

Peer Review: East Village Urban Design Report

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Client: Victorian Planning Authority

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Quality Information

Document Peer Review: East Village Urban Design Report

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Prepared by Sarah Bridges

Reviewed by Zac Cvitkovic

Revision History

Rev	Revision Date	Details	Authorised	
			Name/Position	Signature
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1.0 Introduction

1.1 Purpose

The Victorian Planning Authority has engaged AECOM to prepare a peer review of the Conceptual Master Plan East Village Urban Design Report (Draft – November 2017) prepared by MGS Architects (referred to as the ‘Report’). The purpose of this review is to:

- Review the analysis and research contributing to the design response
- Review the clarity of the built form design response
- Evaluate the built form controls defined within the report in consideration of the surrounding local context and preferred future character of the precinct.
- Identify gaps in the design response rationale
- Propose to the VPA which design methods could be used to address the gaps identified.

It is understood that both Glen Eira City Council and the VPA will work together to define an appropriate way forward to facilitate the urban renewal of the precinct through a Planning Scheme Amendment.

1.2 Methodology

This review summarises content, identifies issues or gaps in the background research and assumptions of the report and provides recommendations for further articulation of the proposed conceptual masterplan. Comments are based on the structure of the report, the methodology of both background research and design response and the proposed built form.

To inform the review we have undertaken:

- A review of relevant documents and policies informing the project
- A review of the relevance of the case studies and benchmark projects
- A review of the built form outcomes
- A review of the design details in plans and sections
- A review of the structure of the report and clarity of the design response

1.3 Reference Documents

The following documents were referred to throughout the peer review process, to ensure a rigorous response.

- Conceptual Masterplan – East Village Urban Design Report
- Glen Eira Quality Design Guidelines
- Glen Eira Planning Scheme
- Better Apartment Design Standards (Clauses 55 and 58 of the Glen Eira Planning Scheme)
- Urban Design Guidelines for Victoria

2.0 Detailed Commentary and Recommendations

2.1 Report Overview

The East Village Urban Design Report provides some strategic and local context to justify the proposed density and built form. Following this, design detail has been provided regarding the envisaged height and setback requirement to street, open space and built form interfaces. Local and international precedents are then described to substantiate and illustrate the built form response.

Whilst somewhat structured in a conventional manner the lack of local scale site analysis and context is apparent. A number of undescribed assumptions and incongruous steps in the design process require further articulation to describe the logic and appropriateness of the design response.

The report would benefit from a reorganisation to better communicate the assumptions and position the vision for the precinct before describing the detail of the master plan concept (and as part of that the built form response).

2.2 Context

The context chapter currently describes

- Regional Context - providing a rationale for urban renewal of the site;
- Strategic Context - describing, existing land use in the form of Housing, Education, Community, Retail and Employment Anchors. This provides a rationale for the scale and type of development on the site;
- Policy Context - making reference to key policies and documents informing the design response;
- Local Context - site specific description.

In general, this structure is successful in its aim to provide justification for the project, however a number of key elements are missing or understated. This review indicates areas of the report which would benefit from further attention.

2.2.1 Regional context

The regional context section provides a sound overview of the site location. The map positions the site within the “Knowledge Triad”, relative to the CBD and the Monash National Employment and Innovation Cluster. Reference is made to previous work undertaken by the Victorian Planning Authority and Glen Eira City Council to develop a concept plan for the site and further description of the corridor it lies within. A brief description of the transport options is given, however only a few destinations are flagged. It is assumed that further discussion of these points will arise later in the report, however they do not eventuate.

2.2.2 Strategic context

Three sub-headings provide the structure of the strategic context analysis for this section of the report: Housing, Retail and Employment and Education and Community Anchors. No mention of movement and transport by any mode has been made.

The report fails to provide a specific definition of an 'enterprise precinct' despite the emphasis placed on this concept. There is a lack of clarity as to the priority or preference of land use anchors. However, it is our understanding that the precinct is envisaged to be an employment precinct first and residential second.

Recommendations:

1. The strategic movement and transport context of the precinct should be more thorough, which would assist in providing a stronger rationale for the value and benefit of substantially intensifying development in this location. This should include:
 - the existing local residential walking catchment to future, significant retail and employment land uses on the site (approximately 18,000* residents within a 1km walking distance),
 - the key employment and education hubs that lie within an easy cycling distance (especially where they are along existing or proposed, dedicated cycling routes, and
 - Connections to other retail, employment, education and community services.
2. The term 'enterprise precincts' should be more well-defined with local examples, and/or example not dependent on heavy rail transport provision

Tips:

More thorough movement and transport context analysis would identify the proximity of significant destinations for work and education including the following approximate cycle times:

- 20 minutes cycle to Monash University Caulfield
- 18 minutes cycle to Monash Medical Centre Clayton
- 8 minutes cycle to Monash Medical Centre Bentleigh
- 18 minutes cycle to Moorabbin Employment Precinct
- 12 minutes cycle to Chadstone Shopping Centre

(By way of comparison South Yarra Railway Station is 16 minutes cycling distance from Flinders Street Station).

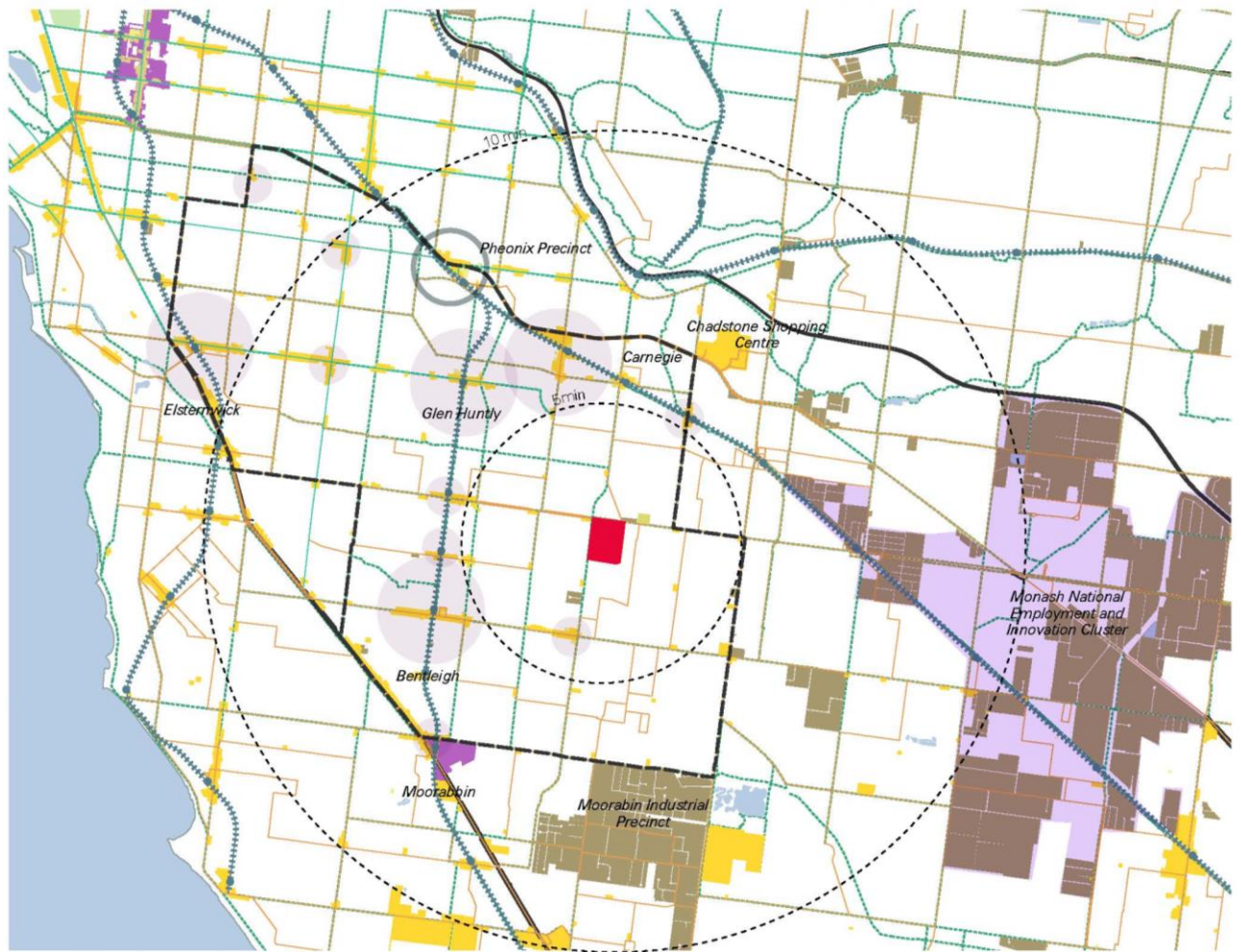


Figure 4. Housing Context

Legend

- East Village (Site)
- Glen Eira Council
- Existing Activity Centre Zone
- Proposed Major Activity Centre
- Proposed Neighbourhood Activity Centre
- Commercially zone land
- Industrial Zone
- Train Line
- Tram Line
- Bus Route
- Bike Lane
- Freeway or Highway

Strategic Map from Report – Travel times are not labelled as to which transport mode they denote.

2.2.3 Policy context:

The policy context within the report provides a relatively short and generic assessment of the Glen Eira Planning Scheme and how it applies to the precinct. This section also extensively describes commercial and market forces on the property.

Recommendations:

3. Reference to the recently adopted '*Glen Eira City Council Quality Design Guidelines*' should be included which provides a well-defined municipal-wide built form expectation that Council aspires to.
4. Proposed and existing zoning graphics should be clarified and explanation of the existing zoning arrangements should be included before any proposed zoning arrangements are made. More detailed zone and overlay maps of the site and immediate context should be provided.

Tips:

The '*Glen Eira City Council Quality Design Guidelines*' contain the following built form types for strategic sites:

- Preferred height of 6 storeys including a 3 storey street wall podium. Allow up to 8 storeys if providing a significant community benefit. Up to 5 storeys over a 3-storey podium (without community benefits provided)
- Preferred height of 5 storeys, including a 2 storey street wall/podium.

2.2.4 Local context

The Local Context section provides a description of both the historical and current land uses and built forms on site. The text is supported with site photos. A key omission in this section is a description of the surrounding neighbourhood, connectivity, character and built form. This creates a largely undescribed step and gap in the methodology between the context analysis and the density and built form analysis section.

Recommendations:

5. Inclusion of a more thorough description of existing connectivity and urban conditions of the site and neighbourhood should be included with:
 - A description of the current street network and alignment with surrounding neighbourhood,
 - Identification of key destinations within and near the site,
 - Potential future desire lines, and
 - Considerations of the green space network.

6. Inclusion of expanded information on existing built form precedents in the neighbourhood that would establish key benchmarks for the Precinct should be included.
7. Inclusion of information relating to sites and precincts within the municipality with similar strategic settings (main road frontage, residential interfaces, road-based public transport reliant centres etc) should be included.

Tips:

Photos of the site and neighbourhood should be located on a site map.

Neighbourhood and municipal precedent should include existing built form, with an emphasis on more recent development including:

- North Road developments that include 3-storey commercial buildings with 0.0 metre front setbacks
- East Boundary Road buildings that include 3-storey commercial buildings and 0.0 metre front setbacks
- Glen Eira Sports and Aquatic Centre (GESAC) community facility with the equivalent of a 3-storey commercial built form and 0.0 front setback
- Development in the nearby Bentleigh East Neighbourhood Centre, including 658-660 Centre Road – Recent 4 storey mixed used development with 0.0 metre front setback and a 7.0 metre top floor setback

2.3 Density and Built Form Analysis

2.3.1 Case Study Analysis and Case Study Comparison Matrix

This section of the report begins with a comparative analysis of proposed or existing built form within the local area. International and Melbourne-based projects delivering 'Enterprise Precincts' are then described followed by a comparison matrix to position the East Village design response relative to the benchmark studies.

Whilst somewhat compelling, it is arguable whether some of the projects identified both locally and internationally are relevant, due to their context or status. A similarity between most of the projects is their proximity to major transport infrastructure, however this is not fully explored or demonstrated. The 'Centrepiece' in Bentleigh East and the Bradmill Precinct in Footscray are the only projects presenting similar contextual characteristics in relation to access to limited transport options. Neither the 'Centrepiece' which has a similar height of 6 storeys, nor Accordia Cambridge which is mentioned in the report are included in the matrix. Considering these factors, the findings of the matrix cannot be considered conclusive.

The comparative study is not confined to this section, and more local examples are referred to later in the Height and Built Form Analysis section. It is suggested that all reference projects are kept in the same part of the document to streamline the narrative, then referenced later if required.

Recommendations:

8. The report should provide criteria for selecting each of the case studies, as well as an explanation of how each case study meets the criteria.
9. An explanation of the findings of the matrix and what elements should be adopted for this precinct is needed focussing particularly on local examples.

2.3.2 Heights and Built Form Analysis

This section discusses existing building heights and Development Plan Overlay height limits as justification for the proposed built form. This is the first reference to the proposal within the document and represents a departure from the methodology of the rest of the chapter which presents analysis rather than justification for the proposal.

The proposal is further described in site sections, whilst informative, the jump from analysis to proposal provokes numerous questions regarding the proposed urban form and morphology which are not discussed previously or subsequently.

Recommendations:

10. A comprehensive built form analysis should be provided and follow a coherent methodology that should include:

- Existing character,
- A precinct vision,
- A design response diagram,
- A concept masterplan,
- Urban design principles, and
- Land use and sub-precincts.

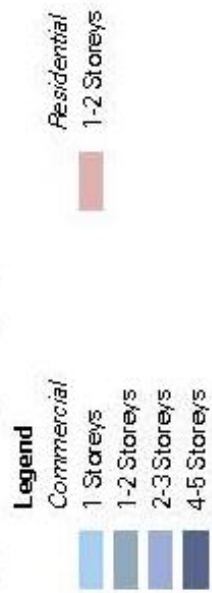
This would inform the analysis and illustrate how the proposed built form envelopes have been developed.



Figure 28. Existing DPO Height Limit



Figure 27. Existing Building Heights



The Existing Building Heights and Existing DPO Height Limits are used as the justification for the proposed heights and setbacks.

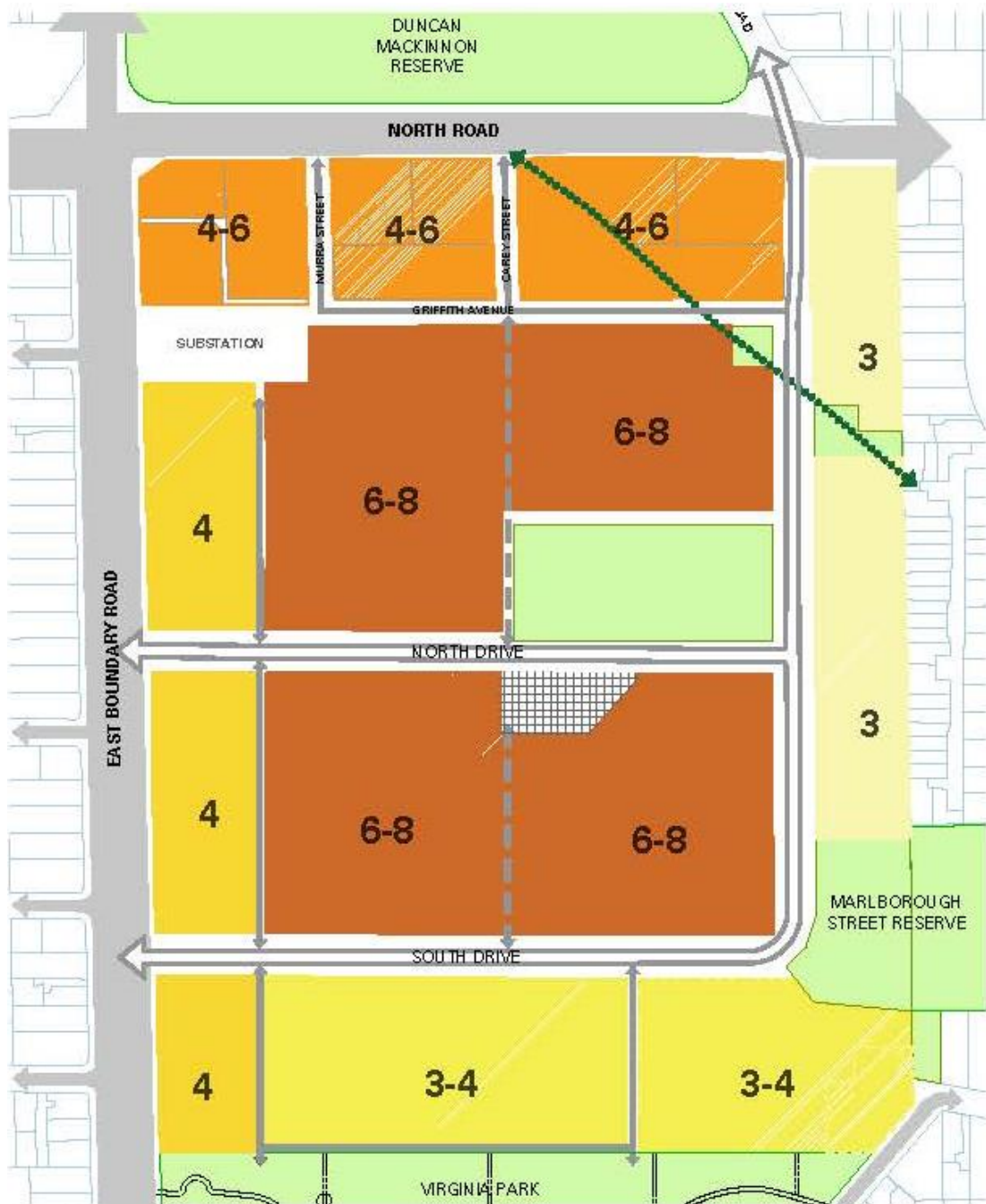


Figure 29. Proposed Building Heights Map (Indicative)

Legend			
	3 Storeys		Town Square
	3-4 Storeys		Open Space
	4 Storeys		Main Streets
	4-6 Storeys		Connector Streets
	6-8 Storeys		Potential Streets
			Green Link

The Proposed Building Height Plan is introduced with no other discussion, justification or explanation regarding street, open space, land use or built form arrangement for the Precinct.

2.3.3 Solar Analysis

Solar analysis studies are provided for winter equinox at 11am and 2pm. Key open spaces being provided within the Precinct will require further solar access testing based on the combination of proposed building heights and setback/interface provision detailed in the Report. These open spaces include the 'Village Square', the existing and extended Marlborough Street reserve and the existing Virginia Park, however the solar analysis is also particularly relevant to Griffith Avenue and North Drive which are proposed to contain some form of retail and/or commercial space at ground level.

Recommendations:

11. Include shadow diagrams for June 21, Winter Solstice, to fully investigate the impact of built form on the public realm.
12. Investigate the impact of built form when complying with overshadowing guidelines listed in Glen Eira City Council's Open Space Strategy

2.4 Interfaces

This section of the report is split into External Interfaces, Internal Interfaces and Side Setbacks with a varying focus of built form, landscape and land uses through the chapter.

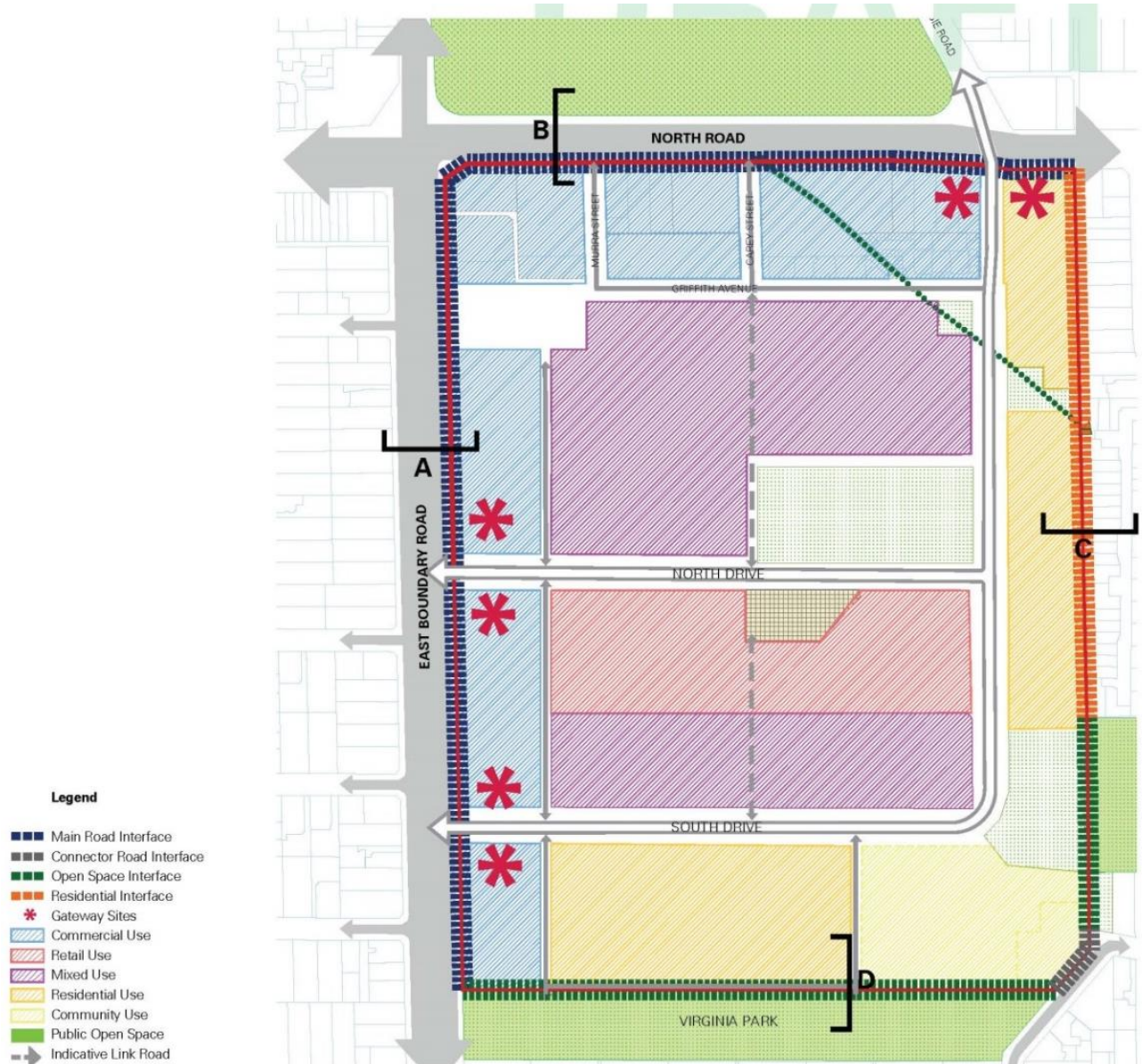


Figure 36. External Interface Map

The External Interface Map introduces proposed land uses within the Precinct for the first time.

2.4.1 External Interfaces

East Boundary Road and North Road

The Report proposes a 4-storey street wall height to East Boundary Road and 4-6 storey street wall height to North Road, with a 0.0 metre setback and introduces the concept of a 3.0-metre-wide 'articulation zone' which would accommodate this, however, it is noted that, 'Section B' (for North Road) in the Report has not included this element at all.

Note: Section A and B dimensions are provided as 2.0-metre-wide and 1.5-metre-wide footpaths. Given the scale, density and level of activity planned for the Precinct it is our opinion that these are too narrow and that further testing and reference to other best practice examples is recommended.

Eastern Interface

The Report establishes either a 5.5-metre-wide rear (garden) setback or a 7.7-metre-wide lane setback (with interspersed tree planting) to a 3-storey residential built form. Section C-1 and C-2 incorrectly include a potential 4th level that is not indicated on the 'Proposed Building Heights Map'. In addition to specific built form controls the Report recommends that CL.22.02 of Melbourne Planning Scheme be replicated in the amendment material.

Southern Interface

The Report establishes a 5.5-metre-wide lane setback to a 3-storey residential built form with reduced overshadowing of Virginia Park from 11am to 2pm on September 22 as established by the Melbourne Planning Scheme 22.02. This clause also sets a requirement to provide winter solstice shadow diagrams which are not included in the report. Section D-1 and D-2 do not include the potential 4th level that is indicated on the 'Proposed Building Heights Map'.

Recommendations:

East Boundary Road and North Road

13. Local context, precedent, and recent Council design guidelines would support a 3-storey commercial street wall height along both street frontages with a 0.0 metre setback and a 3.0 metre setback of taller built form above this.

The use of the 'Articulation Zone' for 'indentation' of the street wall is supported, however a mandatory setback of 3 metres of built form beyond 3 storeys would strengthen the quality and consistency of the built form result.

Eastern Interface

14. The setback as set in Standard B17 in Clause 55 of the Planning Scheme is achieved in either option presented in the Report and would be supported. The 5.5-metre-wide rear (landscape) setback would be preferable from a residential noise interface, however noting that Standard

B17 would be the minimum requirement based on policy and precedent.

Southern Interface

15. The setback provided by the overshadowing control would be supported, however a more positive ground level interface than that suggested by the cross section (currently indicating 'rear loaded' townhouses or apartments) would be preferred.

2.4.2 Internal Interfaces

New Internal Streets

The report proposes a 3-storey commercial street wall height and a 4-storey residential street wall height. Internal to the site, a 2.0-3.0m deep Articulation Zone to the facade of all new buildings has been proposed. Taller built forms are to be set back a minimum of 3.0 metres from the street facade of the podium level. A further setback to all new internal buildings on the north side of North Drive and South Drive would likely eliminate shadows between 11am and 2pm on September 21 on the footpath on the southern side of the streets.

Recommendations:

16. The height and setback arrangements as proposed in the Report are supported as they provide an appropriate scale to the width of streets that are proposed, and would provide continuity of the street wall heights established along East Boundary Road and North Road (as proposed in Recommendation 12 above) – approximately 4 storeys or 13.0 metres.

2.4.3 Maximum Building Height

North Road Building Envelopes

The report establishes a maximum building height of 4-6 storeys, with no required setback from North Road. Whilst these buildings have no adjacent sensitive uses given the adjacency with Duncan McKinnon Reserve, the proposed heights will be inconsistent with the surrounding built form along North Road. Therefore given the context it is suggested that a form of horizontal articulation would be beneficial in achieving an appropriate built form transition.

East Boundary Road Building Envelopes

The Report establishes a maximum building height of 4 storeys, with no required setback from East Boundary Road. Whilst the scale of East Boundary Road would potentially accommodate this scale, the immediate residential interface, and the internal street interface would suggest a built form transition from 4 storeys to 3 storeys would provide a useful transition and continuity throughout the

Precinct. This could be achieved with setting back the 4th storey by 3.0 meters at the sensitive interfaces within the internal streets to the adjacent existing residential interface.

Virginia Park Building Envelopes

The Report establishes a maximum building height of 3-4 residential storeys, with a 5.5m setback from Virginia Park which is created through the provision of a laneway along the interface with the open space. The report shows the majority of shadowing from these buildings will impact the new lane rather than the open space itself meaning the year-round shadow impact to the park will be minimal.

Rear of Dromana Avenue Building Envelopes

The Report establishes a maximum building height of 3 residential storeys, with a minimum 5.5 metre setback from the boundary. This provides a generous setback when compared to Clause 55 provisions for such interfaces, which would apply in this location.

Internal Building Envelopes

The Report establishes a maximum building height of 6-8 'mixed use' storeys with setbacks for solar access to open space and selected footpaths, and a minimum 3.0-metre setback from street walls. A range of building typologies could be accommodated with these proposed heights and setbacks which would support a mix of uses and dwelling types.

Recommendations:

The overall heights proposed for the Precinct are generally supported, however a more fine-grained analysis of the context would suggest additional setbacks would be required as detailed below.

North Road Building Envelopes

17. Further description of the local context, relevant precedents, and recent Glen Eira City Council design guidelines would support a 3.0-metre setback to built forms taller than 3 storeys. A maximum overall height of 6 storeys can likely be accommodated given the interface with the Duncan Mackinnon Reserve on the north side of the street.

East Boundary Road Building Envelopes

18. Further description of the local context, relevant precedents, and recent Glen Eira Council design guidelines would support a 3.0-metre setback to built form taller than 3 storeys. A maximum overall height of 4 storeys can be accommodated, which would respect the residential interface on the opposite side of the street.

Virginia Park Building Envelopes

19. Protection of Virginia Park from overshadowing is of highest priority along these parcels. Limiting overall height to a maximum of 4 storeys with a 5.5-metre laneway is appropriate to

provide further protection of the open space from overshadowing during the winter solstice.

Rear of Dromana Avenue Building Envelopes

20. The existing residential context would support no more than 3-storeys in this location as is proposed in the Report. Reference to the existing controls of Clause 55 within the Planning Scheme could be included to substantiate the built form response in this instance.

Internal Building Envelopes

21. Recent adoption of Glen Eira City Council's Quality Design Guidelines would suggest that a maximum 8 storey built form on a strategic site is generally acceptable. More localised development issues that would require testing include:

- Views of the development from adjacent properties - Visual impact will generally be mitigated by smaller built forms proposed along the east, west and south interface, assuming the proposed road alignments contained within the master plan are maintained.
- Views of the development from surrounding open spaces – Further testing is required to ensure adequate solar access and interface design is proposed.
- Views of the development from streets that approach the Precinct (namely Molden Street, George Street and Garden Road).
- The effect of Standards in Clause 58 on the location and disposition of taller built forms.

2.5 Precincts and Mix

Chapter 5 indicates six proposed precincts within the draft masterplan. Both residential and non-residential uses are assigned to each precinct. This is followed by a vision statement and brief description of the proposed employment and housing mix.

Whilst supported in the final form, there is a lack of reasoning provided for the location and makeup of each precinct and land use.

The report puts forth vision statements for the ‘employment mix’ and ‘housing mix’. These statements are useful in determining key objectives for the site, however further narrative for the vision for the whole precinct and the role of each individual precinct would be beneficial for the report.



Figure 40. Precincts Map

The Precincts Map in the Report (pg 30) provides a description rather than an explanation of the rationale behind this arrangement.

Recommendations:

22. The description of the *sub-precincts* should be introduced in the Draft Masterplan section as the description of the layout of land uses and built form outcomes is vital.
23. The Report should highlight the reason for urban morphology of the site based on the new *sub-precincts*, ie how current site layout and surrounding urban form has influenced the role, use and scale of each *sub-precinct*.

Tips:

- Description of the relationship and interface of each *sub-precinct* to both adjacent properties and internal *sub-precincts* would assist in illustrating the rationale and benefits of the land use mix and arrangement.

2.6 Innovation and Placemaking

Chapter six commences with a description of Innovation Precincts and knowledge-based urban developments. In the description it is noted that these types of developments are compact and public transport oriented, and also proximate to other similar centres. Whilst the notion is supported, further description of these key elements, which can be challenged from a contextual analysis point of view, is required.

Further to this, principles for place making to support innovation precincts in new developments have been highlighted. These include:

- Creative Innovation Culture
- Proximities and Connections
- Diversity and Mix
- Showcase Innovation
- Share Spaces and Places

To demonstrate the potential of place making principles a proposed scenario has been illustrated. This highlights articulation of facades, activation of roof spaces, inclusion of street trees, extensive landscaping and activation of large open spaces with event spaces and play areas etc. The approach is supported, however a more in-depth explanation of where these principles could be implemented on site is required. These principles could also be applied to describe the contribution of the project to the broader surrounding, ie place making on a neighbourhood scale as well as precinct scale.

Recommendation:

24. Application of the placemaking principles to the Precinct would allow improved understanding of the value and relevance to the Masterplan and subsequent development applications that it will accommodate. In particular, it should include a description of:

- Proximity to other similar centres,
- The transport and movement potential of the Precinct,
- The areas or sub-precincts where these principles could be included, and
- How the Precinct can contribute to the surrounding area and community.

2.7 Urban Design Principles

Chapter 7.0 of the Report outlines the urban development principles for East Village, however a more succinct and focused set of principles would help structure and develop the directions that are proposed.

Recommendation:

25. The following principles could establish a starting point for how the built form for the Precinct should be structured and developed:

Tips:

- *Create memorable, safe and inviting places by encouraging built form interfaces which allow for high quality urban design responses.*
 - This supports the application of existing street wall heights present in adjacent and nearby commercial areas along East Boundary Road and North Road to the Precinct's street frontages.
- *Provide generous provision of shade canopy along key streets and walking networks within the site and at its edges*
 - This supports the application of street setbacks to existing and new streets that accommodate landscape and pedestrian paths in line with current Planning Scheme and Council standards.
- *Encourage consistent building height and street proportions such that there is an enhanced user experience*
 - This supports building heights which have a reasonable height transition to existing built form at the Precinct's interface.
- *Ensure building setbacks reduce the overshadowing of public open spaces.*
 - This supports the application of the current overshadowing standards to Virginia Park, the new town park and the extension to Marlborough Street Reserve.
- *Locate lower rise finer grain housing towards adjoining residential interfaces and away from main road frontages*
 - This supports the location of residential built forms away from East Boundary Road and North Road

3.0 Other Recommendations

On review of the overall document, the built form outcomes are generally supported. However, improving the narrative of the design rationale is required to ensure a rigorous design response.

3.1 Report Structure

As stated in section 3.2, the report would benefit from a reorganisation to better communicate the assumptions and describe the vision for the precinct before providing the detail of the master plan concept (and as part of that the built form response).

This would include chapters organised in the following manner:

1. Introduction
2. Context
 - Policy Context – including Strategic Context, SPPF, LPPF and Zones and Overlay Controls
 - Local Context – including Land use, Employment, Retail and Services, Educational and Community Facilities, Recreational Facilities, Movement Network and Residential Character
 - Site Context – including Site Access, Built Form, On-site infrastructure, Topography and vegetation, Interfaces with surrounding neighbourhoods
3. Precedent Projects and Case Study Analysis
4. Design Response
 - 4.1. Project Vision
 - 4.2. Conceptual Masterplan
 - 4.3. Precincts and Land Use (Including Housing and Employment)
 - 4.4. Heights Analysis
 - 4.5. Built form Analysis
 - 4.6. Solar Analysis
 - 4.7. Interface strategies
5. Recommended Urban Design Principles
6. Place making Strategies

A restructure would enable a more transparent understanding of how the heights and setbacks have been derived and assist communication of the limits of any proposal. This will ultimately assist both in providing more clarity for the council planning team to make assessments of development proposals and ensure that community expectations can be managed more effectively.

3.2 Design Response

The report would greatly benefit from a description of the design response describing the proposed urban form and morphology relative to the site context. This would be a conceptual step between analysis and masterplan describing key elements of the design and creating criteria on which the success of the conceptual masterplan can be assessed.

3.3 Master plan

Whilst not the focus of this review, a number of important elements of the master plan will potentially impact the built form outcomes and its realisation.

- Drainage – the accommodation of storm water management will need to be accommodated on site and is not directly dealt with within the Report. This may be dealt with elsewhere but could create a constraint to the envisaged master plan.
- Street interfaces – accommodation of existing vehicle lanes, and aspirational bicycle lanes, pedestrian paths and landscaping within the road reservation may be difficult to achieve. Additional space may be required along East Boundary Road and North Road and further space needed for proposed intersections due to increased traffic movements.
- Potential for roadside and central median street tree improvements that would improve visual and microclimate amenity.
- Street cross sections – accommodation of vehicle lanes, bicycle lanes, pedestrian paths and landscape within the new internal street road reservation.

We note that the street cross sections within the report have been superseded by VPA cross sections issued 13 February 2018 which we assume have been adopted.

4.0 Summary

Our review suggests a more rigorous approach to the background context analysis and further articulation of the design response is required to support the design proposal. In general, this review supports the built form outcome pending further justification.

Key findings of this review are:

- Some undescribed assumptions have been made between analysis and design proposal.
- A clear design response has not been articulated.
- The report structure requires reordering to support the narrative.
- The Glen Eira Quality Design Guidelines and the Urban Design Guidelines of Victoria have not been referred to, however will play a significant role in the justification of the project. Particularly the 6-8 storey height limits proposed for mixed use developments on strategic sites.
- Inconsistencies exist between the built form plan and the sections.
- Proposed sections do not provide best practice design for streetscapes. Of concern is that footpaths do not meet existing Planning Scheme and DDA requirements.
- Description of street wall heights lacks contextual justification. Reference to the heights at the Glen Eira Sports and Aquatic Centre (GESAC) on Boundary Rd and local strip shops on North Road would support this response.
- Description of the land use mix and community contribution of the site to the surrounding area requires further articulation
- Description of strategic site access and transport links around the site require further articulation