

1



T +61 3 9095 5000 www.stockland.com

18 December 2020

Mr Stephen Davis Victorian Planning Authority Craigieburn West PSP Level 25, 35 Collins Street MELBOURNE VIC 3000

Via email: amendments@vpa.vic.gov.au

Dear Mr Davis

### RE: STOCKLAND SUBMISSION - CRAIGIEBURN WEST PRECINCT STRUCTURE PLAN (PSP)

We thank the Victorian Planning Authority (VPA) for the opportunity to comment on the Craigieburn West PSP suite of documents, released to the public for consultation in November 2020.

Stockland is one of Australia's largest diversified real estate companies, with a strong presence in Victoria. We have over \$3 billion invested in 45 properties and projects across Victoria and a strong commitment to future investment in the State. We have a proud history of partnering with the VPA, council and key stakeholders to deliver sustainable communities in Victoria, in particular within Craigieburn, through our award-winning Highlands community.

We control 173 hectares of land or approximately 31% of the total area of the Craigieburn West PSP, through our landholdings detailed below (*Attachment A – Stockland Landholdings Plan within the Craigieburn West PSP*). Our vision is to continue to create superior masterplanned community outcomes for our landholdings in the Craigieburn West PSP, that will be an extension of our existing Highlands community.

- Craigieburn West PSP Property 4 1780 Mickleham Road, Mickleham VIC 3064
- Craigieburn West PSP Property 6 1760 Mickleham Road, Mickleham VIC 3064
- Craigieburn West PSP Property 27 640 Craigieburn Road, Mickleham VIC 3064

We commend the VPA in its undertaking of the PSP 2.0 process with the Craigieburn West PSP, and have been pleased to be able to witness first-hand the benefits of this new process. The PSP has been subject to significant consultation with landowners and agencies, and the current PSP at a precinct level demonstrates a land use plan that is logical, sensible and responsive to place based outcomes. We also note that the plan accords with the strategic work of Hume City Council and specifically their Hume Integrated Growth Area Plan (HIGAP).



### 1. Key Matters to Resolve

In relation to Stockland's landholdings, whilst there is general agreement in principle with the distribution and location of the land uses specified, our submission seeks to clarify, refine and improve aspects of the plan to ensure the best outcome for the future community. In this sense we have structured our submission to reflect areas where we submit that there are aspects that need to be resolved prior to the finalisation of the plan. These key matters relate to drainage and the BCS conservation area 29, as detailed below.

### 1.1 Drainage (Aitken Creek DSS)

As we have discussed with both Melbourne Water and the VPA, we believe that there is capacity to significantly improve the current Aitken Creek Drainage Services Scheme (DSS). The DSS is faithfully incorporated as part of the PSP. We also note that the change to the DSS was communicated very late in the PSP review process and did not form part of the PSP 2.0 review session held in 2019, making a detailed review of this significant change quite a burden on the landowners and other stakeholders within the PSP. Nonetheless Stockland have continued to work with Melbourne Water throughout the PSP exhibition period to find a workable solution for all parties as outlined below.

We have undertaken a detailed review of the drainage scheme for the PSP and with the assistance of Breese Pitt Dixon and Alluvium have prepared *Attachment B – Craigieburn West PSP Aitken Creek DSS Stockland Response, December 2020.* This work has previously been provided to Melbourne Water and details the fact that minor changes to the northern catchment can assist the efficiency of the scheme and maintain water quality outcomes as proposed by the initial Melbourne Water DSS. There will also be resultant significant reductions in the cost of acquiring land for, implementing and maintaining this revised drainage scheme. The key changes proposed to the northern catchment are detailed below:

- 1. Consolidation of assets along the eastern boundary, resulting in the removal of sediment basin ACSB 01 and consolidating these drainage requirements into sediment basin ACSB 02; and
- 2. Consolidation of the northern reach of the constructed waterway, CW2 (within 1760 Mickleham Road) with wetland ACWL01 into a single asset.<sup>1</sup>

Further, our proposed solution for the southern catchment, results in the removal of wetland ACWL 04¹ located on 640 Craigieburn Road. Our proposed DSS instead delivers drainage assets at the eastern extent of this drainage catchment, along Aitken Creek. These assets will be controlled by Stockland and will ensure a consolidated and equivalent water quality outcome, that also reduces the cost of acquiring land for, implementing and maintaining the scheme.

What is required: Endorsement of the revised DSS (Attachment B) by Melbourne Water and subsequent translation of this information, including land takes and asset locations into the PSP by the VPA.

<sup>&</sup>lt;sup>1</sup> Specific ID references to wetlands and sediment basins are taken form Table 3 of the draft PSP.



#### 1.2 BCS Conservation Area 29

The PSP has faithfully demonstrated the BCS Conservation Area 29 as outlined in the Biodiversity Conservation Strategy. It is now our understanding that there is agreement between both Hume City Council and the Environmental arm of DELWP to re-examine the boundary alignment of the reserve in order to enable superior environmental outcomes. The boundary re-alignment of the Conservation Reserve will be based on the premise of no net loss of area whilst also ensuring a net positive outcome for environmental outcomes. This will enable a future application to the Federal Environmental Department to endorse and facilitate this change.

We endorse this course of action, noting that the Conservation Reserve will retain the same extent of area, whilst improving environmental outcomes and only affects land within Stockland's control.

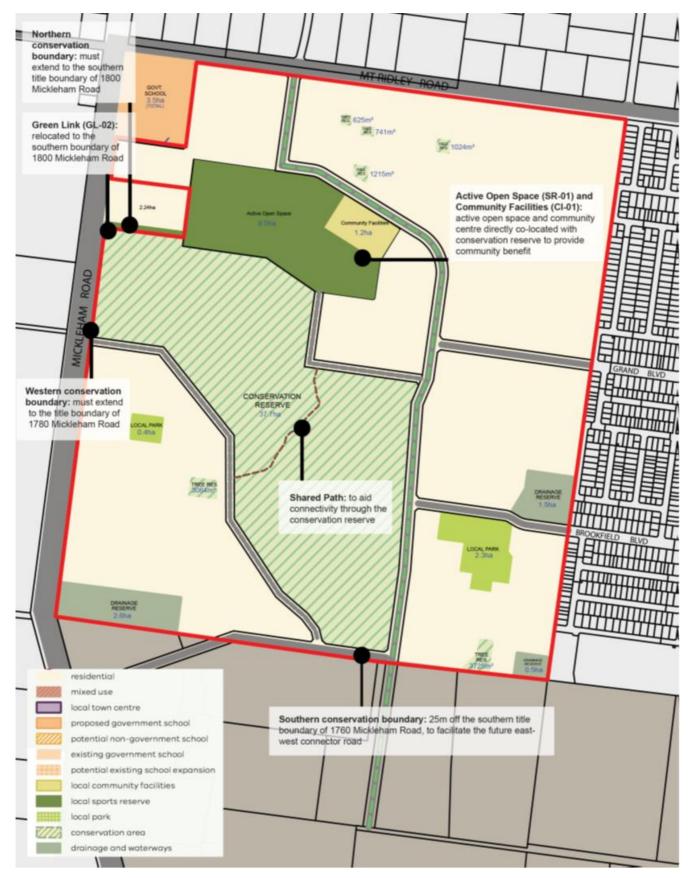
Further, our endorsement of the proposed change to the Conservation Reserve boundary is based on the following:

- That the amended Conservation Reserve boundary is generally in accordance with Stockland's Place Based Plan for 1760 & 1780 Mickleham Road (*Figure 1*).
- Southern conservation boundary must be 25m off the southern title boundary of 1760 Mickleham Road, to facilitate the future east-west connector road.
- Western conservation boundary must extend to the western title boundary of 1780 Mickleham Road.
- Northern conservation boundary must extend to the southern title boundary of 1800 Mickleham Road, where the Conservation Reserve abuts 1800 Mickleham Road.
- That in order to aid connectivity there must be provision to construct at least one shared path connection through the Conservation Reserve (indicatively represented within *Figure 1*).
- The Active Open Space (SR-01) and the Community Centre (CI-01) must be directly co-located with the Conservation Reserve, as shown on Stockland's Place Based Plan for 1760 & 1780 Mickleham Road (Figure 1).
- The BCS boundary amendment cannot delay the approval of the PSP or any subsequent Stockland approvals.

The relocation of the Conservation Reserve allows further consideration of the layout and integration of land uses within Stockland's landholdings. Having examined this (and conditional to our endorsement of the amended boundary of the Conservation Reserve) Stockland requests the subsequent relocation of the Active Open Space Reserve and Council's Community Facility. As detailed on the revised Place Based Plan (*Figure 1*), the relocation of these assets will allow a better and safer connection from the Active Open Space to the Primary School, as well as direct colocation of the future Council facilities with the Conservation Reserve. The capacity to locate the Community Facility directly with the Active Open Space Reserve that is then directly co-located with the Conservation Reserve will provide a superior place based outcome. This will create a unique community asset that provides a significant net community benefit than the separation of uses currently proposed by the PSP.

We consider that the changes as suggested above and outlined in Figure 1 are generally in accordance with the land use outcomes outlined in the draft PSP. We consider that given the improved environmental values assumed by the relocation of the Conservation Reserve and the subsequent co-location of the Active Open Space and Community Centre that the proposed outcomes are superior and provide a greater net community benefit. In addition, the changes as proposed ensure that all land uses are of the same extent and land area and only affect Stockland's landholdings and therefore do not have any negative consequences to other landholders.





**Figure 1:** Proposed Place Based Plan demonstrating Conservation Reserve boundary amendment and subsequent co-location of the Active Open Space and Community Facilities.

What is required: Commitment and acknowledgement of the revised Conservation Reserve boundary and subsequent relocation of the Active Open Space and Community Facility to accommodate a net community benefit as demonstrated in the proposed Place Based Plan (Figure 1).



### 2. Supplementary Matters to Resolve

In addition to the two key matters that require resolution, as detailed within section 1 of this submission, we also have a number of supplementary matters, as detailed below.

### 2.1 Green Links and Open Space

Plan 8: Open Space Plan and Table 5: Credited Open Space Delivery Guide, both specify the requirement for Green Links within 1760 & 1780 Mickleham Road. We submit that these are not required on Stockland's landholdings, as the intent of the Green Links (i.e. GL-01 and GL-03) can be provided within the road network, in addition the land budget set aside for these Green Links can be redistributed to Local Parks where there's greater opportunity to deliver community amenity, such as play spaces and picnic areas.

In addition, we question whether the area and extent of the Local Parks (specifically provided in 1760 & 1780 Mickleham Road) is sufficient to accommodate the Tree Protection Zones (TPZs) to enable the proper retention of the retained trees. Our figures (based on the draft PSP) suggest that to enable sufficient TPZs and to ensure the health and retention of the trees, a much larger area is required than that stipulated and credited by the PSP. This specifically relates to LP-02, LP-03 and LP-04.

In relation to the required land takes for these parks we suggest referring to our revised Place Based Plan (refer to *Figure 1*, above) which specifies the required land take to enable sufficient TPZs to be provided and will ensure the health of the trees in the urban environment. It also specifies the required land take for the trees to be retained in 1780 Mickleham Road parcel once the Active Open Space has been relocated, as detailed within section 1.2 of this submission.

What is required: Proper acknowledgement of the required land take and associated Open Space credit required to retain significant trees within open space network. Direct translation and credit of the required areas for parks associated with tree retention as based on Figure 1, above. Removal of Green Links GL-01 and GL-03.



### 2.2 Bushfire Management - Setback to Woodland Reserve LP-09

Table 4 of the PSP specifies that a 33 metre set back is required to the Woodland Reserve located at 680 Craigieburn Road. Currently the PSP demonstrates a local road interface to the Woodland Reserve that doesn't support the 33 metre separation to development. We submit that a preferred interface would instead be to realign the north-south connector road and have this road directly interface to the Woodland Reserve.

Figure 2 below demonstrates the preferred re-alignment of this road. We consider this will provide a better place making outcome that enables greater pedestrian and cycle mobility to the Woodland Reserve, will deliver a more cohesive, direct and logical street network, can be provided without the removal of additional trees and while not compromising the required traffic management outcomes and spacing for signals along Craigieburn Road.



**Figure 2:** Realignment of the north-south connector road, to facilitate direct interface the Woodland Reserve, Craigieburn Road.

**What is required:** Realignment of the north-south connector road to align with the eastern boundary of the Woodland Reserve (LP-09).



#### 2.3 Sufficient Acknowledgement of Left-in Left-out access to Mickleham Road

We request that the PSP provides clear recognition and acknowledgement of the need to have regular left-in left-out intersections to Mickleham Road.

What is required: Clearly annotate Plan 5 – Transport Plan the requirement for a minimum of two left-in left-out intersections to Mickleham Road between the southern boundary of 1760 Mickleham Road and the northern boundary of 1780 Mickleham Road and any such intersections are to be included as fully funded ICP items.

### 2.4 Active and Community Provision discrepancy from Lindum Vale PSP

We note the Lindum Vale PSP (located to the north) allocated and will contribute 50% of funds for the delivery of an 8.0 hectare Active Open Space Reserve and a 0.8 hectare Community Facility in Craigieburn West. Despite this, the areas now required in the Craigieburn West PSP for the northern Active Open Space and Community Facility are 9.5 hectares and 1.2 hectares, respectively.

What is required: Review and clear justification (including supporting evidence of sufficient funding from the Lindum Vale PSP) for the additional 1.5 hectares and 0.4 hectares required for the northern Active Open Space (SR-01) and Community Facility (CI-01), respectively.

### 2.5 Future Infrastructure Contributions Plan (ICP) and Capacity to Reduce Contributions

The suite of PSP documents does not include an Infrastructure Contributions Plan (ICP). We are satisfied that the preparation of such a document can occur subsequent to the PSP being approved. Craigieburn West is the completion of an existing area and in many ways is an infill precinct. This is reflected by the fact that there are no arterial roads within the precinct (Mickleham Road being to the west and a VicRoads arterial). Further, the community infrastructure required to deliver the precinct is somewhat less than a standalone growth area precinct. As a result of this unique scenario, we consider that the scale of contributions foreshadowed by a standard ICP are beyond what is required to facilitate the necessary infrastructure as outlined in the PSP. Our estimates suggest (based on the ICP 2020-1 rates) that there will be somewhere in the order of \$37.7 million collected for *Community and Recreation Construction* and \$52.5 million collected for *Transport Construction*.

The PSP foreshadows 7 (no.) arterial road intersections, 2 (no.) Active Sports Fields and 2 (no.) Community Facilities. Our estimates suggests that even assuming \$4 million for each intersection (totalling \$28 million) that there will be an excess \$24.5 million in Transport Construction.

Similarly assuming \$8 million for each Active Open Space improvement and \$5 million for each Community Facility, there will be an excess of \$11.7 million for Community and Recreation Construction.<sup>2</sup>

Given the unique nature of the precinct and fact that reducing the ICP will have a direct benefit to housing affordability, we suggest that future ICP should consider reducing the standard ICP rate, whilst still ensuring sufficient funds are collected to deliver necessary local infrastructure for the future community.

**What is required:** Confirmation and acknowledgement that the VPA will consider lesser ICP contribution rates if required infrastructure does not require the funds collected under the standard rate.

<sup>&</sup>lt;sup>2</sup> We are pleased to provide further detailed examples of similar project costings to enable comparison of costs



#### 2.6 Miscellaneous Matters

• Requirement 13 (R13) of the PSP stipulates that stormwater runoff from the development must meet the performance objectives of the CSIRO Best Practice Environmental Management Guidelines for Urban Stormwater. However, Melbourne Water's proposed Aitken Creek Drainage Services Scheme (DSS) does not meet the performance objectives of these guidelines.

**What is required:** Reinstate R13 as a guideline, as Melbourne Water have already substantiated that the requirements of R13 are not being met by the Aitken Creek DSS.

- Requirement 14 (R14) of the PSP references stormwater harvesting to support the health of vegetation (especially existing mature River Red Gums). Similar to the outcomes of the Lindum Vale PSP, we can confirm that we intend to use passive irrigation to support the health of the River Red Gums.
  - What is required: Remove the reference to 'stormwater harvesting' from R14.
- Requirement 33 (R33) of the PSP we suggest that this be reinstated as a guideline. While we recognise the importance of retaining native vegetation where possible, requiring the mandatory retention of native vegetation is at odds with the purpose of clause 52.17 (Native Vegetation) of the Hume Planning Scheme, which allows an applicant to apply for a planning permit to remove native vegetation.
- Local Access Street (14.5-20m) cross section for Conservation Interface, as detailed on page 64 of the PSP

   we suggest the inclusion of fire-resistant trees between the carriageway and the 3 metre shared path, to provide shading to the shared path and a green perimeter to the Conservation Reserve.
- Plan 2: Precinct Features incorrectly identifies the conservation reserve located on 1760 & 1780 Mickleham Road, as conservation area (Growling Grass Frog), the reference to Growling Grass Frog needs to be deleted.
- Permit Condition: Salvage and Translocation further clarity is required on what species needs to be salvaged and translocated.



### 3. Conclusion

Thank you once again for the opportunity to provide comment and submit to the Craigieburn West PSP. We look forward to discussing the matters raised and working collaboratively to enable the swift resolution of issues and the subsequent approval of the PSP.

Yours sincerely,

James Westh

James Westh
Project Director | Residential Communities VIC

#### **Attachments:**

- Attachment A Stockland Landholdings Plan within the Craigieburn West PSP
- Attachment B Craigieburn West PSP Aitken Creek DSS Stockland Response, December 2020



Attachment A: Stockland Landholdings Plan within the Craigieburn West PSP



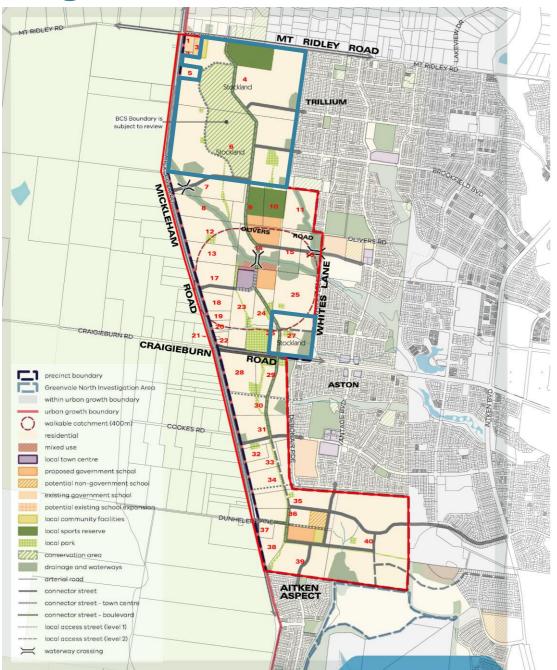


Attachment B: Craigieburn West PSP Aitken Creek DSS Stockland Response, December 2020





# Craigieburn West PSP - Stockland Landholdings



### STOCKLAND LANDHOLDINGS

### Northern Catchment

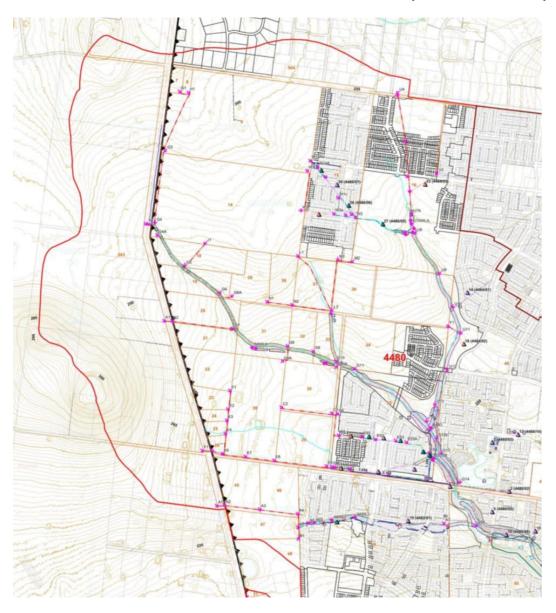
- Craigieburn West PSP Property 4 1780 Mickleham Road
- Craigieburn West PSP Property 6 1760 Mickleham Road

### Southern Catchment

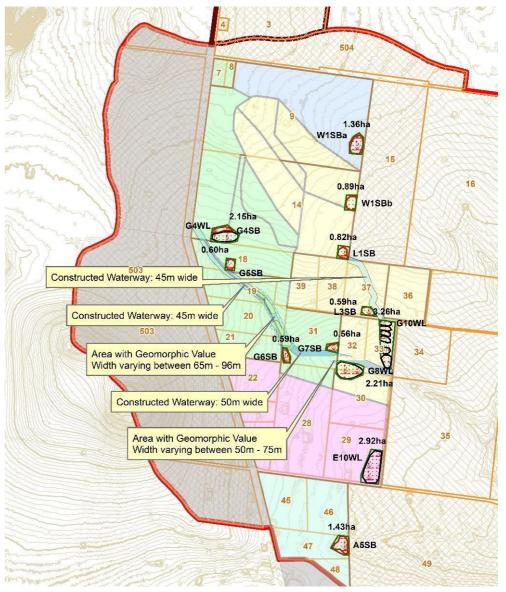
Craigieburn West PSP Property 27 – 640 Craigieburn Road

## **Aitken Creek DSS**

MELBOURNE WATER'S ORIGINAL AITKEN CREEK DSS (2010 - AUG 2020)



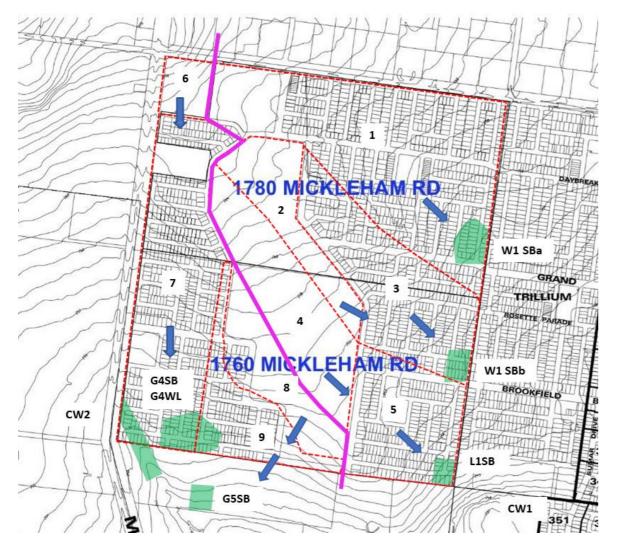
### MELBOURNE WATER'S DRAFT AITKEN CREEK DSS PROPOSAL (AUG 2020)





## **Base Case: Melbourne Water's Draft DSS**

### MELBOURNE WATER'S DRAFT AITKEN CREEK DSS PROPOSAL (AUG 2020)



### MW DRAFT DSS - TREATMENT & LAND BUDGET

Asset	Contributing Subarea (ha)	Treatment area (ha)	Land Budget (ha)			
	East Catchment					
W1SBa	1 (41.60 ha)	0.6	0.89			
W1SBb	2,3 (31.76 ha)	0.35	1.36			
L1SB	4,5 (34.0 ha)	0.2	0.82			
	West Catchment					
G4SB/WL	6,7 (33.76 ha)	0.76	2.15			
CW2	-	-	0.61			
Total			5.83			

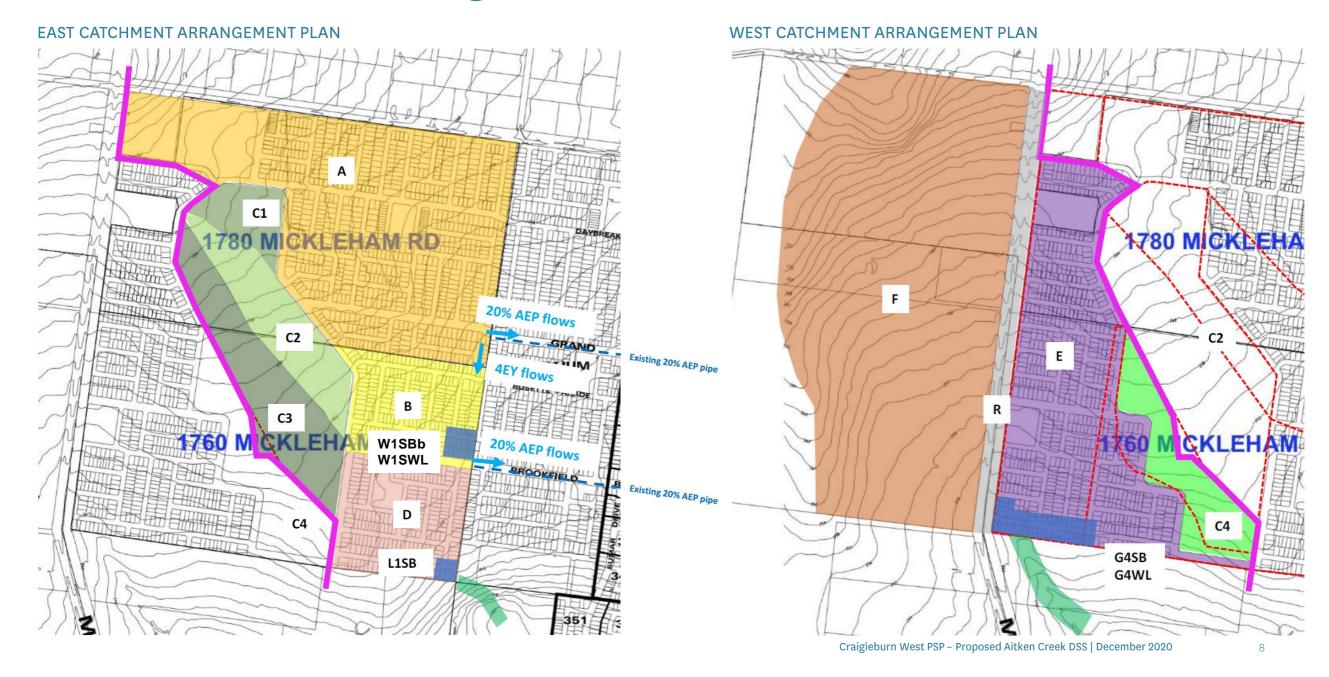
### MW DRAFT DSS - DSS PERFORMANCE

Parameter	Annual Load (kg) generated from subareas 1,3,5,6,7,9	Pollutant Load (kg) removed by assets SB1a,SB1b,L1SB,G4SB/WL	Equivalent Pollutant load reduction
TSS	89300	66960	75%
TP	185	107.2	57.90%
TN	1287	479	37.20%

## **DSS Recommendations**

- 1) Resize sediment basins to meet best practice guidelines of targeting 95% removal of coarse sediments greater than 125 micron.
- 2) Consolidate sediment basins along the eastern boundary.
- 3) Consolidate the constructed waterway and wetland in the south west corner, given the existing waterway in the south west corner has no high intrinsic values and is located at the upstream end of the catchment.
- 4) Opportunity to **drain subareas 8 and 9** into the **G4WL wetland**.

# **Recommendation: DSS Arrangement Plans**



## **Recommendation: DSS Treatment Performance & Land Take**

### TREATMENT PERFORMANCE COMPARISON

Parameter	Annual Load (kg)  Generated (subareas A,B,D,E)	Pollutant Load (kg) Removed (MW Base Case)	Pollutant Load (kg) Removed (Recommendation)	Pollutant Load Reduction (MW Base Case)	Pollutant Load Reduction (Recommendation)
TSS	89300	66960	66300	75%	74%
TP	185	107.2	113	57.9%	61.1%
TN	1287	479	473	37.2%	36.8%

### LAND TAKE COMPARISON

Asset	Contributing Subarea's	Recommendation Treatment Area (ha)	MW Base Case Land Budget (ha)	Recommendation Land Budget (ha)
		EAST CATCHMEN	NT	
W1SBa	NA	NA	0.89	NA
W1SBb W1SWL	A, B, C1, C2 (84.4ha)	0.16 0.42	1.36	1.5
L1SB	C3, D (28.1ha)	0.05	0.82	0.5
G4SB	C4, E, F, R (148.5HA)	0.08		
G4WL	A, B, C1, C2 (84.4ha)	1.00	2.15	2.6
CW2	NA	NA	0.61	0
Total			5.83	4.6

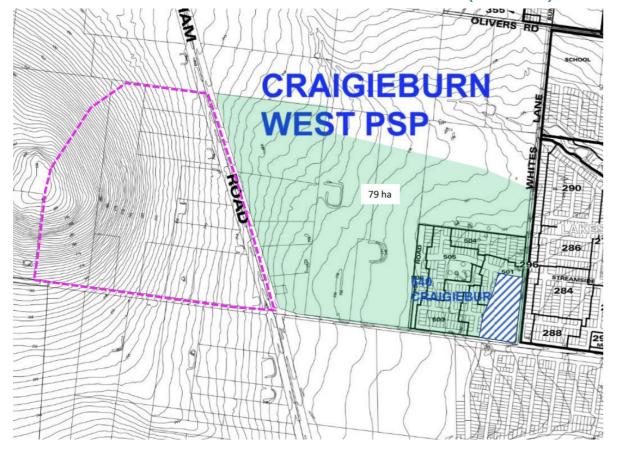
### **SUMMARY**

- 1) Sediment basins sized in accordance with design guidelines
- 2) Optimised land take
- 3) Equivalent load reduction compared to the Melbourne Water base case



## **Base Case: Melbourne Water's Draft DSS**

### MELBOURNE WATER'S DRAFT AITKEN CREEK DSS PROPOSAL (AUG 2020)



### MW DRAFT DSS - TREATMENT & LAND BUDGET

Asset	Contributing Subarea (ha)	Treatment area (ha)	Land Budget (ha)
E10SB	79 ha	0.4	NA
E10WL	79 ha	1.0	2.92
Total			2.92

### MW DRAFT DSS - DSS PERFORMANCE

Parameter	Annual Load (kg) generated from 79ha	Pollutant Load (kg) removed by assets E10SB,E10WL	Equivalent Pollutant load reduction
TSS	57200	41300	72.2%
TP	117	69.4	59.40%
TN	827	317	38.30%

## **DSS Recommendations**

- 1) Resize sediment basin to meet best practice guidelines of targeting 95% removal of coarse sediments greater than 125 micron.
- 2) Optimise and cluster the assets along Aitken Creek, within Highland, and remove the proposed asset from 640 Craigieburn Road.
- 3) Split the catchment.

# **Recommendation: DSS Arrangement Plan**

### CATCHMENT ARRANGEMENT PLAN OLIVERS RD **C**309 SCHOOL 308 306 CRAIGIEBURN 304 WEST PSP MARATHO A (11.2 ha) 303 C (20.4 ha) 290 307 DP30 Nth (24.2 ha) B (26.7 ha) Convert existing sed basin to a D (17.28 ha) wetland **DP Cent** (8.6 ha) Road widening (3.9ha) CHAIGIEBURN Remove proposed wetland Proposed wetland location on 640 Craigieburn Road within Medium Density site

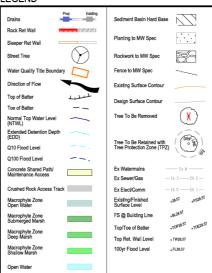
# **Recommendation: DSS Conceptual Layout**



# **Recommendation: DSS Functional Layout**



#### LEGEND



## **Recommendation: DSS Treatment Performance & Land Take**

### TREATMENT PERFORMANCE COMPARISON

Parameter	Annual Load (kg) Generated (for 120.2ha)	Pollutant Load (kg) Removed (MW Base Case)	Pollutant Load (kg) Removed (Recommendation)	Pollutant Load Reduction (MW Base Case)	Pollutant Load Reduction (Recommendation)
TSS	87300	61000	62769	69.9%	71.9%
TP	177	92.4	104	52.2%	58.8%
TN	1250	372	389	29.8%	31.1%

### LAND TAKE COMPARISON

Asset	Contributing Subarea's (ha)	Recommendation Treatment Area (ha)	MW Base Case Land Budget (ha)	Recommendation Land Budget (ha)
North Catchment & DP30				
E10NSB	44.6	0.117		
E10NWL	53.2	0.265	0	1.3
E10SB	67	0.15		
E10WL	67	0.5	2.92	1.4
Total			2.92	2.7

### **SUMMARY**

- 1) Cluster assets along Aitken Creek and utilise land for stormwater treatment within Highlands DP30/DP4, rather than within Craigieburn West PSP
- 2) Existing sediment basin in DP30 (stage 280) is optimised and reconfigured to a wetland
- 3) The wetland (E10WL) is relocated from 640 Craigieburn Rd to downstream medium density site in Highlands DP4
- 4) Sediment basins appropriately sized in accordance with design guidelines
- 5) Equivalent load reduction compared to the Melbourne Water base case
- 6) Additional land take reduced down to 1.4ha



### **Stockland Corporation Limited**

ACN 000 181 733 Stockland Trust Management Limited ACN 001 900 741; AFSL 241190 As responsible entity for Stockland Trust ARSN 092 897 348

LEVEL 25 133 Castlereagh Street SYDNEY NSW 2000

### **Important Notice**

While every effort is made to provide accurate and complete information, Stockland does not warrant or represent that the information in this presentation is free from errors or omissions or is suitable for your intended use. This presentation contains forward-looking statements, including statements regarding future earnings and distributions that are based on information and assumptions available to us as of the date of this presentation. Actual results, performance or achievements could be significantly different from those expressed in, or implied by these forward looking statements. These forward-looking statements are not guarantees or predictions of future performance, and involve known and unknown risks, uncertainties and other factors, many of which are beyond our control, and which may cause actual results to differ materially from those expressed in the statements contained in the release.

The information provided in this presentation may not be suitable for your specific needs and should not be relied upon by you in substitution of you obtaining independent advice. Subject to any terms implied by law and which cannot be excluded, Stockland accepts no responsibility for any loss, damage, cost or expense (whether direct or indirect) incurred by you as a result of any error, omission or misrepresentation in this presentation. All information in this presentation is subject to change without notice. This presentation is not an offer or an invitation to acquire Stockland stapled securities or any other financial products in any jurisdictions, and is not a prospectus, product disclosure statements or other offering document under Australian law or any other law. It is for information purposes only.

