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Shenstone Park Precinct Structure Plan Amendment C241 to the Whittlesea Planning Scheme

Thank you for the opportunity to make a submission in relation to the Amendment C241 to the Whittlesea Planning Scheme and specifically the draft *Shenstone Park Precinct Structure Plan (PSP)* and supporting planning scheme provisions.

Insight Planning Consultants has been engaged by Lavender Rain Pty Ltd, who are a landowner within the adjacent English Street PSP area, to provide the following submission in response to Amendment C241 to the Whittlesea Planning Scheme. The area of specific interest to our clients is the land between the western edge of the Woody Hill quarry and the railway line.

In general terms, we support the approval of the Shenstone Park PSP and Amendment C241 to the Whittlesea Planning Scheme and note that the 'vision' and 'objectives' are appropriate for a PSP area that has existing land use challenges and will transform over time.

However, we believe that the 'land use distribution' could be improved by revising and further enhancing the employment land opportunity within the precinct.

Importantly, we believe that our requested changes will further improve the PSP's ability to guide change, respond to surrounding development areas and most importantly encourage early investment in this precinct.

This submission relates to the 'Exhibited Documents' that are available on the VPA's website and seeks to outline each issue of concern and propose a requested change that we believe will enhance the deliverability of the PSP.

Site Context

The PSP area is located directly south of the Donnybrook – Woodstock residential PSP area and east of the English Street mixed use residential PSP area. These PSP areas are currently being developed resulting in multiple residential subdivisions being active in immediate proximity to Shenstone Park.

The land to the south is generally within the Northern Quarries area (including potential future treatment plant and conservation area) and the land to the east is currently within the green wedge.

Given the location of existing services and the current development in English Street and along Donnybrook Road, it is envisaged that the residential development within the eastern part of the Shenstone Park PSP area will have access to utility services and commence development relatively quickly after the PSP is approved.

There is an existing operating quarry located centrally (toward the western part of the precinct) that limits the ability for sensitive uses within proximity to the quarry due to potential impacts of rock blasting and other amenity issues.

As such, it is logical that the land within the buffer to the quarry has been identified within the Growth Area Framework Plans and the proposed Future Urban Structure as predominantly employment land.

Vision

Section 2.1 of the PSP outlines the 'Vision' for the precinct.

The Vision envisages the following outcomes (amongst other things):

'...The neighbourhood will be an urban extension to the Donnybrook-Woodstock and English Street areas and will integrate cohesively with these urban neighbourhoods and employment areas to the west to continue the development of the North Growth Corridor.

Shenstone Park will contribute to an employment hub for the north, conveniently served by a train station along a nationally significant railway line, as well as major arterial roads and freeways. Light Industrial and Bulky Goods type employment uses will thrive in this well-connected network and will offer specialised services to the Shenstone Park PSP and complement the other parts of the state significant employment area to the south-west of the PSP area.'

These elements of the 'vision' highlight two key aspects of the precinct. Firstly, that it needs to integrate cohesively with the new urban neighbourhoods and employment areas to the west and secondly, that Shenstone Park will contribute to an employment hub that is serviced by an existing train station.

In understanding these two elements of the vision, it is important to acknowledge that the employment land offering in this part of the northern growth corridor is extensive. To the west of the English Street PSP area is the Craigieburn North Employment Area, Folkstone Employment Area and Merrifield Central Employment Area and to the south west is the Craigieburn South Employment Area and the Cooper Street West area.

These precincts represent thousands of hectares of employment land which overtime will service the employment needs of the northern growth corridor and play a broader role for Melbourne, being located on the Melbourne – Sydney rail and road corridors.

Further north at Beveridge is the Northern Freight PSP area.

These precincts will offer a diverse range of employment land from large scale warehouse / logistics that will benefit from connection to the Hume Hwy and the railway line, to higher density campus style employment within Merrifield Central and Lockerbie which will integrate with surrounding residential areas.

The employment land opportunity for Shenstone Park must capitalize on the proximity to the heavy patronized Donnybrook train station and proximity to significant residential areas along the Donnybrook Road corridor. Being located adjacent to an existing train station provides the precinct with a distinct point of difference that will allow the precinct to attract businesses that can service within the corridor.

Regardless of the existence of the quarry the role of this precinct should not be to support heavy industry (Industrial 1 uses) and it is questionable whether the precinct should support light industry (Industrial 3 uses).

Whilst acknowledging that existing uses must be supported and protected, the 'vision' must focus on the long-term future land use and development of the land up to, and beyond 2050.

Objectives

Following from the comments outlined above regarding the 'Vision', there are multiple 'Objectives' that seem to appropriately consider the existing site context however are not reflected in the Future Urban Structure.

The Shenstone Park PSP area seeks to (amongst other things):

- *'Deliver high quality interfaces between residential, employment land and utilities (including the proposed sewerage treatment plant) to minimise impacts of industrial and commercial uses on residential amenity, and to ensure the viability of industrial and commercial land uses.'* (Objective 3)
- *'To ensure appropriate separation distances between industry/utilities and sensitive uses'* (Objective 9)
- *'Deliver employment land for a variety of sectors through industrial and commercial precincts that allow the continued operation and expansion of the Woody Hill quarry and commencement and expansion of the Phillips Quarry'* (Objective 10)

These objectives clearly acknowledge the need for future industrial, commercial and utility land uses to consider the residential amenity of surrounding areas and ensuring that the continued use and expansion of the quarry operations.

Assuming the Woody Hill quarry boundary, including potential expansion area, is accurately shown on the Precinct Features Plan and expansion of the quarry footprint will be to the east, it appears extremely unusual that the land uses that are located between the quarry and the railway line are identified on the Future Urban Structure Plan as being predominantly industrial and utility facility.

Depending on the exact nature of industry and utility facility land uses, these can have major impacts on the amenity of sensitive uses, including those located within the English Street PSP area, which have commenced development between English Street and the railway line (i.e. immediate proximity).

That is, depending on the nature of the industry / utility use, there may be a need for buffers to be applied that would impact greatly on the approved residential PSP area. For example, buffers apply to the sewerage pump stations and are applied to storage ponds (E.g. Parwan).

Given the above, it is unclear how Objectives 3 and 9 can be achieved if the current land use distribution remains.

Additionally, a change in land use from Industry and utility facility (but not to a sensitive use) will not impact on the operation of the quarry and Objective 10 can still be achieved.

Future Urban Structure

The following outlines how we believe the Future Urban Structure can be enhanced to ensure the vision and objectives of the PSP are achieved and proposed land uses appropriately integrate with surrounding land uses.

Future Urban Structure (Plan 3)

As outlined above, Plan 3 – Future Urban Structure designates the land between the western edge of the Woody Hill quarry and the railway line as Industry and Utility Facility.

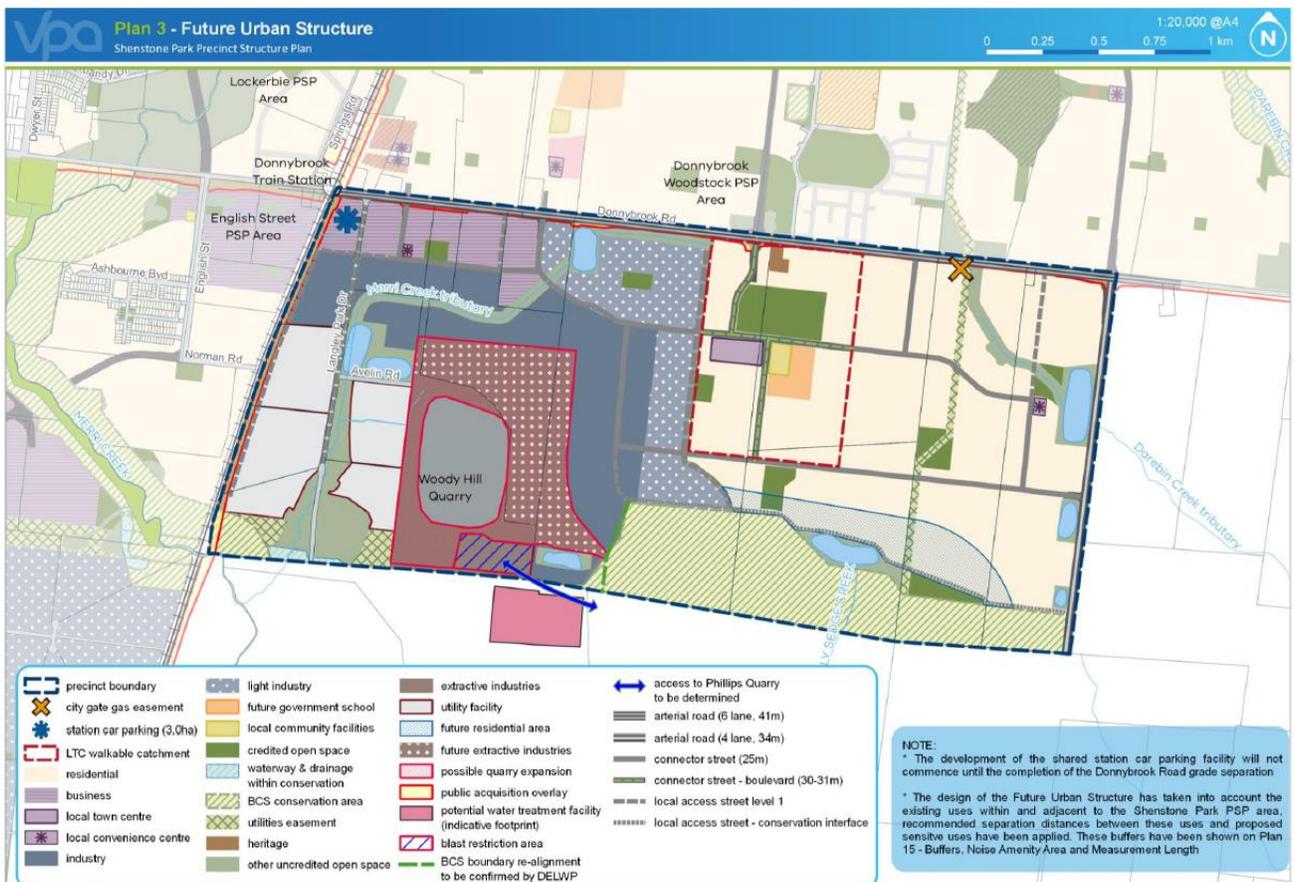
Industry / Utility Facility land uses are likely to be incompatible with sensitive uses. However, residential development is occurring in the English Street PSP area to the west of the railway line and therefore the proposed Industry / Utility Facility land uses should be changed to land uses that are more likely to integrate / interact better with residential.

Given the proximity of this land to the existing Donnybrook train station and the strong strategic planning direction to maximise the number of jobs within areas that have good public transport access, we would recommend that application of the 'Business' land use to the area between the Woody Hill quarry and the railway line.

With appropriate design guidelines (as outlined in Section 3.2.2 of the PSP) this area could be developed in a way that presents appropriately to the residential areas to the west and derives amenity benefit from the proposed waterway corridor that runs along Langley Park Drive and the southern edge of the precinct.

A high amenity business precinct within a walkable catchment of the railway station would provide an employment area with a point of difference when considered in the context of the significant number of employment precincts in this part of the northern growth corridor.

Whilst it is appreciated that designating this area 'Business' is a reasonable increase from what is currently shown, overtime the demand for well-located employment land will grow significantly in line with the population growth in the area. Importantly, the actual development of this land may not be until the quarry is nearing its useful life however the residential areas to the west will not be compromised by the currently proposed short-term uses.



We believe the designation of Business uses in this location will deliver an active and attractive buffer between the quarry and the English Street residential precinct rather than a stagnant passive land use buffer.

In the event that it is absolutely imperative to have a utility facility located in this area, assumingly associated with the potential future waste water treatment plant, it would seem more appropriate that this be located further south in the northern quarries / conservation area where overflow water could be used to some benefit in a location that is away from an existing residential area.

Requested Changes

1. Amend Plan 3 – *Future Urban Structure* to show ‘Business’ (and / or Light Industry) uses extending along the railway line from Donnybrook Road to the southern edge of the PSP area and between the Woody Hill quarry and the railway line.

Walkable Catchment

Plan 3 shows a walkable catchment around the proposed Local Town Centre in the eastern part of the precinct but does not show a walkable catchment to the railway station.

This is a significant omission from the plan as it is important to identify that a large part of the western part of the precinct has easy and direct access to the existing railway station as understanding this existing context should direct consideration of the land uses that are proposed in the Langley Park Drive area, as much as the relationship to the quarry.

Locating higher density employment uses in proximity to public transport is consistent with the State’s 20-minute neighbourhoods policy and is compatible with the existing quarry uses.

Requested Changes

2. Amend Plan 3 – *Future Urban Structure* to include a ‘walkable catchment’ boundary that relates to the railway station.

Schedule 7 to the Urban Growth Zone

The Amendment seeks to insert Schedule 7 to Clause 37.07 Urban Growth Zone into the Planning Scheme. The Schedule relates directly to the implementation of the Shenstone Park PSP and (amongst other things) sets out the Applied Zones that relate to the land use designations within the PSP.

Plan 3 – Future Urban Structure of the PSP (see above) shows that the land use designation along the railway corridor (Langley Park Drive) includes industry, utility facility and business.

Table 1 in Clause 2.2 of the Schedule to the Urban Growth Zone (extract below) outlines the following Applied Zones as they relate to the land uses shown on the Future Urban Structure Plan within the PSP.

In determining whether these Applied Zones are appropriate it is important that the Purpose of each zone is understood in the context of surrounding land uses.

Of particular concern, is the designation of industry and utility facility along this sensitive interface as the Applied Zone for these uses is Industrial 1.

The Purpose of the Industrial 1 zone is:

- *To provide for manufacturing industry, the storage and distribution of goods and associated uses in a manner which does not affect the safety and amenity of local communities.*

The Industrial 1 zone generally accommodates intensive industrial uses and / or uses that include active machinery, a large number of heavy vehicle movements and day and night operations.

These types of uses would not be appropriate adjacent to a residential community.

Additionally, utility facilities of the size shown would usually emit noise and / or odour and pose some risk to sensitive uses and thus, this type of use adjacent a residential community is also inappropriate.

Table 1: Applied zone provisions

Land shown on plan 1 of this schedule	Applied zone provisions
Arterial road	Clause 36.04 - Road Zone - Category 1
Land shown on plan 1 of this schedule	Applied zone provisions
Local town centre and local convenience centre (east)	Clause 34.01 - Commercial 1 Zone
Land shown on plan 1 of this schedule	Applied zone provisions
Industry and utility facility	Clause 33.01 – Industrial 1 Zone
Land shown on plan 1 of this schedule	Applied zone provisions
Light industry	Clause 33.03 - Industrial 3 Zone
Land shown on plan 1 of this schedule	Applied zone provisions
Business and local convenience centre (west)	Clause 34.02 – Commercial 2 Zone
Land shown on plan 1 of this schedule	Applied zone provisions
Residential on a lot wholly within the local town centre walkable catchment	Clause 32.07 - Residential Growth Zone
Land shown on plan 1 of this schedule	Applied zone provisions
All other land	Clause 32.08 - General Residential Zone

Table 1 – Applied Zone Provisions (extract)

Given the likely land use conflicts that will occur between the proposed industry / utility uses and the existing residential uses, it is appropriate to consider alternate land uses (and Applied Zones) between the western edge of the Woody Hill quarry and the railway line.

In other parts of the PSP area, the Future Urban Structure includes Light Industry (Industrial 3 zone) and Business (Commercial 2 zone) in areas between the quarry and residential.

The Industrial 3 zone Purpose includes:

- *To provide for industries and associated uses in specific areas where special consideration of the nature and impacts of industrial uses is required or to avoid inter-industry conflict.*
- *To provide a buffer between the Industrial 1 Zone or Industrial 2 Zone and local communities, which allows for industries and associated uses compatible with the nearby community.*

- *To allow limited retail opportunities including convenience shops, small scale supermarkets and associated shops in appropriate locations.*
- *To ensure that uses do not affect the safety and amenity of adjacent, more sensitive land uses.*

The Purpose of the Industrial 3 zone seems highly appropriate for land adjacent the English Street PSP area.

The Commercial 2 zone Purpose includes:

- *To encourage commercial areas for offices, appropriate manufacturing and industries, bulky goods retailing, other retail uses, and associated business and commercial services.*
- *To ensure that uses do not affect the safety and amenity of adjacent, more sensitive uses.*

The Purpose of the Commercial 2 zone seems highly appropriate for land adjacent the English Street PSP area.

Requested Changes

3. Apply the Commercial 2 and / or Industrial 3 zone to the land located between the western edge of the Woody Hill quarry and the railway line.

Whilst the requested changes in this submission are relatively straight-forward, we believe the overall increase in amenity of the area that will be afforded to residents in the existing English Street PSP and Donnybrook – Woodstock areas will be significant.

Further, the opportunity to create a high amenity employment area within the walkable catchment of the existing train station should not be compromised by designating low density land uses.

We trust that the contents of this submission are clear however we look forward to working closely with the VPA to resolve the issues raised in this submission through the application of the requested changes.

Please contact me on 0433410449 or black@insightplanning.com.au if you have any queries.

Yours sincerely

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