

17 December 2020

Victorian Planning Authority  
Re: Craigieburn West PSP  
Level 25, 35 Collins Street  
Melbourne 3000

To Whom It May Concern

## **Re: Craigieburn West PSP 1068**

### **Pask Group**

Tract Consultants has been engaged by the Pask Group to review and make submissions on their behalf in relation to the draft Craigieburn West Precinct Structure Plan ('the PSP').

Pask Group is an experienced and established Australian developer with extensive experience in residential development within the City of Hume having recently developed the *Providence* estate in Greenvale and are currently developing the *Maples Estate* on Mickleham Road Greenvale.

### **Background**

Pask Group has purchased 4 sites within the proposed Craigieburn West PSP area, being 680 Craigieburn Road (property 24), 1630 and 1660 Mickleham Road (properties 12 and 13), and 1570 Mickleham Road (property 18).

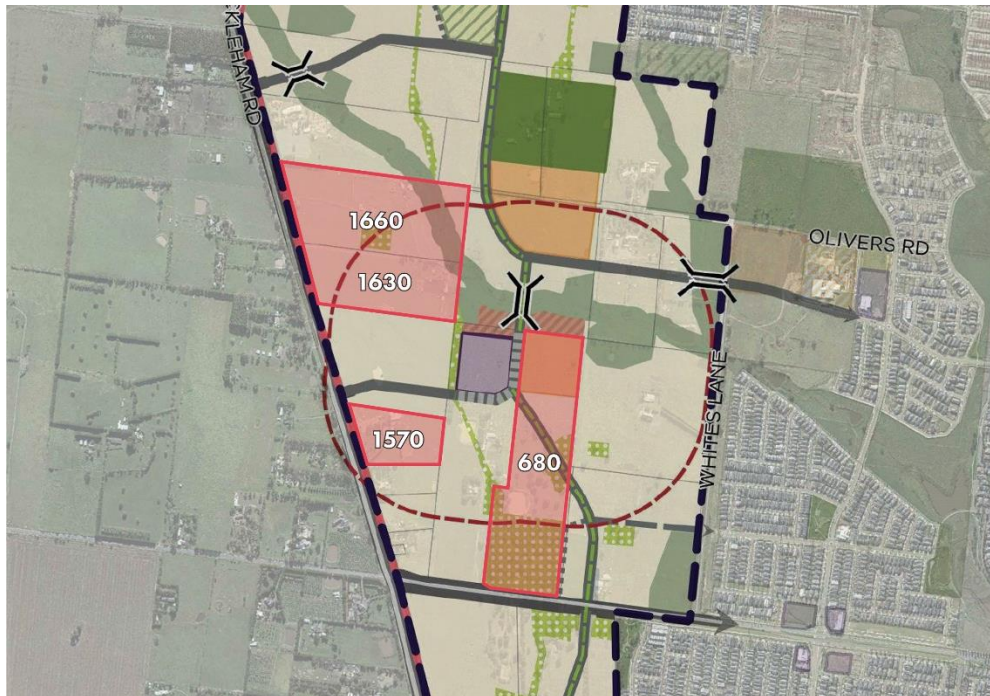
This submission will specifically address the proposed Craigieburn West PSP – Draft for Public Consultation dated November 2020 ("the PSP") as it relates to 680 Craigieburn Road, 1630 and 1660 Mickleham Road. No submission is lodged specifically relevant to 1570 Mickleham Road.

Pask Group reserves the right to make further submissions that may arise from other submissions received and/or changes proposed to the exhibited Craigieburn West PSP.

TRACT CONSULTANTS PTY LTD  
ACN 055 213 842  
AS TRUSTEE FOR THE  
TRACT CONSULTANTS UNIT TRUST  
ABN 75 423 048 489  
195 LENNOX STREET RICHMOND  
(PO BOX 181 RICHMOND)  
VIC 3121 AUSTRALIA  
TELEPHONE 61 3 9429 6133  
FACSIMILE 61 3 9429 5925  
melbourne@tract.net.au  
www.tract.net.au

**MELBOURNE** BRISBANE  
SYDNEY CANBERRA  
ADELAIDE GEELONG

QUALITY ENDORSED COMPANY  
ISO 9001 LIC NO 2095



## Submission

Pask Group supports the fast-track program to approve the PSP and to enable the early delivery of new residential neighbourhoods and provision of new dwellings for the Craigieburn West area. However, there are aspects of the PSP that requires reconsideration and modification.

The following site-specific submission points are made in response to the exhibited PSP.

### 680 Craigieburn Road (property 24)

The largest of the Pask sites is 680 Craigieburn Rd. It is significantly impacted upon by the designated land uses within the PSP that result in a disproportionate provision of local open space and the provision of a primary school.

Proposed open space occupies 6.56h (40%) of the site and appears to be required to preserve vegetation that has been identified for removal in the Biodiversity Conservation Strategy for Melbourne's Growth Areas (BCS) and a further 3.5HA (21%) of the site is committed to the provision of a government primary school. This leaves 6.36HA (39%) of the site available for development within which the encumbrances of a major boulevard connector, on a diagonal, dissects the site and additional land required for defendable space.

This effectively renders the development of the site marginal given the high cost of construction off the above infrastructure against the small development area.

Having an NDA less than 39% of the site represents one of the lowest yielding properties within the entire PSP. This is unequitable considering the surrounding properties generally have 80-90% of the land being NDA and further is not justified on planning grounds.

### Primary School location

The siting of the primary school is in a location that provides significant access constraints and potential conflict with traffic movement around the proposed town centre, mixed use areas and bridge crossing. The primary school is not co-located with any active open space which while not essential, is desirable.

Specifically:

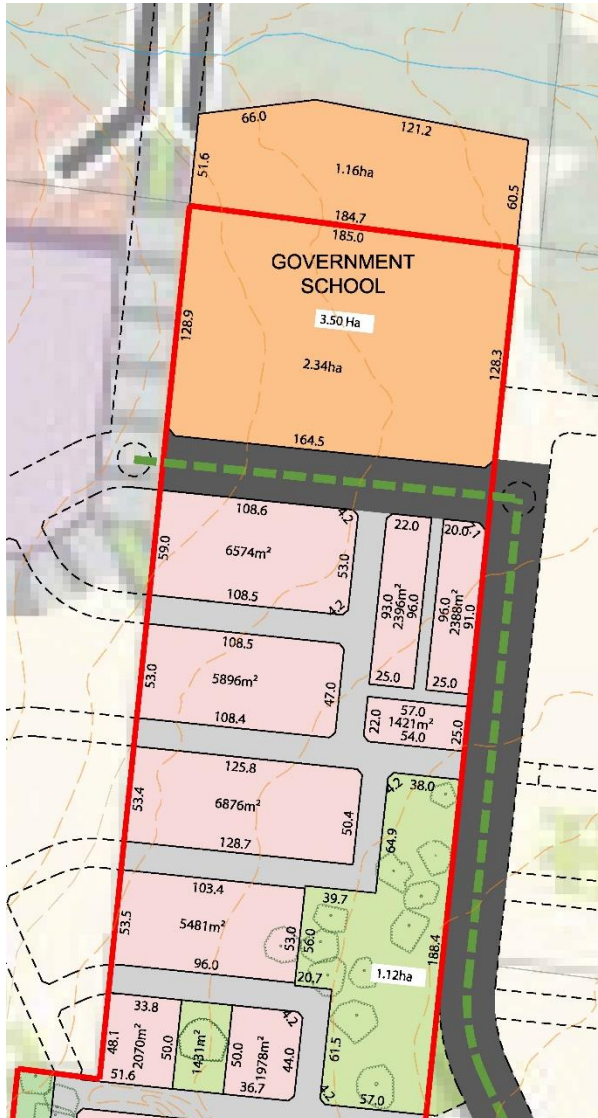
- The school adjoins a neighbourhood activity centre /town centre at the conjunction of two connector roads this creates the potential for conflict between pedestrian movement, particularly children and traffic congestion at pick up and drop off times. This is further compounded by proximity to a bridge creek crossing
- While not essential, it is typically desirable to locate primary schools adjoining open space assets, particularly active open space, to enable a shared use and dispersal area for students head drop off and pick-up time.
- Significantly the siting of the primary school at its current location, creates on the property to the north, a very narrow development area between the school boundary and the Creek. Designated *Mixed use* in the PSP, the distance between the boundary of the Creek and the school boundary is only 60 metres at its maximum point and when factoring in 22 metre fire setbacks to the Creek reserve and the need to provide a road interface with the school a development area with a depth of only 20 metres is created. This is effectively an undevelopable piece of land. Access to the site is also difficult given the limited access opportunity to the connect at a bridge crossing.
- When assessed against the wider distribution of schools, including the R2 PSP to the east, the central part of the PSP's together has a close grouping of schools while the northern part of the PSP is less well serviced.

Opportunities exist to relocate the school to a location more central to the northern catchment which will minimise the impacts of the constraints identified above and provide a school at a location central to its catchment.

### Response

The primary school should be relocated away from the high conflict, constrained location identified in the PSP, to a location further north within the PSP.

If the school is not relocated to the north of the creek which we submit should occur, consideration should be given to shift the school slightly north into the Mixed-Use area so that the creek interface sets the northern boundary of the school. This places the school on the path network to be provided along the creek. In addition, it designates a functional use to what is currently *mixed use* but as indicated above, is effectively undevelopable. The plan below shows the possible location of the school to the north.



### Local Parks LP09 and LP08.

Local park 09 is a patch of remnant redgum vegetation identified within the BCS and relevant property NVIM report as vegetation to be removed and offset.

The purpose of the BC S was to address and confirm indigenous vegetation to be retained or removed within Melbourne's Growth Areas, informing PSP preparation.

The Craigieburn West PSP now seeks to have this vegetation retained and identified as public open space, at a size over and above that required by PSP guidelines for local park size and function. The primary purpose, it would appear, is to preserve the aesthetics and visual appearance of the trees as a contributing factor to the future urban area.

Local park 08, similarly is located within proximity to LP 09, constituting an over provision of open space for the catchment. The primary purpose for this park is the retention of remaining trees identified in the BC S for removal and offset. The park reserves are being created primarily to preserve indigenous vegetation, not to provide an evenly and equitable distribution of parks. The primary focus being the retention of trees which have already identified in the BC S for removal.

If the preservation is for aesthetic reasons this can be addressed through retention of a reduced number of trees in a more equitably spaced hierarchy of parks providing a better, even distribution of parks across the PSP.

#### Response

Modify the size of park LP 09 to a typical local park size (approximately 1-2 Ha, refer to plan 1) collocated with the *green link* to provide a park network that can still incorporate existing trees. More equitably distribute local open space throughout the PSP by increasing several local park sizes and provide additional open space where gaps in distribution exist.

### Connector Road alignment

The connector road dissecting the site has several significant implications:

- The diagonal alignment across the site at 680 Craigieburn Road, creates a significant constraint to the ability to efficiently develop the site which otherwise has land uses at right angle grids e.g., school, and open space boundaries and is not justified on traffic engineering grounds.
- The diagonal road does not provide for direct access to the property immediately to the east (property 25)
- The diagonal road creates traffic movement and local street design constraints around the school site and at intersecting points between the connector roads.

The landowner of property 25 is seeking access to a connector road and put forward an alternative location that provides a safe and functional road network while enabling their site to be accessible to a connector.

#### Response

Realign the diagonal Road to a north/south orientation to be provided within the boundary of the property to the east (property 25) as outlined in plan 1.

### Residential densities

The PSP prescribes A residential density of 26.5 lots per hectare within a 400-metre radius around the local town centre. This has a significant impact on all three Pask properties, significantly on the already heavily encumbered 680 Craigieburn Rd.

In researching all available background information informing the preparation of the PSP there appears to be no justification for the 26.5 per hectare figure. Without the basis for the figure being detailed, it appears to be an arbitrary figure. While the principles behind density around service centres and public transport hubs such as train stations is understood, the local town centre, in the absence of a major train station or significant employment generator,

would appear not to be enough of a catalyst to support higher density populations. Based on the marketing research and experience of the Pask group in this corridor, it is unlikely that such densities are going to meet market expectations or be supported.

This requirement in addition to other impediments placed on the Pask sites presents as an unacceptable restriction on the ability to develop the site.

#### Response

Remove density requirements around such a small activity centre as a catalyst for density as it will not generate demand for higher density housing. Retain the overall PSP target of 18 lots per Ha average. Any density targets should be able to be flexibly applied to enable response to market demands and to achieve good planning outcomes depending upon the specific site context.

#### Bushfire safety

The PSP places considerable fire buffers around open space and other reserves, without clear indications as to where fire buffers are to be maintained. This includes:

- The requirement in Bushfire hazard area 1 for a 33m setback – in the urban context this has been addressed in previous PSP's (e.g., Officer Town Centre) with fire management undertaken as part of surrounding street reserves and within the reserves themselves.
- The requirement in Bushfire Hazard area 2 for a 19m setback to creek reserves – typically these reserves are managed to minimise fire risk on site with no impact on adjoining development other than preference for a road interface as setback.

#### Response

Add additional description through a requirement in relation to *table 4 Bushfire hazard vegetation management and setback requirements* to confirm that all bushfire setbacks are to be within the reserves and adjoining streets only. The bushfire setback requirements should not be from private residential allotments.

#### R24 – Master Planning for the linear reserve

R24 requires that the first development proponent to lodge a permit application for subdivision of land which contains a section of the park must undertake a master plan for that section.

While only a minor issue, this should include additional clarifications as any plan should be:

- The specific section to be designed needs to be further clarified as the park section identification number



- A preliminary plan only should be required, as details such as cross overs and interfaces may not be known for adjoining sites.

Response

Adjust wording to better describe the specific sections required to be master planned.

## 1630 and 1660 Mickleham Road (properties 12 and 13)

### Open space

The local park LP 05 identified central to this site serves a catchment that extends in the North and East bounded by the creek corridor to the West, Mickleham Rd to the South and the 400-metre setback from local park LP09. The park is not located central to this catchment. To provide a better level of accessibility at a central location the park should be located further South. An opportunity exists to locate this park on the creek corridor or linear reserve as an open space node to encumbered land. Specifically:

- The current park location is 800 metres from the redgum park LP 09 but only 400 metres from active open space SR O2.
- By relocating the park approximately 200 metres to the South/south west it will be almost equidistant between LP 09 to the South and the Creek reserve to the North.
- Spatially this is a central location to the residential community that is bounded by Craigieburn Rd to the South, the Boulevard connector Rd town centre to the east, the Creek alignment to the North and Mickleham Rd to the West.

Response

By shifting the park to the northern boundary of property 17(immediately south of property 13 site boundary) collocated with the creek reservation the relocated park will be more central to the community that is bounded by the creek and Mickleham and Craigieburn Roads.

### Access

The connector road, providing access to this site is located on the property to the south (property 17). Access to the sites at 12 1st 13 will be totally dependent on that development proceeding first with access required through the adjoining site. Some flexibility, within acceptable standards to The Roads Corporation is required in the siting of the intersection to, where possible, allow an initial developer to accommodate the intersection.

Response

Introduce into the PSP, either through the guideline or requirement provision, some wording around the flexibility as to where the intersection is located.

**Drainage**

The level of detail available to fully assess Melbourne Waters drainage scheme requirements is limited and additional information is being sought. Pask Group reserves the right to present a response to the Melbourne Water Drainage scheme when additional, more detailed material becomes available.

**Response**

Detail associated with the provisions of the Melbourne Water Drainage scheme will be responded to further when detail is available.

**Summary**

Pask in lodging this submission seeks to reserve the right to respond to the outcome of public exhibition more generally and in making this submission we reserve the right to present to a panel appointed to hear submissions and respond to other submissions made to the amendment.

Should you have any queries please contact Greg Wood on 0419 314 147 or email [gwood@tract.net.au](mailto:gwood@tract.net.au)

Yours faithfully

A handwritten signature in black ink, appearing to read 'Greg Wood', with a stylized, cursive script.

Greg Wood

Senior Principal

**Tract Consultants**



