



15 November 2019

Paul Cassidy
Director – Outer Melbourne

Victorian Planning Authority
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Dear Mr Cassidy,

SUBMISSION TO THE SHENSTONE PARK PRECINCT STRUCTURE PLAN – AMENDMENT C241 TO THE WHITTLESEA PLANNING SCHEME

Thank you for the opportunity to provide this submission to the exhibited Shenstone Park Precinct Structure Plan (PSP) and supporting provisions and background documents.

This submission focusses on Property 13, which is to be transferred to Satterley post finalisation of the PSP and associated Scheme Amendment. A plan showing land ownership and interest is provided as an explanation in Attachment A.

It is hoped that upon review of this submission, key matters can be discussed and ultimately resolved with both the Victorian Planning Authority ('VPA') and Whittlesea City Council ('Council') prior to the Panel Hearing.

OVERVIEW AND BACKGROUND

Under the Donnybrook JV, Satterley has a history of strong collaboration with Government in regard to the preparation of the Shenstone Park PSP. Since inception of the Draft PSP by Council in 2016, Satterley has been actively involved in the review of draft background documents, provided input into various Future Urban Structure Plans (FUSP) and has met and negotiated with key government authorities including the VPA and the City of Whittlesea.

Property 13, being 1030 Donnybrook Road, is zoned Urban Growth Zone (UGZ), and subject to a Public Acquisition Overlay (PAO2) which allows for the widening of Donnybrook Road. The site directly abuts the Donnybrook Woodstock PSP and is outlined within the North Growth Corridor Plan as 'Residential' as indicated by Attachment B.

As previously stated, Council in liaison with the VPA initiated the PSP in 2016 with background studies commencing in April 2016. The Draft Shenstone Park PSP was referred to state agencies as part of the 'Agency Consultation' period, which was undertaken in December 2017

Although substantial discussions and meetings had occurred between key landowners and Council, copies of the final 'Draft FUSP' were not provided to Satterley until just prior to formal Exhibition earlier this year in 2019.

We understand that the delay in exhibition was as a result of issues raised by DJPR resulting from the Victorian Governments renewed focus on extractive resources, culminating in the Extractive Resource Strategy, which was released to the public in July 2017.

Satterley have been actively involved in the PSP negotiation process, yet we question why the work undertaken by Council, agencies and landowners in the preparation of a Draft FUSP was set aside and replaced with the current exhibited plan. To this end our submission addresses the current plan but makes reference to items previously raised and supported by Council and the VPA.

SUBMISSION STRUCTURE

This submission is structured into two sections:

1. The PSP Plan – Response to Quarries, Application of Buffers and Employment Land

Satterley Property Group is aligned with the Donnybrook Joint Venture submission – *Amendment C241 to the Whittlesea planning scheme proposed Shenstone park PSP.*

2. Specific Areas of Submission and Clarification

These are areas of submissions that address strategic issues as they impact the subject land. These matters require changes, or a level of flexibility reflected in the PSP to ensure the intended outcomes are realised through the design and development process.

These are discussed under the following headings:

- a. Configuration and approach to land uses
- b. Approach to density and the walkable catchment
- c. Approach to affordable housing implementation
- d. Nomination of heritage site (heritage overlay)
- e. Land uses – Community facilities

1. The PSP Plan – Response to Quarries, Application of Buffers and Employment Land

Following investigations by the relevant State Government departments into quarrying activity and existing/future resources across the northern corridor, the PSP now reflects a significantly increased area of industrial, light industrial and an extended business area along Donnybrook Road.

These uses are based on a possible eastern expansion area of the existing Woody Hill Quarry (WA 492) being a sand/mudstone quarry located within the western portion of the PSP. This quarry is owned and operated by Barro Group, and extraction is currently taking place. The exhibited FUSP and associated background reports refer to the possible expansion area of the quarry to the east but fail to justify the extent of expansion and likelihood of achieving associated approvals. We contend that the previous plan which illustrates a noise buffer to the existing Works Authority area, as identified within both the North Growth Corridor Plan, Northern Quarries Investigation Area (Attachment C) and Draft FUSP as prepared by Council and circulated to all referral authorities, should continue to be supported as the base plan for the application of buffers and employment land in the western portion of the PSP. The exhibited PSP represents a substantial departure from this which has not been justified satisfactorily.

Until such time that the quarry buffer is resolved following a consultative process with relevant parties post-PSP exhibition, DJV and Satterley are of the position that the Future Urban Structure cannot be finalised, particularly the location of the Local Hub.

Also, as the land within the Shenstone Park PSP has been identified long term for residential use, as indicated by the UGZ zoning of the land, any future quarry expansions should be clearly confirmed before being illustrated on the final adopted FUSP and should not impact on future residential capabilities unless approvals have been obtained.

In addition, from a strategic viewpoint, the following matters are also raised:

- Viability of quantum of land nominated for business and employment having regard to the strategic context of the site more broadly and other designated employment precincts across the northern growth corridor.
- Whether the treatment of transition between non-residential and residential land uses is appropriate from an urban design perspective.

Satterley Property Group is supportive of the Donnybrook Joint Venture submission – *Amendment C241 to the Whittlesea planning scheme proposed Shenstone park PSP*.

2. Key Strategic Submission items

Satterley have undertaken a detailed reviewed of the exhibited plan and provide the following submissions to other key strategic matters as they relate to Property 13 land interest:

a. Approach to density and the walkable catchment

Increased residential densities within nominated walkable catchments is supported in principle. It is acknowledged a density target of 25 dwellings/ha is required within the walkable catchment, whilst 17 dwellings/ha is nominated for the balance of the applied area.

Whilst the planning rationale for increased densities within walkable catchments is generally understood, the principle of defining the alignment of a walkable catchment boundary in the PSP through the use of linework is difficult in its application, and will likely create implementation delays at the permit level, for the following reasons:

- Hard and defined boundaries as shown on the PSP will not provide the flexibility required at the permit stage, where urban design nuances might be required as a result of detailed site analysis and master planning. In the case of this PSP, stony knolls and other geotechnical features may impact where density might be delivered thereby requiring flexibility.
- The eastern extent of the PSP will be defined by a drainage line and LCC creating a neighbourhood node. This node could be enhanced by permitting increased densities (and if possible, other land uses) which would facilitate diversity in housing and sense of place.

As such, in the context of this PSP being contained in nature, we question whether walkable catchments are able to reflect all site constraints and instead should be removed and more flexibility provided at the permit stage to achieve diversity across the precinct and density in proximity to key areas of amenity. In this respect, given the constraints, it is questioned whether the applied zone of 'General Residential Zone' (GRZ) achieves the objective of delivering diverse and affordable housing and instead 'Residential Growth Zone' (RGZ) should be applied across the whole precinct to enable greater flexibility of housing diversity within all areas of the PSP, which are in close proximity to the town centre.

Separate to the matter addressed above, where increased densities can be accommodated across the PSP, it has been identified that Requirements and Guidelines within the PSP inhibit the ability to deliver both existing and new/innovative housing product and subdivision design options that will assist in reaching the density targets.

This includes:

- R56 which requires lots with a 7.6m (or less) frontage to be serviced via rear laneway. This approach inhibits innovation in new housing product that will serve to achieve density in appropriate locations and could provide affordable housing outcomes.

What is Sought:

- In the first instance, we request an understanding of the analysis which has informed the walkable catchment.
- **Amend R16** to either remove the walkable catchment or reflect a **flexible** approach to walkable catchments at the permit stage, rather than definite boundaries.
- **Deletion of R56** which inhibits innovative and affordable housing designs currently on the market and which can provide diverse and affordable housing product within the walkable catchment areas of 22 dwellings/ha.
- **Remove** reference to the General Residential Zone and apply only the Residential Growth Zone across the PSP area; to encourage diversity and affordability, having regard to its context and proximity to the town centre and other land uses.

b. Configuration and approach to land uses

The PSP area is unique thanks to its strategic context including proximity to a future station (located to the north-west of the precinct), two well-located arterial roads and diversity of uses both within and external to the precinct. In addition, the PSP presents a number of physical constraints ranging from quarry buffers and visual impacts, high pressure gas pipeline measurement length and other interface considerations such as arterial roads and conservation areas. We therefore see the Requirement and Guidelines of the PSP must support flexibility and diversity in the public realm, particularly in the residential areas which will develop first.

Satterley specifically supports the location of the proposed three way signalised intersection on Donnybrook Road, between two key signalised four-way intersections, providing access to the site and surrounding developments.

However, setting aside our plan-based position, we note that the current exhibited version of the plan presents a number of issues and challenges:

- Diversity in road cross-sections and road alignments which in turn, support the vision of the PSP to contribute to localised, place-making outcomes. Currently the PSP Requirements and Guidelines appear rigid in this regard.
- Whether the high-pressure gas pipeline measurement length has been properly mapped (appears to deflect at an incorrect angle)

What is Sought:

- Satterley supports previous versions of the PSP and submissions by DJV which better balance employment opportunities with residential outcomes and expanded residential uses to the west and provide for a town centre hub.
- **Inclusion** of stronger support for alternative connector road alignments and cross-sections as an important place-making contribution to the residential areas of the PSP.

c. Approach to affordable housing implementation

Being an active land developer across Australia, Satterley is supportive of affordable housing outcomes within greenfield areas. The ability to implement affordable housing outcomes as defined within the Act, however, is important to ensure affordable housing meets Council and the developer's aspirations as well as those required by housing providers and other stakeholders.

Achieving affordable housing in a greenfield context is significantly different to established areas and strategic redevelopment sites, and therefore further clarification is sought from the VPA and Council, as to how this is represented in the PSP and later implemented.

Currently, we understand the PSP implements affordable housing via two Guidelines. The first, G14 requiring affordable housing of up to 10% of Net Developable Area. The second, G15 identifying where affordable housing should be directed, with an emphasis within the walkable catchment.

Without a clear path to understand how affordable housing can be firstly identified and then implemented through the planning permit process, these guidelines cannot be effective.

Given the relative contained nature of the residential component of the PSP area and structural connections to the town centre, affordable housing should be an outcome sought for the whole precinct, not just within walkable catchments

Our comments in relation to affordable housing also align with our previous comments relating to the illogical application of walkable catchments within the PSP area, and whether a defined catchment is appropriate, noting the small scale/contained nature of the PSP area.

What is Sought:

- Explanation of practical implementation of G14 and G15 as to whether provision of affordable housing will be "required" to be delivered (noting expression as a Guideline) and how outcomes are expected to be achieved.
- In the context of the above, explanation of how affordable housing is to be implemented and achieved particularly from Council's perspective.
- An understanding of how/where the 10% cap was derived and how this figure will be negotiated.
- **Amend G15** to delete reference to "walkable catchments" and instead encourage affordable housing across the precinct.
- **Implement** a new Guideline (or other mechanism as appropriate) which allows **and** encourages Council to apply its discretion to other Requirements or Guidelines with the view to facilitate innovative affordable housing outcomes within the PSP area.

d. Nomination of heritage site (HO187)

The exhibited PSP seeks to implement a new heritage overlay (HO187) that proposes to protect this site and its extended curtilage.

Satterley are reviewing this proposal and will make further submissions on this matter at a later date. Satterley consider that the condition of items identified in the heritage study undertaken for the PSP are poor and as such question whether the heritage study adopted a practical position in its assessment having regard to the future urban use of the subject land.

e. Land Uses – Community facilities

The exhibited version of the plan nominates 1.2ha of land for a Community Activity Centre including a neighbourhood house. However, in accordance with ASR Research's community and open space provision ratios, the population levels for Shenstone Park PSP only warrant a community facility of 0.8ha. Nevertheless, Council's Community and Open Space Need Assessment states that:

...no neighbourhood house has been provided within the Donnybrook-Woodstock PSP. It is considered that for the benefit of the Shenstone Park community and as well as some residents of the Donnybrook-Woodstock community that the provision of a neighbourhood house should be made in the Shenstone Park PSP, bringing a total of 1.2ha being required. The lack of demand for these facilities required by the Shenstone Park residents alone will be offset with a demand from adjacent Donnybrook – Woodstock residents.

However, the report also states the following:

Donnybrook-Woodstock is providing eleven permanent maternal and child health rooms (a minimum requirement of three for a population of 46,700, again noting that these rooms are likely to be multi-purpose and readapted for a different use as the community's needs change), as well as flexible maternal and child health room that will also be used for other activities. It is considered that the additional rooms provided within Donnybrook-Woodstock will be able to meet any additional demand generated by Shenstone Park.

Based upon the above, further investigation should be undertaken to confirm that the identified capacity in the community infrastructure in the Donnybrook PSP can be utilised to accommodate the Neighbourhood House proposed in the Shenstone PSP. This will avoid oversupplying floorspace in the Shenstone PSP.

With respect to active open space, 8.45ha of active open space is allocated on the exhibited FUS Plan, which exceeds demand generated by Shenstone Park. Council's community and open space assessment justifies the larger provision on potential need for other "non typical" sports such as softball, baseball etc. However, it also states that "a level

of flexibility will be required to nominate the land for active recreation and to ultimately determine the appropriate open space and land use".

Without clear understanding of the sports envisaged for this reserve and in the context of the Shenstone Park PSP being physically separated by an arterial road and relatively self-contained, it is our position that the active recreation reserve should be reduced to a more standard 8.0ha, which can accommodate a range of active recreation pursuits.

What is sought:

- Reduction of the Community Activity Centre to 0.8ha.
- The Active Open Space to be revised to 8.0ha.

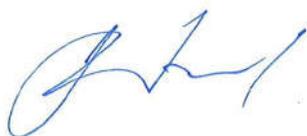
Thank you again for the opportunity to provide this submission to the Shenstone Park PSP process.

We note that this submission objects to the PSP plan, and as such until such time as this is discussed with VPA and Council, we reserve our right to make further detailed submission on the exhibited documents at Panel.

We request a meeting with the VPA and Whittlesea City Council to discuss our submission in further detail which support our key strategic submission items. Satterley also request to be notified and involved in any discussions that may impact upon their landholding following the submission the period and Panel (if required).

Please don't hesitate to contact

Yours sincerely,



Stuart Woodward

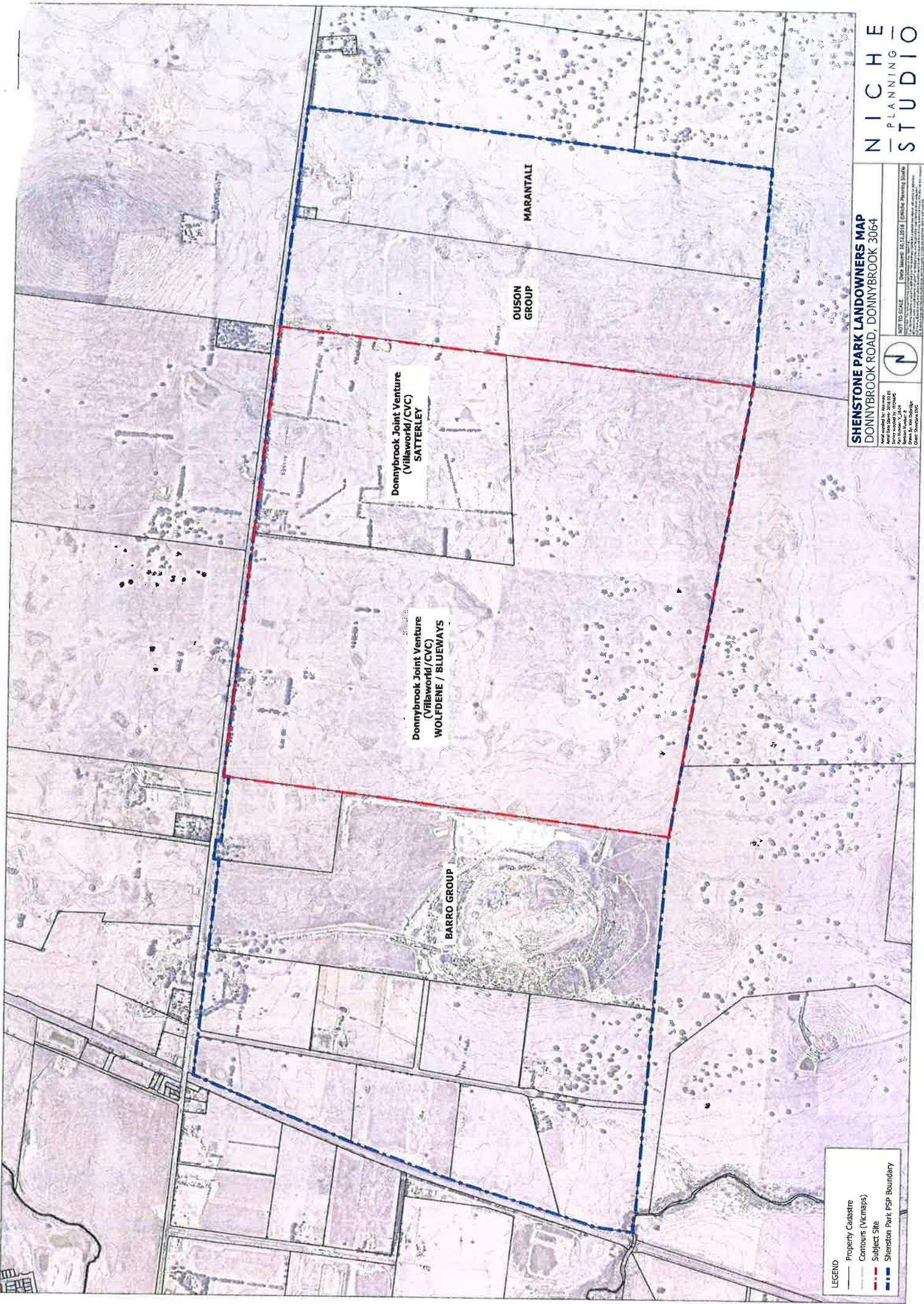
Development Manager

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SHENSTONE PARK LANDOWNERS MAP
DONNYBROOK ROAD, DONNYBROOK 3064

Map prepared by: Niche Planning Studio
Date: 12/12/2013
Map Number: 03
Scale: 1:1000
Drawing Number: 03
Drawing Date: 12/12/2013

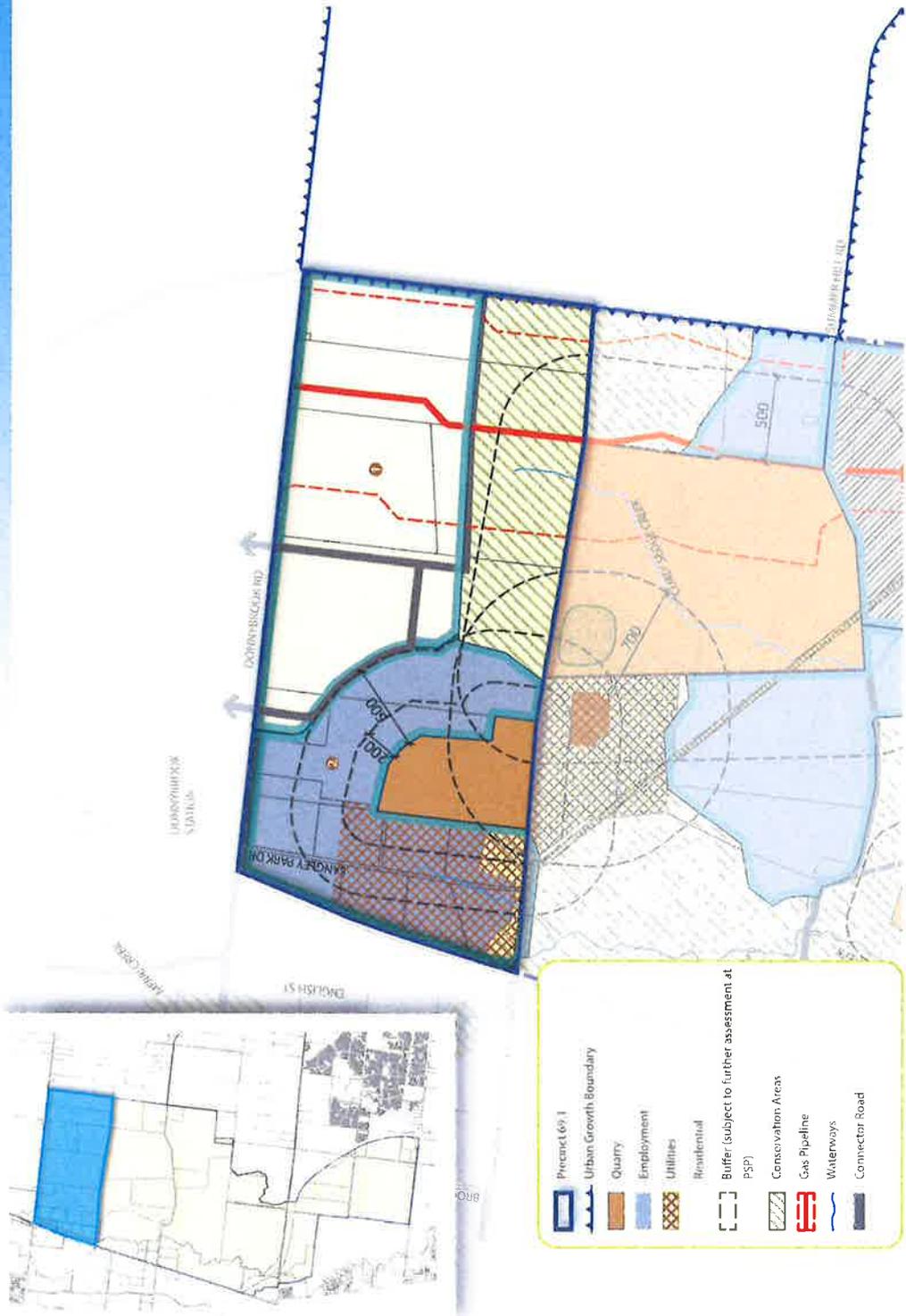


LEGEND

- Property Cadastre
- Contours (Vicmaps)
- Subject Site
- Shenstone Park PSP Boundary

4 Potential Precinct Structure Plan Areas

Plan 4



This addendum provides a sub-regional concept for a future urban structure that seeks to qualify and identify appropriate PSP boundaries to assist in the future planning of the area.

The scale of the NQIA, the context of the underlying and future land uses, the present transport network, as well as barriers to connectivity, determine the need to define explicit areas to assist in the proper and orderly planning of the area.

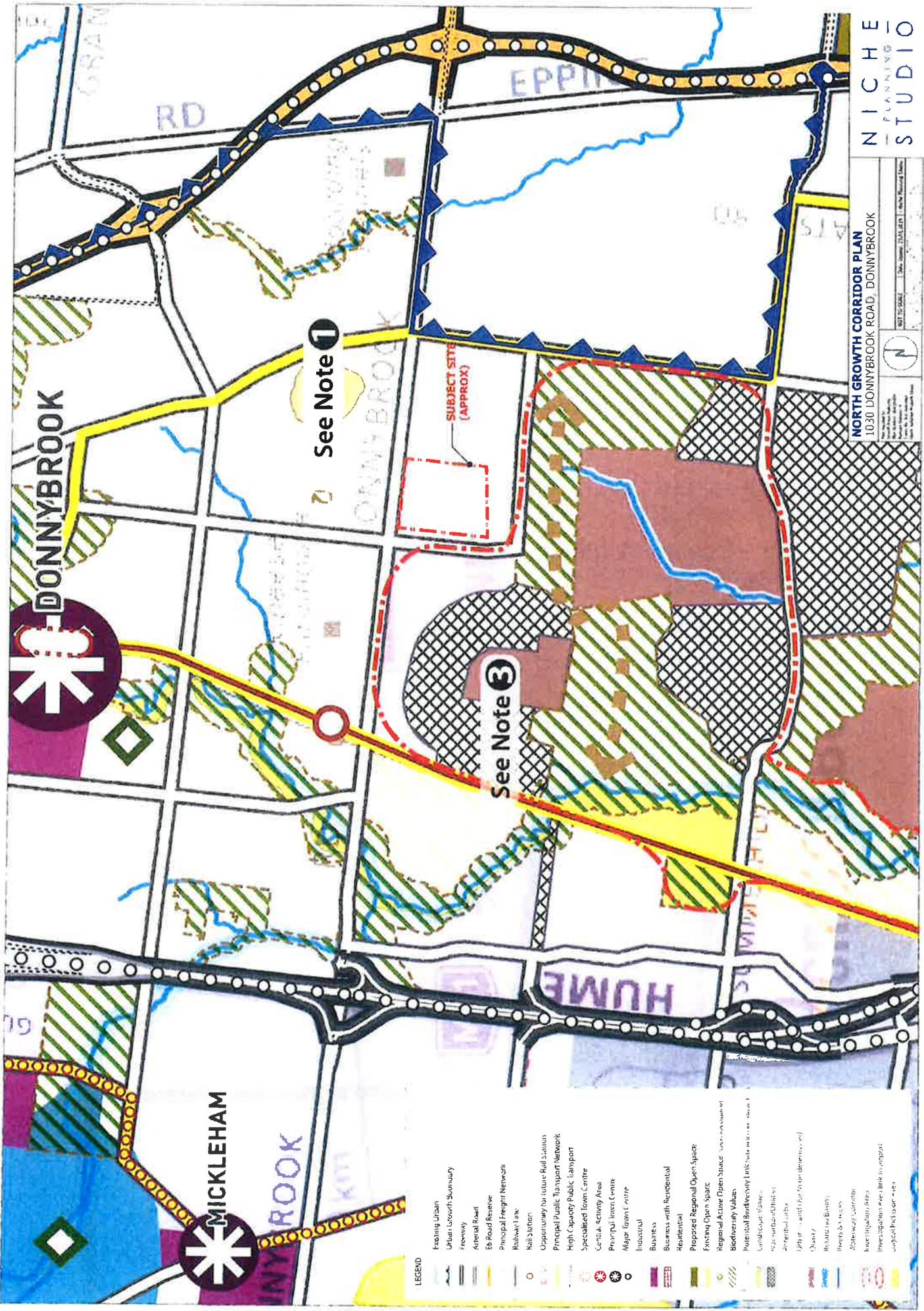
The following PSP areas have been identified for discussion. They aim to ensure the logical and practical implementation of future PSPs with regard to the creation of future urban areas and the provision and delivery of requisite infrastructure. These precincts may be refined over time following detail assessments of potential impacts of proposed and existing utilities and extractive industries.

PSP 69.1

Areas 1 and 2 are proposed to form a single PSP (Plan 4) with a total area of 261 hectares, much of which is non-developable. These areas could create a residential population, integrated with the Donnybrook / Woodstock PSP community to the north. This community is complemented by the employment land surrounding WA 492 that is all reliant upon Donnybrook Road for access. The southern boundary of the PSP is defined by the non-developable land to the south.

NORTH GROWTH CORRIDOR PLAN
1030 DONNYBROOK ROAD, DONNYBROOK

Scale: 1:10,000	Date: 15/01/2024	Author: [Name]
Project: [Name]	Client: [Name]	Location: [Name]



- LEGEND**
- Existing Urban
 - Urban Growth Boundary
 - Freeway
 - Aerial Road
 - Eb Road Reserve
 - Principal Freight Network
 - Railway Line
 - Rail Station
 - Opportunity for future Rail Station
 - Principal Public Transport Network
 - High Capacity Public Transport
 - Specialised Town Centre
 - Central Activity Area
 - Principal Town Centre
 - Major Town Centre
 - Industrial
 - Business
 - Business with Residential
 - Residential
 - Proposed Regional Open Space
 - Existing Open Space
 - Regional Active Open Space
 - Biodiversity Values
 - Potential Biodiversity Linkages
 - Landscaped Space
 - Waterways
 - Other
 - Urban
 - Open Space
 - Waterways
 - Other
 - Investigation Area
 - Other