

Dear Stephen,

18 December 2020

Mr. Stephen Davis
Senior Planning Advisor
Victorian Planning Authority

Sent via email:
amendments@vpa.vic.gov.au

**Submission to Draft Craigieburn West Precinct Structure Plan
75 Whites Lane, Mickleham**

Ratio Consultants acts on behalf of the *Universal Syrian Orthodox Church*, in relation to land at 75 Whites Lane, Mickleham ('the subject site').

The subject site is occupied by the Syrian Orthodox Church, which is an established and long standing use that has been serving the community for over 30 years.

As the subject site is located within the Craigieburn West Precinct to which the draft Craigieburn West Precinct Structure Plan (the "Draft PSP") applies – accordingly we make this submission.

By way of background, our Client has held several previous discussions / meetings with the VPA to explain their future intentions to expand the existing church facility on the subject site, as well as develop the land for a range of uses comprising medical, childcare, community hall, sports facility, and residential subdivision. This was outlined in a letter to VPA from our office dated 20 December 2018 (as attached).

The VPA has previously acknowledged the important role of the church in the area and understood that our Client has an intention to expand the church into a wider complex which offers additional services and complementary land uses.

Having reviewed the Draft PSP, our Client wishes to make the below submissions.

1 Site Context

Our Client's land is identified as Property ID #25 under the Draft PSP.

The subject site is 16.73ha in size and at present comprises an existing church with associated buildings which are centrally located, as pictured below. Planted vegetation frames the driveway entry into the site which is accessed from Whites Lane to the east.

The land is generally barren with respect to vegetation cover, save for a number of scattered trees generally located in the southern third of the property and along the northern property boundary. Further, two dams exist at the northern third of the property, and a communications tower is positioned in the south-western corner.

Photo 1

Aerial photo of subject site and surrounding context.



2 Submissions to Draft PSP

2.1 Overview

In review of Plan 4 'Place Based Plan' and general directions of the Draft PSP, our Client wishes to express its support for the following key outcomes:

- Recognition of existing church on the subject site (Plan 9).
- The future zoning of the land is likely to be an applied residential zone (General Residential Zone is preferred by our Client), which is compatible with the current place of worship and will permit the additional land uses which are envisaged by our Client.
- The proximity of the local town centre which is located within a walkable catchment, as well as the adjacent school site to the west, which are complementary to the current and future uses envisaged on the site.
- The opportunity for future connections from the west, where at present vehicle access has been limited to Whites Lane (albeit the specific location of the connector road is not supported – as addressed below).

Figure 1

Extract from Plan 4 'Place Based Plan' of the draft Craigieburn West PSP.



In review of the Draft PSP, we wish to raise a number of points of objection and clarification for the VPA to consider, which are set out under the following themes:

- Future road layout and access
- Facilitating the future expansion of the church complex and land use opportunities
- Lot density requirements
- Extent of trees sought for retention
- Design and location of the drainage asset 'ACWL03'

Each of these matters are addressed in turn below.

2.2 Future road layout and access

Our Client does not support the proposed 'connector road' alignment within the Draft PSP, which does not offer adequate and necessary access to the subject site. Having regard to both the current and proposed future land uses, the lack of suitable road access to the west as well as connection to other uses within the precinct, is problematic and may be prejudicial to our Client's future vision for the land.

Please refer to the accompanying submission from Ratio's Transport / Traffic team which identifies the road design deficiencies with the Draft PSP, and moreover, seeks to offer a proposed solution that involves realignment of the connector road to the western edge of the subject site. Not only does this solution cater for the needs of our Client, but it also provides benefits to surrounding landowners consistent with the purposes of the Draft PSP.

Figure 2

Extract from Plan 5 'Transport Plan' of the Draft PSP.



As identified on Plan 5 'Transport Plan' of the Draft PSP (as pictured above), a Boulevard Connector Road abuts the south-western corner of the subject site only, although does not allow for suitable / convenient access to accommodate the existing and proposed future uses on the land.

The angled alignment of this Boulevard Connector Road will result in irregular and complex subdivision layouts and inefficient development of the land through the creation of triangular / trapezoid land parcels. This concern relates not only to the subject site, but also relates to the land to the west (Property ID #24 of the Draft PSP).

Further to this, we note that the proposed connector road bisects parklands which contains the largest cluster of high retention value trees in the immediate area. This is a sub-optimal outcome based on environmental and urban design grounds, as it appears that a large number of these existing valued trees will need to be removed to develop the proposed road position.

For greater detail regarding the road/access concerns from a traffic engineering perspective please refer to the enclosed letter prepared by Ratio Consultants dated 10 December 2020. This letter also includes an alternate road layout which improves the road network and access arrangements within the precinct.

2.3 Facilitating the future expansion of the church complex and land use opportunities

The Draft PSP identifies the existing church land use at the subject land by nominating its location as 'place of worship / assembly'.

The existing church has been in operation for the last 30 years, creating a strong presence in the area with the local population. We note that Requirement 27 of the Draft PSP acknowledges the important role of the established use on the land, as it directs that the church should *"become a feature of the precinct"*.

Figure 3

Extract from Plan 9 'Heritage and Public Realm Plan' of the Draft PSP.



There is intention to expand the church complex into a 'community hub' which will include additional land uses complementary to the place of worship land use. This includes developing areas of the land which are identified as 'residential'. The proposed land uses (albeit non-residential) are permissible with any future residential zoning and can be appropriately designed to co-exist, and be compatible with, the surrounding land uses including the school and residential subdivisions.

At present, we observe the Draft PSP directs childcare centres and medical centres to be located "*within or at the edge of the local town centre*" (Section 4.3 of the Draft PSP). We consider this guideline is too narrow and unduly restrictive.

Instead, we suggest an additional guideline be inserted, or the wording of this guideline should be modified to offer more 'flexibility' and 'encouragement' for such uses to occur in the precinct. For example, we consider that it is entirely appropriate for a childcare or medical centres to be located on the subject site which is located within the walkable catchment of the local town centre, is co-located with an existing place of worship and other non-residential uses including the proposed school site. Accordingly, the guideline should be added or amended to recognise this opportunity.

This would provide for a suitable and preferential planning outcome that would serve the interests of the current and emerging community and also aligns with state and local planning policy, by promoting synergies and convenient traffic / pedestrian movement between complementary and co-located land uses.

Subject to modified wording of the land use guidelines as above, the Draft PSP ought to enable (rather than unduly restrict) the future intentions of our Client to expand the church complex and introduce new appropriate land uses (as outlined above).

2.4 Lot density requirements

Under the Draft PSP, the subject site is partly anticipated (with the exception of the church land use) to deliver residential development.

Whilst our client intends to provide new housing and notionally supports the objective to increase residential densities in the most accessible locations, it is considered the proposed lot density (26.5 per ha) to be excessively high and unviable.

Table 2 of the Draft PSP, classifies the site as ‘residential within walkable catchment’ with the following neighbourhood character outcomes anticipated:

“Development will have an urban neighbourhood character, characterised by buildings up to four storeys in height.

Housing will comprise a variety of typologies, including low-rise apartments buildings, terraced homes and townhouses (including rear loaded product), and detached dwellings.”

Additionally, lot densities anticipated are 26.5 dwellings per net developable hectare.

Requirement 2 of the Draft PSP, is as follows:

“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 and Table 2.”

Given that the subject site contemplates an expansion of the existing place of worship, and add new non-residential uses, achieving the prescribed minimum lot density of 26.5 dwellings per net developable hectare is not viable and is not appropriate having regard to interface issues with the current and future uses envisaged.

The density targets which are sought to be achieved by the Draft PSP do not appear to be directed by any findings in the supporting background documents. Higher residential densities are often sought in areas proximate to activity centres where a high public transport catchment is achieved. Excepting the proposed bus routes, the medium density housing areas are located in an area where public transport services are limited – the nearest railway station is more than 4km away and not within walking distance. Market and housing demand trends are unlikely to support such high-density targets in this area, given the site’s context and the scale of activity centres proposed within the PSP. As such, we query the 26.5 dwellings per hectare target proposed by the Draft PSP.

Until such time as the expansion of the church complex occurs, we consider that greater flexibility pertaining to achieving minimum lot densities be provided. As such we recommend rewording Requirement 2 to:

“Subdivision must provide a diverse neighbourhood character by providing a range of lot sizes and dwelling types in appropriate locations throughout the Precinct. Subdivision should achieve minimum average densities and planned neighbourhood character as specified in Plan 4 and Table 2.”

We welcome any alternate wording which allows for flexibility with respect to achieving minimum lot densities.

2.5 Extent of trees sought for retention

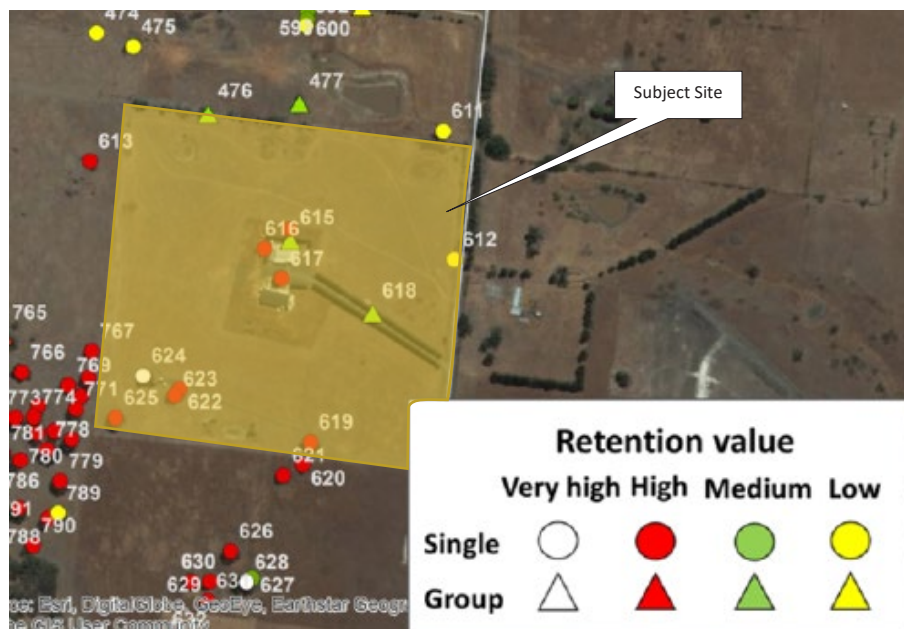
We refer to the background documents prepared which are summarised below as relevant to the subject site:

- The Craigieburn West Landscape Character Assessment dated February 2019. This report shows the subject site as having no ‘established vegetation’, and within Landscape Character Type 01 ‘Open Grassy Plains’ generally characterised by its flat gradient, clear expanse of land and some scattered remnant River Red Gums. The subject land is identified as having key views to existing urban interfaces only. No canopy or tree line views are relevant to the subject site. The retention of River Red Gums is identified as an opportunity for the precinct in the findings of the assessment.
- The Arboricultural Assessment Report dated 27 February 2019, we make the following observations:
 - Three trees in the south-western corner of the subject site are specified as within the ‘Significant Area A’.

- Map 2 of this report identifies the retention value of existing trees on the land, including one tree that has a very high retention value, seven trees have high retention value, two trees have medium retention value and one tree has low retention value.
- Trees at the subject land are generally scattered.

Figure 4

Extract of Map 2 of the Aboricultural Assessment report prepared by Treetec, dated 27 February 2019.



In review of the Draft PSP we note that the south western trees (Trees #622, #623 and #624) are identified for retention with the remaining trees considered appropriate for removal.

With respect to retention quality, trees approved for removal also comprise trees which have high retention value. We observe that a Local Park (LP-07) measuring 0.3ha in area is proposed for the purpose of retaining these existing trees (according to Table 5 of the Draft PSP). We also observe that LP-07 will also contain the existing communications tower.

As the land is developed and infrastructure delivery progresses, the telecommunications tower may be relocated (including in association with future expansion of the church complex).

We recommend including a guideline or requirement within the Draft PSP that offers flexibility around the retention of the Trees #622, #623 and #624 in the event that the telecommunications tower is relocated.

Our Client intends to undertake a peer review tree study given the arborist report is somewhat dated (report is dated February 2019) and to determine the retention value of the trees for the proposed purpose of creating a new local park.

At this time, our Client provisionally seeks to contest the location of the proposed Local Park on the subject site until further investigations are undertaken as outlined above.

2.6 Design and location of the drainage asset 'ACWL-03'

The Draft PSP specifies a drainage asset proposed at the subject site, known as 'ACWL-03'. This asset is identified as a 2.21ha wetland.

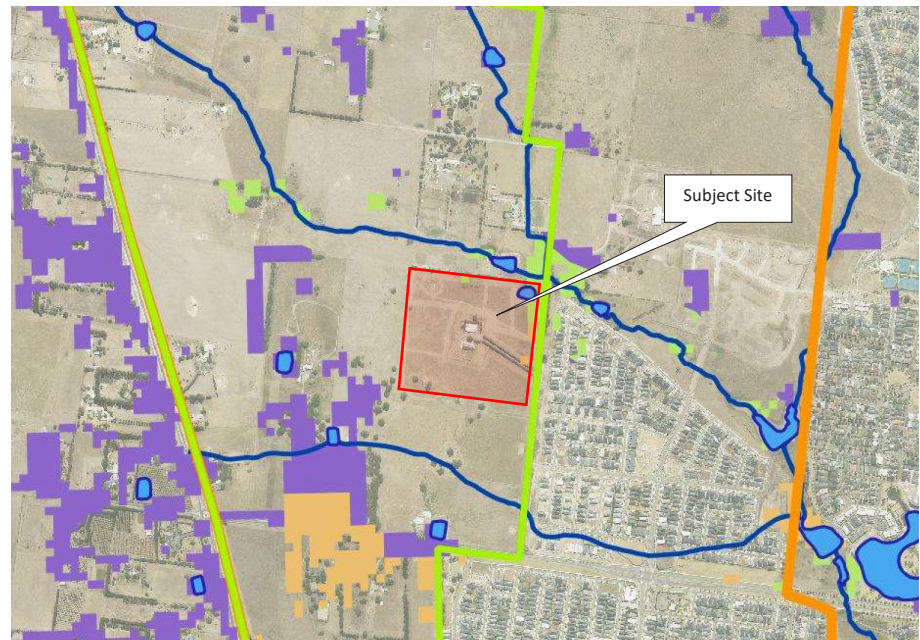
In review of the Integrated Water Management Issues and Opportunities report prepared dated March 2019, we note:

- A watercourse affects the northern adjoining property, but does not appear to affect the subject site itself.

- A waterbody is identified in the north-eastern corner of the subject site, as reflected by the existing dam.
- The 100 year flood extent does not affect the subject site (see **Figure 6**).

Figure 5

Extract from Figure 4 of the Integrated Water Management Issues and Opportunities report.



In review of the Draft PSP (as below), there is a proposed drainage asset/wetland that partially affects the north-western corner of the subject site.

Our client questions the size and location of this asset, including whether there is a demonstrable 'need' for such a wetland on the subject site, noting there does not appear to be any justification offered in the Integrated Water Management Issues and Opportunities Paper (as outlined above).

Figure 6

Extract from Plan 5 'Integrated Water Management Plan' of the Draft PSP.



Given the location of the watercourse and the extent of escarpment shrubland, we consider that the wetlands could be more appropriately considered on the northern

adjoining property (Property IDs #15 and 16) to allow for logical delivery and staging of infrastructure and the asset.

3 Conclusion

As relevant to our Client's specific property holdings, we advise that our Client generally supports certain key elements of the Draft Craigieburn West PSP, however there are a number of matters that are of concern that require greater clarification or modification of the Draft PSP to facilitate an optimal planning outcome.

Moving forward it is our Client's intention to prepare a future concept plan for the subject site to demonstrate their vision for the site in line with the matters raised in this submission.

In making this submission our Client reserves the right to respond to the outcome of the public consultation process and to present to a panel appointed to hear submissions and respond to other submissions made to the draft PSP.

Please contact the undersigned by telephone on 03 9429 311 or email robbiem@ratio.com.au should you wish to clarify or discuss any aspect of this submission. We would welcome the opportunity for further meet with VPA in relation to the subject site.

Yours sincerely,

A handwritten signature in black ink, enclosed within a hand-drawn oval shape. The signature appears to be 'Robbie McKenzie'.

Robbie McKenzie
Director: Planning
Ratio Consultants Pty Ltd

Dear Edward,

10 December 2020

Edward Dakhoul
Director / Group General
Manger
Construction Consultants
Level 7,
79 George Street,
Parramatta, NSW 2150

Craigieburn West PSP Submission
75 Whites Lane, Craigieburn – Transport Considerations

1 Introduction

The following submission seeks changes to the Draft Craigieburn West PSP, prepared by the Victorian Planning Authority (VPA) and currently on exhibition.

Based on the information provided by the Syrian Orthodox Archdiocese of Australia and New Zealand, the landowners of 75 Whites Lane, and the background reports available, Ratio have reviewed the implications to the subject site within the Craigieburn West PSP area and make the following comments for consideration by the VPA during the next phase of the PSP process.

2 Scope of Review

The following review is specific to the subject site at 75 Whites Lane, which is listed as land parcel 25 within the exhibited PSP. This submission does not include a detailed review of the wider PSP area.

The following documents have been reviewed to form the following opinion:

- PSP 1068 – Craigieburn West Precinct Structure Plan, Draft for Public Consultation, prepared by the VPA, dated November 2020.
- Craigieburn West Precinct Structure Plan, Transport Impact Assessment, prepared by onemilegrid, dated 9 November 2020 (onemilegrid report).
- Craigieburn West Precinct Structure Plan, Existing Conditions Assessment, prepared by onemilegrid dated 18/2/2020.

3 Existing Site and Surrounding Road Network

An aerial image of the subject site is shown Figure 3-1.

Figure 3-1: Aerial Image of the Subject Site

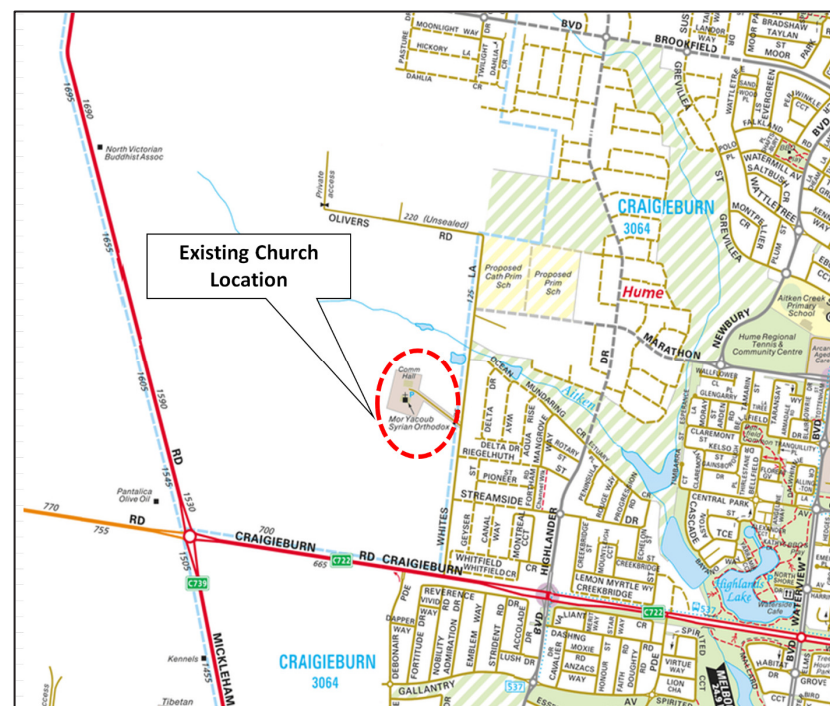


Source: Nearmap.com.au

The site is rectangular in shape and abuts Whites Lane to the east, it is approximately 17 Ha in size. The surrounding land uses are currently rural to the north, west and south and residential to the east. The site is currently occupied by two buildings and a car parking area.

The subject site in the context of the surrounding road network is shown in Figure 3-2.

Figure 3-2: Road Network Surrounding the Subject Site



Source: Melway online

As shown in the preceding figure, access to the subject site is currently provided via Craigieburn Road and Whites Lane. It is highlighted that there are currently no turning restrictions at the Craigieburn Road / Whites Lane intersection.

Craigieburn Road

Craigieburn Road is an Arterial Road aligned east west between Mickleham Road and Epping Road to the east. West of Mickleham Road, Craigieburn Road is a local road extending west to its termination shortly after Oaklands Road.

Craigieburn Road is proposed to be upgraded by Major Road Projects Victoria (MRPV) to provide four lanes to the west of Whites Lane and six lanes to the east of Whites Lane. The upgrade project is scheduled to be complete by 2025.

As part of the upgrade project, the existing traffic movements at the Whites Lane / Craigieburn Road intersection will be restricted to left-in and left-out movements only.

Whites Lane

Whites Lane is a Local Access Road that runs north-south between Olivers Road in the north and Craigieburn Road in the south.

It currently has a road reserve of approximately 20 metres providing a single vehicle width paved carriageway, with gravel shoulders allowing passing at slow speed.

Whites Lane provides access to the current church facilities on the subject site.

4 Development Potential of the Subject Site

It is understood that the envisaged development potential of the subject site includes the provision of an expanded church facility, community uses (medical centre, childcare centre, community/multi sports centre), and residential subdivision areas.

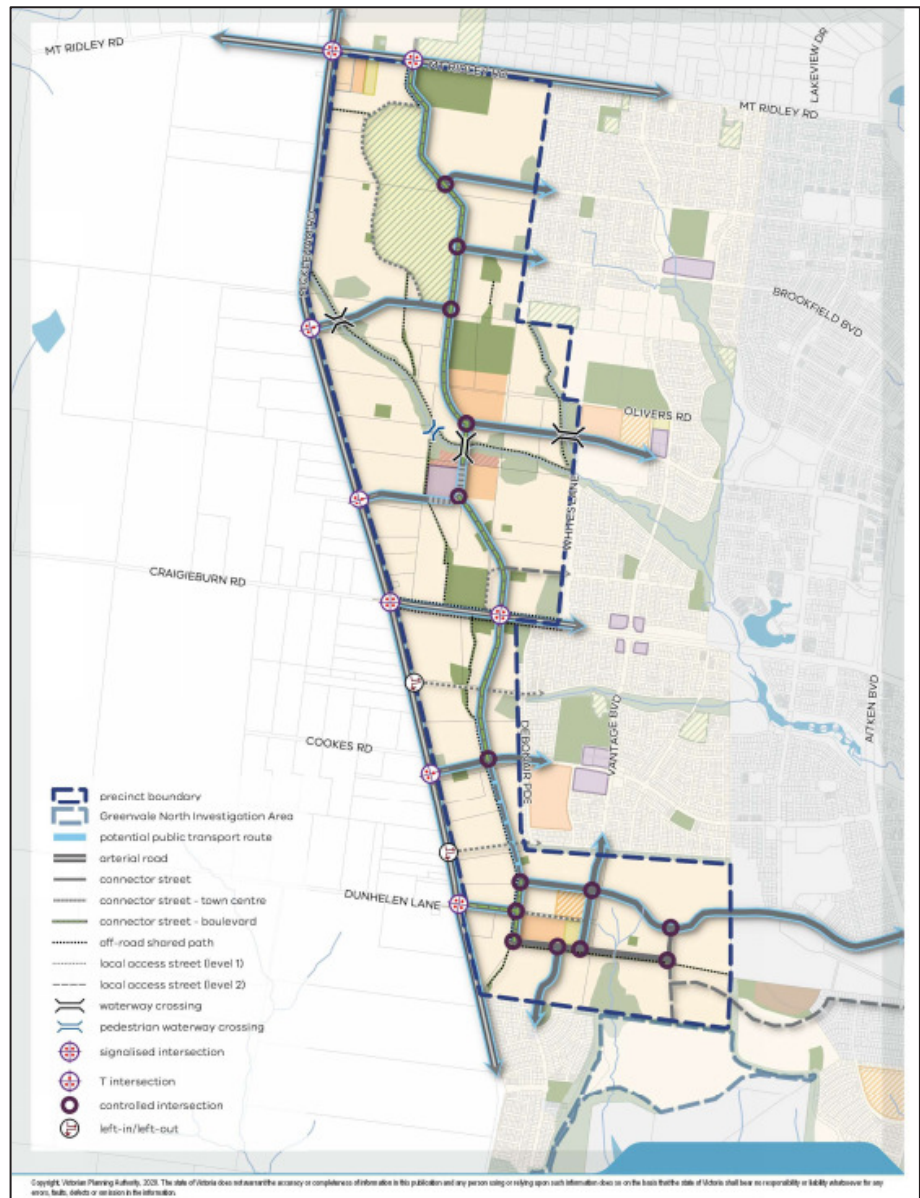
Such a level of activity would require Connector Street accessibility to the site to cater for the expected traffic volumes (noting that the capacity of a Connector Street is in the order of 3,000-10,000 vehicles per day (vpd) in activity areas).

5 Proposed Craigieburn West PSP Road Network

Overview

Plan 5 of the Draft PSP outlines the proposed 'Transport Plan', which is reproduced as Figure 5-1.

Figure 5-1: Draft PSP Transport Plan (Nov 2020)

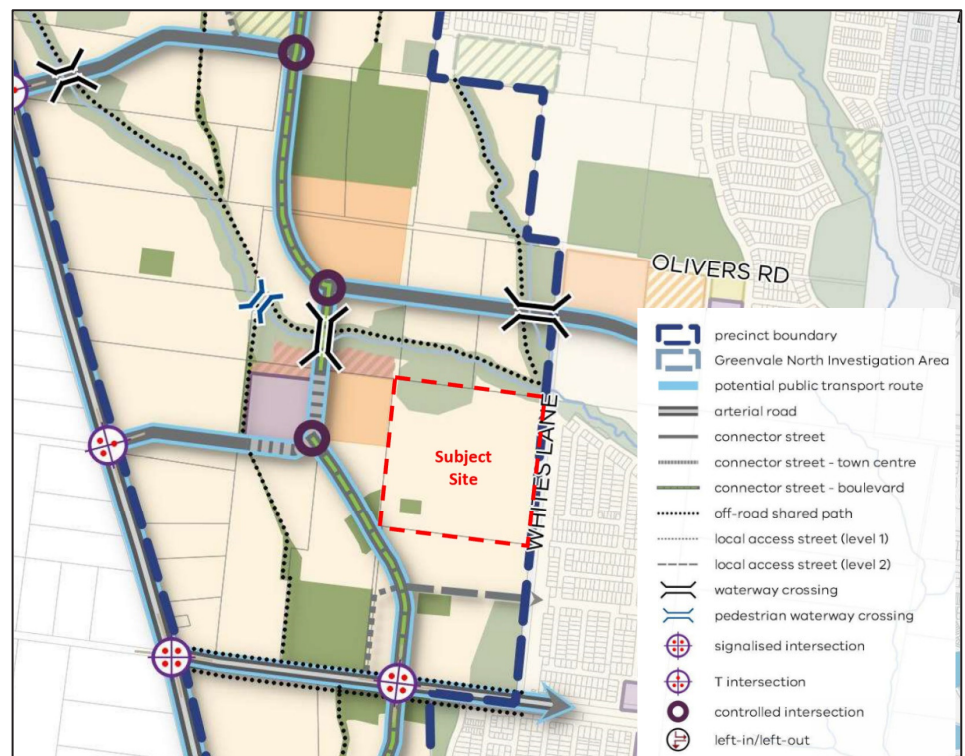


As shown in the preceding plan, the Craigieburn West PSP includes the provision of a north-south Boulevard Connector Street spine which forms a link from the northern end of the PSP (Mt Ridley Road) to the southern end past Dunhelen Lane.

This Boulevard Connector spine runs in close proximity to the subject site and is also shown as connecting to Craigieburn Road to the south of the subject site via a signalised intersection.

The PSP proposed road network surrounding the subject site is shown in Figure 5-2.

Figure 5-2: PSP Proposed Road Network Surrounding the Subject Site



As shown in the preceding plan, the subject site land is nominated to be entirely residential with some open space in the draft PSP. This does not accord with the envisaged future development of the site.

The site is also shown to sit next to a primary school (to its west) which is co-located with a Local Town Centre (LTC) and an associated mixed-use area.

The north-south Connector Street spine is shown to run north-south between the school and LTC before continuing in a south-easterly direction where its alignment touches the south-west corner of the subject site.

The onemilegrid report further notes that the controlled intersection between the LTC and primary school is intended to be a roundabout. This roundabout would need to be able to cater for bus movements given that the north-south Connector Street spine is denoted as a potential public transport route in the draft PSP.

To the east, the subject site is still shown to adjoin Whites Lane, however the draft PSP does not envisage any changes to Whites Lane.

Issues

The draft PSP road network does not provide a Connector Street level connection along any of the subject site frontages and thereby does not consider the envisaged development potential of the site.

Furthermore, no road connection at all is shown along the western site boundary thereby limiting the site's integration with the adjoining school and LTC activity area.

The onemilegrid report further notes that residential uses have been modelled for the subject site with no consideration given to the existing church facilities on the site or the envisaged future development of the site.

As noted previously, an expanded church facility, community uses (medical centre, childcare centre, community/multi sports centre), and residential subdivision areas are envisaged on the subject site. The draft PSP road network, in its current form, does not allow for the integration of these uses with the adjoining school/LTC activity area.

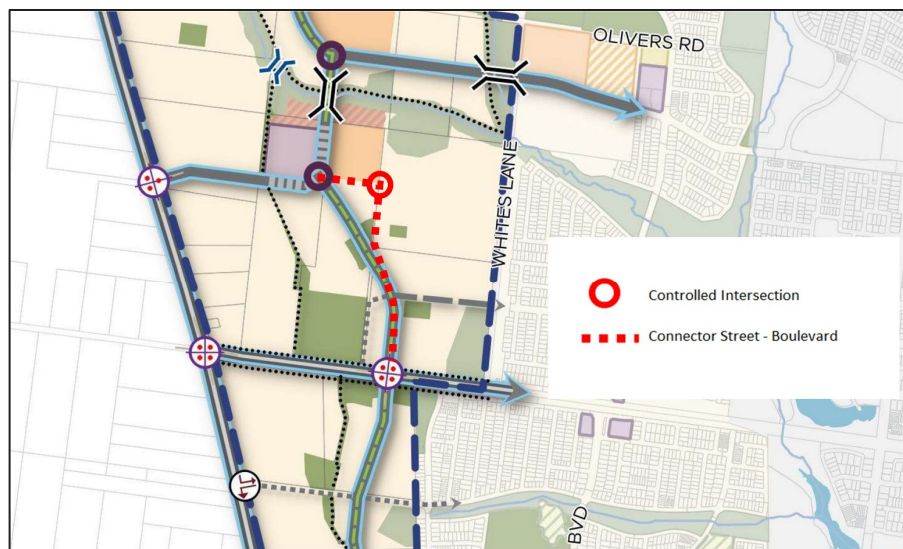
The draft PSP Road Network Plan therefore does not support connectivity between the subject site and adjacent complementary uses, and therefore does not provide transport infrastructure that supports health liveable communities that reduce the demand, and length of, motorised trips to/within activity areas.

This coupled with the future turning restrictions at the Craigieburn Road/Whites Lane intersection (to left-in / left-out movements only) will significantly reduce the level of accessibility to the subject site.

Solution

In order to increase accessibility (by all transport modes) to the site and integrate the subject site with the adjoining school/LTC activity area it is proposed to realign the north-south Connector Street spine to about the southern portion of the western site boundary as depicted in Figure 5-3.

Figure 5-3: Proposed Road Network Changes



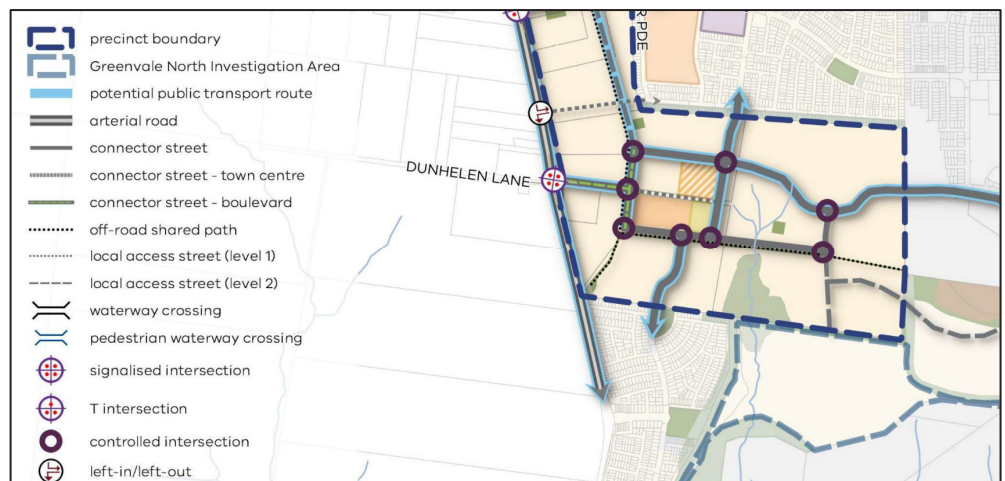
The above shown changes realign the Boulevard Connector Street (and the associated potential public transport route) to better integrate the subject site with the adjoining school/LTC activity area. In addition, the proposed alignment preserves the local parks shown on the subject site and near the western site boundary.

The proposed alignment also increases accessibility to the site from further afield via the proposed Boulevard Connector Street/Craigieburn Road signalised intersection.

The proposed realignment is envisaged to be facilitated through a controlled intersection, approximately 200m to the east of the controlled intersection shown between the adjoining primary school and LTC uses.

The proposed changes are consistent with the PSP road network layout shown further south near Dunhelen Lane as outlined in Figure 5-4.

Figure 5-4: Comparable PSP Road Network near Dunhelen Lane



As shown in Figure 5-4, the road network surrounding the school/local community facilities activity area near Dunhelen Lane includes several closely spaced controlled intersections which connect Boulevard Connector Streets and Connector Streets, all of which are shown to be potential public transport routes.

6 Summary

In summary we would like to see the following amendments made to the proposed Craigieburn West PSP:

Road Network Plan

- Realignment of the north-south Boulevard Connector Street in the vicinity of the subject site such that it extends along the southern boundary of the primary school site before turning south along the western boundary of the subject site.
- Inclusion of a controlled intersection at the 90-degree bend in north-south Boulevard Connector Street where it first meets the western boundary of the subject site.

We look forward to the VPA's consideration of the abovementioned matters.

Yours sincerely,

Manesha Ravji
Associate Traffic
Ratio Consultants

Dear Ella,

20 December 2018

Ms. Ella Adams
Victorian Planning Authority
Level 25, 35 Collins Street
MELBOURNE VIC 3000

Via email:

ella.adams@vpa.vic.gov.au

and

ben.weiner@vpa.vic.gov.au

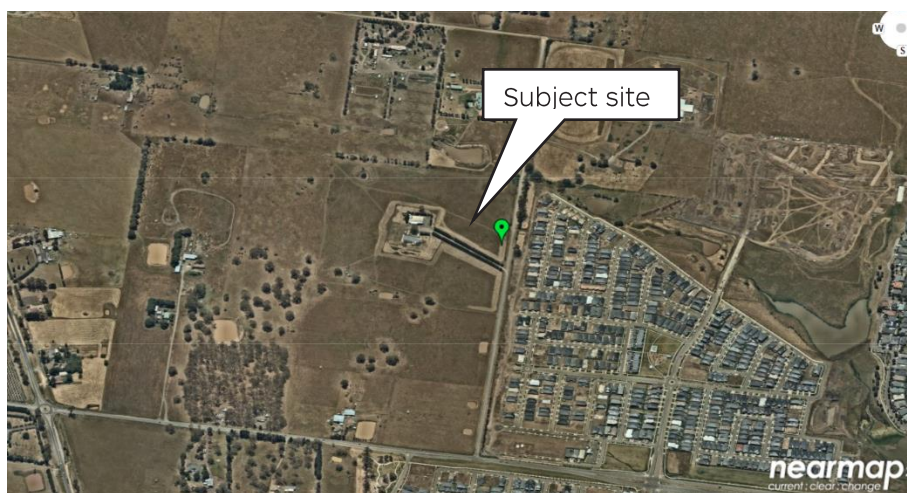
75 Whites Lane, Mickleham Craigieburn West PSP

We act on behalf of the Syrian Orthodox Archdiocese of Australia and New Zealand, the owner of the above-mentioned property.

Further to our previous meeting on 3 October 2018 we write to outline our clients preferred future use and development for the land.

The subject site

The subject site is located at 75 Whites Lane, Mickleham, and is currently occupied by a Syrian Orthodox Church.



As pictured above, Whites Lanes forms the western boundary of the Craigieburn West Precinct Structure Plan, where existing housing development is establishing (as pictured above).

In relation to the current planning controls, the subject site is affected by a Farming Zone, Schedule 3 and is not affected by any overlays. The site

adjoins land within the Urban Growth Zone, Schedule 1, to the east which has an applied zone of General Residential Zone.

Figure 1: Zoning Map



Proposed future direction of landowner

The subject site is located within the Craigieburn West PSP area, which we understand has recently been identified as a priority project by the Minister with the VPA being assigned the lead role for the preparation of the PSP.

We understand the VPA have commenced a Precinct Structure Planning Process for the area and that adequate funding has been secured for the entire process via agreements with landholders in the PSP area.

Our client advises they were not aware / notified of the PSP process commencing or the opportunity to contribute financially to the strategic work to be undertaken, however they do wish to be actively involved in the PSP process moving forward. We understand that parties that have not made any such financial contribution will not be affected or prejudiced on the opportunity for collaboration and involvement in the strategic work moving forward.

In respect of the development intentions of our client, the enclosed plans give a general indication of our client's future intention for the land and serve as a starting point for future discussions.

The overall uses can be summarised as:

- Church Domain:
 - Church building (existing) & surrounding landscape grounds are to be retained
 - Land area of approximately 9400m²
- Retirement Village:
 - 50 Residential units for approximately 100 residents
 - Land area of approximately 9,000m²

- Function centre
 - Capacity for 800 patrons
 - Basement carpark comprising 250 car spaces
 - Land area of approximately 8,500m²
- Childcare centre
 - Capacity for 100 Children
 - Land area of approximately 3,300m²
- Medical centre
 - Polyclinic to serve the church development and surrounding area
 - Land of approximately 3,300m²
- Retail
 - Commercial / retail / business along Whites Lane frontage.

We highlight some of the key features of the proposal as follows:

- The proposal includes the retention and continued operation of the Church, which serves the existing community and can continue to provide a community facility to the future catchment population.
- The proposal includes the provision of social infrastructure and community facilities in a mixed-use community precinct with supporting residential development.
- Community uses may include childcare, residential aged care and/or medical facilities, which will also provide local jobs to future residents.
- The proposal envisages a range of residential densities and a diversity of housing types / layouts. We note this is consistent with the desire of VPA to direct greater housing growth into new PSP areas at a density in the order of 25 lots per ha.

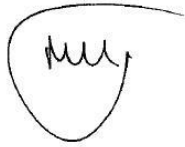
Next Steps

We understand that technical consultant reports are currently being prepared by VPA to inform a draft issues and opportunities paper which is schedule to be released by end of the first quarter of 2019.

Noting there is still substantial strategic work to be undertaken at a precinct level by the VPA in order to progress with planning the future development of the area, we look forward to a collaborative relationship moving forward.

Should you have any queries regarding this matter, please do not hesitate to contact the undersigned robbiem@ratio.com.au or Claire Whelan on clairew@ratio.com.au.

Yours sincerely,

A handwritten signature in black ink, consisting of a large, sweeping 'R' followed by a series of loops and a final flourish.

Robbie McKenzie
Director