

29 October 2020

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Via Email : alexandrea.malishev@vpa.vic.gov.au

Dear Alexandra

Re: Submission on behalf of owners at 31-49 Browns Road, Clayton

Further to the VPA's exhibition of the proposed Planning Scheme Amendment C156 in relation to the PMP Printing Precinct, please be advised that I represent the owner of the PMP site and provide the enclosed submission in response to the proposal.

The property is owned by [REDACTED] in its capacity as agent for [REDACTED] in its capacity as trustee of the [REDACTED]

Should you have any questions regarding our submission please direct all queries to [REDACTED] and I will respond on behalf of the new owner.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Affordable Housing

C156 proposes that affordable housing is to be provided at subdivision via a S173 agreement and provide for the delivery of up to ten (10) per cent Affordable Housing by way of one of the following options:

- *Transfer of a land parcel or parcels with the capacity to support the development of 10 per cent of the site's total dwellings as Affordable Housing dwellings, to be provided to a Registered Housing Agency at nil consideration; or*
- *Sale of four per cent of total dwellings as completed dwellings at a 50 per cent discount to the established market value to a Registered Housing Agency for use as Affordable (rental) Housing; or*
- *The gifting of two per cent of total dwellings as Affordable Housing, delivered in the form of completed dwellings gifted to a Registered Housing Agency for use as Affordable (rental) Housing; or*
- *Any other model that achieves ten per cent of total dwellings as Affordable Housing for a minimum 15-year period, on the condition that these dwellings are managed thorough an appropriately regulated management arrangement and the model is subject to the approval of the Responsible Authority.*

The nominated options limit the provision of affordable housing to social housing (ie provided by Housing Association/Provider), and prevents the full application of the Planning & Environment Act definition of affordable housing extending to moderate-income households.

It is recommended that the options for the provision of affordable housing be expanded to contemplate the full spectrum of potential delivery methods and income-bands.

The minimum 15 year period is not supported. Ten years is recommended as more appropriate.

Developable Land

Setback alignments

R6 on the plan requires that the front setbacks of residential development along Browns Road in the north-west corner of the site must align with the adjacent site at 29 Browns Road. This setback is significant, not reflected in the proposed CDP, does not impact on shadowing of the adjacent site to the north and is not considered relevant for the PMP site which is a strategic development site identified for higher density development and capable of supporting a different building typology.

Tree retention

The proposed SDP requires that trees identified as 'high' or 'medium' retention value must be retained or would require a planning permit for removal subject to the satisfaction of the responsible authority. A number of high and medium value trees are shown within the building envelopes of the proposed CDP which misrepresents the building area. It is recommended that the wording be modified to be a guideline.

Overall

CDP is rigid and prescriptive; setting requirements through the use of words such as *must*, *maximum*, and *mandatory* and serve to restrict the precinct's ability to respond to the market over time.

It is recommended that greater flexibility is provided for such a long-term development whereby Guidelines are applied in preference to Requirements to achieve the greatest overall outcomes.

Figure 1



C156 Proposed Plan



Preferred Plan



Alternative Plans


Development Parcel Sizes

In order to provide for a variety of product, minimise the extent of roads and allow the project to respond to the market over the long term flexible development parcel sizes are needed. Parcels should comprise dimensions sufficient to support a variety of building typologies and configurations.

Appropriate development parcel sizes also provide for carparking being incorporated into the building in an integrated way, should basement carparking not be feasible. This is a preferable outcome design treatment of carparking on this site.

The parcel sizes as proposed in C156 limit the design options in portions of the site to townhouses. The objective being to provide for a residential interface, however, this may be achieved in design outcomes and building typologies other than townhouses.

Inclusion of larger, flexible development parcels will also contribute to reducing the extent of roads allowing greater efficiency.

It is recommended that the parcel sizes within the proposed  be reviewed to provide flexibility for the long term by incorporating parcels commensurate with those identified in **Figure 1**.

Development Parcel Heights

As previously outlined, the intent for this precinct is to support the anticipated growth into the future. The delivery of the SRL and associated growth further emphasises the need for flexibility to respond to the market and growth over time.

The use of mandatory restrictions on height is not supported. It is recommended that indicative heights be provided. This also provides for the contemplation of integrated above ground carparking should this be necessary. It should be noted that carparking ratios are not referenced in C156 and this would be preferred.

Public Open Space

The Public Open Space contribution for each land-owner is to be 10% in total. Accepting that this is a greater contribution than generally sought anywhere else within the municipality of Monash, it is pointed out that the POS nominated in the proposed CDP includes more than 10% of the northern 6 hectare site to be contributed by the northern 6 hectare site. This should be revised to more accurately reflect the 10% contribution from this land holding.

It is also recommended that the POS should be re-orientated to maximise the amenity of the space, its access to sunlight, benefit to surrounding dwellings and view lines and pedestrian connections across the site as per **Figure 1** would be greatly enhanced.

The below **Figure 1** demonstrates how the objectives and principles of the precinct can be achieved in a number of ways and supports the application of flexibility and less prescription.

The objectives of the proposed Planning Scheme Amendment C156 are generally supported, being:

- facilitating the transition from industrial uses to a mix of residential, retail and office uses;
- ensuring new development does not unreasonably impact on the amenity of the area;
- encourages high quality urban design and architecture that is environmentally sustainable, responsive to its environs;
- improves local accessibility and permeability through the precinct;
- To create a vibrant, safe, diverse and attractive public environment.

The importance of achieving these objectives is magnified as this site forms part of the future Clayton Suburban Rail Loop (SRL) precinct and the super hub connecting SRL to Bairnsdale and Traralgon lines as well as Pakenham & Cranbourne lines.

The SRL will trigger investment and renewal in the neighbourhoods associated with the new station. The project will enable clusters of jobs and businesses, as well as new quality housing, amenity and services to support the growth.

The development of the PMP site is seeking to provide for the sustained, long-term growth of the precinct. The importance of certainty and flexibility over the long term to achieve the objectives of the precinct cannot be overstated and will be supported by the planning framework put in place for the site.

Certainty by removing third party notice and review rights where development proposals are **generally in accordance** with the intents of the CDP is supported.

Flexibility to allow for responding to the market over the long term is also extremely important. The flexibility sought is particularly in relation to:

- Vehicle and pedestrian connections;
- Development parcel sizes;
- Development parcel heights.

Vehicle & Pedestrian Connections

In order to provide a precinct with significant neighbourhood amenity, the principle of promoting pedestrian connections and **reducing the extent of roads** and vehicle dominance is a priority. This principle also contributes to the reduction of heat island effect.

In order to avoid vehicle 'rat runs', vehicle connections to the east are not supported with limited potential vehicle connections to the southern parcels. Pedestrian connections in all directions are supported.

The principle of minimising crossovers to Browns road and internalising vehicle movements is supported.

Allowing for network designs generally in accordance with these principles is recommended. The PSA as drafted provides for subdivision that is in accordance with the general layout being exempt from notice and review, however, this does not apply to a proposal to move a street, public open space or trail shown on any plan in the CDP. It is recommended that the drafting of this clause be amended to allow for some variation and allow development flexibility.

It is recommended that the vehicle and pedestrian layout within the proposed CDP be reviewed to provide flexibility of the long term by incorporating the network in line with those identified in **Figure 1**.