

SATTERLEY PTY LTD SUBMISSION TO LINDUM VALE PSP EXHIBITION

OCTOBER 2017



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Satterley is generally supportive of the PSP and associated documentation as exhibited. Our submission focuses upon the following issues which we seek to discuss in further detail with relevant authorities and parties:

1. We have provided a table of queries and corrections in relation to the exhibited documentation.
2. We seek further clarity in relation to the designation of trees for retention and removal in the exhibited documentation which is unclear due to the non-standard categories included.
3. We have provided a Surface/Storm Water Management Strategy which sets out a different vision to that contained within the PSP. We believe this will achieve an improved outcome for the future community for a variety of reasons, particular in relation to the interface with the existing properties to the east.
4. Further to the above, an excessive amount of land has been identified as encumbered for drainage and landscape purposes which requires review.
5. We do not support the interurban break area as proposed along Mt Ridley Road given the designation of the PSP area for urban development. More broadly, we consider there is an over provision of open space within the PSP area which is not distributed equitably.
6. We seek for the inclusion of part of the Boulevard Connector Road network as in ICP project given its strategic importance to the broader road network.

We continue to progress our masterplan for the landholding and propose to table this with relevant parties to demonstrate its implementation of the Future Urban Structure. However, before tabling this masterplan, we seek confirmation in relation to a number of issues with the exhibited documentation which are set out in this submission. This will enable us to provide a more responsive masterplan which addresses key issues up front rather than drip feeding responses on individual issues.

To this end we request that our submission be treated as a "placeholder" submission with regard to the areas of clarification that we have requested and accordingly we reserve our right to lodge further material, including our masterplan, in the future. Our priority is to resolve these issues in a timely manner so seek your co-operation and equally those of other parties to do so.

1 INTRODUCTION

Satterley Property Group Pty Ltd (Satterley) acts on behalf of Satterley Mickleham Pty Ltd in relation to properties 1 and 2 of the Lindum Vale Precinct Structure Plan (PSP), being 1960 and 2040 Mickleham Road, Mickleham. The site comprises the majority of the land subject to Hume Planning Scheme Amendment C205.

The above mentioned properties adjoin a property owned by Satterley Mickleham Pty Ltd at 2090 Mickleham Road which has subdivision approval for 700 lots in accordance with planning permit P20186.

Properties 1 and 2 of the Lindum Vale PSP will be an extension of the development at 2090 Mickleham Road.

Satterley engaged a project team to undertake an independent review of the Lindum Vale PSP based upon a first principles approach to analysis. Satterley acknowledges that the landholding has been subject to significant analysis in the past which has been based on outcomes driven by the planning controls at the time as well as outcomes driven by proposed changes to the planning controls.

The land has more recently been brought into the Urban Growth Boundary and is designated for urban development. The PSP sets out the vision for future urban development of the land and through Planning Scheme Amendment C205, the planning controls are reshaped to implement this vision. Satterley has a clear vision for the land, which includes the practical retention of the existing landscaping to enhance the natural features of the land. This vision requires balancing a range of objectives which are required to be met as part of delivering an urban development.

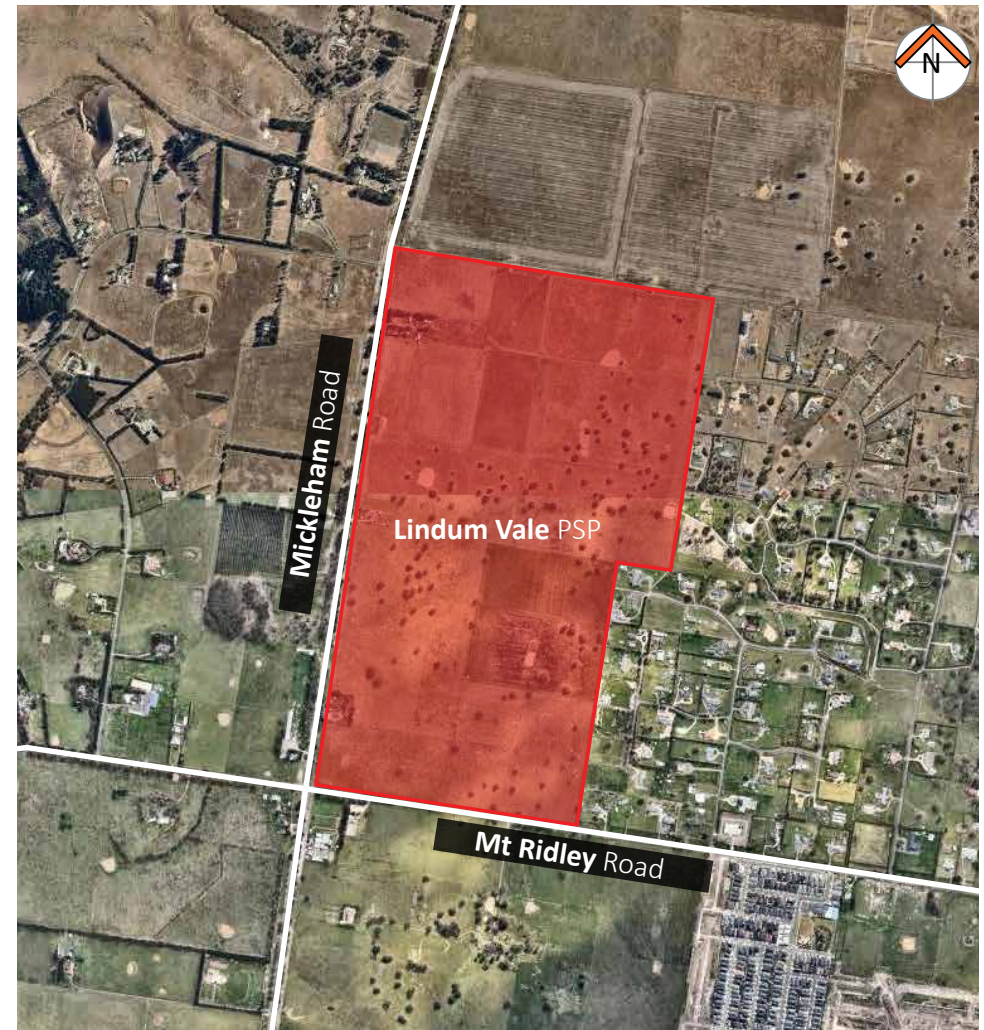


Figure 1: Aerial of the Lindum Vale PSP area

2 SITE ANALYSIS AND WORK UNDERTAKEN TO DATE

The site's defining characteristic is the presence of multiple clusters of trees which provide a woodland character.

Each interface has a different character and will require a specific treatment as follows:

- To the north the site adjoins a transmission easement where it will be preferable to have development facing away from the power lines due to their lower amenity outlook.
- To the east the site adjoins an existing rural-residential estate where it will be preferable to limit the extent of adjoining residential development through the placement of parks and drainage infrastructure.
- To the south is Mt Ridley Road beyond which lies a school and community hall, and which will be developed for residential purposes. A north-south pedestrian and cycle linkage through the PSP to the future sport reserve and conservation reserve to the south is a key linkage required in this location.
- To the west is Mickleham Road, beyond which lies rural land in the Green Wedge Zone.

In order to review the site's opportunities and constraints, Satterley have commissioned the following work in preparing this submission:

- A masterplan prepared by Spiire that illustrates Satterley's vision for the site. As discussed in Section 1, we will complete this and provide it as an addendum to our submission once we have received clarification on other issues.
- A Draft Surface/Storm Water Management Strategy prepared by Alluvium (see attached) that proposes an alternative layout for the drainage assets.
- A review of the native vegetation retention and removal by Biosis. Their advice is attached.
- A review of the road network by Traffix. Their advice is attached.
- A review of the dry stone walls by Ecology and Heritage Partners. Their advice is attached.
- A review of the proposed infrastructure contributions approach by Urban Enterprise. Their advice is attached.

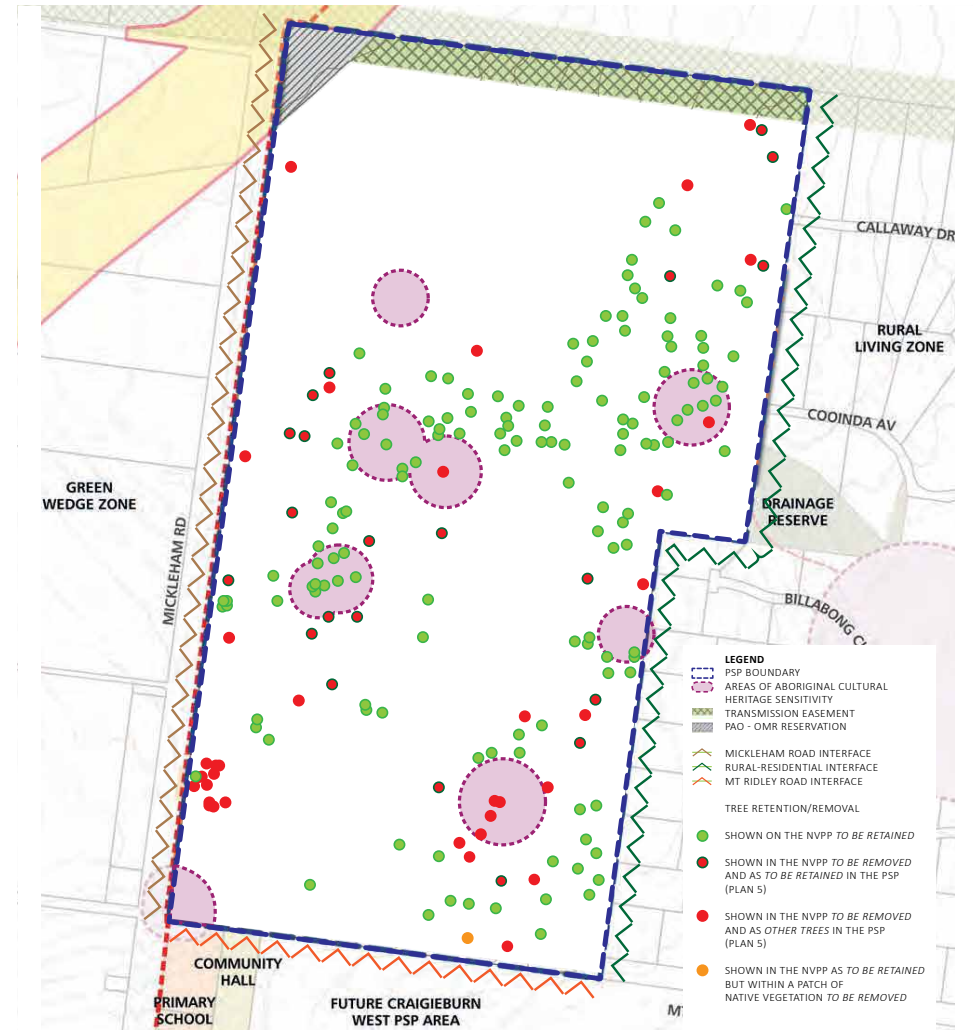
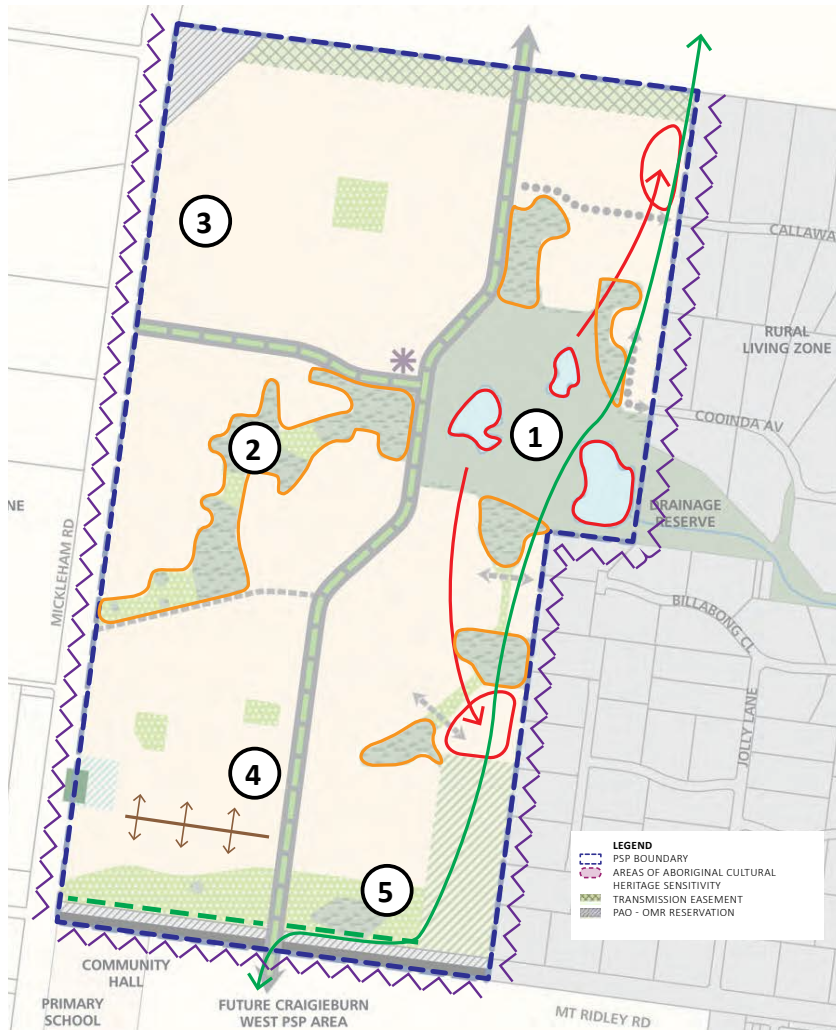


Figure 2: Key Features Plan

3 KEY SUBMISSION MATTERS



1

1) Review the central drainage reserve and relocate some of the drainage assets along the eastern boundary:

- Reduces the excessively large amount of land set aside for drainage purposes.
- Avoids significant earthworks in close proximity to the trees as is proposed in the PSP's centralised stormwater approach.
- Locating the drainage assets along the eastern boundary would also provide an enhanced outcome for the rural-residential land to the east by providing large setbacks between dwellings.
- Strengthens the north-south connections through the site by linking to the conservation reserve and the open space network.

2

3) Retain the native vegetation in reserves which better integrate with urban development:

- Rationalise the extent and boundaries of retained native vegetation by keeping less trees in reserves that have more regular boundaries to allow for frontage roads between development and trees.

3

4) Achieve a density of 16.5 dwellings/nda through efficient development outcomes:

- Requiring undefined 'large lots' along the eastern and southern boundaries will have significant implications for the achievement of the 16.5 dwellings/nda sought in the PSP. Large stretches of low density lots will necessitate the development of significant tracts of medium density development elsewhere, yet this PSP does not contain any of the features normally associated with medium density development (e.g. town centres, schools or active open space) aside from a local convenience centre.
- Rather than large lots, require design guidelines to be prepared for lots adjacent to the southern and eastern boundaries that consider design and landscape treatments.

5

2) Rationalise the open space provision, enhance the north-south connections, and take a contemporary approach to the inter-urban break:

- The PSP proposes an exceptionally high amount of open space, with 8.17% (7.94ha) of credited local parks and an additional 12.43% (12.09ha) of uncredited landscape values land, in addition to the conservation reserve and uncredited 'kickabout' spaces in the drainage reserve.
- Apply a contemporary approach to the outdated inter-urban break by utilising landscaping rather than parkland and setbacks to define the interface.

4

Ensure the retained dry stone walls don't inhibit access:

- Only retain high quality walls subject to permit.
- Allow for breaks in the walls for access.

In order to explain our key submission points, Sections 3.1 to 3.5 address the following:

- Drainage systems
- Retention of trees and vegetation
- Open space network
- Dry stone walls
- Treatment of interfaces

Section 4 discusses the Infrastructure Contributions Plan. Section 5 provides a table of the specific changes we are seeking to various elements of the PSP and Native Vegetation Precinct Plan (NVPP).

3.1 DRAINAGE SYSTEMS

Alluvium have provided the following comments in relation to the design of stormwater drainage in the PSP area (refer also to the attached Draft Surface/Storm Water Management Strategy):

- *The existing outfall constraints and characteristics need to inform the future surface water management strategy for the development of the Lindum Vale PSP. That is the concentrated outflows from the developed catchment should not be allowed to discharge into adjoining residential properties. As a result Alluvium's proposed surface water management strategy will collect, retard and convey all surface flows up to the 100 year ARI event to the existing drainage reserve that interfaces with the development. This would be achieved through the provision of three separate drainage reserves. That is a wetland/basin reserve in the north, a single wetland/basin reserve in the central open space area and a wetland/basin reserve in the south. However the exhibited Lindum Vale PSP only includes provision for a large central drainage reserve, which includes three stormwater quality treatment assets within the significant stand of native trees. This arrangement is not feasible based on the need to provide flood protection to adjoining allotments and the protection of existing trees from excessive earthworks (which contradict R31).*
- *The entire large central reserve as shown on the PSP is not required for drainage purposes and therefore shouldn't be considered as encumbered for drainage reasons. The primary reason for the majority of the reserve is therefore for the preservation of the trees.*
- *It is understood that there is a desire from Council to consider the watering and irrigation needs of the existing vegetation community that has been preserved as part of the PSP process. In particular the on-going source of water to supply sustainable moisture levels for the extensive number of mature trees. Urban stormwater runoff provides a potential source of supply for future irrigation of the native vegetation. However a "one size fits all approach" is not possible at the Lindum Vale site. The various groups of trees are spread across diverse topographic and subsequently varying hydrologic regimes. For example some trees are located on "high ground" with very little external runoff continuing, whereas others are possibly located within the low point and depression of the existing waterway. As a result*

it would be necessary to identify the key tree locations that may require additional moisture based upon an ecological assessment of the species key hydrologic needs and characteristics. This would then enable options to be considered for the supply of water to meet those ecological needs.

Figures 3 to 5 provide details from Alluvium's Draft Surface/Storm Water Management Strategy.

In addition to the above-mentioned recommendations is requested that land ultimately set aside for drainage purposes is identified on the gazetted zoning plan with an appropriate zone applied, rather than the General Residential Zone.

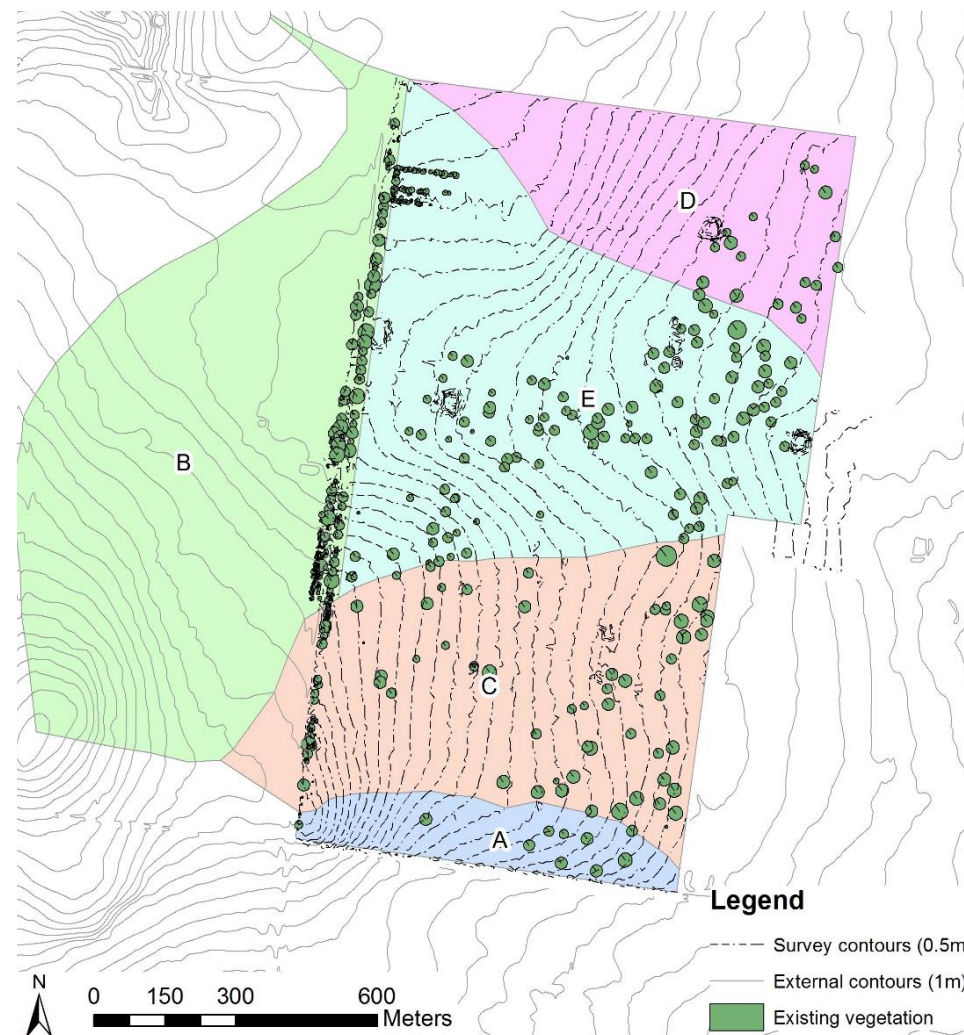


Figure 3: Catchments from Alluvium report

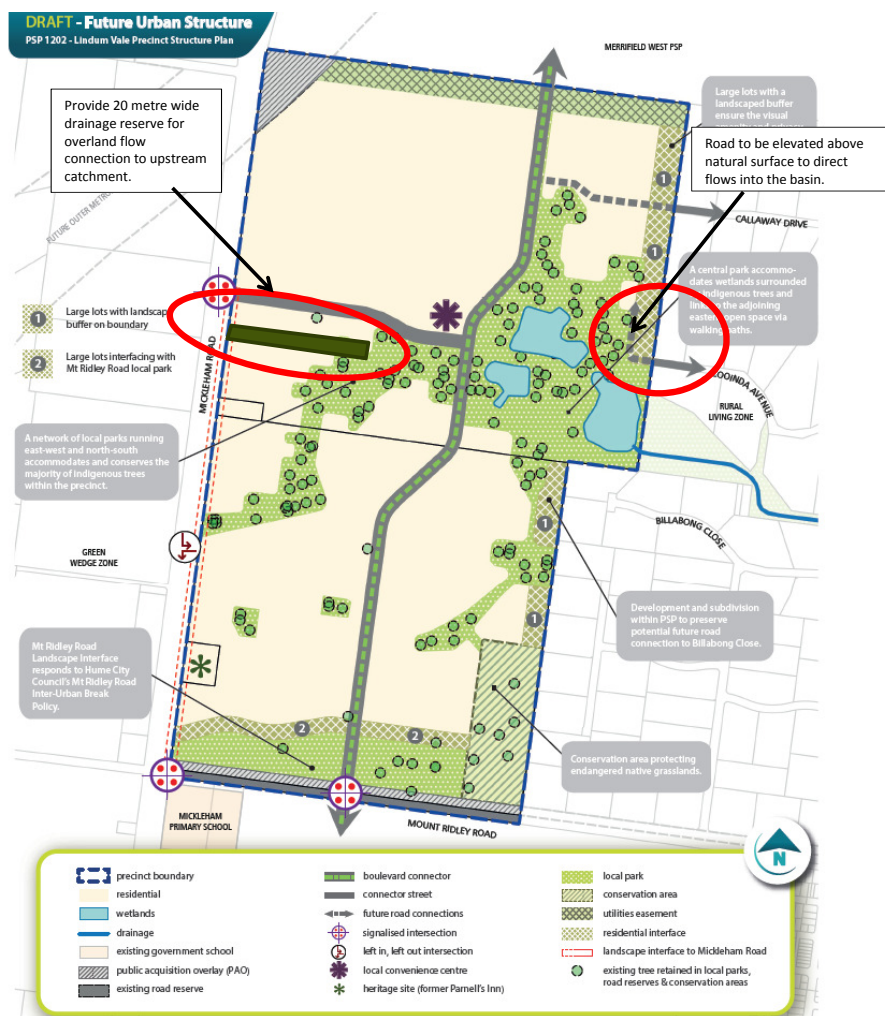


Figure 4: Consultation draft of Future Urban Structure annotated by Alluvium

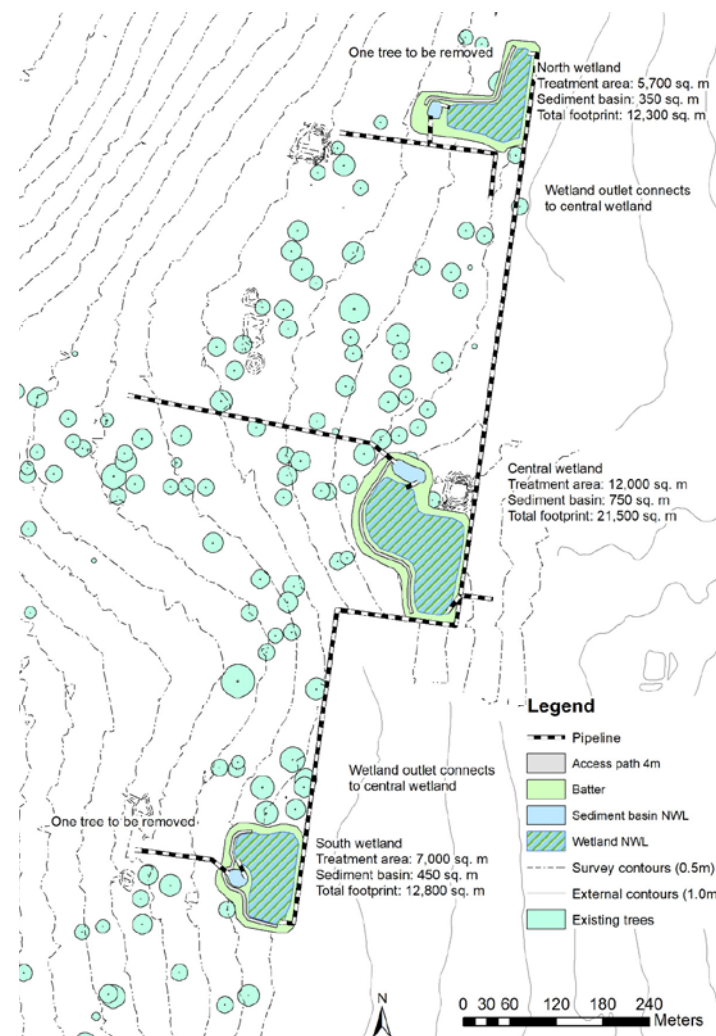


Figure 5: Proposed stormwater strategy from Alluvium report

3.2 RETENTION OF TREES AND VEGETATION

We note that the PSP proposes to retain vegetation as follows:

- In the conservation reserve
- In the drainage reserve
- In local parks
- In land identified for landscape values
- As individual scattered trees identified in the Native Vegetation Precinct Plan
- As individual trees identified in the PSP as "trees retained for landscape values"
- As scarred trees in areas of Aboriginal cultural heritage sensitivity (we note that the locations of these have been redacted in the CHMP)

We query the extent of the tree retention proposed by the PSP given the impacts this will have on the ability to deliver a high quality residential neighbourhood. It is also unclear what the PSP is seeking to achieve in relation to tree retention, with the NVPP showing trees that can be removed, a number of which are shown for retention on Plan 5 of the PSP for landscape purposes. The PSP does not elaborate on the basis on which the "trees retained for landscape value" classification has been nominated; nor is the correlation between these nominations and the tree assessment background report entirely clear. We seek clarification on these matters.

Figure 6 shows the trees classified as follows:

- Trees identified in the NVPP as scattered trees or trees in patches of native vegetation as trees to be retained (143 trees)
- Trees identified in the NVPP as scattered trees or trees in patches of native vegetation as trees to be removed (36 trees)
- Trees identified for removal in the NVPP but identified in the PSP as to be retained for landscape values (21 trees)
- Tree shown for retention in the NVPP but within a patch of native vegetation to be removed (1 tree) - for calculation purposes we have assumed that this is to be retained but seek clarification on this matter

As noted above the locations of the Aboriginal scar trees is not available.

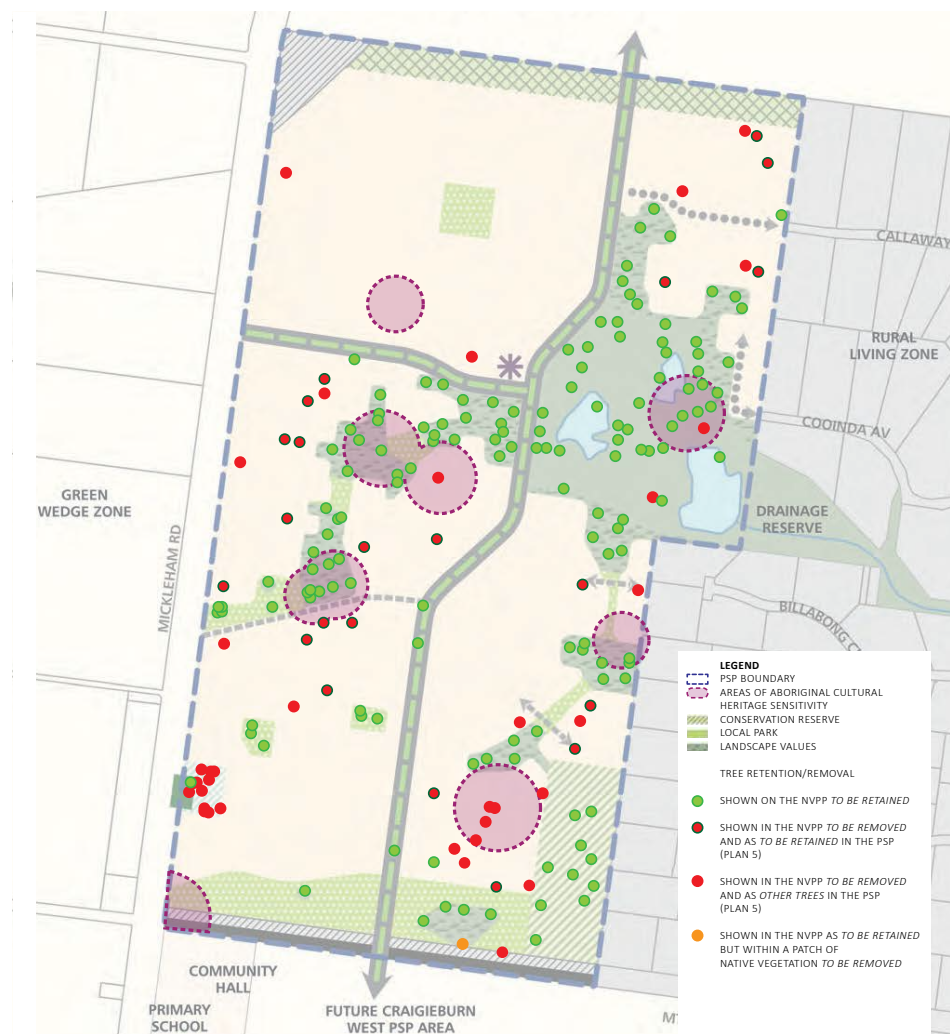


Figure 6: Classification of trees from the PSP and NVPP

Of the 201 trees identified in the NVPP for retention or removal or identified in the PSP as having landscape values, 165 (82%) are identified for retention and we anticipate that this number will be higher when the Aboriginal scar trees are taken into account. We submit that the PSP should reduce the tree retention rate by taking a more pragmatic approach to tree retention.

There are three scattered trees shown for retention in the NVPP that are located within the connector road (trees 25, 90 and 91). These should be shown as scattered trees to be removed.

We agree that the trees identified for retention in the conservation area and the finalised locations of local parks should be kept. However, we have concerns regarding the convoluted boundaries of the landscape values land identified for tree retention purposes. It will be difficult to integrate these with residential blocks, especially given that Guideline G17 states that 'open spaces should have a road frontage to the majority of edges'. In selecting trees and vegetation patches for retention and removal, the PSP should have regard to the need to create practically manageable edges and more regular boundaries to the landscape values land.

We note that Guideline G4 does allow for the consideration of proposals to remove 'trees retained for landscape values' if an explanation can be given as to why removal cannot be avoided. Once trees are nominated for retention in the PSP there will be a presumption that they be retained and it is likely to be difficult to obtain agreement from Council for their removal. We consider that these matters should be more rigorously assessed as part of finalising the PSP, so as to avoid potential disputes in relation to the retention of 'landscape value' trees in the future.

We are also concerned about the impact that retaining so many trees may have on achieving the residential densities required in the PSP. With a minimum density of 16.5 dwellings per net developable hectare being stipulated, retaining multiple trees in uncredited public reserves will require more medium density dwellings to be included to ensure this density is achieved. This PSP does not contain any of the features normally associated with medium density development (e.g. town centres, schools or active open space) aside from a local convenience centre, and it would not be reasonable to expect

future residents to live in medium density dwellings without the usual amenities and facilities associated with these.

The woodland character of the site can still be achieved through the retention of trees in parkland areas with a few additional trees inter-dispersed throughout the residential area. As such we request that the trees shown as "trees retained for landscape value" on Plan 5 of the PSP be relabelled as "trees to potentially be retained for landscape value" in recognition that other matters such as the density of development require consideration as well.

3.3 OPEN SPACE NETWORK

The PSP proposes an exceptionally high amount of open space. As detailed in the Land Budget in Section 2.3 of the PSP, the total provision of all open space is 42.91% of the net developable area. This includes 8.17% (7.94ha) of credited local parks and an additional 12.43% (12.09ha) of uncredited landscape values land, in addition to the conservation reserve and the uncredited 'kickabout' spaces in the drainage reserve.

As detailed in the attached advice from Urban Enterprise, the average in comparable PSPs such as Craigieburn R2 and Merrifield West is 3%, and ASR recommends 4% in the standards they prepared for the VPA. We request that the passive space be reduced from 8.17% to 3% or at the most 4%.

We also submit that the provision of parkland along Mt Ridley Road is not necessary and should be removed and replaced with a landscaped strip adjacent to the road. Parks in this location are not central to the catchments they are intended to serve, and their inclusion is the reason the local park provision is too high.

We understand that this parkland may have been included in the PSP as some homage to the inter-urban break policy that existed in this area before the land in the wider area was included in the UGB in 2012. This policy is not longer of direct relevance to the future planning of this locality.

We seek a contemporary interpretation of the inter-urban break that is defined by landscaping rather than large setbacks from Mt Ridley Road. Our reasoning for this is provided in our analysis on the inter-urban break on the following pages.

Also, it appears that Plan 6 is missing the walkable catchment boundaries. We request that this be clarified so that we can assess this and consider it as part of the preparation of our masterplan.

Inter Urban Break

As outlined in Section 1.2, the PSP is within the area covered by the Inter-Urban Break Strategy which was established over 20 years ago. The inter-urban break comprises land in the 1997 Mt Ridley Local Structure Plan area (shown as low density/rural living) and the remaining western parcels (now identified as the Lindum Vale PSP) shown as future residential land.

The Mt Ridley Local Structure Plan references the inter-urban break at Craigieburn Strategy 1994 as the original framework which guides its preparation. This 1994 Strategy states that the original intention of the Break was to limit the northern residential expansion of Craigieburn. The Break was envisaged to create a buffer between any additional northern developments and to utilise the existing environmental features as part of a broader open space network.

The Hume Planning scheme now describes the roles of the inter-urban break as being to “provide a high quality rural living environment that is relatively self-sufficient in terms of servicing and effluent disposal, and will contain substantial conservation and open space areas” (Clause 21.06-2).

Upon review of the both 1994 and 1997 documents and the current controls contained within Hume's MMS, two main elements arise. These are outlined below and their applicability to current residential development in existing urban areas is discussed.

Lot sizing

Considering the 1997 Structure Plan and the 1994 Strategy, both outline that to achieve the objectives of the Inter Urban Break, development should be low to very low density (1ha-6ha) (1994 Strategy p. 4). This low density development pattern is reflected in the existing subdivision pattern to east of the PSP area.

The Lindum Vale PSP is based on an entirely different design philosophy in that urban development is intended to realise 16.5 dwellings per net developable hectare and lots will be connected to urban services including reticulated sewer.



Figure 7: Inter Urban Break at Craigieburn extents and interface studies key

State Planning Policy encourages *average overall residential densities in the growth areas of a minimum of 15 dwellings per net developable hectare, and over time, seek an overall increase in residential densities to more than 20 dwellings per net developable hectare* (Clause 11.02-3).

Given the objective to efficiently use existing urban land, the PSP is inconsistent with the older IUB policies but is clearly responsive to the updates in planning policy and proposes a minimum average dwelling density of 16.5 dwellings per net developable hectare (Requirement R19). This update to be consistent with State Planning Policy is supported.

Existing interface conditions

The 1997 Structure Plan and the 1994 Strategy contain objectives for “...setbacks, landscaping and the need to create an obviously distinct character from the urban form opposite [south of Mt Ridley Road]” (1994 Strategy p. 4). The documents also call for development “To create a permanent landscape buffer north of Mt.Ridley Road which will provide a variety of landscapes and opportunities for rural residential living whilst conserving and enhancing significant landscape, flora and fauna values.” (1997 Local Structure Plan p. 8).

Figures 8 through to 11 demonstrate that urban development along Mt Ridley Road has essentially failed to implement these objectives to create a conservation or landscape buffer between Craigieburn and development to the north.

The Trillium Estate frontage of Mt Ridley Road (Figure 4 and 5), does not exhibit exceptional landscaping treatment on the south side of Mt Ridley Road with a service road servicing properties facing Mt Ridley Road.

Properties contained within the Inter Urban Break to the north of Mt Ridley Road, contain little to no landscaping, with the only prominent feature being small trees located within the Mt Ridley Road Reserve. These trees are placed within the Mt Ridley Road reserve and depending on the final arterial road layout might be required to be removed.

Property setbacks within the Inter Urban Break within this area range approximately 30-33m with no attempts made through landscaping within private areas to create a buffer from the conventional residential densities south of Mt Ridley Road.

Further eastward, dwelling setbacks on the northern side of Mt Ridley Road do increase in the order of 10-20m. As shown in Figure 8 these increased setbacks within private property have not been utilised to improve the general amenity of the area or achieve the original intention of the inter-urban break to create a conservation landscape buffer.



Figure 8: Existing interface conditions, Mt Ridley Road (28/02/2017)



Figure 9: Existing interface conditions looking west, Mt Ridley Road (02/2014)



Figure 10: Existing interface conditions, Mt Ridley Road (28/02/17)



Figure 11: Existing interface conditions looking east, Mt Ridley Road (02/2014)

Notwithstanding the landscape characteristics, the PSP seeks to revive the idea of an inter-urban break by requiring the creation of a 5.8 ha local park running parallel to Mt Ridley Road reaching perpendicular depths between 45-110m.

This local park sterilises a large amount of land for no demonstrable purpose or effect. There is no similar open space to the east for it to connect and respond to. As outlined in Figures 8 through to 11, the existing large lot residential properties are not significantly set back from their front boundary and provide little if any landscape, conservation or general amenity to the support the objectives of the Inter Urban Break.

We request that the east-west local park running parallel to Mt Ridley Road be removed and that the PSP maintain the existing focus on north-south links that provide open space connectivity linking conservation spaces and natural systems.

In addition focusing on north-south links provides greater open space connectivity with the opportunity to connect into the conservation and potential active open spaces south of Mt Ridley Road (within the Craigieburn West PSP).

The concept plan shown as Figure 12 demonstrates how a green link between Lindum Vale PSP and the Craigieburn West PSP could be established which:

- Retains identified trees by designating the majority into identified parks or conservation areas.
- Joins the two conservation areas and enhances the north south dominance of the open space provision.
- Provides attractive entry into the Craigieburn West PSP
- Will result in the efficient utilisation of land within the Urban Growth Zone.

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3.4 DRY STONE WALLS

The PSP identifies two walls for retention; one along Mickleham Road and another east of Parnells Inn. Ecology and Heritage Partners have investigated these and recommend the following:

- *DSW2-2 and DSW3 are relatively intact and are in fair to excellent condition. Retention of these walls is desirable if a holistic flow of development from north to south is achievable.*
- *DSW2-1 is less intact. It is desirable that this wall is retained and repaired if possible. However, if only part of the overall wall (both segments) can be retained, the retention of DSW2-2 is preferable.*
- *DSW1 (both segments) are in extremely poor condition and intactness. Retention of this wall is not recommended.*



Figure 13: Dry Stone Walls classified by Ecology and Heritage Partners

3.5 TREATMENT OF INTERFACES

The draft PSP proposes specific interface treatments for the eastern, southern and western boundaries of the site. We provide comments on each of these as follows.

Our key concern in relation to the undefined 'large lots' proposed along the eastern and southern boundaries is that these could have a significant impact on the achievement of the 16.5 dwellings per net developable hectare required in the PSP. Large stretches of low density lots will necessitate the development of significant tracts of medium density development elsewhere, yet as discussed previously this PSP does not contain any of the features normally associated with medium density development (e.g. town centres, schools or active open space) aside from a local convenience centre. We submit that the eastern and southern interfaces should be defined by specific landscaping treatments rather than large inefficient lot sizes.

Eastern boundary - interface with rural-residential development

The draft PSP proposes to locate residential development directly adjoining approximately 875m of the eastern boundary. Requirement R18 requires larger lots to be provided along this boundary, and Guideline G7 states that dwellings should achieve a 10m rear setback and 3m side setbacks. We submit that our proposed relocation of the drainage assets would be a more effective method to address the majority of this interface by providing large separations between the boundary and the dwellings.

Requirement R8 also requires development along the eastern boundary to utilise screening vegetation, fencing, landscape buffers, building materials and setbacks to minimise the visual impact. We seek clarification that this would be more effectively dealt with via Memorandum of Common Provisions rather than at the subdivision permit stage.

Southern boundary - interface with Mt Ridley Road

The draft PSP proposes a large park as a direct interface to Mt Ridley Road, and Requirement R18 requires larger lots to be provided along this boundary. Requirement R7 also requires development along this interface to "create an appropriate interface that reflects the natural features of the precinct and softens the visual prominence of

development". As discussed in Section 3.3, we do not agree that a local park is required along the full extent of Mt Ridley Road.

Western boundary - interface with Mickleham Road

The draft PSP requires development along Mickleham Road to "respond to the existing native vegetation interface with appropriate development and built form" (Requirement R6). It also includes a cross section for this interface which identifies the following:

- A 23.6m landscape zone within Mickleham Road reserve with the notes "existing trees in road reserve retained where possible" and "trees and understorey planting within Mickleham Road softens development while maintaining sightlines for passive surveillance". A 3.0m shared path is also included in this zone.
- A 12.0m one way local frontage road within the PSP area. This includes a 1.8m landscaped area adjoining the Mickleham Road reserve with trees shown as straddling the boundary.

We query what the "native vegetation interface" referred to in Requirement R6 is. Biosis have advised that there is limited existing native vegetation along the eastern edge of Mickleham Road, and that it is therefore unclear how it can be enhanced or how the built form can respond to this. We submit that Requirement R6 should be deleted.

We also seek clarification that the landscaping and construction of a shared path in Mickleham Road will be the responsibility of Council and VicRoads. Mickleham Road is outside the boundary of the PSP.

The provision of landscaping along the Mickleham Road boundary is also problematic. There is a Telstra cable located very close to this boundary that will preclude planting. We submit that the interface should show only grassed areas on the 1.8m landscaped area on the western side of the 12.0m frontage road cross section.

4 INFRASTRUCTURE CONTRIBUTION PLAN

We rely on the attached advice from Urban Enterprise and Traffix to support our submission. We request that the following changes be made to the Infrastructure Contributions Plan:

- Reduce the passive open space contribution from 8.7% to 3%.
- Reduce the drainage reserve by adopting the Alluvium design (reducing the area from 12.7ha to 5ha).
- Include the north-south boulevard connector as a short term ICP item as it will serve the broader area.
- Include the apportioned costs of the community centre in Craigieburn West.
- Confirm the apportionment of the costs of the library at 10%.

Taking into account these changes and the consequential increase in the net developable area, this will result in a levy of \$361,646 per net developable hectare.

5 PSP REQUIREMENT AND GUIDELINES - SPECIFIC SUBMISSIONS

Requirement/guideline/plan	Issue	Requested change
Plan 2	Public acquisition overlay along Mt Ridley Road is missing sections.	Add the missing grey hatched public acquisition overlay shading under the area of Aboriginal cultural heritage sensitivity and the grassy eucalypt woodland shading.
Plan 3	The Future Urban Structure should be revised as per our submission.	We will provide a masterplan illustrating our requested changes once we have further clarification on the other matters.
Plan 3	Plans 3, 5 and 8 are inconsistent in regards to classification of the internal road links.	The links from Callaway Drive and Cooina Ave and the links across the linear open space west of Billabong Court and Jolly Lane are shown in different categories on different plans. On Plan 3 some are streets and some are pedestrian/cycle links, on Plan 5 they are all pedestrian/cycle links, and on Plan 8 some are classified as Level 2 local access streets and some as Level 1 access streets). They should all be classified as local access streets on all plans for consistency.
Table 1	Errors in open space measurements	Delete "Heritage Reserve - Post Contact" row, amend "Utilities Easements" from 12.09ha to 4.56ha, amend "Other" from 33.80ha to 12.09ha (or preferably a lower amount as per our other submission points), and amend "Sub-total Service Open Space" to 33.80ha (or preferable a lower amount as per our other submission points).
Plan 5	Plans 3, 5 and 8 are inconsistent in regards to classification of the internal road links.	The links from Callaway Drive and Cooina Ave and the links across the linear open space west of Billabong Court and Jolly Lane are shown in different categories on different plans. On Plan 3 some are streets and some are pedestrian/cycle links, on Plan 5 they are all pedestrian/cycle links, and on Plan 8 some are classified as Level 2 local access streets and some as Level 1 access streets). They should all be classified as local access streets on all plans for consistency.
Plan 5	Too many trees to be retained, resulting in impacts on development densities	Amend the second legend item to "trees <u>to potentially be</u> retained for landscape values" and amend Guideline G4 as detailed below.
Guideline G4	States that the trees labelled as 'trees retained for landscape values' should be retained unless removal cannot be avoided.	Amend to "River Red Gums and Grey Box Trees labelled as 'trees <u>to potentially be</u> retained for landscape value' on Plan 5 should be retained <u>if feasible</u> . A proposal to remove 'trees retained for landscape value' should describe why removal cannot be avoided to the satisfaction of the responsible authority. "

Requirement/guideline/plan	Issue	Requested change
Requirement R6	Refers to retaining an undefined "existing native vegetation interface" along Mickleham Road whereas there is very little native vegetation at present, and refers to "appropriate landscaping and built form".	Delete as there is very little existing native vegetation along Mickleham Road, the PSP boundary excludes Mickleham Road, and it is unclear how built form could respond to this.
Requirement R7	Refers to development along Mt Ridley Road creating an appropriate interface that "reflects the natural features of the precinct", however it is unclear how this could be achieved via built form.	Amend to " Development <u>Landscaping</u> along Mt Ridley Road must create an appropriate interface..."
Requirement R10	Refers to retaining Parnell's Inn on a parcel that contains "appropriate curtilage"	We seek clarification that the curtilage will only involve land on property 3 and will not include any land on property 2.
Guideline G7	Requires large setbacks for dwellings adjoining the eastern boundary which will make achieving a density of 16.5 dwellings per hectare difficult.	Delete Guideline G7.
Guideline G12	This guideline seeks for dry stone walls to be retained in open space, conservation reserves or road verges.	Delete Guideline G12.
Figure 1	The Mickleham Road interface plan shows a shared path and vegetation in the Mickleham Road reserve. We note that this land is outside the area of the PSP. The interface plan also shows trees planted on the property boundary where a Telstra cable is located.	We seek clarification that landscaping within the Mickleham Road boundary will be the responsibility of VicRoads and Council. This land is not inside the PSP. It is not feasible to plant trees on the boundary due to the presence of a Telstra cable. Figure 1 should be amended so that the landscaping between the shared path and the one way road consists of a grassed area with no trees.
Requirement R18	Refers to the provision of "larger lots" along the eastern and southern interfaces	Define "larger lots" as lots over 600 sqm to ensure that there is no expectation that very large lots (e.g. 2,000 sqm) are expected.
Plan 6	Too much landscape values land	Reduce the amount of landscape values land by making smaller areas with regular boundaries.
Plan 6	Requirement R22 refers to walkable catchments on Plan 6 but none are shown.	Add walkable catchments to Plan 6.
Requirement R23	Refers to using encumbered land for recreational opportunities.	We seek clarification that this will not be interpreted as using encumbered land as a quasi-local park with similar levels of public infrastructure.

Requirement/guideline/plan	Issue	Requested change
Requirement R30	Using drainage infrastructure to maximise the viability of River Red Gums	We seek clarification that this refers to the use of WSUD techniques only.
Table 4	Refers to hardstand areas, community gardens etc	Delete first two columns or include a note that these are potential future opportunities, i.e. that developers will not be expected to construct these.
Figure 4	Demonstrates how design is inefficient and not viable, with large tracts of land for uncredited local park functions, and significant earthworks required near the trees	Adopt Satterley's stormwater concept.
Figure 5	It is not clear where the conservation reserve boundary is	The conservation area boundary should be labelled adjacent to the nature strip rather than where the low fence is located. We note that locating shared paths in conservation areas is allowable.
Plan 7	Depicts both an on-road bike land and off-road shared path along the connector roads	Delete the on-road bike lanes from the connector roads.
Plan 7	Depicts an off-road shared path along Mickleham Road	We seek clarification that the construction of this shared path will be the responsibility of VicRoads and Council as it is not located in the PSP.
Plan 8	Plans 3, 5 and 8 are inconsistent in regards to classification of the internal road links.	The links from Callaway Drive and Cooina Ave and the links across the linear open space west of Billabong Court and Jolly Lane are shown in different categories on different plans. On Plan 3 some are streets and some are pedestrian/cycle links, on Plan 5 they are all pedestrian/cycle links, and on Plan 8 some are classified as Level 2 local access streets and some as Level 1 access streets). They should all be classified as local access streets on all plans for consistency.
Requirement R58	Requires the delivery of shared paths on both sides of minor waterways as outlined on Plan 7	Plan 7 does not depict the location of minor waterways so it is unclear what this requirement refers to. We seek the deletion of this bullet point as one shared path is sufficient.
Requirement R60	Lighting along shared, pedestrian and cycle paths	Delete as we understand Council does not want this and neither do we
Plan 9	Stormwater strategy is inefficient	Adopt Alluvium strategy instead
Guideline G36	Using drainage infrastructure to maximise the viability of River Red Gums	We seek clarification that this refers to the use of WSUD techniques only.

Requirement/guideline/plan	Issue	Requested change
Requirement R70	Requires services to be located outside tree protection zones	We understand that encroachments of up to 10% are acceptable, so seek deletion of this. As encroachments of more than 10% would mean that the tree is no longer counted as retained, there is a mechanism to assess this anyway.
Requirement R76	Does not allow for alternative utility designs to be considered if Melbourne Water and Council are agreeable.	Add "or as otherwise agreed with them"
Plan 11	Connector road should be an ICP item.	Add connector road.
Table 6	There are no short term projects and all open space projects are medium term	Amend as follows: <ul style="list-style-type: none"> • IN-01 = change from M to S • IN-03 = change from M to S • LP-01 to LP-10 = change from M to S-M
Connector Street cross section	Inefficient provision of pedestrian and cycle infrastructure.	Delete left pedestrian path, change two way bike path to shared path
NVPP – Map 2	Three scattered trees (25, 90 and 91) shown to be retained are located in the connector road	Show these as to be removed
NVPP – Maps 2 and 3	Tree 1 is shown as to be retained but it is within a path of native vegetation shown for removal and is partially located in PAO	Clarify whether tree 1 is to be removed or retained.
NVPP - Maps 2 and 3	The extent of vegetation shown for retention is excessive and will impact on development outcomes.	Review trees and vegetation patches shown for retention with a view to rationalising these.
GAIC	It is not clear whether the	



**SATTERLEY PTY LTD SUBMISSION TO
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OCTOBER 2017