December 2020. A total of 429 submissions were received (including late submissions).
10. Council Officers prepared a revised version of the Amendment documents to which further changes were made consistent with Councils’ resolution of 3 August 2021 (herein referred to as the Panel Preferred version).
11. My evidence is based on the Panel Preferred version, and references to the Amendment from hereon in are to this version unless otherwise specified.
12. My evidence focuses on the drafting of Amendment C269 and the approach to housing, affordable housing, and activity centre designations and boundaries, as well as other planning issues raised in submissions, where they are relevant to my expertise as a town planner.
13. I have not been asked to peer review the Housing Strategy, Building for Diversity – Yarra’s Social and Affordable Housing Strategy, Spatial Economic and Employment Strategy or Activity Centres Roles and Boundaries documents, but I have assessed them against the relevant Planning Practice Notes to satisfy myself that they adequately address the key planning issues identified in paragraph 2 of my evidence. I have taken the content of these strategies into account in undertaking my assessment of the Amendment, with a view to determining whether they provide a satisfactory evidence base to support the content of the Amendment. In regards to heritage, noise, and traffic and transport my review is limited to the drafting of the proposed policies, as the technical aspects of these issues are outside my area of expertise.



4.1. State and Regional Planning Policies and Strategies

14. I have prepared my assessment of the planning merit of Amendment C269 having regard to the following State and Regional policies and strategies. The below focuses on activity centres and housing as these are the key planning issues I have been asked to provide my opinion on.

4.2. Plan Melbourne

15. Plan Melbourne includes the following relevant directions:

- *1.2 - Improve access to jobs across Melbourne and closer to where people live*
- *2.1 – Manage the supply of new housing in the right locations to meet population growth and create a sustainable city*
- *2.2 – Deliver more housing closer to jobs and public transport*
- *2.3 – Increase the supply of social and affordable housing*
- *2.5 – Provide greater choice and diversity of housing*
- *4.3 – Achieve and promote design excellence*
- *4.4 – Respect Melbourne’s heritage as we build for the future*
- *5.1 – Create a city of 20-minute neighbourhoods*
- *5.2 – Create neighbourhoods that support safe communities and healthy lifestyles*

4.3. Planning Policy Framework

16. The following relevant State and Regional Planning Policy Framework policies apply to activity centres and housing, which is the key focus of my evidence.

17. Clause 11 – Settlement contains a number of relevant objectives and strategies relating to the future planning of activity centres and housing, including:

- *Plan to accommodate projected population growth over at least a 15 year period and provide clear direction on locations where growth should occur.*
- *Planning for urban growth should consider:*
 - *Opportunities for the consolidation, redevelopment and intensification of existing urban areas.*
 - *Neighbourhood character and landscape considerations...*

- *Build up activity centres as a focus for high-quality development, activity and living by developing a network of activity centres that:*
 - *Comprises a range of centres that differ in size and function.*
 - *Is a focus for business, shopping, working, leisure and community facilities.*
 - *Provides different types of housing, including forms of higher density housing.*
 - *Is connected by transport.*
 - *Maximises choices in services, employment and social interaction.*
 - *Support the role and function of each centre in the context of its classification, the policies for housing intensification, and development of the public transport network.*
 - *Encourage a diversity of housing types at higher densities in and around the activity centres.*
18. Clause 15 – Built Environment and Heritage contains a number of relevant objectives and strategies relating to new developments and existing built form (including heritage values), including:
- *Ensure development is designed to protect and enhance valued landmarks, views and vistas.*
 - *Create a city of 20 minute neighbourhoods, that give people the ability to meet most of their everyday needs within a 20 minute walk, cycle or local public transport trip from their home.*
 - *Recognise, support and protect neighbourhood character, cultural identity, and sense of place.*
 - *Support development that respects the existing neighbourhood character or contributes to a preferred neighbourhood character.*
 - *Ensure the preferred neighbourhood character is consistent with medium and higher density housing outcomes in areas identified for increased housing.*
 - *Ensure development responds to its context and reinforces a sense of place and the valued features and characteristics of the local environment and place by respecting the:*
 - *...Neighbourhood character values and built form that reflect community identity.*
19. Clause 16 – Housing contains a number of relevant objectives and strategies relating to the future planning for housing need, including:

- *Increase the proportion of housing in designated locations in established urban areas (including under-utilised urban land) and reduce the share of new dwellings in greenfield, fringe and dispersed development areas.*
- *Encourage higher density housing development on sites that are well located in relation to jobs, services and public transport.*
- *Identify opportunities for increased residential densities to help consolidate urban areas.*
- *Facilitate diverse housing that offers choice and meets changing household needs by widening housing diversity through a mix of housing types.*
- *Support opportunities for a range of income groups to choose housing in well-serviced locations.*
- *Manage the supply of new housing to meet population growth and create a sustainable city by developing housing and mixed use development opportunities in locations that are:*
 - *In and around the Central City.*
 - *Urban-renewal precincts and sites.*
 - *Areas for residential growth.*
 - *Areas for greyfield renewal, particularly through opportunities for land consolidation.*
 - *Areas designated as National Employment and Innovation Clusters.*
 - *Metropolitan activity centres and major activity centres.*
 - *Neighbourhood activity centres - especially those with good public transport connections.*
 - *Areas near existing and proposed railway stations that can support transit-oriented development.*
- *Identify areas that offer opportunities for more medium and high density housing near employment and transport in Metropolitan Melbourne.*
- *Facilitate increased housing in established areas to create a city of 20 minute neighbourhoods close to existing services, jobs and public transport.*
- *Provide certainty about the scale of growth by prescribing appropriate height and site coverage provisions for different areas.*

- *Allow for a range of minimal, incremental and high change residential areas that balance the need to protect valued areas with the need to ensure choice and growth in housing.*
- *Create mixed-use neighbourhoods at varying densities that offer more choice in housing.*
- *To provide for a range of housing types to meet diverse needs.*
- *Improve housing affordability by:*
 - *Ensuring land supply continues to be sufficient to meet demand.*
 - *Increasing choice in housing type, tenure and cost to meet the needs of households as they move through life cycle changes and to support diverse communities.*
 - *Promoting good housing and urban design to minimise negative environmental impacts and keep costs down for residents and the wider community.*
 - *Encouraging a significant proportion of new development to be affordable for households on very low to moderate incomes.*
- *Increase the supply of well-located affordable housing by:*
 - *Facilitating a mix of private, affordable and social housing in suburbs, activity centres and urban renewal precincts.*
 - *Ensuring the redevelopment and renewal of public housing stock better meets community needs.*

20. Clause 17 – Economic Development contains the following relevant objectives and strategies relating to the future planning for employment uses in activity centres, including:

- *Plan for an adequate supply of commercial land in appropriate locations.*
- *Ensure commercial facilities are aggregated and provide net community benefit in relation to their viability, accessibility and efficient use of infrastructure.*
- *Locate commercial facilities in existing or planned activity centres.*
- *Improve access to jobs closer to where people live.*
- *To encourage development that meets the community's needs for retail, entertainment, office and other commercial services.*

4.4. Draft Inner Metro Land Use Framework Plan

21. The Draft Inner Metro Land Use Framework Plan was released along with the five other metropolitan regional plans for public consultation in August 2021. These plans set out a 30 year vision for each metropolitan region and are intended to guide the application of Plan Melbourne at a regional and local level. The Inner Metro plan covers the municipalities of Melbourne, Port Phillip and Yarra. As the plan is in draft form, it does not form part of the planning scheme.
22. The draft plan includes directions and strategies relating to productivity, housing, transport, liveability, strong communities and sustainability.
23. The draft plan also includes consideration of COVID-19 impacts on planning. As per the excerpt below, whilst there is a short-term interruption to growth as a result of restrictions on migration, this is not expected to change Melbourne's long-term future direction.

The coronavirus (COVID-19) pandemic is having dramatic impacts on Victoria's population, economy and society. With movement restricted, migration to Victoria has been reduced almost to zero. The Australian Government's expectations for overseas migration losses will see Victoria's population decline slightly in 2020-21, compared with average growth of 2 per cent for most of the previous decade. International migration is expected to resume within one to two years but not return to normal until the mid-2020s at the earliest.

This interruption to growth is not expected to change the long-term future direction of Melbourne.

However, the global pandemic has had significant impacts. This includes the shift to work-from-home arrangements for large parts of the metropolitan workforce, a greater uptake of online retail services and a shift to local living, with more people are relying on their activity centres and neighbourhoods to meet their day-to-day needs. Many industry sectors impacted by COVID-19 restrictions, including tourism, the arts and international education, are still recovering.

The Inner Metro Region is expected to experience the greatest short-term slowdown in growth compared to the other metro regions due to its reliance on overseas migration.

The LUFs will help Melbourne's metropolitan regions manage the economic and social impacts of the pandemic especially in specific areas such as Melbourne's CBD and the Monash and Bundoora education precincts.

The progress of each LUF will be monitored and revisited to ensure each regional land use pathway continues to contribute to Plan Melbourne's outcomes. (p. 8)

5. Activity Centres

24. I have considered the following issues in regards to the planning merits of the approach to activity centres within Amendment C269:

- Are the designations of the activity centres appropriate?
- Are the boundaries of the activity centres appropriate?

5.1. Strategic context for Yarra’s activity centres

25. The Yarra Spatial Economic and Employment Strategy identifies that the ‘conventional’ hierarchy approach to categorising activity centres and employment precincts does not readily apply to Yarra, where there is a “diversity of employment and economic activities in overlapping yet functional precincts” (p. 40). Figure 39 of that Strategy provides an economic structure map that identifies the following precincts:

- Retail, hospitality, commercial (Activity Centres)
- Mixed Employment Precincts (Major)
- Industrial Precincts
- Indicative Health Precincts
- Special Use Precincts

26. It also identifies Major, Neighbourhood and Local Activity Centres in Strategy 1 at Section 5 of the document.

27. The Yarra Spatial Economic and Employment Strategy includes capacity analysis of the Smith Street, Victoria Street, Bridge Road, Brunswick Street, Swan Street and Johnston Street East retail precincts. It identifies that an estimated 134,000sqm of additional commercial, retail and institutional floor space will be added to these larger centres between 2016 to 2031, and concludes that “the extent of Yarra’s Activity Centres currently zoned for employment is likely to be sufficient to accommodate this growth” (p. 61). It also identifies that the other smaller activity centres within Yarra are likely to accommodate modest growth in retail and commercial floor space, and that the land zoned for employment within these will be sufficient to accommodate projected growth to 2031.

28. In regards to longer term demand for employment floorspace, the Yarra Spatial Economic and Employment Strategy notes that “in aggregate terms the capacity for additional floor space exceeds demand in the medium term (i.e. the period to 2013)” and that “beyond the 2031 planning

horizon...further demand for employment space will draw on the additional capacity identified” (p. 55).

29. These capacity assumptions are reflected in the Activity Centres Roles and Boundaries report prepared by Council.
30. In regards to the housing role for Yarra’s activity centres, the ACRB report identifies that there is ample future dwelling capacity across the municipality as follows:

Recent capacity monitoring for Yarra by SGS Economics as part of expert evidence for Amendment C231 (August 2019) found there is ample dwelling capacity in Yarra’s activity centres. Based on planning controls proposed in current amendments there is a total potential capacity of 32,730 dwellings across Yarra’s activity centres. This far exceeds the predicted dwelling demand for 16,540 dwellings in all of Yarra to 2031 (VIF2019). (p. 17)

31. I understand that Mr Julian Szafraniec of SGS is providing commentary on updated employment and housing capacity modelling that has been prepared for Amendment C269. At the time of writing this report I have not reviewed that evidence.

5.2. Are the designations of the activity centres appropriate?

32. Amendment C269 proposes a hierarchy of three activity centre designations as follows:

- Major Activity Centres (5 centres)
- Neighbourhood Activity Centres (8 centres)
- Local Activity Centres (5 centres)

33. This is a more nuanced approach than in the current planning scheme, which identifies five Major Activity Centres and thirteen Neighbourhood Activity Centres on the Strategic Framework Plan at Clause 21.03. I understand that Council has sought to take a policy neutral approach to the new activity centre classifications by translating the existing designations to Amendment C269, except where a centre was determined to be too small to be considered a Neighbourhood Activity Centre under current state planning policies.

34. Plan Melbourne and the DELWP website contains the following descriptions of Neighbourhood Activity Centres (emphasis added):

Traditionally, the focal point for neighbourhoods were its high streets and local villages. While the structure of local shopping centres has changed over time, these places are an integral part of community life and fundamental to creating a city of 20-minute neighbourhoods.

'Neighbourhood activity centres' is the land-use planning term used to describe these local shopping centres. Community services and infrastructure are generally co-located with these places, planned and managed by local government. Neighbourhood activity centres provide retail services and goods (newsagent, bakery, supermarket), local entertainment facilities (cafes and restaurants) and local health services and facilities to meet daily needs. While individually these places may only serve a local community's needs, the network of these places across the city plays a significant role in creating a sustainable, equitable, and accessible city. (planning.vic.gov.au/ /policy-and-strategy/planning-for-melbourne/plan-melbourne/20-minute-neighbourhoods accessed 6 September 2021)).

"Neighbourhood activity centres are an integral part of the city's vibrant community life and critical to the creation of 20-minute neighbourhoods. These high streets and specialised strips of shops, cafés, small supermarkets, service businesses, community services and public spaces serve the needs of the surrounding community and provide a focus not only for local jobs but also for social interaction and community participation". (Plan Melbourne p. 99)

"The attributes of and opportunities for neighbourhood activity centres at the local level vary across Melbourne. That is why local communities should lead the planning of their own centres. Where centres are well established or communities are seeking to protect the unique character of their centres (such as protecting heritage buildings or access to public land or open space to achieve community benefit), they should be assisted in determining the desired built form outcomes." (Plan Melbourne p. 99)

35. I agree that the Amendment should separate the existing thirteen Neighbourhood Activity Centres (refer to Table 2 on page 23 of my statement for a list of these) into two categories to enable the smaller centres to be recategorised as Local Activity Centres. There is a significant range in the size of these thirteen centres from large, diverse centres up to 1.7km in length (Johnston Street east), down to centres that consist of just half a dozen lots (Ramsden Street), with the smaller centres clearly not containing the range of activities that would be commensurate with a Neighbourhood Activity Centre designation. Furthermore, Neighbourhood Activity Centres are now given greater strategic prominence within Plan Melbourne as part of the 20 minute neighbourhood concept, so the planning scheme should only identify centres that can play a role in in fulfilling this.
36. There are two background documents to the Amendment which consider the role of the centres: The Yarra Spatial Economic and Employment Strategy, and the Activity Centres Roles and Boundaries report.
37. The Yarra Spatial Economic and Employment Strategy (SEES) assesses and makes recommendations in relation to the role of Yarra's activity centres. Strategy 1 of the SEES sets out designations for the activity centres as Major, Neighbourhood or Local Activity Centres (refer to Table 2 on page 23 of my

statement). The Major Activity Centres are identified by their Plan Melbourne designations. The strategy does not include specific definitions of Neighbourhood and Local Activity Centres.

38. The Activity Centres Roles and Boundaries report (ACRB report) identifies that the current planning scheme “does not distinguish between the larger neighbourhood centres which serve significant local catchments and the smaller centres” (p.7). It provides the following description of the roles and functions of the centres:

- **Major Activity Centres (MACs):**

- *...these centres are identified in Plan Melbourne 2017- 2050 and provide access to a wide range of goods and services, some serving larger subregional catchments (p. 3)*
- *...the major activity centres will play an important role as locations for additional housing and jobs. (p. 7)*

- **Neighbourhood Activity Centres (NACs):**

- *...these centres are in the existing Yarra Planning Scheme and provide access to local goods, services and employment opportunities and serve the needs of the surrounding community (p. 3)*
- *The neighbourhood centres will play a more nuanced role [for additional housing and jobs] which will vary depending on the nature of each centre and the constraints or opportunities of their context. (p. 7)*

- **Local Activity Centres (LACs):**

- *...these centres provide a limited range of goods, services and employment to adjoining communities. They are identified in the existing Yarra Planning Scheme (YPS). (p. 3)*
- *The local centres will play a limited role in providing for housing and local employment. (p. 7)*

39. Sections 7, 8 and 9 of the ACRB report set out the boundaries and categories for the centres (refer to Table 2 on page 23 of my statement). I note that the detailed analysis in Section 8 (Neighbourhood Activity Centres) includes seven centres, but pages 4 and 9 of the report erroneously excludes the Rathdowne Street Neighbourhood Activity Centre, and I recommend that this be corrected in the document. I also recommend that the report be updated to use a different term for the smaller Rathdowne Street Carlton North Local Activity Centre to avoid confusion between the two (noting that Amendment C269 uses the term “Rathdowne Street north, Carlton North (near Richardson

Street)”). These Amendments are necessary given the document is proposed to be a background document to the planning scheme.

Table 2: Current planning scheme, Amendment C269 and SEES designations for activity centres

Centre	Current planning scheme designation	SEES designation	ACRB report designation	Proposed C269 designation
Bridge Road	MAC	MAC	MAC	MAC
Brunswick Street	MAC	MAC	MAC	MAC
Smith Street	MAC	MAC	MAC	MAC
Swan Street	MAC	MAC	MAC	MAC
Victoria Street	MAC	MAC	MAC	MAC
Gertrude St, Fitzroy	NAC	NAC	NAC	NAC
Heidelberg Road, Alphington (former AMCOR site)	NAC	NAC	NAC	NAC
Johnston Street East, Abbotsford/Collingwood (east of Smith St)	NAC	NAC	NAC	NAC
Johnston Street West (west of Smith Street)	NAC	Included in Brunswick St MAC (as discussed at para 40)	Included in Brunswick St MAC	NAC
Nicholson Street, North Fitzroy	NAC	NAC	NAC	NAC
Rathdowne Street, Carlton North	NAC	NAC	NAC	NAC
St Georges Road, North Fitzroy	NAC	NAC	NAC	NAC
Queens Parade, Clifton Hill and Fitzroy North	NAC	NAC	NAC	NAC
Berry Street/Ramsden Street, Clifton Hill	NAC	LAC	LAC	LAC
Lygon Street, Carlton North/Princes Hill	NAC	LAC	LAC	LAC
Nicholson Street south, Carlton North	NAC	LAC	LAC	LAC
Rathdowne Street north, Carlton North (near Richardson Street)	NAC	LAC	LAC	LAC
Spensley Street, Clifton Hill	NAC	LAC	LAC	LAC

Abbreviations:

MAC = Major Activity Centre; NAC = Neighbourhood Activity Centre; LAC = Local Activity Centre



40. I understand that whilst the Johnston Street West activity centre is classified as a Neighbourhood Activity Centre in the ACRB report (p. 11), its assessment of the boundaries is subsumed into the assessments of the Brunswick Street and Smith Street Major Activity Centres. Map 3 on page 33 of the document shows the Smith Street, Brunswick Street, Johnston Street and Gertrude Street assessment areas, but only has a Neighbourhood Activity Centre boundary (and subsequent assessment at Section 8) for Gertrude Street. I recommend that the report be updated to include a separate assessment of the Johnston Street Neighbourhood Activity Centre at Section 8.
41. I agree with the Major Activity Centre designations as these match their Plan Melbourne designations.
42. I agree that the eight Neighbourhood Activity Centres proposed in C269 have been designated correctly. These centres contain the “local goods, services and employment opportunities and serve the needs of the surrounding community” as per the ACRB report, and the “shops, cafés, small supermarkets, service businesses, community services and public spaces” identified in Plan Melbourne.
43. I agree that the five Local Activity Centres proposed in C269 have been designated correctly as they are too small to be considered Neighbourhood Activity Centres, and do not contain the range of uses that would enable them to play a role as centres within the 20 minute neighbourhood network.
44. There are five centres for which the designated roles are raised in the submissions, and I address these as follows.
45. For **Heidelberg Road, Alphington**, submitters have queried the designation of the section of Heidelberg Road between Parkview Road and Como Street as a Neighbourhood Activity Centre. I am of the view the designation of these lots as part of a larger Neighbourhood Activity Centre is appropriate. These currently contain a range of mixed uses and will form part of a larger centre once the adjacent former AMCOR site is developed in line with its approved Development Plan, which proposes retail (including supermarkets), commercial, hospitality, commercial and community uses, along with significant residential development.
46. For **Nicholson Street, North Fitzroy**, submitters are seeking the centre to be designated as a Local Activity Centre rather than its proposed Neighbourhood Activity Centre designation. I am of the view that the designation of this centre as a Neighbourhood Activity Centre is appropriate. The centre contains a range of mixed uses including shops, grocers, cafes, restaurants and medical facilities, and includes a large future residential development site. It is located on the #96 tram line and the 504 bus service. It provides the opportunity for people to meet their daily needs as per Plan Melbourne’s 20 minute neighbourhood.
47. For **Rathdowne Street, Carlton North** submitters are seeking the centre to be designated as a Local Activity Centre rather than its proposed Neighbourhood Activity Centre designation. I am of the view

that the designation of this centre as a Neighbourhood Activity Centre is appropriate. The centre contains a range of mixed uses including shops, grocers, cafes, restaurants, medical facilities and offices, and includes a significant large residential development site. It is located on the 250, 251 and 546 bus routes, and is within 200m of the #1 and #6 tram lines and 330m of the #96 tram line. It provides the opportunity for people to meet their daily needs as per Plan Melbourne’s 20 minute neighbourhood.

48. For **Berry Street/Ramsden Street** and **Spensley Street, Clifton Hill** the Council officer prepared the following summary of the issues raised in the submissions relating to this centre:

If Berry/Ramsden and Spensley Streets are retained within the LACs, the language in the Strategies section needs to be clarified and amended so that it doesn't permit wide application of inappropriate activities in this residential area.

49. I am of the view the designation of the above two locations as Local Activity Centres is appropriate. They are small scale centres consisting of 8 and 11 lots respectively and both contain a mix of local convenience and residential uses. In regards to the strategies, I note that proposed Clause 11.03-1L includes strategies to “Maintain the local convenience retail role of the municipality’s local activity centres” and “Ensure any development respects the character of the area”. The Commercial 1 zoning means that proposals for retail premises (including convenience retail) and offices would be Section 1 – Permit Not Required uses, but proposals for most other uses would require a planning permit, and would be assessed against this policy. Council would have grounds to refuse any such proposed uses that fell outside the local convenience retail role.

5.3. Are the boundaries of the activity centres appropriate?

50. The planning scheme currently depicts the activity centre boundaries with “bubbles” on the plans that are not tied to zoning or cadastral boundaries. It is necessary for Amendment 269 to identify the activity centre boundaries, as this ties in with the proposed Strategic Housing Framework Plan in proposed Clause 16.01-3L and provides greater certainty for the community.
51. The rationale for the proposed activity centre boundaries is set out in the ACRB report. It utilises the following criteria from Planning Practice Note 58 (Structure Planning for Activity Centres) in its assessment of the boundaries:

a) Consider the following issues in determining the potential location of an activity centre boundary:

- *the location of existing commercial areas and land uses*
- *the location of existing government and institutional areas and land uses*
- *the location of existing areas of public open space*
- *commercial and residential needs*
- *environmental and flooding constraints*

- *heritage constraints*
- *availability of strategic redevelopment sites, both existing and potential*
- *the location of residential areas, including whether they provide significant redevelopment opportunities or constraints for the centre*
- *consideration of physical barriers and opportunities for their improvement*
- *proximity to public transport, especially fixed rail (train or tram)*
- *the location of existing and potential transport infrastructure including fixed rail, buses, bicycle paths, car parking areas and modal interchanges*
- *walkability – opportunities to provide for and improve walkability within 400 to 800 metres from the core of the centre (depending on topography and connectivity)*
- *consistency with State policy*
- *consistency with local policy and Municipal Strategic Statement or Municipal Planning Strategy where relevant (both referred to in this practice note as MSS)*
- *impacts of the boundary on other activity centre boundaries.*

b) In setting a boundary for an activity centre, include:

- *sufficient land to provide for the commercial (retailing, office, fringe retailing and support activities such as entertainment) activities needed over a 15 to 20 year time frame and then into the 30-year horizon*
- *residential areas that are integrated into the activity centre or surrounded by other uses that have a strong functional interrelationship with the activity centre even where limited development opportunities exist*
- *key public land uses that have or are intended to have a strong functional inter-relationship with the activity centre even where there are no or limited redevelopment opportunities*
- *public open space areas that have or are intended to have a strong functional interrelationship with the activity centre.*

c) In setting a boundary for an activity centre, generally exclude:

- *residential land encumbered by significant constraints (such as a Heritage Overlay) located at the edge of the activity centre.*

52. I agree that using this criteria is the appropriate methodology for identifying activity centre boundaries.

53. The detailed tables in Sections 7 to 9 of the ACRB report set out Council's assessment of each centre against this criteria. The ACRB report recommends that the application of the above criteria warrants the following land being included within the centre boundary for each activity centre:

1. *Commercial 1, Commercial 2, Mixed Use, Comprehensive Development Zones and civic uses fronting the main street of the retail core.*

2. *Commercial 1 areas not fronting the retail street, but contiguous (generally behind) with Category 1 that do or could have a strong physical or land use connection to the retail core.*
 3. *Commercial 2 areas not fronting the retail street, but contiguous (generally behind) with Category 1 that do or could have a strong physical or land use connection to the retail core.*
 4. *Mixed Use areas that are contiguous with Category 1 and 2 areas and do or could have a strong physical connection to the retail core.*
 5. *Health [facilities].*
 6. *Public open space, community facilities and schools not fronting the main street of the retail core, with a strong functional inter relationship with the activity centre.*
 7. *Commercial 1 and Commercial 2 fronting a main road that intersects the main street of the retail core, and contiguous with land in another category.*
 8. *Residential areas that due to the surrounding uses, built form and road network are logically Included.*
 9. *Large sites or areas with potential to be part of or contribute to an activity centre, if upgraded or redeveloped.*
54. I agree that the inclusion of the above land uses and zonings within the proposed centre boundaries is a logical and reasonable application of the Planning Practice Note 58 criteria to these centres.
55. In regards to whether the activity centre boundaries provide adequate land for the commercial activities needed over a 15 to 20 year time frame and then into the 30-year horizon, I refer to Section 6.1 of my statement which sets out the SGS capacity modelling. I agree that the proposed activity centre boundaries, which as per the tables in Sections 7 to 9 of the report incorporate land already zoned for retail, employment and other purposes, sufficiently provides for both these medium and long term planning horizons.
56. The location of the activity centre boundaries has been raised in three submissions, and I address each of these as follows.
57. For **Swan Street, Collingwood/Fitzroy** the Council officer prepared the following summary of the issues raised in the submissions relating to the boundaries of centre:
- *Does not support Stewart, Hoddle, Tanner and Wangaratta Streets being included in the Swan Street Major Activity Centre*
 - *Swan Street MAC boundary should not be extended to include Australian Knitting Mills complex just north of Richmond Station*
58. The land in question is an area zoned Mixed Use directly north of Richmond Station as per Figure 1.

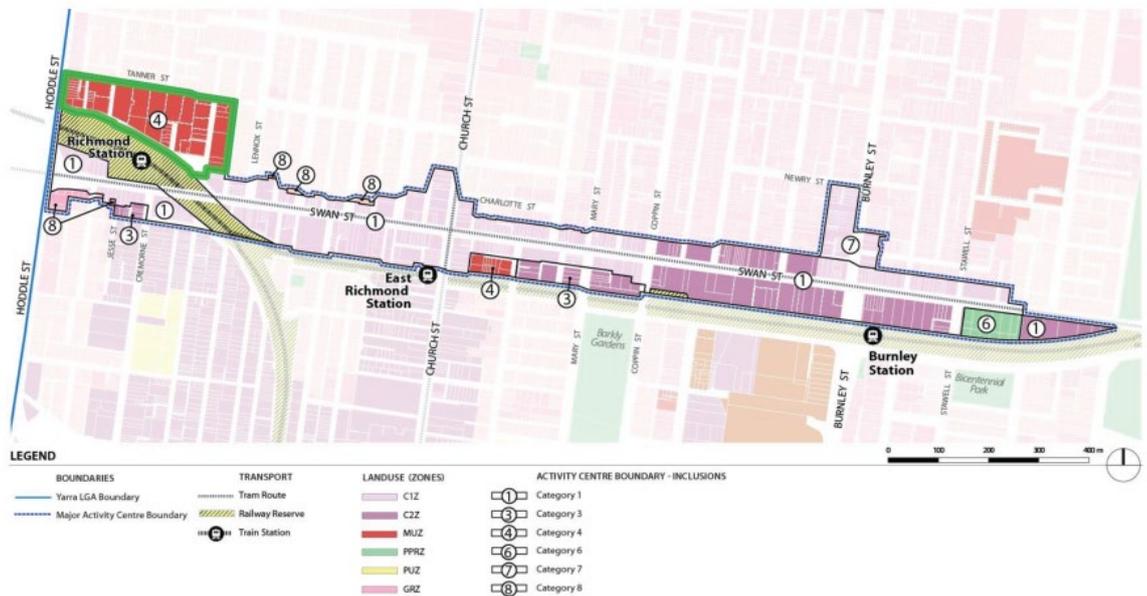


Figure 1: Mixed Use land north of Richmond Station (highlighted in green) – excerpt from Map 4 of Activity Centres Roles and Boundaries report

59. I am of the view that the Mixed Use land should be included in the activity centre boundary to accord with Planning Practice Note 58. The zoning of the site, the presence of a mix of medium density housing (in terraced houses and low rise apartments in heritage buildings) with business activities, and the proximity to Richmond Station mean that it has a strong relationship with the rest of the centre.
60. For **Heidelberg Road, Alphington (former AMCOR site)** the Council officer prepared the following summary of the issues raised in the submissions relating to the boundaries of centre:
- Concerned at the proposal made in C269 to designate the section of Heidelberg Road (south site), between Parkview Rd and Como St as a NAC, to be an area of Moderate Change, allowing for mid-rise development of 8-14 storeys.
61. For the reasons provided in paragraph 45 of my statement, I am of the view that these sites will form part of a larger Neighbourhood Activity Centre once the former AMCOR site is developed. I note that the site is currently subject to interim built form controls that were introduced in 2020 via Amendment C272, and that Council is currently progressing an amendment for permanent built form controls.

62. I also note that submission 222 specifically refers to concerns regarding the inclusion of 582 Heidelberg Road in the activity centre. The site is in the Commercial 1 Zone, and thus fits within the criteria for inclusion identified in paragraph 53 of my statement. I agree that it should be included in the activity centre boundary.
63. For **Queens Parade, Clifton Hill and Fitzroy North** the Council officer prepared the following summary of the issues raised in the submissions relating to the boundaries of centre:
- *The boundaries cause confusion - entire length of Queens Parade is defined as an activity centre but only the shopping precinct qualifies as an activity centre*
 - *Extending the boundary of the Queens Parade Activity Centre to include Mayors Park should be deferred until a heritage study is commissioned to determine whether Mayors Park requires heritage and significant landscape overlay protection*
64. I agree that the entire length of Queens Parade should be included in the Neighbourhood Activity Centre boundary to accord with Planning Practice Note 58. Neighbourhood Activity Centres have more than just a retail role, and as per the practice note, a range of land uses should be considered for inclusion in the boundary.
65. In regards to Mayors Park, I agree that this should be included in the activity centre boundary. Planning Practice Note 58 requires consideration of “public open space areas that have or are intended to have a strong functional interrelationship with the activity centre”. Mayors Park includes active recreation facilities and adjoins Commercial 1 zoned land.
66. For **Rathdowne Street, Carlton North** I am of the view the boundary should be extended to include the cluster of businesses north of Fenwick Street on the east side of Rathdowne Street (418 to 430 Rathdowne St; refer to Figure 2 on following page). These have a similar characteristic to the properties in the south part of the centre, in that they are predominantly businesses (primarily medical premises) with a couple of intervening dwellings.

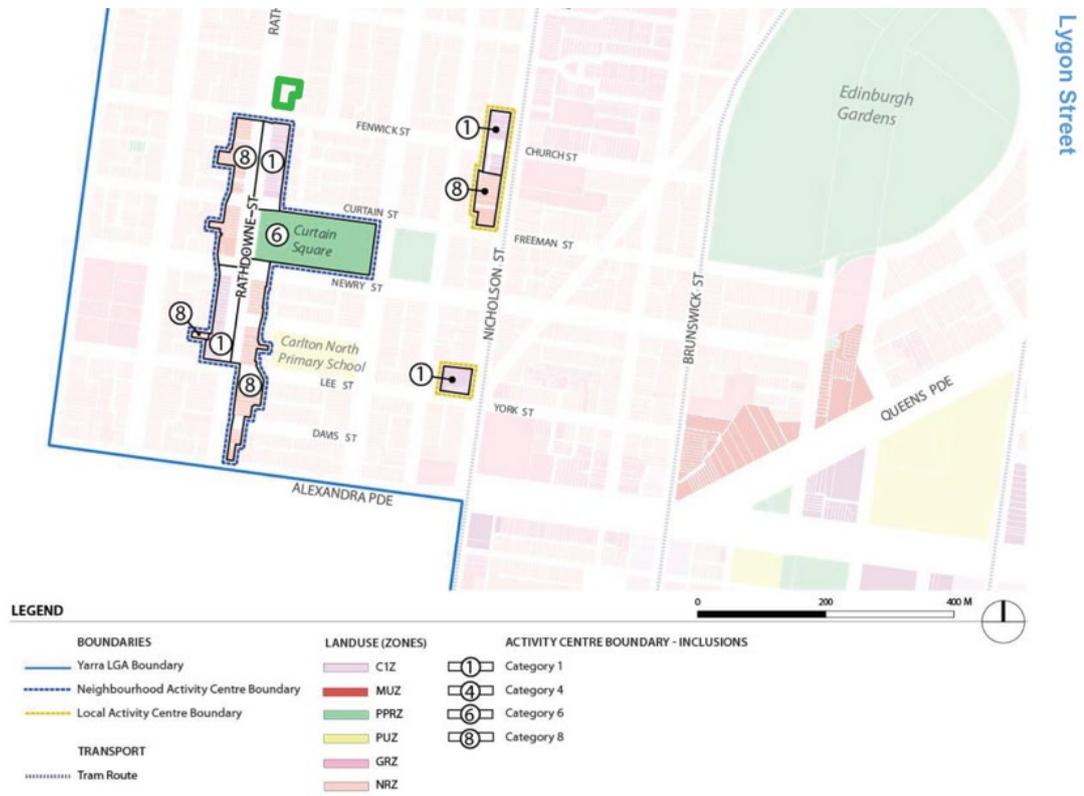


Figure 2: Land north of Fenwick Street for inclusion in activity centre boundary (highlighted in green) – excerpt from Map 7 of Activity Centres Roles and Boundaries report

6. Housing

67. I have considered the following issues in regards to the planning merits of the approach to housing within Amendment C269:
- Does the proposed housing framework contained within the Amendment meet the Planning Practice Note 90 requirements?
 - Are the housing change area categories appropriate?
 - Does the proposed housing framework contained within the Amendment appropriately identify locations for residential development, including the designation of specific change areas (ie. High, Moderate, Incremental or Minimal change areas)?
 - Does the Amendment balance residential growth in and around activity centres with the commercial and cultural roles of the centres?
 - Is the proposed affordable housing policy appropriate?

6.1. Strategic context for housing in Yarra

68. Yarra Council adopted its Housing Strategy in September 2018, and is now seeking to implement it in the Planning Scheme via Amendment C269, and to include the Housing Strategy as a background document.
69. I note that the Housing Strategy was based on the Victoria In Future 2016 population and household projections, where it was forecast that between 2016 and 2031, 29,412 new residents and 13,431 new dwellings would be accommodated (p. 6). The Victoria in Future 2019 (VIF 2019) figures identify that within the 2016 to 2031 timeframe it is now forecast that there will be 32,962 residents and 18,483 new dwellings within Yarra, and from 2021 to 2036, there will be 31,549 residents and 16,308 new dwellings within Yarra.
70. The ACRB report documents the anticipated housing capacity across the municipality (based on the earlier work of SGS in 2019) and this report has identified that the planning controls in the current amendments at that time identified a total potential capacity of 32,730 dwellings across Yarra's activity centres. This capacity comfortably exceeds either of the VIF forecasts referred to above.
71. I understand that Mr Szafraniec of SGS is providing commentary on updated housing capacity modelling that has been prepared for Amendment C269. At the time of writing this report I have not reviewed that evidence.

72. I understand that as per the Strategic Direction 1 strategies from the Housing Strategy that Council intends to monitor population and housing trends and maintain a housing capacity model to provide certainty that a sufficient ongoing supply of land can be provided.

6.2. Does the proposed housing framework contained within the Amendment meet the PPN90 guidance?

73. Planning Practice Note 90: Planning for Housing includes guidance on the contents of a local housing strategy, including the relevant aspects of the Planning Policy Framework. I have assessed the Yarra Housing Strategy against these as in Table 3 below. The four Housing Strategy Strategic Directions referred to in the table are as follows:

- *Strategic Direction 1: Monitor population growth and evolving development trends in Yarra to plan for future housing growth and needs*
- *Strategic Direction 2: Direct housing growth to appropriate locations*
- *Strategic Direction 3: Plan for more housing choice to support Yarra’s diverse community*
- *Strategic Direction 4: Facilitate the provision of more affordable housing in Yarra*

Table 3: Assessment of Yarra Housing Strategy against PPN90

PPN90 Guidance	Does the Yarra Housing Strategy address this?
Ensures a range of housing opportunities are available across the municipality to meet the needs of the projected population (p. 7)	Yes – Strategic Directions 2 and 3
Outlines the strategies and implementation mechanisms to accommodate the projected population and household needs (p. 7)	Yes – Strategic Directions 1 to 4
Identifies where and how the housing needs of the future population will be met across the municipality (p. 7)	Yes – Strategic Direction 2
Identifies suitable locations for housing growth including those areas close to services, jobs, public transport and activity centres, and strategic development areas (p. 7)	Yes – Strategic Direction 2
Planning authorities should use Victorian Government population projections and land supply estimates when planning for population growth and managing housing change (p. 2)	Yes – p. 6 identifies that the Victoria in Future 2016 projections are used. This should preferably be updated to utilise the VIF 2019 data.
The PPF (Clause 11.01-1S) requires planning authorities to consider Plan Melbourne (p. 2)	Yes – p. 22
The PPF (Clause 11.02-1S) requires planning authorities to “Plan to accommodate projected population growth over at	Yes – p. 6 identifies 29,142 new residents and 13,431 new dwellings by 2016 to 2031. This should preferably be updated to utilise



PPN90 Guidance	Does the Yarra Housing Strategy address this?
least a 15-year period and provide clear direction on locations where growth should occur" (p. 2)	the VIF 2019 data. I refer also to the evidence of Mr Szafraniec which provides updated dwelling capacity modelling which I understand will address the issue of dwelling capacity modelling.
The PPF (Clause 11.02-1S) states that planning for urban growth should consider "Opportunities for the consolidation, redevelopment and intensification of existing urban areas (p. 2)	Yes – Strategic Direction 2
The PPF (Clause 11.02-1S) states that planning for urban growth should consider "Neighbourhood character and landscape considerations" and 15.01-5S states "Ensure development contributes to existing or preferred neighbourhood character" (p. 2)	Yes – Strategic Direction 2
The PPF (Clause 11.02-1S) states that planning for urban growth should consider "The limits of land capability and natural hazards and environmental quality" (p. 2)	Yes – Strategic Direction 2
The PPF (Clause 11.02-1S) states that planning for urban growth should consider "Service limitations and the costs of providing infrastructure" (p. 2)	Yes (noting that this not a significant issue within this existing urban area)
The PPF (Clause 16-01-1S) seeks to "Increase the supply of housing in existing urban areas by facilitating increased housing yield in appropriate locations, including under-utilised urban land." and "Ensure that an appropriate quantity, quality and type of housing is provided." (p. 2)	Yes – Strategic Direction 2
The PPF (Clause 16-02-1S) seeks to "Increase the proportion of new housing in designated locations within established urban areas and reduce the share of new dwellings in greenfield and dispersed development areas." and "Encourage higher density housing development on sites that are well located in relation to services, jobs and public transport." and "Ensure an adequate supply of redevelopment opportunities within established urban areas to reduce the pressure for fringe development." and "Identify opportunities for increased residential densities to help consolidate urban areas." (p. 2)	Yes – Strategic Direction 2
PPN90(p2-3): The PPF (Clause 16-01-3S) seeks to "Ensure housing stock matches changing demand by widening housing choice." and "Facilitate diverse housing that offers choice and meets changing household needs."	Yes – Strategic Directions 3 and 4
A Residential Development Framework should be underpinned by a Housing Strategy, Neighbourhood Character Strategy, and Other Strategic Work (heritage,	Yes – p. 11 identifies the heritage considerations

PPN90 Guidance	Does the Yarra Housing Strategy address this?
environmental, landscape and land capability constraints) (pp. 6, 9)	

6.3. Are the housing change area categories appropriate?

- 74. Planning Practice Note 90 (Planning for Housing) identifies the need to define areas as being capable of accommodating minimal, incremental or substantial housing change. It notes that the extent of change is defined relative to its context, which means that the categories of change (and the associated preferred development outcomes) identified for Yarra will result in different outcomes than what they might mean in other municipalities. It is thus necessary to include guidance on what development outcomes may be expected to provide this context in the Housing Strategy and associated planning policies.
- 75. Planning Practice Note 90 provides for a greater breakdown of housing change areas to be considered where there is a strong strategic basis for the approach and the additional housing change areas reflect preferred development outcomes that are legible and clear so that the type of change being sought broadly falls within the boundaries of the broader minimal, incremental and substantial change categories.
- 76. The Yarra Housing Strategy proposes four categories (minimal, incremental, moderate and high change areas) which I agree broadly fall within the minimal, incremental and substantial change categories. Table 4 below provides my assessment against these. I understand that the substantial change category has been split into two categories: moderate change for application to mixed use and commercial areas that have heritage significance and/or other constraints, and high change for mixed use and commercial areas that are not subject to these constraints. I agree that this is a pragmatic way to still provide for substantial levels of change but to ensure a balance of other considerations and competing objectives, in particular heritage.



Table 4: Assessment of PPN90 and Yarra Housing Strategy change categories

PPN90 Housing Change Categories	Yarra Housing Strategy Housing Change Categories
<p>Minimal changes areas:</p> <ul style="list-style-type: none"> • have special characteristics that distinguish them from other parts of the municipality or surrounding area • have special neighbourhood, heritage, environmental, or landscape characteristics identified in the planning scheme • are identified in a housing strategy, or in the planning scheme, as unsuitable for providing future housing growth • tend to have overlays that reflect neighbourhood, heritage, environmental or landscape characteristics or other physical constraints which may impact their capacity for change (p. 11) 	<p>Minimal change areas are applied to residential areas that have limited capacity to accommodate future housing growth over time. The expected development outcomes are one or two dwellings on typically small individual lots.</p> <p>Minimal change areas generally display one or more of the following characteristics:</p> <ul style="list-style-type: none"> • Within established residential areas (Neighbourhood Residential Zone) that have heritage significance; • Have consistent fine-grain subdivision pattern and small lots sizes; and/or • Have detached and dual occupancy dwellings. <p>I agree that this category is consistent with the PPN90 minimal change area, which seeks to protect neighbourhood character.</p>
<p>Incremental changes areas:</p> <ul style="list-style-type: none"> • have capacity for housing growth and more diverse types of housing • are where new development should respect existing valued neighbourhood character attributes • are where existing neighbourhood character will evolve and change over time with reference to the key identified neighbourhood attributes. (p. 12) 	<p>Incremental change areas are applied to residential, mixed use and commercial areas that have the capacity to accommodate a more modest level of housing growth over time. The expected development outcomes are one, two or more dwellings on individual lots (including smaller scale apartments).</p> <p>Incremental change areas generally display one or more of the following characteristics:</p> <ul style="list-style-type: none"> • Within established residential areas (General Residential Zone); • Within mixed use and commercial areas that have heritage significance, including cohesive and highly intact heritage streetscapes and buildings; • Have consistent fine-grain subdivision pattern and small lots sizes; and/or • Have detached, dual occupancy and smaller scale apartment dwellings. <p>I agree that this category is consistent with the PPN90 incremental change area, which seeks to consolidate existing urban areas.</p>
<p>Substantial changes areas:</p> <ul style="list-style-type: none"> • may include areas in and around activity centres, along public transport corridors and strategic development areas 	<p>Moderate change areas are applied to mixed use and commercial areas that have the capacity to accommodate moderate housing growth over time (generally parts of the major activity centres). The expected development</p>



PPN90 Housing Change Categories	Yarra Housing Strategy Housing Change Categories
<ul style="list-style-type: none"> • are close to jobs, services, facilities or public transport • facilitate housing growth that takes advantage of their proximity to jobs, services, and public transport • make the most of strategic development areas or opportunity sites that either exist or are identified from time to time • promote housing diversity • result in a new built form and neighbourhood character (p. 12) 	<p>outcomes are mixed use, infill and shop-top apartment development on individual and consolidated lots that respond to existing heritage character of streetscapes.</p> <p>Moderate change areas generally display one or more of the following characteristics:</p> <ul style="list-style-type: none"> • Within or close to activity centres that have heritage significance, sensitive interfaces and other site constraints; • Have excellent access to services, open space and public transport; and/or • Have mixed lot sizes. <p>I agree that this category is consistent with the PPN90 substantial change area which seeks to plan for intensification., It also includes relevant additional considerations to ensure that development responds to the existing heritage character of the streetscapes.</p>
<p>Substantial changes areas:</p> <ul style="list-style-type: none"> • may include areas in and around activity centres, along public transport corridors and strategic development areas • are close to jobs, services, facilities or public transport • facilitate housing growth that takes advantage of their proximity to jobs, services, and public transport • make the most of strategic development areas or opportunity sites that either exist or are identified from time to time • promote housing diversity • result in a new built form and neighbourhood character (p. 12) 	<p>High change areas are applied to mixed use and commercial areas and sites that have the capacity to accommodate substantial housing growth over time (including large areas of unconstrained land in major activity centres and strategic redevelopment sites). The expected development outcomes are mixed use, infill and urban renewal apartment development that will establish new character for a site or precinct.</p> <p>High change areas generally display one or more of the following characteristics:</p> <ul style="list-style-type: none"> • Within or close to activity centres that have an absence of site constraints; • Have excellent access to services, open space and public transport; and/or • Have large lot sizes. <p>I agree that this category is consistent with the PPN90 substantial change area which seeks to plan for intensification.</p>

6.4. Does the proposed housing framework contained within the Amendment appropriately identify locations for residential development?

77. The Housing Strategy seeks to direct the majority of growth into the activity centres and major regeneration areas, which are categorised as moderate and high change areas. I agree that this is



appropriate for the Yarra context. The Housing Strategy identifies that approximately two thirds of all properties in Yarra are covered by the Heritage Overlay, and that this is greater than any other municipality in Victoria.

78. I agree that the focus for housing change should thus be directed to sites where these constraints do not exist, whilst continuing to provide for a lower level of change in the low scale existing residential areas where the ongoing addition of individual and dual occupancy dwellings (which the minimal and incremental change areas allow for) will continue to provide for diverse housing options when coupled with the medium and high density dwelling options to be found in the moderate and high change areas.
79. Yarra has generally excellent access to public transport with almost all areas in walking distance of train stations and tram lines, and the proposed moderate and high change areas take advantage of close proximity to these.
80. Submissions have been made in relation to seventeen properties or sites where request for changes to the area classifications have been made, and I address these as follows.
81. For **10 Garryowen Lane Fitzroy** the Council officer prepared the following summary of the issues raised in the submissions:
- *Reference to 10 Garryowen Lane, Fitzroy. It's not appropriate for areas to be designated "incremental development" when facing a park. This includes all addresses on Garryowen Lane and the north side of 35 Rose Street.*
82. I am of the view that the sites should remain in the incremental change area. They are located in a Mixed Use Zone and the site and its surrounds have already been developed for medium density housing (townhouses and apartments), which fits with the dwelling typologies potentially anticipated in this change area.
83. For **133-137 Victoria Parade** the Council officer prepared the following summary of the issues raised in the submissions:
- *Submits that the subject site is unique and should be designated in a "High Change Area" and not "Moderate Change Area". Submission outlines justification for this request.*
84. I am of the view that the site should remain in the moderate change area primarily as it is located in and surrounded by Heritage Overlay.
85. For **53 Hoddle St Collingwood** the Council officer prepared the following summary of the issues raised in the submissions:

- *Strongly opposes the 'mid-rise' or 'moderate change' growth classification for the site and submits it should be reasonably anticipated for 'high change' given the main road frontage, proximity to higher order activity centres, public transport and bicycle infrastructure, and significant separation from Yarra's low scale, sensitive, historically significant residential neighbourhoods.*
 - *Does not agree with the 'moderate change' classification of their site given the Commercial 1 Zoning of the land, the site's excellent access to public transport, services and amenities and the position along Hoddle Street.*
 - *The moderate change guidance unreasonably imposes the requirement to respond to heritage significance (there is none abutting our client's site) and streetscape character, failing to anticipate a degree of change and improvement along this important Boulevard.*
86. I am of the view that the site should remain in the moderate change area as it is located adjacent to several sites that have heritage significance. As a site of moderate size, is not one of the major redevelopment sites the Housing Strategy applies the high change area classification to.
87. For **39-47 Lithgow St, Abbotsford** the Council officer prepared the following summary of the issues raised in the submissions:
- *Supports the inclusion of the site in the Victoria Street Major Activity Centre within the Strategic Framework Plan in Clause 02.04-1.*
 - *Does not support the designation of the site as an Incremental Change Area for the purpose of Clause 16.01-2L. Proposes that the site be designated as a Moderate Change Area, which better reflects its position in the Victoria Street Major Activity Centre and its future development potential. Submission outlines justification for this request.*
88. I am of the view that the site should remain in the incremental change area. The site is in a Mixed Use Zone, it is in a heritage overlay and adjacent to a heritage streetscape. The incremental change area provides for consideration of smaller scale apartments.
89. For **288-296 Johnston St Abbotsford** the Council officer prepared the following summary of the issues raised in the submissions:
- *States that the land at 288-296 Johnston Street should be nominated as a 'high change' area for consistency with existing built form controls based around the Johnston Street Local Area Plan and as reflected in the Yarra Planning Scheme at DDO15.*

90. I am of the view that the site should remain in the moderate change area. The two adjacent high change area sites are an “island” site separated from other lots by roads and rail, and a large development site approximately 4 times the size of 288-296 Johnston St.
91. For **1 Turner St, Abbotsford** the Council officer prepared the following summary of the issues raised in the submissions:
- *States that the adjoining property to the north known as 1 Turner Street, Abbotsford appears to have been mistakenly identified as a 'minimal change' area. This is at odds with the current zoning of the land (C 1Z) and existing scale of development on the land (4 storeys with 100% site coverage).*
92. I agree with the Panel Preferred version of Amendment C269 which reclassifies this site to the incremental change area, as it is in the Commercial 1 Zone, and already contains a 4 storey development on the site. As a smaller scale apartment development, it exhibits the character of an incremental change area.
93. For **Rathdowne St Carlton North** the Council officer prepared the following summary of the issues raised in the submissions:
- *Strongly opposes designation of 'incremental change' in Rathdowne Street Activity Centre (south). This should be 'minimal change'.*
 - *Changes within NAC need to be minimal to incremental change.*
94. I am of the view that the site should remain in the incremental change area as it is within a Neighbourhood Activity Centre and there have already been some shop-top dwellings constructed on top of single storey premises.
95. For **84-104 Johnston Street Fitzroy**, submission 429 seeks the following:
- Our client strongly opposes the 'mid-rise' or 'moderate change' growth classification for their site and submits it should be reasonably anticipated for 'high change' given the main road frontage, proximity to higher order activity centres, public transport and bicycle infrastructure, and significant separation from Yarra's low scale, sensitive, historically significant residential neighbourhoods; and displaying similar characteristics similarity to proposed high change areas proximate to the site.*
96. I am of the view that this site should remain in the moderate change category. It sits within a heritage streetscape which will require consideration when designing development on the site. As a

site of moderate size, is not one of the major redevelopment sites the Housing Strategy applies the high change area classification to, which has been applied to larger sites or precincts.

97. For **Nicholson St, Carlton North** the Council officer prepared the following summary of the issues raised in the submissions:

- *Opposes 'incremental change' designation on the west side of Nicholson Street (Carlton North). Should be 'minimal change'.*

98. I am of the view that these sites should remain in the incremental change area. They are within a Neighbourhood Activity Centre and are zoned Commercial 1.

99. For **Queens Parade** the Council officer prepared the following summary of the issues raised in the submissions:

- *Queens Parade Activity Centre should be designated 'incremental change'.*
- *The Neighbourhood Activity Centre DD016 Queens Parade Precinct 4 as a 'moderate change' is now at odds with DD016 (C231). Must be recognised as a minimal change area .*
- *Row of houses at 104-118 Queens Parade has been listed as incremental, yet it has a HO and fits the definition of 'minimal change area'.*

100. In regards to the designation of parts of Queens Parade as a moderate change area, I am of the view that these should remain in this area. The relevant Design and Development Overlay 16 provides for development up to 14m in parts of the area.

101. In regards to the row of dwellings at 104-118 Queens Parade, I agree with the submitter that this site should be changed to a minimal change area. There are other examples on Queens Parade within close proximity to this site where this finer grained approach has been applied (e.g. 264-270 Queens Parade).

102. For **Swan St** the Council officer prepared the following summary of the issues raised in the submissions:

- *That area of the Swan St Activity Centre on the northern side of Swan St should be excised from the Major Activity Centre and thus provide a buffer between the commercial activities (particularly entertainment venues) in Swan St and adjoining residences. Its definition as a Neighbourhood Activity Centre would be appropriate. To protect a human-friendly ambiance, and prevent the creation of a virtual canyon, all multi-storey developments by virtue of their size and visual impact should be well set back from Swan St.*
- *Should cluster moderate change zones rather than spread them through the entire street.*

103. For the reasons provided at paragraph 59 of my statement, I am of the view that the site should remain in the Swan Street Major Activity Centre. I understand that Council is progressing Amendment C191 which will introduce Schedules 25 to 28 to the Design and Development Overlay not including this area but I understand as per resolution 1(g) from the Council minutes dated 3 August 2021 that Council intends to progress the work for this area as follows:

Resolution 1(g) progress further strategic work as soon as practicable (subject to officers capacity and resources to undertake such work) for the land identified as Land subject to future strategic work at proposed Clause 1.03-1L Swat Street Activity Centre Plan in the attached preferred version of policies based on the recommendations of the independent Planning Panel report in relation to C269, when received

104. For **West Ramsden St, Clifton Hill** the Council officer prepared the following summary of the issues raised in the submissions:

- *West Ramsden St, Clifton Hill should be 'minimal' not 'incremental'.*

105. I am of the view that the site should remain in the incremental change area. It is within the General Residential Zone, is not subject to a Heritage Overlay, and is next to a train station so it is of particular importance to provide opportunities for some level of change to take advantage of its strategic location.

106. For **Campbell St, Collingwood** the Council officer prepared the following summary of the issues raised in the submissions:

- *Campbell Street, Collingwood should be 'minimal' not 'incremental'.*

107. I am of the view that the site should remain in the incremental change area. It is within the General Residential Zone and is not subject to a Heritage Overlay.

108. For **Gipps St, Park St and Stanton St Abbotsford** the Council officer prepared the following summary of the issues raised in the submissions:

- *Question why the small section bound by Gipps St, Park St, Stanton St and the train line is considered Incremental Change. It is a small area bound by a Minimal Change Area - quiet mostly single dwelling blocks, and not high density. Should be reconsidered and the area changed to a Minimal Change Area to reflect these surrounds.*

109. I am of the view that the site should remain in the incremental change area. It is within the General Residential Zone, is not subject to a Heritage Overlay, and is next to a train station so it is of

particular importance to provide opportunities for some level of change to take advantage of its strategic location.

110. For **Bridge Road** the Council officer prepared the following summary of the issues raised in the submissions:

- *Should cluster moderate change zones rather than spread them through the entire street.*

111. I am of the view that the moderate change zones along Bridge Road should be retained. This is a Major Activity Centre where growth is anticipated.

112. For **Alphington**: the Council officer prepared the following summary of the issues raised in the submissions:

- *Strongly believes that the 'minimal change' term should apply to the vast majority of Alphington.*
- *Designation of 16 hectares of land to "high change" has ramifications for the immediate area - moderate change creeping either side of the high change area.*
- *Moderate change areas along Heidelberg Road should definitely be changed to 'incremental change areas' in order to remain within neighbourhood character.*
- *Concerned at the proposal made in C269 to be an area of Moderate Change, allowing for mid-rise development of 8-14 storeys.*
- *Porta site doesn't warrant being a moderate change area.*

113. I am of the view that the former AMCOR site should remain in the high change area as it is one of the municipality's largest major redevelopment sites. I am also of the view that the surrounding sites should remain in the moderate change area as these are in a Neighbourhood Activity Centre, are in the Commercial 1 Zone, and are not subject to a Heritage Overlay (apart from one isolated site).

114. For **Malleson Street and Wall Street Richmond** the Council officer prepared the following summary of the issues raised in the submissions:

- *Minimal change areas - should be added to more sections along Malleson Street and extend to sections along Wall Street. From the Coppin/Wall/ Malleson intersection, houses on the west side part of the way down to Dame Nellie Melba Park should also be minimal change areas.*

115. I am of the view that the sites mentioned above should remain in the incremental change area, as these are in the General Residential Zone and are not subject to a Heritage Overlay.

6.5. Does the Amendment balance residential growth in and around activity centres with the commercial and cultural roles of the centres?

116. Balancing residential growth so that it does not displace important and valued commercial and cultural activities is a key issue for Yarra (as expressed on page 12 of the Housing Strategy). I am of the view that Amendment C269 provides a reasonable balance in providing for new housing while continuing to provide for these non-residential uses within the Activity Centres.
117. The Housing Strategy and ACRB report work together to identify the commercial, cultural and residential roles of the centres and their surrounds. I note that heritage is a key consideration in regards to the built form, and thus capacity, of many parts of the centres.
118. Within the Major Activity Centres and the larger Neighbourhood Activity Centres (Johnston Street east, Johnston Street west and parts of Queens Parade and Alphington), the Amendment provides for moderate and high change areas, meaning that there will be opportunities for more significant growth within these. These large and diverse centres will provide significant future commercial, cultural and residential development opportunities, and the strategies in proposed Clause 11.03-1L promote these roles.
119. The Neighbourhood Activity Centres in minimal and incremental change areas and the Local Activity Centres in minimal change areas will see more modest residential growth, with dwelling typologies limited to detached and dual occupancy dwellings and smaller scale apartments. The role of these centres will thus likely remain predominantly commercial and cultural as there will be limited opportunities for residential development.
120. In regards to the balance of residential versus commercial and cultural land uses, I note that the majority of the centres are zoned Commercial 1, within which ground floor residential uses require a planning permit. This will enable Council to control the conversion of commercial buildings to wholly residential uses if there is a concern regarding the loss of non-residential floor space.
121. I also note that as noted in the SEES, the 'conventional' hierarchy approach to categorising activity centres and employment precincts does not readily apply to Yarra, so the ongoing provision of opportunities for commercial and cultural activities in the other employment areas such as Cremorne and Gipps Street is important, including avoiding pressure to rezone these sites for residential uses. Proposed Clause 17.01-1L seeks to maintain the zoning of these areas to support their economic function.
122. Considering the above, I am of the view the Amendment balances the residential, commercial and cultural roles of the centres.

6.6. Is the proposed affordable housing policy appropriate?

123. Proposed Clause 16.1-4L seeks to support development that includes the provision of affordable housing. The policy is to consider as relevant:

- The capacity for a rezoning to residential use to provide a minimum of ten percent affordable housing, and
- The capacity of a major residential development of 50 or more dwellings to deliver a minimum of ten percent of affordable housing, unless affordable housing has been provided as part of an earlier rezoning of the site.

124. It is informed by the Housing Strategy, Building for Diversity – Yarra’s Social and Affordable Housing Strategy, and the Policy Guidance Note: Affordable Housing Outcomes at Significant Redevelopments.

125. I agree that seeking a (minimum) 10% affordable housing contribution is an appropriate target, and that a higher % would not be justified. In forming this opinion, I have had regard to the Social and Affordable Housing Strategy, which identifies that 3,570 households in Yarra have an unmet need for affordable housing, which represents approximately 9% of the current population and is based on the number of people who are homeless, marginally housed and households in long-term rental stress. I also note that the Strategy identifies aspirations to provide more housing for key workers, as 85% of people who work in Yarra do not live there and there are limited numbers of key workers who can afford to live in Yarra.

126. I have also had regard to the affordable housing contributions being sought within existing or proposed planning controls or strategy documents elsewhere across Melbourne as follows:

- Precinct 15 (City of Hobsons Bay): 5% (in planning controls)
- East Village (City of Glen Eira): 5% (S173 agreement)
- City of Knox: 5% (in Affordable Housing Action Plan)
- Fishermans Bend (City of Melbourne and City of Port Phillip): 6% (in planning controls)
- Burwood Highway and Scoresby Road (City of Knox): Up to 10% (in planning controls)
- City of Port Phillip: 20% of new dwellings within multi-unit developments to be affordable (in Affordable Housing Strategy)
- City of Melbourne: Up to 25% on Council land (in Affordable Housing Strategy)

127. The policy context for affordable housing contributions in Victoria is as follows:

- The Planning and Environment Act 1987 was amended in 2018 to:
 - include the facilitation of the provision of affordable housing in Victoria
 - introduce a definition of 'affordable housing'
 - amend Section 173 to include new provisions to enable a council to enter into a voluntary agreement with a land owner for the development or provision of land for affordable housing
- Clause 16.01-2S of the PPF includes a strategy to encourage a significant proportion of new development to be affordable for households on very low to moderate incomes
- Plan Melbourne includes policies to:
 - Policy 2.3.3 - Strengthen the role of planning in facilitating and delivering the supply of social and affordable housing
 - Policy 2.3.4 - Create ways to capture and share value uplift from rezonings
- Plan Melbourne notes the following in relation to the delivery of affordable housing via major urban renewal developments:

There is an increasing need to encourage the development of more affordable housing, including the integration of social and affordable housing options within major urban renewal developments.

There is scope to capture some of the value created by the rezoning process for policy priorities such as social and affordable housing.

Urban renewal precincts and sites offer significant opportunities to deliver tangible broader public benefit through their rezoning for social or affordable housing, as well as local assets such as open space and community facilities.

Consideration needs to be given to developing a new requirement that when land is rezoned to allow for higher value uses, a proportion of the value uplift should be contributed to the delivery of broader public benefit outcomes such as social and affordable housing.

128.I note that affordable housing contributions can thus only be sought on a voluntary basis under the current legislation, and that there is a stronger nexus for seeking contributions on sites where rezonings and/or revisions to planning controls create value uplift and the contribution would be a portion of that uplift, as compared with seeking contributions on sites with existing zoning and planning controls in place. On the basis that the affordable housing contributions are sought using

the voluntary tools currently available, I am comfortable with Clause 16.1-4L providing the basis to seek voluntary contributions on both residential rezonings and major residential redevelopments of 50 or more dwellings.

129.I recommend that Council provide guidance such as via an update to its existing document "Policy Guidance Note: Affordable Housing Outcomes at Significant Developments" to confirm how the contribution is to be calculated, noting that as per the research on page 70 of the Social and Affordable Housing Strategy 2019, 10% of land versus 10% of completed dwellings results in very different costs to the developer.



7. Other Planning Issues Raised in Submissions to Amendment C269

7.1. Overshadowing

130. The Council officer prepared the following summary of the issues raised in the submissions relating to this theme:

- *Ensure that new developments do not overshadow parks and green spaces.*
- *Overshadowing of public open space should be based on the winter solstice, not the equinox.*
- *Green spaces must have more than 5 hours sunlight a day in winter.*

131. I agree with the Panel Preferred version of the Amendment which changes proposed Clause 15.1-1L to “Avoiding overshadowing of public open space between ~~11am~~ 10am and 2pm on 22 September” to accord with Council's general approach to built form throughout the planning scheme. I am of the view that a proposal to change to the winter solstice would require further strategic investigations that are outside the scope of the current Amendment, as while this approach may offer greater protection for parks, it would have an impact on many of the existing built form controls which have been modelled on equinox controls and which would require separate detailed investigations. I note that Melbourne Planning Scheme Amendment C278 for sunlight to parks involved significant strategic work and community consultation.

7.2. Form and content issues

132. I have been asked to consider the ‘form and content’ issues associated with the Amendment, such as key terms used in the built form policy elements of the Amendment, including references to ‘mid-rise’ development. My opinion on the form and content of the Amendment is generally captured in the following section of this statement, but this section of my statement provides specific comment on the use of terms such as ‘mid-rise’. I note that the Amendment uses a range of terms as follows:

- Low-rise development
- Lower mid-rise development
- Mid-rise development
- Mid-rise buildings
- Moderate built form
- Taller development

- High-rise development

133. I also note that individual Design and Development Overlays provide their own context-specific definitions of mid-rise character; for example, DDO23 refers to it as 3-12 storeys, DDO30 refers to it as 3-8 storeys, and DDO35 as 3-6 storeys.

134. The overall approach to heights in the Amendment is as follows:

- Avoid high-rise development unless specified by a schedule to the Design and Development Overlay
- Direct mid-rise development to appropriate locations within major and neighbourhood activity centres, major employment precincts, commercial and industrial land, major regeneration areas, and certain boulevards that are outside the activity centres
- Ensure that development reflects the predominant low-rise character of the area elsewhere

135. Clause 16.01-2L also refers to densities as follows:

- medium density residential and mixed use development in the form of apartment buildings within moderate change areas (which are generally within or close to activity centres)
- high density residential and mixed use development in the form of apartment buildings for the high change areas (which are generally within or close to activity centres)

136. Given that the overall policy is to generally direct mid-rise development to activity centres where these moderate and high change areas are, the term mid-rise therefore covers most of these medium and high density developments. The overall policy seeks to avoid high-rise development apart from where specific sites are identified for higher development within a Design and Development Overlay, so there will be relatively few buildings that fall within the definition of high-rise.

137. The “mid-rise” category thus covers a wide range of potential heights between the low-rise residential areas that are generally 1-2 storeys and the occasional high-rise building. The definition of mid-rise for particular centres is also precinct-specific given the different height ranges used in the existing Design and Development Overlay schedules.

138. I note that there are no definitions of mid-rise, medium-rise or medium-density development in any widely used planning documents that can be drawn upon.

139. Planning Practice Note 60 – Height and Setback Controls for Activity Centres identifies that proposed heights need to consider consistency with state and regional policy, and be underpinned by a comprehensive built form analysis that selects appropriate heights and built form outcomes through

evaluation of built form objectives, land use outcomes and economic growth. This highlights that both the context and role of the centre are important in considering heights.

140. I recommend that the second building height strategy of Clause 15.01-2L be amended as follows:

- *Ensure that development reflects the predominantly low-rise character of the area, except in the following locations **where a range of building heights should be provided that respond to their context and role:...***

7.3. Universal Design

141. The Council officer prepared the following summary of the issues raised in the submissions relating to this theme:

- *Pursue inclusion of Universal Design and the Liveable Housing Guidelines and develop a position on mandatory minimum accessibility regulations for Class 1a residential buildings and internal parts of individual Class 2 buildings.*

142. Clause 16.01-1S of the PPF already includes a strategy to:

Encourage the development of well-designed housing that:

- *Provides a high level of internal and external amenity.*
- *Incorporates universal design and adaptable internal dwelling design.*

143. I note from the Council officer's report that Council will be preparing a separate report on the Silver Standards for inclusive design. Any changes to the planning scheme based on this future report would need to be pursued via a separate amendment.

7.4. Climate Change

144. The Council officer prepared the following summary of the issues raised in the submissions relating to this theme:

- Yarra's declaration of a Climate State of Emergency should be reflected in C269.
- Concerned that often the proposed changes are aspirational rather than enforceable and lack the sense of urgency that our current climate crisis demands.

145. I agree with the Panel Preferred version of the Amendment which inserts a reference to Yarra Council's Climate Emergency Plan and adds it as a background document to the planning scheme. I note that many of the actions within the Climate Emergency Plan are outside the remit of the planning scheme, or will be subject to future planning scheme amendments (e.g. action 2.8 seeks to introduce zero carbon standards for new commercial and residential developments via a future

amendment, and action 3.3 seeks to work with the state government to periodically update the planning scheme to reflect evolving best practice in addressing climate-related issues). The proposed ESD policy at Clause 15.02-1L includes strategies to achieve best practice environmentally sustainable design and reflects the strategic priorities Climate Emergency Plan relating to energy, transport and climate adapted built environments.

7.5. Building heights

146. A number of submissions were received on building heights. It is not the role of Amendment C269 to identify building heights for individual sites, as this work arises from the preparation of structure plans and built form frameworks, but rather to set a policy framework which sets out the range of factors that must be considered in identifying appropriate heights. The proposed clauses relating to Activity Centres (11.03-1L), Building Design (15-01-1L), Urban Design (15.01-2L), Heritage (15.03-1L) and Location of Residential Development (16.01-2L) address heights and development density in a general sense. I am of the view that these provide appropriate guidance for future precinct-specific strategic planning work such as structure plans and built form frameworks that identify building heights.

7.6. Liveability

147. The Council officer prepared the following summary of the issues raised in the submissions relating to this theme:

- *279 submissions were submitted via the 'Do Gooder Campaign' with 219 including the following Statement: 'I am making this submission to help ensure Yarra's liveability as well as its diverse and vibrant heritage shopping strips can continue to benefit us all for another 100+ years.'*
- *C269 should in no way include provision, or omit provisions, which will diminish the liveability or heritage of the municipality.*

148. Liveability is a broad concept which encapsulates a range of factors that planning can influence. There is no universal definition as different locations will apply local preferences and weighting to the elements. The RMIT Centre for Urban Research proposes the following definition which assists consideration of liveability in the Melbourne context:

"...a 'liveable' community as one that is 'safe, attractive, socially cohesive and inclusive, and environmentally sustainable; with affordable and diverse housing linked by convenient public transport, walking and cycling infrastructure to employment, education, public open space, local shops, health and community services, and leisure and cultural opportunities' ('Creating liveable cities in Australia: Mapping urban policy implementation and evidence-based national liveability indicators.'

(2018) Jonathan Arundel, Melanie Lowe, Paula Hooper, Rebecca Roberts, Julianna Rozek, Carl Higgs, Billie Giles-Corti, Page 20).

149.I consider that Amendment C269 seeks to provide for these factors within Yarra and thus the Amendment provides for the municipality to develop as a liveable location.



8. Has Amendment C269 been drafted in accordance with the relevant guidance?

150. In considering whether the Amendment has been drafted correctly, I have had regard to the following:

- The Ministerial Direction on the Form and Content of Planning Schemes
- Ministerial Direction No. 9 Metropolitan Planning Strategy
- Ministerial Direction No. 11 Strategic Assessment of Amendments
- A Practitioner's Guide to Victorian Planning Schemes (Version 1.3)
- LPPF Translation Manual (Version 2.0)
- Planning Advisory Note 71: Amendment VC148
- Planning Advisory Note 72: Amendment VC148
- Planning Practice Note 13: Incorporated and Background Documents (March 2020)

151. The key tenets of these documents include:

- Templates for PPF clauses that sets out certain text that must be included
- Whether the amendment has regard to Plan Melbourne
- The strategic considerations that must be addressed in the explanatory report
- For the Municipal Planning Strategy, the content that is to be included or excluded, the format the clauses and maps should take, and how the material should link to the rest of the planning scheme and the background documents
- The need to avoid repetition of State and Regional PPF content and material found elsewhere in the planning scheme (e.g. in schedules) in local policy content
- The use of policy guidelines only when necessary
- Evidence-based justification for new planning policies
- A checklist for place-based policies
- The need to exclude conflicting content, non-planning matters, outdated content

- Consistency with the operational provisions of the scheme, any parent provision and any relevant Ministerial Direction
- Avoiding the use of information that is likely to become out of date before the next review cycle (approximately 4 years)
- The use of plain English and the avoidance of ambiguity

152. I am aware that Council has worked closely with the Department of Environment, Land, Water and Planning (DELWP) during the preparation of the Amendment, and that DELWP have provided detailed feedback on the drafting and its consistency with the practice guidance.

8.1. Overall aspects of the Amendment

153. I am of the view that the Amendment is in accordance with the relevant aspects of Plan Melbourne as listed in paragraph 15 of my statement. It provides strategies to enable residents to access employment and housing opportunities that are well linked to public transport, and to meet their daily needs in their local neighbourhood, as well as ensuring heritage and environmental considerations are addressed for new developments.

154. I am of the view that the strategic considerations from Ministerial Direction No. 11 have been adequately addressed in the explanatory report.

8.2. Municipal Planning Strategy

155. The **overall structure** complies with the e Ministerial Direction on the Form and Content of Planning Schemes and is within the 5,000 word limit identified in the Ministerial Direction.

156. For **Clause 02.01 (Context)**, the Practitioners Guide states that context should be 1/2 to 1 page, whilst the proposed clause in the Amendment is approximately 3.5 pages. However, I understand that DELWP has been closely involved in the drafting of the Amendment and has not raised issues with the length of the clause, and that the overall word count for the MPS is met. As per the Practitioners Guide it includes a description of the geographic, economic, environmental and demographic qualities, opportunities and challenges.

157. **Clause 02.02 (Vision)** distils Council's wider vision into a land use and development focused statement as per the practice guidance. I support the Panel Preferred Version which removes reference to the 2017-2021 document referred to in exhibited version, which would be out of date by the time the Amendment is gazetted.

158. The **Clause 02.03 (Strategic Directions)** follow the PPF headings, and provide the strategic context for the main policy areas, including the activity centre hierarchy, planning for housing growth and choice, and overarching climate change and environmental consideration. For consistency with the

Ministerial Direction, the strategic directions should be prefaced with "Council's strategic directions for [insert heading] are to:..."

159. The **Clause 02.04 (Strategic Framework Map)** depicts how Yarra will change as a result of the implementation of the planning scheme including major regeneration areas and proposed future linkages. For consistency with Ministerial Direction, text should be included above the plan stating "The plan contained in Clause 02.04 is to be read in conjunction with the strategic directions in Clause 02.03."

160. Subject to the minor drafting corrections as listed above, I am of the view the MPS generally accords with the relevant practice guidance.

8.3. Planning Policy Framework

161. The **overall approach** accords with the relevant practice guidance. The proposed local policies implement additional material where other parts of the planning scheme do not provide enough direction.

162. I note that some clauses are policy-neutral translations from the existing planning scheme, and others contain amended or new policies based on new strategic documents (as set out in Table 1 of my statement).

163. I am of the opinion that the majority of the material in the Panel Preferred Version of the PPF accords with the relevant practice guidance, although I have identified some clauses where I would recommend changes to ensure consistency with these guidance documents. I set these out as follows.

- **Clause 11.03-6L Vic St East Precinct** – The first objective should be removed as it repeats the objective from Clause 12.03-1R.
- **Clause 12.03-1L River corridors** – The final strategy ("Support development that creates or enhances public access to the Yarra River") should be removed as it repeats elements from the strategies of Clause 12.03-1R.
- **Clause 13.07-1L Caretaker's houses** – Some of the existing planning scheme policy wording should be retained for the strategy. The proposed wording seeks to prevent prohibited dwellings, which the zoning controls provide for. The strategy should be reworded as "Protect business and industry by ensuring that caretaker's houses are legitimately associated with a commercial or industrial use".
- **Clause 13.07-1L Interfaces and amenity** – I defer to the evidence of Mr Antonopoulos in relation to acoustic matters, but note that from a drafting perspective the following should be amended:

- Move the hours of operation strategy to the policy guidelines.
- Delete references to the Acoustic Reports and Waste Management Plans from the policy guidelines. The LPPF Translation Manual states that application requirements do not form part of the PPF, and that such requirements should be located within local schedules, or if it cannot fit into a schedule format, can be set out in a Council information sheet or other ancillary document for permit applications. These could potentially be located in the incorporated document associated with this clause.
- Delete any policy guidelines that directly reflect the EPA noise requirements under the Environment Protection Act 2017, as these are referred to in Clause 13.05-1S.
- **Clause 12.03-1L River corridors** - The final strategy ("Support development that creates or enhances public access to the Yarra River") should be removed as it repeats elements from the strategies of Clause 12.03-1R.
- **Clause 15.01-1L Signs - Heritage** – The Clause should be moved into Clause 15.03-1L. The Practitioners Guide states that if a sign policy solely relates to the appearance of signs within a heritage area, it can sit with Clause 15.03-1 Heritage conservation.
- **Clause 15.01-2L Landmarks**– I have no issues with the clause itself but note that the primary views are repeated elsewhere in the planning scheme within schedules to the Design and Development Overlay (e.g. DDO21 – Bridge Road Activity Centre). It would be preferable for these overlays to be updated to provide cross references to the primary views in Clause 15.01-2L to avoid repetition of material throughout the scheme.
- **Clause 16.01-2L Location of residential development** - Strategy bullet point "That respects character of the street" should be deleted as this repeats Clause 15.01-5S.
- **Clause 16.01-4L Housing affordability** – A reference to hospitality, arts, child care, cleaning and laundry workers should be inserted into the key workers definition to match the background policy document (Social and Affordable Housing Strategy 2019).
- **Clause 17.01-1L Employment** - The material on built form outcomes (i.e. 4th strategy onwards) should be moved into the Urban Design policy (Clause 15.01-1L).
- **Clause 17.02-1L Retail** – The 2nd and 3rd bullet points should be moved to the Building Design policy (Clause 15.01-2L).
- **Clause 18.02-1L Sustainable transport** – The two "Support the upgrade and establishment of paths along the Yarra River..." strategies in walking and cycling should be combined into one strategy in the sustainable transport clause.

- **Clause 19.02-6L Open space** – The objective and first and third strategies should be deleted as these repeat elements of Clause 19.02-6S.
- **Clause 19.03-3L WSUD** – The examples of measures to improve stormwater quality and prevent litter being carried off being should be moved to the policy guidelines.
- **Clause 19.03-2L Development contributions** - The first strategy should be deleted as this repeats elements of the objective from Clause 19.03-2S.

8.4. The role of the background and incorporated and background documents

164. Amendment C269 seeks for the following documents to be listed as **incorporated documents** in the Schedule to Clause 72.04 of the planning scheme:

- A new document titled Guidelines – Managing Noise Impacts in Urban Development, June 2021.
- The Amendment documents also list the “City of Yarra Database of Heritage Significant Areas, revised September 2019”, however I understand that Amendment C245 has been gazetted which updated this document to the June 2020 version, so Amendment C269 no longer needs to include this.

165. The relevant Planning Practice Note 13 on Incorporated and Background Documents (March 2020) identifies that documents must be incorporated if:

- They are essential to administration or enforcement of the planning scheme.
- They are necessary to determine the extent of a planning control or whether planning permission is required.
- They are required to be incorporated under an Act, specific planning provision or Ministerial Direction, such as an incorporated plan under the Incorporated Plan Overlay, and the documents listed in the Ministerial Direction on the Form and Content of Planning Schemes
- They will be used to guide the exercise of discretion by the responsible authority.

166. Having regard to this practice note, I am of the view that the proposed new incorporated document relating to noise is necessary, as the Guidelines will be used to guide the exercise of discretion by Council when considering permit applications.

167. The LPPF Translation Manual provides the following guidance on the term background documents, which replaces the term reference documents:

Reference documents have been renamed Background documents, but their operation has not changed. They still have no statutory weight and are not a formal part of a planning scheme. Background documents should not be listed in the MPS, unless they are necessary to directly understand the context of a strategic direction. (p. 28)

168. The Amendment seeks for the documents addressing the following to be listed as background documents in the Schedule to Clause 72.08 of the planning scheme:

- Activity centres
- Housing
- Built form and urban design
- Heritage
- ESD, WSUD, stormwater, climate change and waste minimisation
- Open space
- Biodiversity and vegetation
- Traffic and parking
- Amenity and other considerations (noise, licenced premises, waste, gaming etc)
- High level policies (IMAP, Council Plan)

169. The new background documents are as follows:

- Activity Centres Roles and Boundaries October 2019
- Yarra Housing Strategy September 2018
- Noise and Vibration Considerations October 2019
- Landmarks and Views Assessment October 2019
- Residential Heritage Policy Review October 2019
- Yarra Industrial Heritage Policy October 2019
- Building for Diversity – Yarra’s Social and Affordable Housing Strategy November 2019
- Nature Strategy 2020-2024

- City of Yarra Climate Emergency Plan

170. Planning Practice Note 13 on Incorporated and Background Documents (March 2020) provides the following guidance for the use of background documents:

- Background documents can be mentioned in the scheme if they provide useful information in understanding the context for a policy and/or provision.
- There is no need to refer to a document in the planning scheme if the substantive elements of it have been included in the MPS, PPF or a schedule, unless it contains additional useful information.
- A reference document may explain why particular requirements are in the scheme, substantiate a specific issue or provide background to specific decision guidelines in local planning policies or schedules.
- Reference documents have only a limited role in decision-making as they are not part of the planning scheme. They do not have the status of incorporated documents or carry the same weight.
- Background documents such as housing strategies that have informed the preparation of multiple provisions should be listed in the schedule to Clause 72.08 rather than repeatedly referred to throughout the PPF.

171. Having regard to this practice note, I am of the view that the C269 proposed background documents are suitable for inclusion. They provide useful information to understand the policies, and whilst the Planning Scheme Review commenced some time ago, I understand Council undertakes ongoing monitoring of employment and housing data to ensure capacity figures are kept up to date in regards to the ongoing supply of land.

172. I also understand that the list of background documents is larger than the list of reference documents currently in the planning scheme, both as a result of the insertion of new documents (as per paragraph 169 of my statement), and to accurately list the full range of existing documents Council has drawn on in preparing the Amendment. My evidence has focused on the key new planning documents that form the basis for the key issues in the submissions that relate to my area of expertise.

173. In regards to drafting, I note that the table in the schedule will need to include the Amendment number before each clause reference in the right hand column to accord with the Ministerial Direction on the Form and Content of Planning Schemes, and that the four background documents included in the current version of the planning scheme relating to the Yarra River will need to be inserted into the updated table.

174.I also understand that the Yarra 2036 Community Vision referred to in proposed Clause 02.02 has been recently adopted by Council but the Council Plan (which will include this vision statement) has not yet been finalised. Once this occurs, the proposed reference to the Council Plan 2017-2021 will be updated.







CAREER OVERVIEW

2015 –
Principal Urban Planner, Echelon Planning

2009 – 2014
Senior Consultant, Urbis

2008 – 2009
Strategic Planner, Aurecon (Melbourne)

2004 – 2008
Planner, Aurecon (New Zealand)

2003 – 2004
Student Planner, Aurecon (New Zealand)

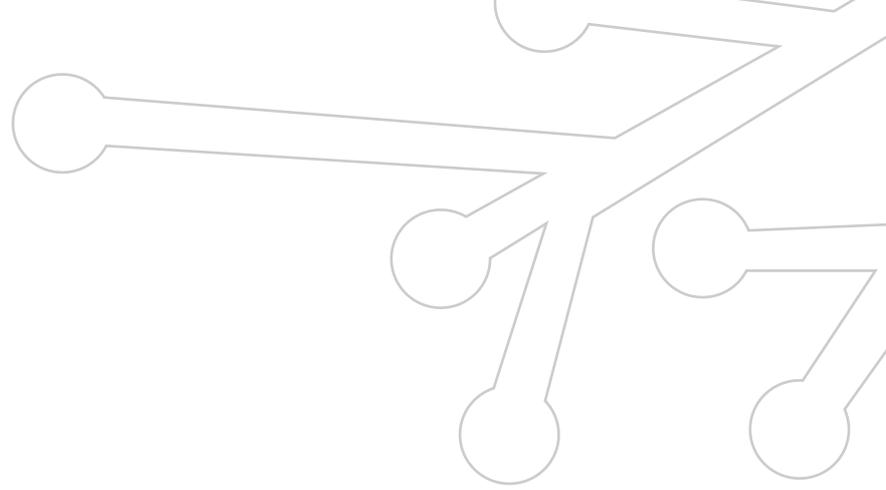
QUALIFICATIONS

Master of Regional and Resource Planning
(with Distinction), University of Otago

Bachelor of Arts (Geography), University of
Canterbury

MEMBERSHIPS

Victorian Planning & Environmental Law
Association



Sarah Ancell

PRINCIPAL URBAN PLANNER

Sarah has over fifteen years of experience on a broad range of planning projects in Victoria, Tasmania and New Zealand. She has equal expertise in strategic and development approval planning, giving her the ability to advise clients on any aspect of their projects, from initial feasibility queries through to all stages of the strategic planning and development approval processes.

Working for consultancy firms has given Sarah an excellent understanding of the financial considerations of her clients. During this time she has also worked closely with numerous state and local government clients, which has bestowed her with insight into the planning and approval processes within these organisations.

Sarah specialises in bringing strategic planning documents such as structure plans and regional-scale strategies to fruition, and in obtaining development approvals for growth area subdivisions and complex sites. She has worked on a range of residential, commercial, industrial, retail, transportation, airport, open space, justice, education, and telecommunications projects.

Her clients value her persistence in seeing projects through from beginning to end with a determined energy and focus. Sarah is passionate about improving how our cities function, and gains immense job satisfaction from working with her clients to facilitate transformative and lasting change to urban areas.



Project Experience

DEVELOPMENT FACILITATION & PROJECT APPROVALS

Sarah has worked with a wide range of private and state government clients to obtain development approvals for residential, office, commercial and specialist land use projects. Her equal expertise in statutory and strategic planning gives her the ability to advise clients through all stages of the framework planning and development approval processes.

Sarah's work in Melbourne's growth areas has included providing development advice and obtaining approvals for the following clients:

- Stockland for their Mt Atkinson estate
- LLT Developments for their Verdant Hill estate
- Satterley for their Mickleham Road estate
- Mirvac for their Smiths Lane estate
- Lend Lease for their Harpley and Aurora estates
- Peet Ltd for their Aston, Aspect Greenvale and Tarneit Gardens estates
- Dacland for their Regent Street estate
- The Barro and Richmond families for their Werribee landholding

Sarah has also provided planning assistance with the following inner city projects:

- Stockland's Altona North site
- 664 Collins Street office development
- 167 Cremorne Street mixed use development
- Australia 108 (70 Southbank Boulevard) mixed use development
- 40 La Trobe Street apartment complex
- 477 Collins Street office development
- Goodman's Fishermans Bend mixed use development proposal

The commercial projects Sarah has worked on include:

- Stockland's Melbourne Business Park
- Woolworth's Masters Home Improvement stores
- Major Project Victoria's Melbourne Wholesale Markets Development Plan and development approvals
- Colonial First State Global Asset Management's DFO South Wharf rejuvenation
- Geelong Homemaker Centre
- Selwyn District Council's IZone Business Park

Sarah has also assisted the State Government to advance development on specialist sites including the following:

- Tallangatta Department of Environment Land Water and Planning Depot Project
- Rezoning surplus school sites for the Department of Education and Training
- Ravenhall Prison Correctional Facility Development Plan for the Department of Justice and Regulation
- Shrine of Remembrance Galleries of Remembrance Development for Major Projects Victoria

In Victoria's regional areas, Sarah's work has included:

- The roll-out of gas infrastructure to 11 regional towns for TasGas and Brookfield
- Waranga Green Energy's anaerobic bio-digester project in Stanhope
- Mennotty's Spring Creek residential project in Torquay
- Telecommunications sites for Optus



Project Experience

STRATEGIC PLANNING

Sarah specialises in activity centres and small town structure plans, and has also undertaken a range of other strategic and open space planning projects in urban and regional areas. She has extensive experience in leading multi-disciplinary project teams and in running consultation processes including design charrettes. She also has experience in presenting submissions and expert evidence at planning panels.

Examples of the strategic planning projects Sarah has led and participated in include:

- Caulfield Structure Plan
- Box Hill Major Activity Centre planning controls
- Wallan Town Centre Masterplan and Urban Design Framework
- Stonnington Neighbourhood Centres Strategy
- Bayside Small Activity Centres Built Form Review
- Brighton Structure Plan (TAS)
- Sorell Land Supply Strategy
- Corowa Urban Design Framework
- Vision East 2030 Sub-Regional Land Use Strategy
- St Helens Structure Plan
- Huonville/Ranelagh Structure Plan
- Bicheno Structure Plan
- Triabunna/Orford Structure Plan
- Nubeena/White Beach Structure Plan
- Devonport CBD Structure Plan

Examples of the open space projects Sarah has led or participated in include:

- Living Links Corridor Study for the Port Phillip Westernport Catchment Management Authority
- Colac Otway Shire Public Open Space Strategy

RESEARCH AND POLICY DEVELOPMENT

Several of Sarah's projects have required her to undertake in-depth research into particular urban planning issues. Her findings and policy recommendations have assisted clients to refine their approaches to these issues.

Research projects Sarah has contributed to include:

- Homes for Key Workers for Colac Otway, Corangamite, Glenelg, Moyne, Souther Grampians and Surf Coast Shire Councils and the VPA
- Affordable housing research and policies for Hobsons Bay, Mitchell, Whitehorse and Nillumbik Councils
- Byron Shire Alternative Housing Models
- Plan Melbourne Affordable Housing
- Melbourne Airport's Master Plan zoning approach and Plan Melbourne submission
- Grattan Institute's "Cities – Who Decides?" report
- Tourism and Transport Forum's Tourism Planning Code

TRANSPORT

Sarah's time at Aurecon gave her the opportunity to participate on a range of large scale transport projects including the following:

- Port of Hastings Rail Corridor Feasibility Study
- South Morang to Mernda Rail Extension
- Rutherglen Heavy Vehicle Deviation Route Study
- Christchurch Rolleston and Environs Transportation Study