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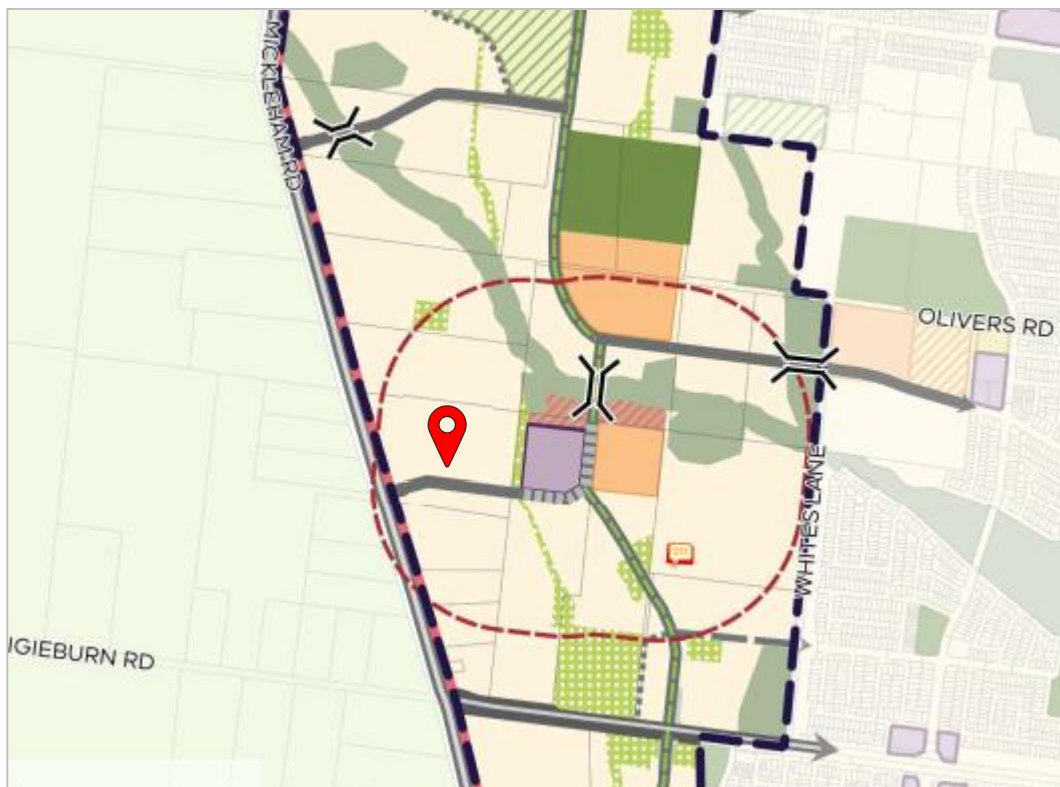
BPD Ref: 9773  
18 Dec 2020

Stephen Davis  
Victorian Planning Authority (VPA)  
Level 25, 35 Collins Street  
MELBOURNE VIC 3000

Dear Stephen,

**RE: 1600 Mickleham Road, Mickleham  
Draft Craigieburn West PSP Exhibition  
PSP Parcel 17**

We act on behalf of the future owner and developer of the above land being SFA Land Development Pty Ltd in respect to this matter. The land is identified as property 17 within the exhibited draft Craigieburn West Precinct Structure Plan. This submission is in response to the exhibited draft PSP and associated documents forming part of an amendment to the Hume Planning Scheme being advanced by the Victorian Planning Authority and Hume City Council under the VPA Fast Track Program. The below extract of the Place Based Plan identifies the subject land within the draft PSP context. The site is identified to support residential development with the majority of the land positioned within a 400 metre local town centre walkable catchment. The land is also identified to support a connector street linking Mickleham Road and the nominated town centre.



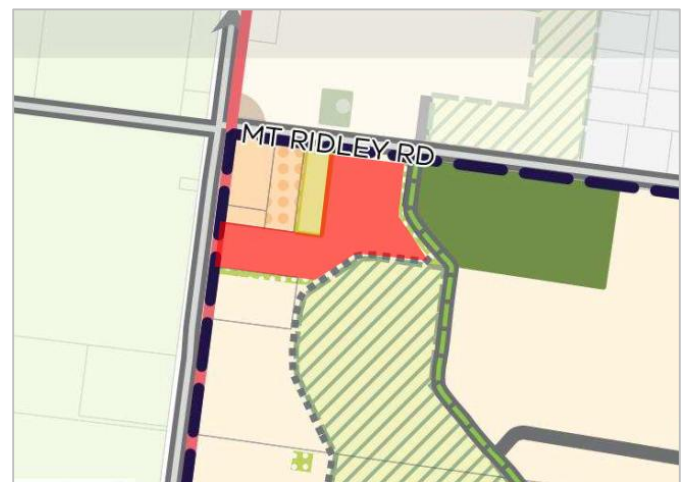
We make the following submissions following review of the exhibited documents.

### **Draft Craigieburn West PSP**

#### Housing, subdivision & built form

- 1) There is concern how the housing density outcomes of the PSP will be implemented. We are of the view that the proposed housing density target of 26.5 dwellings per net developable hectare (NDha) is too high should the minimum density need to be complied with for all individual parcels within the walkable catchment.
- 2) SFA Land Development Pty intend to submit a permit application to develop the land at the earliest time following gazettal of the PSP. SFA Land Development Pty intend to undertake the civil construction of a new residential estate and develop the dwellings to deliver turn-key house and land packages to the market. The application of a housing density of minimum 26.5 dwellings per hectare within a typical greenfield residential subdivision development raises significant concerns on the potential for such density to undermine its objectives of delivering a residential estate supporting a high level of amenity and character.
- 3) From experience with past projects the delivery of such housing density within a greenfield residential context is reliant on increased provision of compact and narrower residential lots. At this point in time there is an absence of reliable volume builders delivering higher density low-rise housing within the greenfield housing market. We consider this unlikely to change from gazettal of the PSP to planning approval and commencement of development on the land. At current, we consider it highly probable that a residential subdivision form of development will be provided on this site along with other parcels commencing development in the short-term.
- 4) A residential subdivision-lead form of development supporting a minimum housing density of 26.5 dwellings/NDha has a higher potential to undermine preferred urban design objectives. The symptoms of a housing density of this order include a higher proportion of narrower lots requiring single space garages and resultant increased on-street parking and congestion. Whilst Clause 56.06-8 the planning scheme requires on-street parking provision at a rate of one space to every two lots the reality is that Councils require one space per lot to gain planning and engineering approval. Whilst a level of rear-accessed lots will typically comprise a portion of residential lots within a walkable catchment context the majority of lots typically support front access and is reflective of market preference. The provision of an increased number of smaller lots results in a higher demand for on-street parking, albeit such lots and associated driveways decrease the quantum of on-street parking availability leading to congested local streets and reduced amenity. Where increased housing density is achieved through the creation of small lots infrastructure services within the nature strip and vehicle crossings commonly result in a reduced ability to provide sufficient unencumbered and permeable area to provide the desired level of street tree planting which is detrimental to character and amenity outcomes.
- 5) We consider it likely that delivery of the local town centre will follow in the medium to longer term. Development of the town centre will provide the appropriate context for the delivery of housing which may support low-rise apartment accommodation and housing at a higher density from 26.5 dwellings/NDha. Provision of higher density low-rise apartment housing is considered highly unlikely to be provided in the short-term representing an unproven dwelling product in this location and significant concern with the cost of development and market pricing compared to more typical house and land offerings. In this context we request that the PSP clarify that the minimum housing density target within the walkable catchment of the local town centre is to be realised over its life cycle allowing Council discretion to issue planning approval for a parcel which may not achieve the adopted minimum housing density albeit are satisfied that the housing density target will ultimately be achieved.

- 6) We note that PSP's which are significantly advanced, including Beveridge North West and Shenstone Park, support housing density within walkable catchments at a minimum of 25 dwellings/NDha with the walkable catchment of Shenstone Park in close proximity to future employment land. We do not agree that adoption of an increased walkable catchment housing density is justified within the context of this PSP.
- 7) Clause 11.03-2S concerns growth area planning encouraging average overall residential densities in the growth areas of a minimum of 15 dwellings per net developable hectare, and over time, seek an overall increase in residential densities to more than 20 dwellings per net developable hectare. Clause 11.03-2S was created as part of the roll out of the new-format Planning Policy Framework under Amendment VC148 in July 2018.
- 8) There appear to be opportunities to achieve the desired housing density target of a minimum of 20 dwellings/NDha over the PSP area through realising opportunities for increased housing density in areas external to the local town centre walkable catchment. It is considered that such areas may support housing at an increased density as they are favourably located with convenient access to activity centres within external land, the public open space network as well as school and community facility sites. These areas are identified below.



- 9) Through providing a greater level of housing diversity and increased density in areas such as the above the means of achieving the desired overall PSP density of at 20 dwellings/NDha may be achieved whilst allowing for a reduced minimum housing density within the local town centre walkable catchment.
- 10) R1 requires subdivision layouts, lot diversity and housing typologies to respond to the natural and rural landscape interface west of Mickleham Road. R4 requires development along Mickleham Road to provide a sensitive rural interface through design treatments, which include a landscaped nature strip between the row of housing and road reservation. The inference of R1 and R4 is that the subdivision and housing character along Mickleham Road is to support a specific character which is responsive to its rural context west of Mickleham Road through greater emphasis on the landscape setting. One would typically interpret this PSP guidance as having a preference to larger residential lots which allow for greater separation between buildings and enhanced landscaping potential to achieve the preferred

balance of the built environment and landscaping. This is commonly the preferred planning and urban design preference where development interfaces a permanent rural context.

- 11) We consider there to be an apparent conflict in the housing requirements of the PSP whereby there seems to be support for reduced housing density and enhanced landscaping to be provided along Mickleham Road whilst this portion of the site is also positioned within the local town centre walkable catchment. This reinforces our position that greater flexibility should be incorporated into the PSP to achieve the ultimate housing density targets over the walkable catchment rather than require each parcel to achieve a minimum of 26.5 dwellings/NDha.
- 12) We are of the view that a more appropriate housing density target for this site is a minimum of between 20 to 23 dwellings/NDha.
- 13) Consistent with the Beveridge North West PSP we request that similar wording be provided in relation to Table 2 and R2 by including the below.

*The minimum average density provides guidance regarding the expected quantum of housing to be delivered within a development area. Applications for subdivision that do not meet the minimum average density but can demonstrate how the requirement may be achieved over time may be considered.*

- 14) R4 states *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.* The PSP provides no direction on what is expected for this road design. R4 should be redrafted as it suggests provision of a nature strip separate to a typical local street reserve cross section. It is unclear what landscaping requirements are contemplated by the requirement.
- 15) G4 appears to be contrary to R5 as it states the provision of affordable housing up to 10% and prioritised to within a walkable catchment whereas there is no such detail in R5. G4 suggests the provision of affordable housing is at the discretion of the developer up to 10% whereas R5 specifies a rate to the satisfaction of council. A rate of up to 10% represents an arbitrary figure whilst a provision of 1% or less would technically satisfy the rate of up to 10%. It is proposed that G4 is deleted and replaced with consistent affordable outcomes to G17 and G18 of the Beveridge North West PSP tracked changes Appendix 2 version.
- 16) Table 2 redraft to, *Housing will comprise a variety of typologies, **which may include** low-rise apartments buildings, terraced homes and townhouses (including rear-loaded product), and detached dwellings.*

#### Local town centre

- 17) As higher density housing is identified within close proximity to the local town centre, and with no concept layout for the activity centre included in the PSP, we request an additional performance guideline be included in Table 7 as follows:

*The design of the local town centre is to ensure that the back-of-house design and operation will not result in a detrimental impact to the amenity of surrounding residential land.*

- 18) As the local town centre is positioned centrally within the PSP area access is required via the connector street network through residential areas rather than via an arterial road. We request the VPA further review the proposed location of the town centre and its potential relocation along an arterial road.

Vegetation

- 19) VPA to confirm there is no expectation of the PSP for retention of existing Cypress trees located in adjoining land adjoining the site's east boundary and in GL-04 as shown below.



UGZ12

- 20) The affordable housing assessment should have formed part of the PSP background information rather than a site specific requirement upon submission of permit applications. The requirements and guidelines in the PSP address provision of affordable housing. Propose deletion of the requirement to prepare an affordable housing assessment.

We welcome the opportunity to discuss the above matters in further detail with the VPA. For further discussion please contact the undersigned on either 0430 588 237 or [timh@bpd.com.au](mailto:timh@bpd.com.au).

Yours faithfully  
for breese pitt dixon pty ltd

A handwritten signature in black ink, appearing to read 'Tim Hamilton', written over a horizontal line.

Tim Hamilton  
Manager - Planning

