



# **DEAGUE GROUP SUBMISSION TO CRAIGIEBURN WEST PSP AMENDMENT**

DECEMBER 2020

**DEAGUE GROUP®**



<b>1 Introduction</b>	<b>4</b>
<b>2 Key submission matters</b>	<b>5</b>
2.1. Efficient lot layout.....	6
2.2. Road access, servicing and delivery.....	8
2.3. Drainage and waterways.....	10
2.4. Catchments and location of school/AQS.....	13
<b>3 Infrastructure Contributions Plan</b>	<b>15</b>
<b>4 Planning Scheme Amendment process</b>	<b>17</b>
<b>Appendix 1: Exhibited PSP Design Review</b>	<b>18</b>
<b>Appendix 2: PSP Requirements and guidelines</b>	<b>19</b>

# 1 Introduction

The Deague Group own 4 parcels of land in the Craigieburn West PSP Area situated on the eastern side of Mickleham Road, north of Craigieburn Road. Its landholding comprises some 45 hectares within the PSP Area, making it one of the more significant landholdings affected by the proposed amendment. The Deague Group parcels are referred to in the draft PSP as parcels 7, 9, 11 and 15.

Deague Group engaged a project team to undertake background studies and be involved in the PSP during its preparation over the past 2 years. Our established consultant team has now undertaken an independent review of the Craigieburn West PSP and the relevant background reports. This submission follows on from recent written correspondence and discussions with VPA in relation to what the PSP shows for our sites and the surrounding properties.

The PSP sets out the vision for future urban development of the land and through the planning scheme amendment, and the Deague Group support the overall vision for the Precinct in completing the Craigieburn growth corridor. The development of our properties are vital to achieving the established vision, as they connect the existing Craigieburn estates in the east through to Mickleham Road, will deliver key drainage infrastructure and high density housing in the walkable catchment, and will continue the north-south green link.

Our submission sets out the key issues up front and is supported by plans and diagrams. The key issues we are addressing which are set out in Chapter 2 are as follows:

- Efficient Lot Layout.
- Road Access, Servicing and Delivery.
- Drainage Layout and Extent.
- Catchments and Location of School/AOS.

Chapter 3 sets out our position in relation to the Infrastructure Contributions Items.

Chapter 4 sets out our position in relation to the planning scheme amendment process and the consideration of submission via the Standing Advisory Committee.

Appendix 1 sets out our submission in relation to the Requirements, Guidelines and specific Plans/Figures in the PSP and includes our suggested changes/recommendations.

Given we had only four weeks to review the material and prepare a submission, we reserve the right upon further review of the PSP, amendment materials and background reports to make a further submission.

## 2 Key submission matters

1

### Efficient Lot Layout

Review the layout of the AOS, waterway and roads to ensure that the PSP is not creating undevelopable land or an inefficient subdivision layout. Our proposed changes:

- Reduces the excessively large amount of land set aside for drainage purposes.
- Avoids creation of compromised land between Mickleham Road and the waterway.
- Creates a viable development area to the north of the AOS.
- Improves efficiency in lot layout by removing curved/diagonal roads where possible.

3

### Drainage Layout and Extent

Review the size, extent and location of retarding basins to better align with the catchments and provide waterways where they are required and contribute to urban development.

4

### Catchments and Location of School/AOS

Ensure the location of the active open space and school is best positioned to be service the largest walkable catchment and be delivered in the short term.

2

### Road Access, Servicing and Delivery

Review access to the sites to better reflect likely staging and removal of existing road access.

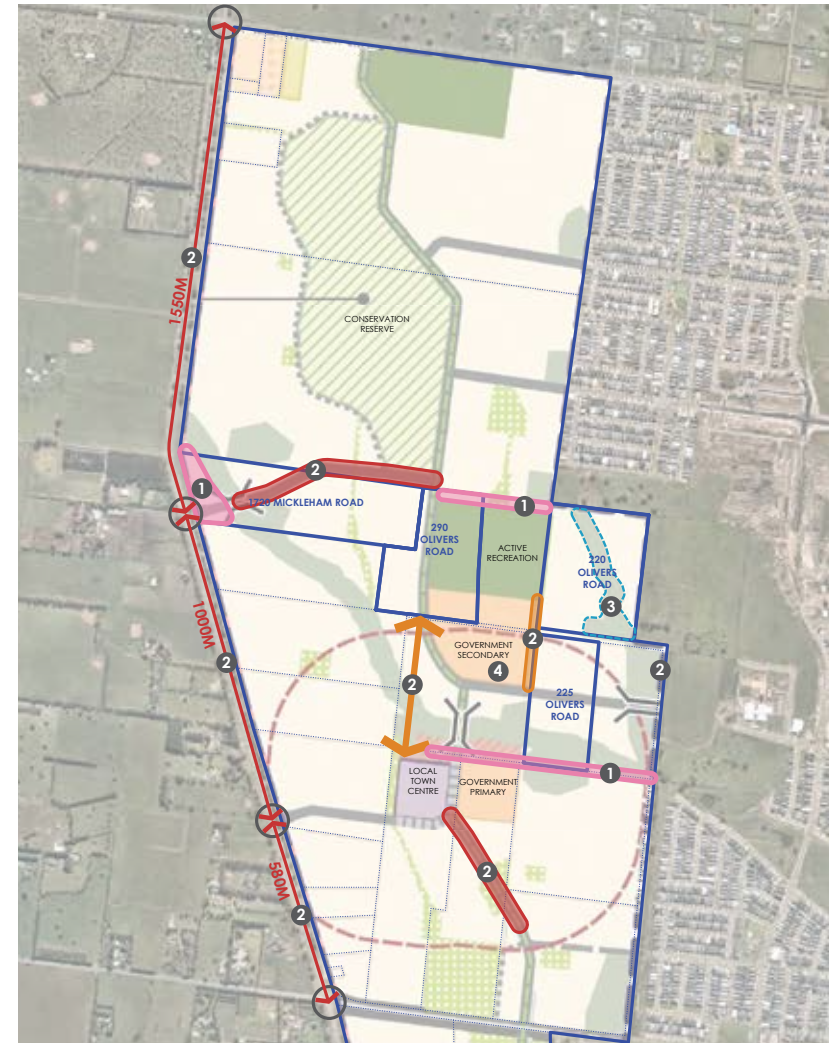


Figure 1. Key Plan - Summary of Submission items.



## 2.1 Efficient lot layout

We have identified several issues in the PSP which will create an inefficient subdivision layout and which we submit ought to be reviewed and corrected in the next iteration of the PSP. Some of the matters are discussed in more detail in subsequent chapters of our submission. Figure 2 below shows the changes that we submit ought to be made to the Place Based Plan (Plan 4) and which are addressed over the following pages.

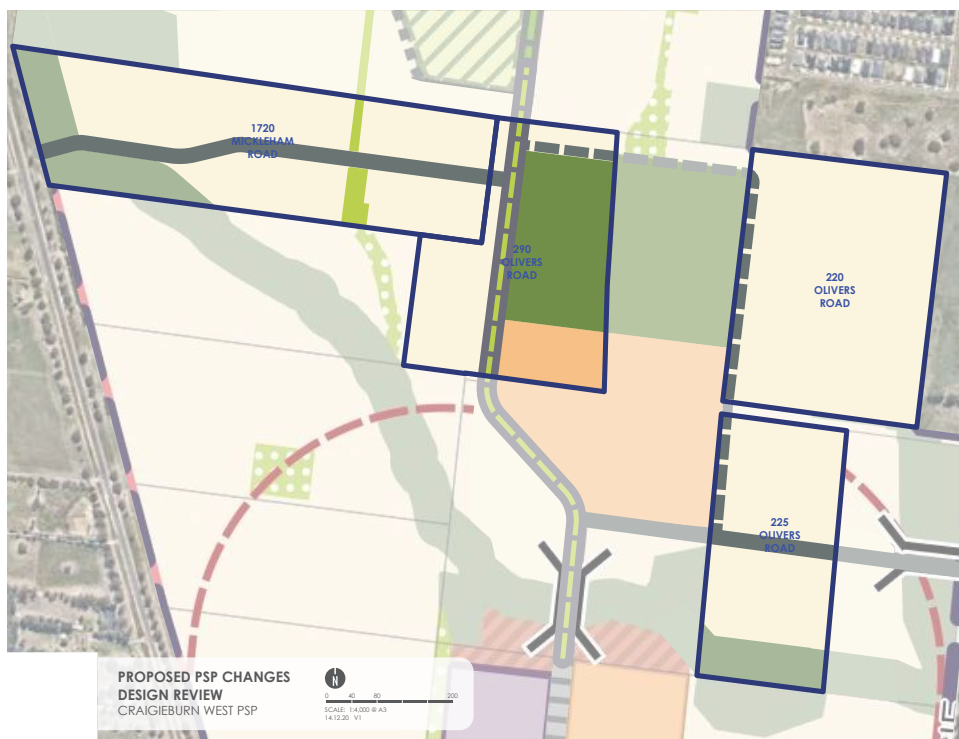


Figure 2. Recommended changes to Plan 4.

**Adequate lot depths** – Shift the AOS 15 metres to the south to enable the development of lots along the boundary of parcel 9. The positioning of the AOS in the PSP does not provide adequate space to provide for a local road along the boundary of the AOS and a row of lots. Shifting the AOS 15 metres to the south will resolve this issue as shown in Figure 3 below.



Figure 3. Lot Depth Achieved North of AOS.

***Curved and Diagonal Roads*** – local and connector roads must be reviewed to create a more efficient lot layout and maximise views to natural assets as follows:

- Diagonal alignment south of the school and town centre straightened to seek improved subdivision outcomes.
- Potential for the connector intersection at Craigieburn Road to shift west and align with the park reserve road whilst still maintaining a 400m spacing. This would also mean the realignment to the north doesn't need to be so severe.
- Square the north south connector through property 14 to create a direct view line to the waterway and Town Centre, reduce extent of undevelopable land and improve lot layout.

***Review waterway width and alignments*** – review the location of the waterways so that they are not creating compromised land or cutting diagonally across properties. To improve land use and efficiency the following is recommended:

Locate the waterway along Mickleham Road as it passes through properties 7 and 6. This approach is beneficial in a number of ways by:

- Providing for a soft green frontage and will deliver the rural interface character sought by R4;
- Removing a difficult piece of residential land which would be wedged between a 6 lane arterial;
- Reduces frontage roads required along the waterway as well as loop roads to Mickleham Road frontage; and
- Allows for the culvert/bridge requirements to be determined and developed as part of the delivery in intersection IN-01.

## 2.2 Road access, servicing and delivery

The Deague Group land is located immediately west of the current growth front from the Highlands estate. The area between Whites Lane and Mickleham Rd is readily serviceable however there is some fragmentation in ownership that may inhibit efficient and timely development of this part of the PSP. The Deague Group land provides an opportunity to link the respective land parcels from east to west thereby enabling land to be readily developed. Our approach will be to develop from Whites Lane in a westward direction which will ultimately include a connection to Mickleham Rd. The land gently rises from west to east making the westward development front a logical approach together with the location of existing service assets at Whites Lane. This is consistent with the background Servicing Report prepared for the VPA which anticipates an east to west staging of development.

A key part of the staging strategy is the East West connector road being extended from the Highlands estate (Marathon Boulevard) and then linking to the North South Connector Rd within the Deague Group properties at 250 Olivers Rd. This has the potential to 'unlock' at least 4 other properties and provide a logical development pattern linking to the Highlands estate and all the established local amenity. This road, along with the delivery of the waterway will benefit all landowners in this area and provide early links for the community.

The proposed location of the secondary school site limits the ability to upgrade the existing road reserve in Olivers Road which would be the normal course of action to provide continued access to the sites. However, given this road reserve will be discontinued, an alternative east-west road connection is required to be established in the short term.

Given the importance of the early establishment of the Marathon Boulevard extension and shared usage between landholders, we submit that this section of the connector street ought to be included as an infrastructure project in the Precinct Infrastructure Plan and funded via the Infrastructure Contributions Plan to encourage respective land owners to deliver this in the short term as shown at Figure 4. This matter is discussed in more detail in Chapter 4 of our submission.



Figure 4. Connector Road proposed to be included in ICP.



The other important road to be delivered to open up the development area is Whites Lane. Whites Lane is nominated in the Craigieburn R2 PSP as Cross Section 13 (20-22m, Access Street Level 2, 7m carriageway, parking on both sides) which effectively uses the existing carriageway. Whilst the cross section in the PSP suggests Whites Lane could be staged, it is unsealed at the moment and as such there is a minimum standard of works that will be required to facilitate development in the Craigieburn West PSP. We understand that the upgrade of Whites Lane is tied to the land to the east, but there is no current timeframe in which the road must be built, noting that the land directly adjoining the road reserve is a permit stage which has not yet commenced construction. This is a challenge for all the landowners Craigieburn West PSP who will rely on Whites Lane for access and is a matter that the VPA and Council must discuss with the landowners with whom the delivery obligation lies.

Whilst the strategy is to develop east to west, it is also important that the intersection with Mickleham Road (IN01) located on our land (parcel 7) can be delivered. We do not object to the intersection being located on our site, however it is our submission that the joining connector road ought to be realigned so it is wholly contained within our parcel and can be delivered together with the intersection to provide access to parcels 7 and 9 and join to the key north south connector road, which is the spine of the precinct.

The current location of IN01 means that whilst the Deague Group would likely be responsible for the delivery of the intersection (through a WIK arrangement) we would not have control over the delivery of the section of the connector road which travels along the southern boundary of Stockland's land. To ensure its timely delivery, it should be realigned as shown on Figure 2 and a local road can be located along the conservation reserve as required for conservation and bushfire purposes.

***Recommendation:***

- Include the connector road as an infrastructure project in the Precinct Infrastructure Plan and funded via the Infrastructure Contributions Plan
- Realign the connector road coming off IN01 so that it is wholly contained within our property.

## 2.3 Drainage and waterways

Drainage and waterway infrastructure are fundamental to the planning of a PSP area and in our view should be much more resolved before a draft PSP is finalised for public consultation. The alignment of the waterway and location of the basins can greatly impact design responses relating to amenity and outlook, the location of facilities, and the opportunity for efficient water use to open space – these are matters that should be considered at the outset of preparing the plan. The waterway and wetland layout shown in the draft Urban Structure (Place Based Plan) is lacking in technical basis as we understand that Melbourne Water have not been able to complete its modelling and assessments to the same extent it ordinarily would to inform the preparation of a PSP. Given this, the waterway design and wetland locations and the overall approach to the drainage is unresolved and results in the draft Place Based plan creating inefficient spaces, poor interfaces and in some instances some irregular drainage outcomes. This is a fundamental deficiency in the process to date and must be resolved.

We appreciate that the VPA are seeking to keep the process moving and as such have released the PSP for consultation without the drainage having been resolved for the precinct. With that being the case, it is our submission that the work required to analyse and resolve the drainage infrastructure for the Precinct ought to be completed by Melbourne Water in consultation with the Council and landowners as a matter of priority. We submit that the completion of the approval of the PSP amendment in a scheduled program should not override the detailed consideration of drainage options for the Precinct and our site.

Afflux was commissioned by the Deague Group to undertake modelling and assessments, and have been in contact with Melbourne Water to seek its endorsement of the modelling and approach taken. There has been an emphasis on the waterway which travels through the Deague land, but Afflux has considered the whole catchment in their work to date.

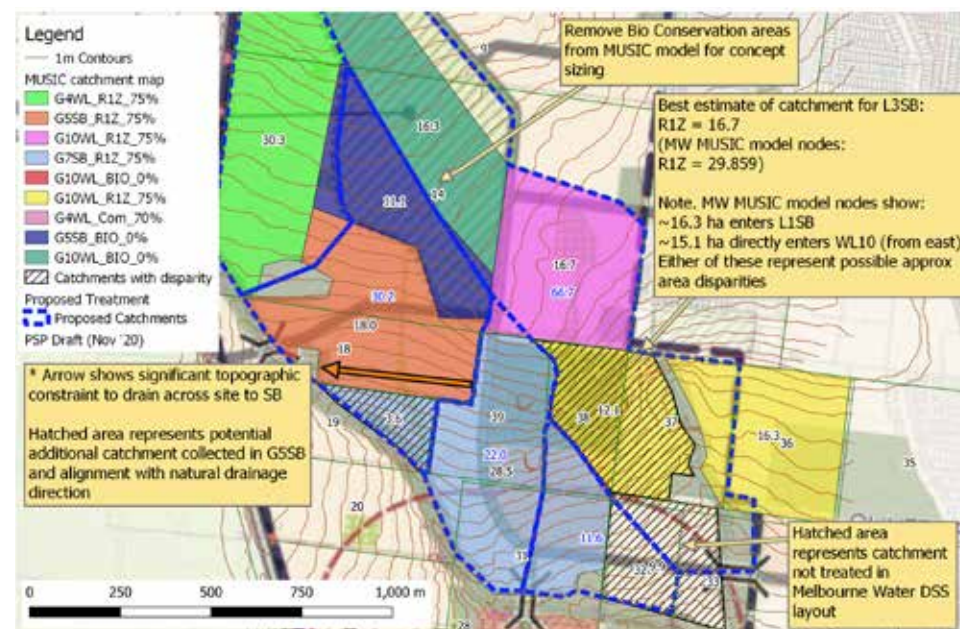


Figure 5. Review of Drainage.

Afflux has prepared a plan which recommends improvements to be made to the waterway/wetlands to create improved drainage outcomes but which could also influence and improve the structure and functionality of the precinct. We make the following submissions based on detailed assessment of the drainage requirements by Afflux Consulting (also refer to Figure 5 and the Afflux Memo provided with this submission) with the following two major changes (and subsequent minor changes):

**G4 sediment basin and wetland** – should be relocated (west) to the Mickleham Road interface at the head of the waterway. There is no level change associated with this and it provides a more logical urban form. It will also meet the principal of discharging pipe into wetland and then into waterway.

- G5SB – is recommended to move further south depending on final Urban Structure to ensure it collects the full catchment and creates a better relationship with the urban form. The current location has very little catchment with potentially only 18 hectares of residential land draining into it, shifting it south would improve its catchment. Ideally this basin is moved far enough south to collect flows from the proposed north south collector road and/or combining with G7SB.
- G7SB – Relocate to the end of the North-South connector road. This road link is assumed to be a major overland flow path and represents a significant topographic consideration when selecting sediment basin location. The catchment for G7SB is indicated in the Melbourne Water MUSIC to collect 29.859 ha (RES). However, Afflux has reviewed the model and expects that this catchment may have already been counted for treatment in G5SB catchment or L3SB (if Pipe N1 drains east toward L3SB). The proposed catchment and relocation will provide for better drainage outcomes due to topography and represents a much more logical asset positioning.
- G8WL – move south of geomorphic feature and abutting recreation fields. Placing a wetland across two land parcels creates future conflicts and delivery issues. The waterway should sit on MW parcel 32, and the wetland on parcel 30.

**Remove the north-south Waterway tributary** – The north south tributary construction is a high risk engineering proposal, that does not meet with MW's own sodic soil recommendations. The flows from this catchment have been incorrectly calculated and do not meet the hydraulic criteria for a waterway. The 45m corridor does not provide for either a headwater stream or a piped, highly engineered waterway, and either should be reduced in scope or completely removed and a piped option considered.

- Swales – the use of swales and green roads ought to be considered as a viable alternative to overland flow conveyance given the lower flows found in the RORB review (~6 m³/s split over two swales and pipes). In our view, the flows here do not justify a 40-45m waterway and particularly one which has high risk sub-surface soils with high risk for future failure such as this (as per Jacobs' report findings, source: MW email 21/11/2020). Moreover, swales require less cut (as compared to constructed waterways) and therefore reduce possibility of soil failure expected in locations with steep slope that would provide a safe alternative for overland flow conveyance.
- L1SB – Shift to south and combine into the G10WL for better catchment efficiency. As with G5SB the sediment pond catchments should be maximised to reduce Council/MW assets. If the north south waterway is removed, there is no need for this basin here and it would be better placed with the wetland system.
- L3SB – reconfigure to align with overland flow path and consider its relocation in conjunction with RORB and waterway conveyance review.
- G10WL – Wetland configuration requires review noting that This asset does not collect flows from DFWS property 32 or 33, leaving those flows untreated. The wetland is located on area of high grade and will be of high engineering risk. A more east west alignment, rather than north south would be a better arrangement.

There is no compelling hydraulic reason for Tributary of Aitken Creek (north-south alignment) and Jacobs report reinforces problematic soils and erosion risk. The slope of this proposed waterway increases the risk to construction considerably, and at this early stage these issues must be considered – not pressed further down the line for an unsustainable outcome.

A detailed Memo and RFI response has been provided to Melbourne Water and Afflux continue to liaise with Melbourne water to resolve the drainage for the site and wider area. Neighbouring properties have also been consulted for these changes and have found to be amenable.

**Recommendation:** Adopt the recommendations of the Afflux work in the PSP Urban Structure, and require MW to undertake detailed further modelling.

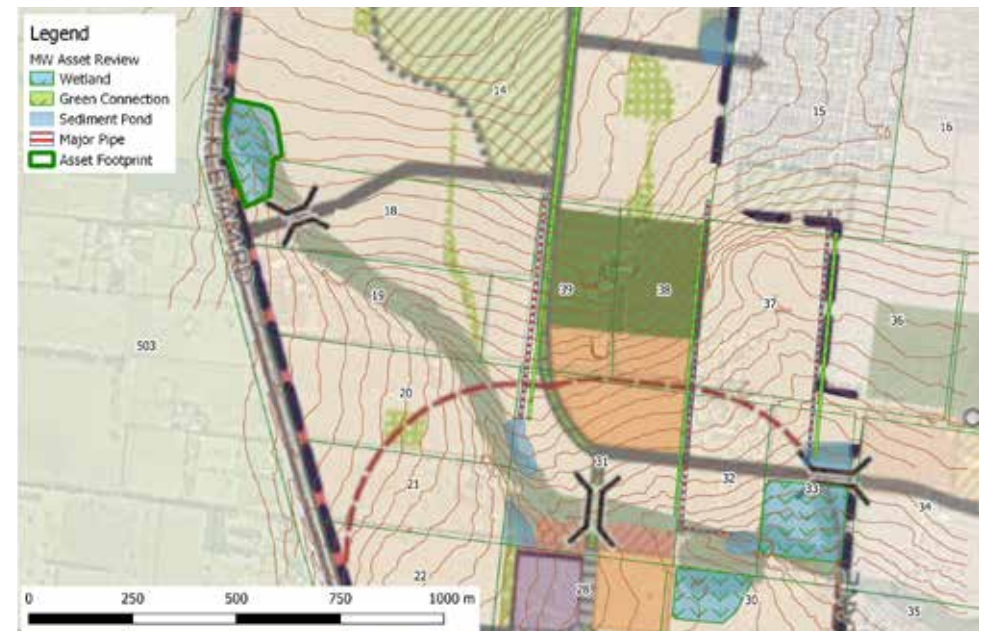


Figure 6. Drainage Concept Plan.



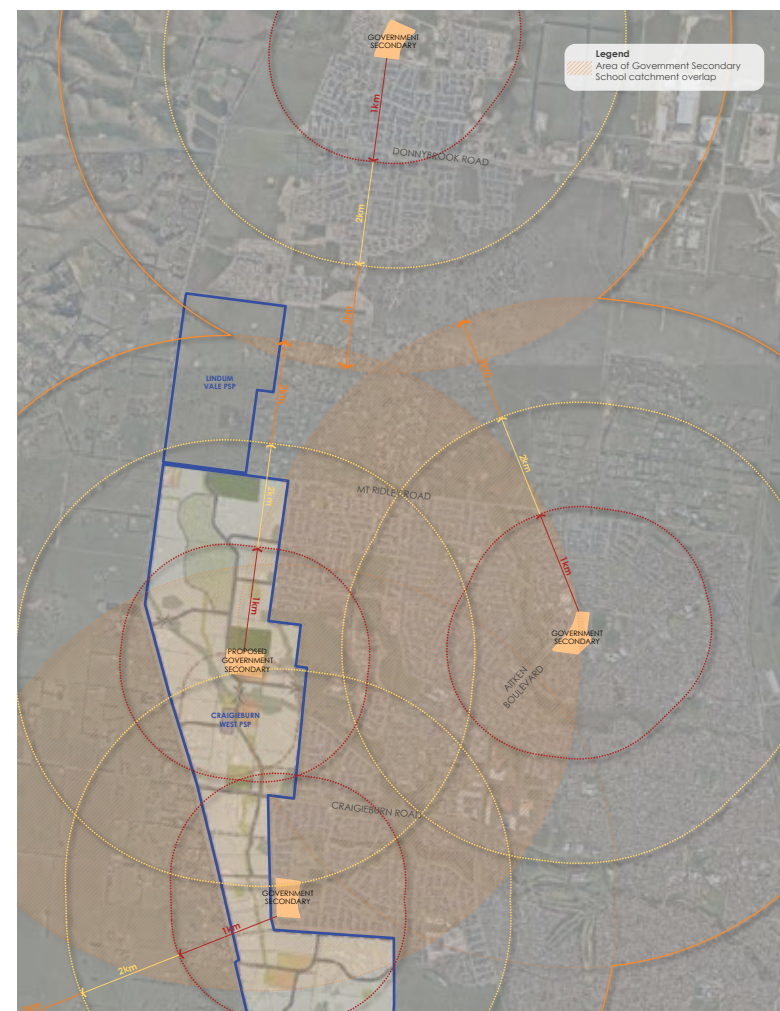
## 2.4 Catchments and location of school/AOS

The Deague Group has provided correspondence to the VPA over the past few months in which we have queried the planning basis for the location of the secondary school and district size active recreation in the PSP. We also questioned the matters which were considered in determining the locations having regard to existing facilities in the adjoining neighbourhoods and the catchment which the School/AOS is to serve. We understand that a Community Facility Report was not prepared as part of the preparation of the PSP and the size/locations of the recreation reserves have been derived by Council.

With regard to the Schools, we understand that Department of Education and Training (DET) advised VPA that due to increased densities built in nearby housing estates, there is now the demand for an additional secondary school in the Mickleham area which wasn't evident during the Stakeholder Workshops held in September 2019. We understand that the catchment for the secondary school includes the Lindum Vale precinct which extends north between Mt Ridley Road and Donnybrook Road which does not provide for any schools or communities facilities.

We understand that the DET has confirmed the need for a secondary school site in the PSP on the basis that the PSP is close to the provision ratio for secondary school and that Schools in nearby areas in Craigieburn are nearing their capacity. We are not aware whether DET has determined specific catchments for this Secondary school or whether that has informed the location in the PSP.

The Place Based Plan in the PSP proposes to concentrate new education, community and open space facilities within an area of the PSP close to existing (and planned) facilities in the adjoining estates. As a result, other areas within and adjoining the Craigieburn West PSP (such as Lindum Vale) will have a much lower service level within their walkable catchments.



**Figure 7.** Catchment Analysis showing overlapping catchments.



Whilst the PSP benchmark is for homes should be within 3.2km of a secondary school, we view this as a low threshold which could readily be achieved in PSPs. The location of secondary schools should seek to capture the largest walkable/cycling catchment possible and avoid overlapping catchments. Given the elongated shape of the PSP, it is inevitable that some overlapping catchments will be created, but it is our submission that this should be minimised. The location of the secondary school on the draft Place Based Plan creates overlapping catchments (within 1km and 2km) with existing secondary schools in Craigieburn, and leaves the majority of the Lindum Vale PSP area to the north (which has no community/education facilities) outside a 2km catchment. We believe that the planning of facilities in this PSP should have consideration for the wider context and the catchments for the facilities and the Place Based Plan could improve in this regard.

In our earlier correspondence we also questioned whether there had been consideration of issues relating to acquiring the land for the school and AOS given it spans multiple property boundaries (including in the case of the school and existing road reserve of Whites Lane). We foreshadow that there may be some issues in acquiring the land for the school given it spans four titles and there may therefore be delays in the purchase of the land on our property set aside for the school. The issue of the closure of Olivers Road is dealt with in Chapter 2.

***Recommendation:***

- VPA to consider the catchments for the AOS and Secondary School and whether the Place Based Plan ought to be reviewed to reduce overlapping catchments.
- VPA and DET to provide confirmation that the location of the secondary school across 4 property titles will not pose an impediment to its early acquisition.

### 3 Infrastructure Contributions Plan

We understand that an Infrastructure Contributions Plan to impose a standard levy will be prepared and approved via a Section 20(4) process at the same time (or shortly after) the approval of the Craigieburn West PSP. Given this, landowners can only review the PIP in the PSP and make comments on the infrastructure descriptions and timing for delivery.

We submit the following in relation to the PIP and the preparation of the ICP for approval:

- **School timeframes** – The PIP identifies the school as medium-long (M-L) term delivery. Our submission is that they must be regarded as short-medium (S-M), noting:
  - o DET and VPA have previously advised that there is existing demand for the secondary school noting that existing schools in Craigieburn are at capacity. This was one of the reasons cited by the VPA to provide and locate the school as per the draft PSP.
  - o The positioning of the school across 4 titles as shown in the PSP will make it difficult to acquire the land, and as such the PIP should signal that this School acquisition be given priority and the acquisition process should commence early.
- **SR02 timeframes** – The PIP identifies this project as M-L. We submit that it should be shown for S-M delivery to align with the secondary school.
- **Funding of Connector Road to provide access** – The PSP locates the Secondary School across 4 titles, one of which being the existing road reserve for Olivers Road. This currently provides access to the Deague land and other parcels. Typically, PSPs would seek to retain a road reserve and show its continued use as a local road to provide ongoing access to properties. However, given this is not the case, and the PSP area is highly fragmented, the Precinct PIP and ICP must fund the delivery of the connector road to facilitate development for several properties, and enable connection from east to west through the Precinct.



Figure 8. Connector Road proposed to be included in ICP.

The Ministerial Direction for Infrastructure Contributions Plan at section 12C provides for an allowable Supplementary Levy item to be funded via a Standard Levy if there are sufficient levies available. A local collector road is listed as a Supplementary Levy allowable item and so long as the relevant criteria set out in the Ministerial Direction are met, a local road can be funded under the Standard Levy.

The relevant criteria are set out at item 22 in Annexure 1 of the Ministerial Direction, and the proposal meets these criteria as follows:

- *The item, normally provided by a developer to develop the land for urban purposes, is on or adjoins land in fragmented ownership;*

The road is a standard connector road which would normally be delivered as part of development works. However, this small section of the connector road sits across 4 properties and is required to provide access to others also.

- *The fragmented land ownership makes the delivery of the item by the developer difficult;*

As above, given the precinct is highly fragmented and land is not all controlled by developers, the full delivery of the road will be highly challenging (within a reasonable timeframe).

- *The item is essential to the orderly development of the area;*

If this road is not delivered in its entirety it threatens the development of this part of the precinct, with a need to wait for intersection along Mickleham Road to be constructed to provide access.

- *The relevant municipal Council has agreed to be the development agency for the item; and*

Confirmation has not yet been sought from council. However, given this infrastructure item would be minor in comparison to other infrastructure items under Council control.

- *The cost of the item can be fairly levied amongst the developers who will benefit from the delivery of the item.*

There are sufficient levies available in the standard levy to be collected. The delivery of this road will be advantageous to a many number of properties in the precinct. Moreover, it is not a significant project in comparison to the other transport infrastructure to be funded via the standard levy.

Our project team has undertaken a high level review to understand the likely transport levies to be collected versus the infrastructure items to be delivered via the ICP. Our assessment is that there is likely a surplus in levies to be collected for transport items.<sup>1</sup> On that basis, we submit that the VPA ought to consider funding this key connector street as part of the standard levy to ensure that access can be gained through the fragmented land.

#### **Recommendation:**

- Make changes to the PIP as per the above.
- Commence preparation of the ICP to ensure that there is not a significant time lag between the approval of the PSP and the approval of the ICP for Craigieburn West.

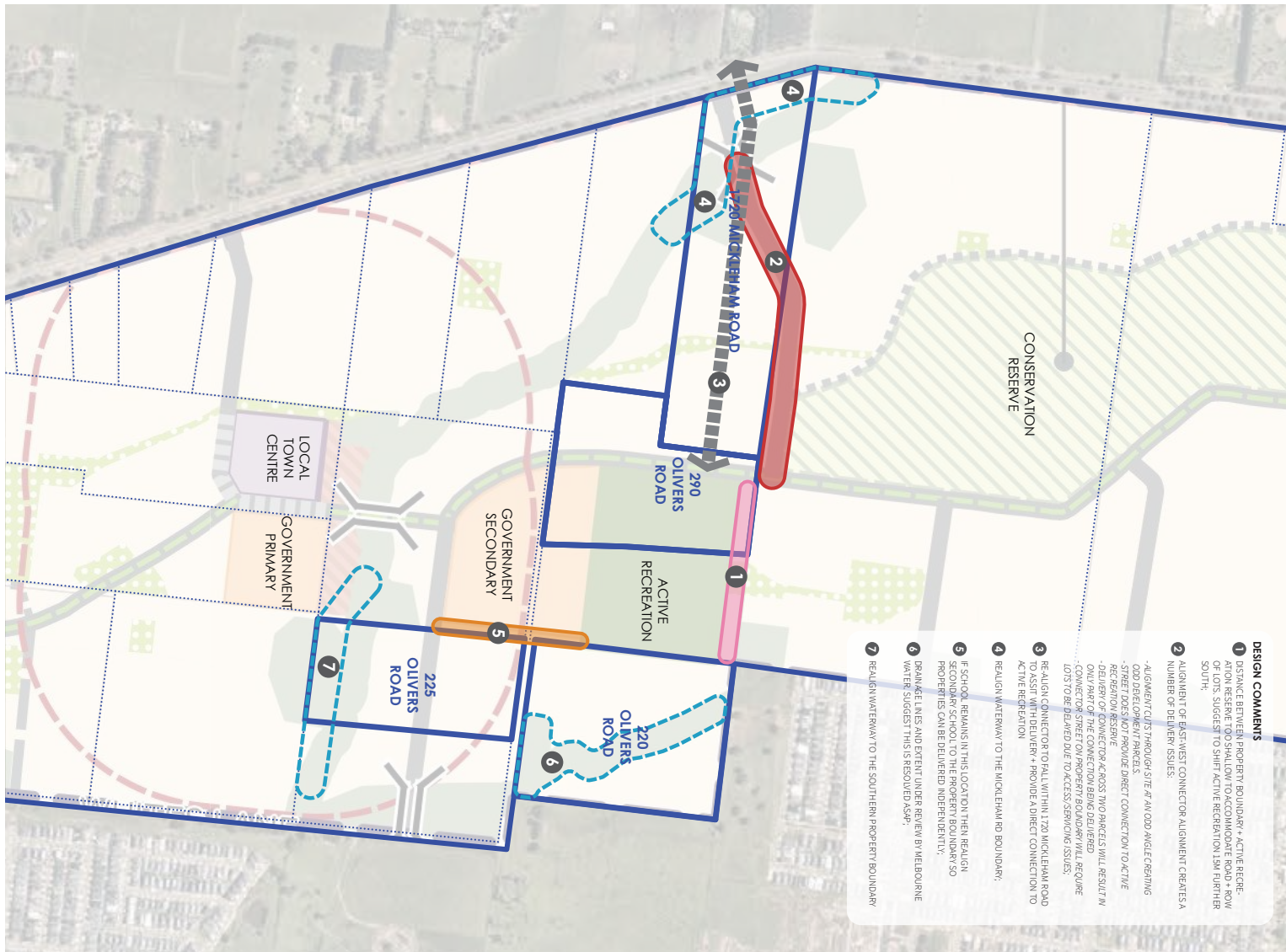
<sup>1</sup> Our high level assessment has adopted the VPA benchmarks costs and the NDA as per the PSP on public consultation.

## 4 Planning Scheme Amendment process

This submission follows on from our letter dated 10 September 2020 in relation to the procedural change to the PSP amendment which became evident in August 2020 and has meant that the amendment has not been formally put on exhibition but rather released for public consultation. We understand that the proposal is for submissions to be considered by the newly established Standing Advisory Committee Process (SAC), rather than a Planning Panel.

We support the broad objective to reduce amendment timeframes and to address issues via upfront consultation but believe that the Craigieburn PSP process to date has not been able to achieve these two aims. It therefore remains our submission that the formal consultation and submissions process must be given priority over rushing the process to ensure that a thorough consideration of the issues is undertaken. Moreover, it is our submission that the principles of natural justice and orderly planning must be followed for the Craigieburn West PSP amendment in allowing us to make submissions and test assumptions of the PSP by calling evidence at the SAC. On that basis, we urge the VPA to request the SAC hear submissions and evidence via a public Committee Hearing and process.

# Appendix 1: Exhibited PSP Design Review





## Appendix 2: PSP Requirements and guidelines

Requirement/Guideline/Plan	Comment	Recommendation
<b>R2</b> <i>Subdivision must provide a diverse neighbourhood character by providing a range of lot sizes and dwelling types in appropriate locations throughout the Precinct, including achieving minimum average densities and planned neighbourhood character as specified in Plan 4 (Place Based Plan) and Table 2 (Housing density guide and planned neighbourhood character).</i>	Unclear how the average densities for the PSP have been derived.	Clarification required from the VPA.
<b>R4</b> <i>Development along Mickleham Road and Mt Ridley Road must provide a sensitive rural interface through design treatments, which include a landscaped nature strip between the row of housing and road reservation.</i>	This has not been consistently applied in other approved PSPs along Mickleham Rd interface (i.e. not applied in Greenvale Central, Greenvale West, Merrifield West) and it is unclear as to what an ideal design response would be for this interface.	VPA to advise of the expectations for the Mickleham Rd interface and provide clearer direction or options for this to avoid confusion at permit stage.
<b>R5</b> <i>An application for subdivision of land into residential lots or development of land for residential or mixed use purposes must provide affordable housing as defined by the Planning &amp; Environment Act 1987 to the satisfaction of the responsible authority.</i>	The Planning Panel for Beveridge North West PSP considered the requirements and guidelines affordable housing in detail and recommended that the requirement for affordable housing in the PSP be deleted, and for an application requirement to be included within the Urban Growth zone (similar to the draft in UGZ Schedule 12). It made this recommendation on the basis that without a strategic assessment or study of the affordable housing needs and delivery mechanisms it was not appropriate to include a mandatory requirement. Given the detailed consideration of this issue by a recent Planning Panel, we submit that the Panel recommendations ought to be adopted for the Craigieburn West PSP and R5 should therefore be deleted.	Adopt Panel recommendations for the Craigieburn West PSP and delete R5.

Requirement/Guideline/Plan	Comment	Recommendation
<p><b>G4</b>  <i>Applications for residential subdivision or development should provide an equivalent of up to 10% of the total number of dwellings forecast to be provided (and may be provided as constructed dwellings or land or otherwise). The affordable housing should:</i></p> <ul style="list-style-type: none"> <li><i>be provided within walkable catchments where practicable;</i></li> <li><i>provide for a range of housing typologies to meet demonstrated local need; and</i></li> <li><i>provide for very low, low, and moderate income households</i></li> </ul>	<p>The VPA (and its experts) at the Beveridge North West Panel Hearing acknowledged that the 10% target for affordable housing is an arbitrary figure and is not linked to any previous study or background report and there was a call by many experts that the target metric ought to be removed from the PSP. An affordable housing report has not been publicly released for the PSP to provide the basis for the 10% target nor has any other information in support of such a target been put forward. On that basis, we submit that the target should be removed from G4.</p> <p>We reiterate that we do not object to including an affordable housing 'guideline' within the PSP as an acceptable response to the relevant policy directions, provided it is properly worded.</p>	<p>Remove 10% affordable housing target from G4.</p>

Requirement/Guideline/Plan	Comment	Recommendation
<p><b>G6</b>  <i>Subdivision should provide for a street separating development from waterways, sporting reserves and local parks and the linear reserve. Where subdivision does not propose a local street separating development, design and layout options should demonstrate:</i></p> <ul style="list-style-type: none"> <li>• <i>Lots directly fronting open space and landscape value areas should be set back at least 4.0 metres from the waterway corridor and open space.</i></li> <li>• <i>Lots directly fronting open space should allow for vehicular access via a rear laneway.</i></li> <li>• <i>A “paper road” should be provided as the primary point of access from a footpath or shared path with a minimum width of 1.5 metres along the lot frontage.</i></li> <li>• <i>Subdivision design should avoid side or rear fence treatments fronting open space.</i></li> <li>• <i>Subdivision design should maximise opportunities for informal passive surveillance.</i></li> <li>• <i>Subdivision design should not limit the use of adjacent open space. All to the satisfaction of the responsible authority and Melbourne Water, where adjacent to a waterway.</i></li> </ul>	<p>Support inclusion of this guideline to enable diversity within the precinct and to maximise amenity and outlook to natural features and open space.</p>	<p>Retain Guideline in PSP.</p>
<p><b>G7</b>  <i>Subdivision applications for super-lots identified for future medium density, high density, or integrated housing should demonstrate:</i></p> <ul style="list-style-type: none"> <li>• <i>Expected dwelling density in line with Table 2 (Housing density guide and planned neighbourhood character).</i></li> <li>• <i>Connections and active interfaces with adjacent streets, open space and waterways.</i></li> <li>• <i>Safe and effective internal vehicle and pedestrian circulation.</i></li> <li>• <i>Indicative treatments for interfaces with non-residential land uses.</i></li> </ul>	<p>This is an application requirement in the UGZ and so doesn't need to be repeated.</p>	<p>Delete from PSP.</p>

Requirement/Guideline/Plan	Comment	Recommendation
<b>G8</b> <i>Specialised housing forms, such as retirement living, or aged care should:</i> <ul style="list-style-type: none"> <li>• Respond to and integrate with adjoining development, avoiding inactive interfaces and blank facades to the public street network.</li> <li>• Be located within the walkable catchment shown on Plan 4 (Place Based Plan)</li> <li>• Be accessible by public transport.</li> <li>• Not present a barrier to movement through the surrounding road and pedestrian movement network.</li> </ul>	<p>Whilst this is a Guideline and therefore not mandatory, it is still explicit in stating that specialised forms of housing should be in the walkable catchment. Given the shape of this PSP and its limited 'walkable catchment', this significantly constrains the ability for these specialised housing forms to establish in the precinct.</p>	<p>Add 'where practicable' to dot point 2.</p>
<b>G18</b> <i>The frequency and impact of vehicular crossovers on verges of connector roads should be minimised by applying a combination of:</i> <ul style="list-style-type: none"> <li>• Rear loaded lots with laneway access.</li> <li>• Vehicular access from the side streets.</li> <li>• Combined or grouped crossovers.</li> <li>• Increased lot widths.</li> </ul>	<p>Connector streets are low speed traffic environments that are suitable for direct lot access. We appreciate that the connector road will carry up to 10,000 vpd, however given the road is to be designed with a central median the potential for conflict (via right hand turns etc.) is limited.</p> <p>Moreover, with regard to the two way bike path, the standard connector street cross section allows for a 4.5m clearance between the property boundary and the pathway. This distance was agreed to by growth area councils and the VPA as a sufficient zone for vehicles to stop if necessary, prior to the bike path.</p>	<p>Remove guideline.</p>

Requirement/Guideline/Plan	Comment	Recommendation
<p><b>R10</b>  <i>Stormwater conveyance and treatment (including interim solutions) must be designed to avoid or mitigate the risk of erosion from sodic/dispersive soils and in accordance with the relevant Development Services Scheme and Plan 6 (Integrated Water Management Plan) to the satisfaction of Melbourne Water and the responsible authority.</i></p> <p><i>Note: this may result in variation to the Melbourne Water DSS as shown on Plan 6 (Integrated Water Management Plan).</i></p>	<p>Any extra over land flow requirement or costs to specifically deal with sodic soils must be funded by the scheme. Normally, waterway land is not funded by the DSS, we would propose any 'extra over' land required for sodic soil management in waterway reserves be funded.</p>	<p>Add to note to say this could include changes in the DSS in relation to sodic soil requirements.</p>
<p><b>R11</b>  <i>Final designs and boundaries of constructed wetlands, retarding basins, stormwater quality treatment infrastructure, and associated paths, boardwalks, bridges, and planting, must include appropriate treatments to provide protection for dispersive soils where these are present and be designed to the satisfaction of both Melbourne Water and the responsible Authority.</i></p>	<p>As per R10. The normal conveyance widths not funded, extra land for sodic soil management must be funded as all landowners and ultimately the community take benefit.</p>	<p>As per R10.</p>
<p><b>R15</b>  <i>Applications must demonstrate, through the preparation of Integrated Water management Plans:</i></p> <ul style="list-style-type: none"> <li><i>Waterways and integrated water management design enables land to be used for multiple recreation and environmental purposes.</i></li> <li><i>Overland flow paths and piping within road reserves will be connected and integrated across property/parcel boundaries.</i></li> <li><i>Melbourne Water and the responsible authority freeboard requirements for overland flow paths will be adequately contained within the road reserves.</i></li> <li><i>Relevant Integrated Water Management (IWM) requirements of this PSP will be achieved to the satisfaction of the retail water authority, including the supply of recycled water where required by the relevant water authority.</i></li> </ul>	<p>Our submission makes the note that waterways should be adjacent to public land such that any stormwater harvesting initiatives can be realised – particularly active open spaces and schools.</p> <p>Whilst we are a supporter of IWM initiatives, we caution the mandating of tanks via a IWM permit condition or mandating tanks via permits. The density targets in this PSP makes it very difficult to incorporate rainwater tanks coupled with the lack of demand/competition with the Class A Recycled Water (mandated) reticulated system.</p>	



Requirement/Guideline/Plan	Comment	Recommendation
<b>R21</b> <i>Development adjoining bushfire hazards shown on Plan 7 (Bushfire Plan) must be setback in accordance with Table 4 (Bushfire hazard vegetation management &amp; setback requirements).</i>	We are unclear what the rationale is for the Waterway for Aitken Creek being classified as a Bushfire Hazard 2 (Grassland). The northern end of the Aitken Creek will be a highly modified waterway corridor as it is less defined in this location and will be designed and landscaped in accordance with Melbourne Water standards.	Change classification of northern section of waterway to Bushfire Hazard 3.
<b>R22</b> <i>Where a setback from a bushfire hazard area is required by Table 4 (Bushfire hazard vegetation management &amp; setback requirements), unless otherwise agreed by the responsible authority and relevant fire authority, vegetation within the setback must be managed as follows:</i> <ul style="list-style-type: none"> <li>• <i>Grass must be short cropped and maintained during the declared fire danger period.</i></li> <li>• <i>All leaves and vegetation debris must be removed at regular intervals during the declared fire danger period.</i></li> <li>• <i>Within 10 metres of a building, flammable objects must not be located close to the vulnerable parts of the building.</i></li> <li>• <i>Plants greater than 10 centimetres in height must not be placed within 3m of a window or glass feature of the building.</i></li> <li>• <i>Shrubs must not be located under the canopy of trees.</i></li> <li>• <i>Individual and clumps of shrubs must not exceed 5 sq. metres in area and must be separated by at least 5 metres.</i></li> <li>• <i>Trees must not overhang or touch any elements of the building.</i></li> <li>• <i>The canopy of trees must be separated by at least 2 metres.</i></li> <li>• <i>There must be a clearance of at least 2 metres between the lowest tree branches and ground level.</i></li> </ul>	As per above.	As per above.

Requirement/Guideline/Plan	Comment	Recommendation
<p><b>G29</b>  <i>Stormwater runoff in areas identified as being affected by sodic and dispersive soils should be designed to manage the potential risk of erosion. Potential management methods may include but not limited to:</i></p> <ul style="list-style-type: none"> <li>• <i>Widening the buffer distances between the core riparian zone and the outside vegetated buffers that allows sufficient tolerances for channel migration.</i></li> <li>• <i>Diversion of water away from sodic and dispersive materials.</i></li> <li>• <i>Minimising potential convergence and/or ponding of surface flows.</i></li> <li>• <i>Compacting to reduce pore spaces and minimise water movement through material.</i></li> <li>• <i>Physical and chemical soil ameliorants.</i></li> <li>• <i>Maintenance of topsoil across undisturbed land, preferably with grasses to provide surface soil stability and root anchorage.</i></li> <li>• <i>Minimise the amount of time land is exposed (e.g. by staging development).</i></li> <li>• <i>Ensure that culverts and drains excavated into dispersive subsoils are capped with nondispersive topsoil, gypsum stabilised and vegetated.</i></li> </ul>	<p>As per our comments for R10 and R11, any widening of the waterway over and above the hydraulic widths to convey flows must be funded by the scheme.</p>	
<p><b>G35</b>  <i>Utility easement to the rear of lots should only be provided where there is no practical alternative.</i></p>	<p>Rear easements are a key part of the urban forest strategy in certain areas. 'Practical alternative' needs better definition.</p>	<p>Amend G35 to define what 'practical alternative' means.</p>
<p><b>G37</b>  <i>Subdivision adjoining a bushfire hazard area should include a publicly accessible perimeter road.</i></p>	<p>Assume that this would only apply to Bushfire Hazard Areas 1 and 2 and not Areas 3 and 4 which are low threat.</p>	<p>Clarification required and to be reflected in G37.</p>

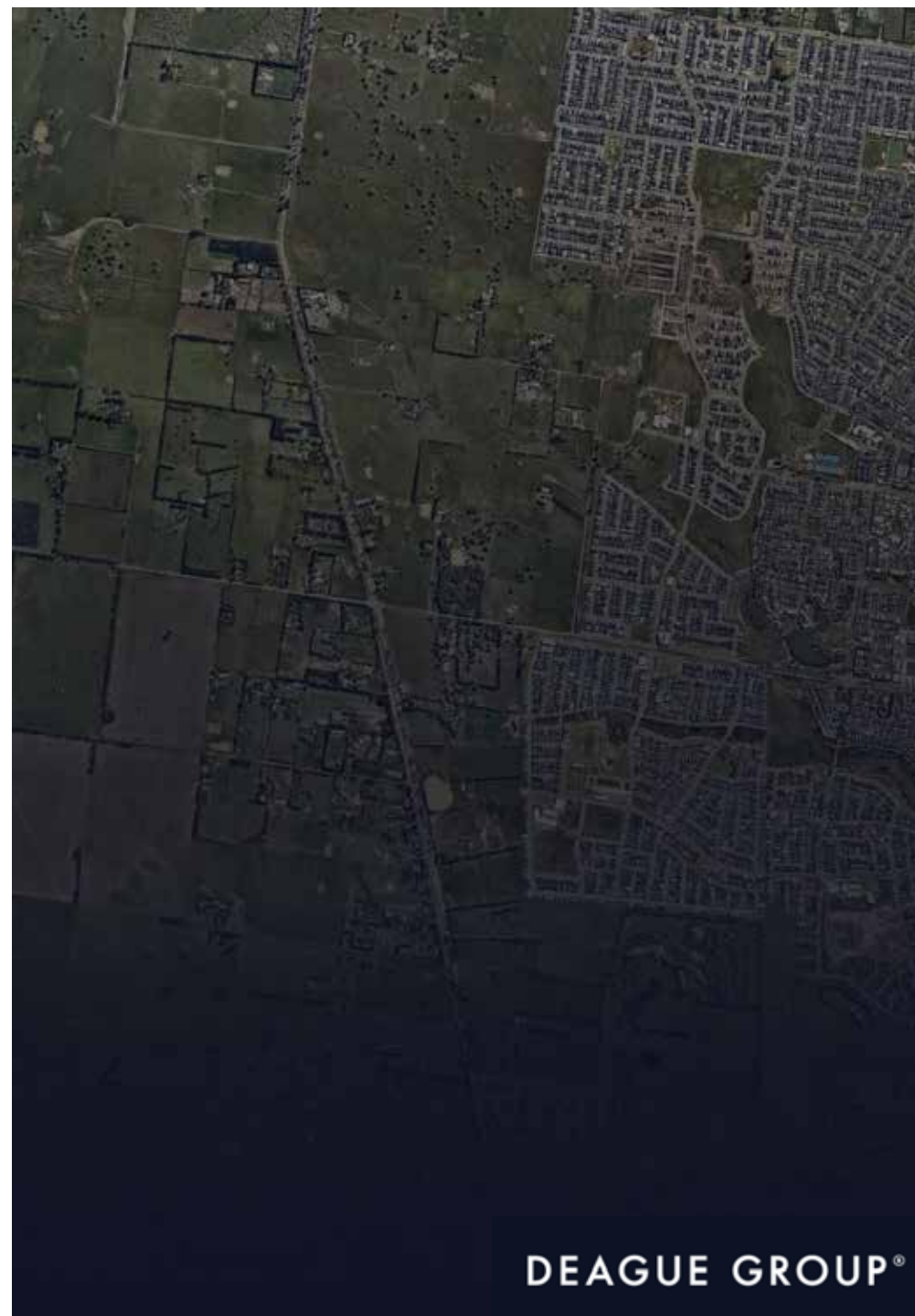
Requirement/Guideline/Plan	Comment	Recommendation
<b>G39</b> <i>Where a setback is required from a bushfire hazard, the setback should be provided on public land where practical.</i>	<p>Suggest that this guideline be reworded to allow for the setback to be on private land so long as maintenance is undertaken in accordance with the Bushfire Management Plan which is required to be prepared with a subdivision application.</p> <p>The Bushfire Site Management Plan should provide the direction appropriate for each site rather a blanket guideline across the PSP.</p>	Delete guideline or reword so that the setbacks defer to the Site Management report.
<b>R23</b> <i>Trees in streets, civic places and the open space network must be provided in accordance with Council's policies and guidelines, and:</i> <ul style="list-style-type: none"> <li>• <i>Complement the existing native indigenous and exotic species.</i></li> <li>• <i>Be larger species to facilitate continuous canopy cover.</i></li> <li>• <i>Be planted in modified and improved soil to support tree establishment.</i></li> <li>• <i>Be appropriately sized to nature strips, nearby utilities and buildings.</i></li> <li>• <i>Suited to local conditions.</i></li> </ul>	Support this initiative but must be co-ordinated with service depths and offsets. The use of site won soils and the requirement to review and enhance soils is supported.	
<b>R24</b> <i>The first development proponent to lodge a permit application for land which contains a section of the linear park as outlined on Plan 8 (Open Space Plan) must undertake a master plan for that section of the entire linear park, unless otherwise agreed by the responsible authority.</i> <p><i>The masterplan may be prepared in separate stages (i.e. north and south of Craigieburn Road) to the satisfaction of the responsible authority.</i></p>	This requirement is unclear. If an application is lodged on parcel 7, would R24 require that a masterplan is prepared for the entire GLO3 (parcels 7 and 8) or all the green link down to Craigieburn Road.	Clarification required. Amend R24 so it is clear what is required by each landowner.

Requirement/Guideline/Plan	Comment	Recommendation
<b>G48</b> <i>Public recreation and open space areas should be located adjacent to significant landscape value areas and waterways to create and or enhance any buffer area.</i>	The PSP does not really provide for this.	
<b>R27</b> <i>Where a Place of Worship/assembly is proposed to be retained, subdivision and development adjacent to existing and future Places of Worship and Places of Assembly as indicated on Plan 9 (Heritage &amp; Public Realm Plan) must:</i> <ul style="list-style-type: none"> <li>• <i>Ensure the site becomes a feature of the precinct.</i></li> <li>• <i>Provide a buffer between the Places of Worship &amp; Assembly and new dwellings.</i></li> <li>• <i>Ensure the building is contained on a parcel that provides an appropriate curtilage to the building.</i></li> <li>• <i>Maintain convenient access to the site.</i></li> <li>• <i>Ensure the parcel containing the Places of Worship &amp; Assembly has access to the internal subdivision street network.</i></li> </ul> <i>All to the satisfaction of the responsible authority.</i>	<p>Unless a building has heritage significance or is contributing in another sense, it is not the role of the PSP to require that each existing building becomes a feature of the precinct.</p> <p>It is also a very vague requirement to be applied to adjoining land.</p>	Delete first dot point of R27, and change 'must' to 'should'.
<b>G63</b> <i>Subdivision and development should facilitate integration of schools, sports reserves and community facilities where they are co-located and promote:</i> <ul style="list-style-type: none"> <li>• <i>Integration with neighbouring facilities to maximise efficiencies through the sharing of car parking and other complementary infrastructure.</i></li> <li>• <i>Out-of-hours use, street activation and permeability.</i></li> <li>• <i>Safe and convenient pedestrian and cyclist shared path access.</i></li> </ul>	The integration of community recreation and education facilities is the role of the State and local government, not a development proponent who in the case of this PSP has only part of the land for each land use. Given the recreation and education sits across multiple titles it is very difficult for a single developer to facilitate an integrated design response.	Reword to acknowledge that the subdivision may not facilitate the integration but it should not compromise the design of the facilities in an integrated fashion.

Requirement/Guideline/Plan	Comment	Recommendation
<b>G71</b> <i>The staging of development should provide for the early delivery of sports fields, community facilities, local parks and playgrounds within each neighbourhood and may be delivered in stages in consultation with the responsible authority.</i>	This is difficult to achieve when key community infrastructure facilities such as active recreation and government schools are located across multiple properties.	Amend as follows: 'should provide for the early acquisition or delivery of ...'
<b>G73</b> <i>Infrastructure projects identified in the Plan 11 (Precinct Infrastructure Plan) should be delivered as per the timing priority identified in the timing column of Appendix 4.1.</i>  <i>Where infrastructure is proposed to be delivered outside or ahead of the sequence identified in Appendix 4.1, the onus is on the developer to fund the infrastructure works as 'Works In Kind'.</i>  <i>Note: Project delivery timing outlined in Appendix 4.1 is indicative and subject to periodic review by the relevant responsible authority.</i>	See comments on PIP and staging of infrastructure in Chapter 3.	
<b>Street cross sections – Connector Street (28.0 to 31.0m), Boulevard</b>	The inclusion of footway/two way bike path detail and the need for driveways will create a poor urban forest outcome.	Review cross section.
<b>Street cross sections – Local Access Street Level 1 (16.0m)</b>	Issue with the notes at this plan on the trees, should include 'canopy spread' as well (our estimation is minimum 8m in diameter).	Update cross section to refer to 'canopy spread'.



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