Ms Emily Killin  
Senior Strategic Planner  
Victorian Planning Authority  
Level 25, 35 Collins Street  
Melbourne VIC 3000

23 November 2020

Dear Emily,

SUBMISSION TO BANNOCKBURN GROWTH PLAN

I act on behalf of [REDACTED] with respect to their landholdings at [REDACTED]. Our client also has three additional properties within the south-west precinct currently under contract, which represents approximately 75% of the land ownership within the south-west precinct.

We write in relation to the draft Bannockburn Growth Plan that is currently released for community consultation.

We support the VPA’s commitment guide the sustainable growth of Bannockburn to 2050. The Bannockburn Growth Plan will identify where and when future housing may be developed and also what infrastructure is needed to support the growing community, such as roads and community facilities, and land for employment and retail.

Bannockburn is the largest urban centre in the Golden Plains Shire. State and Local Planning Policy Framework within the Golden Plains Planning Scheme supports the town’s growth and the provision of more housing, employment and community services. The population of Bannockburn is expected to reach approximately 13,090 by 2036.

The Growth Plan is a high-level and broad strategy that:

- Sets out a vision for Bannockburn
- Guides sustainable growth and development over the next 30 years
- Identifies the steps needed to manage growth
- Defines key projects and infrastructure required to support growth
- Provides certainty for public and private investment decision making


Bannockburn Growth Plan Submission
We have reviewed the draft Growth Plan and are generally supportive of the plan, however we are of the view that refinements and further clarification could be provided around the following key themes:

- Housing and Community Infrastructure
- Future Industrial Expansion
- Drainage Assets and Open Space
- Road Cross Sections and Intersections
- Development Sequencing
- Development Levies

1. **SITE CONTEXT**

The land holdings at [location] are both shown in a future residential medium term priority in the proposed framework plan (Plan 1). The key timings for a medium term precinct are 5 to 10 years.

The vision for the south-west precinct is:

*The south west precinct will deliver housing and employment land in the medium to long term and will benefit from connections to new infrastructure and facilities in the South East precinct. Improved connections between Bruce’s Creek and the Bannockburn Flora and Fauna Reserve will connect new residents with environmental values and recreational opportunities. The precinct will provide employment opportunities with the expansion of the existing Bannockburn Business Park.*

The South West Precinct will accommodate approximately 1,159 dwellings and 3,420 residents.

Figure 1 - Plan 5 Proposed Growth Areas – Bannockburn Growth Plan
2. REVIEW OF DRAFT FRAMEWORK PLAN

2.1. KEY ISSUES IDENTIFIED

2.1.1. Housing and Community Infrastructure

The Bannockburn Growth Plan identifies that there is considerable low-density housing supply in the north and east of the town, with lots generally ranging between 1 and 3 hectares. These areas have a rural character with characteristics such as gravel footpaths, large front set-backs to dwellings and swale drainage.

The other main component of Bannockburn’s existing housing typology is new subdivisions, located to the north-west and south of the Bannockburn Town Centre. The lot sizes in these areas are approximately 700 square metres.

The Growth Plan identifies that it is anticipated that new growth areas will continue to be predominately detached housing, similar to the densities developed in newer greenfield growth areas. There is an opportunity to facilitate medium dwelling density, in locations close to services and transport nodes. We are supportive of the provision of new housing in the form of standard and medium density allotments within the south-west precinct.

Plan 6 of the Growth Plan identifies potential community and recreation infrastructure within the south-west precinct. The community and recreation infrastructure items include:

- Kinder (3 and 4 year old) – Medium term project
- Childcare – Short to medium term project
- Maternal and child health service - expansion of existing facility or provision of additional facility in medium to long term
- Tennis facility – Medium term project
- Netball courts – Short to medium term

We are supportive of these potential items within the south-west precinct, however suggest that the wording is slightly altered to refer to the infrastructure items as ‘estimate/benchmark’ facilities to provide additional certainty.

The timing of these facilities may also be problematic, as they have all been identified within the short to medium term. The provision of these facilities in Bannockburn with these population figures may be too early and it is unclear as to whether the funding is being generated by various other sources.

2.1.2. Future Industrial Expansion

The Growth Plan identifies that Bannockburn currently has a relatively low level of industrial land provision compared to other comparable regional centres. Recent trends in the uptake of industrial land in Bannockburn show there is demand for additional supply, primarily supporting local demand needs.

At a minimum, approximately 20 hectares of additional industrial land should be provided to bring Bannockburn in line with other towns of a similar size. Local industrial land in Bannockburn is currently provided by the town’s business park adjacent to the South West Precinct. An expansion of this business park is proposed to address local industrial supply needs and is a medium term project.
The Growth Plan suggests that a buffer area is proposed around the future industrial expansion precinct, however it is not clear how this will impact on the broader outcomes of the South West precinct, particularly amenity of future residents and infrastructure provision.

We are supportive of the provision of additional industrial land to support local employment, however it is not clear within the Growth Plan what implications this would have on the land and what the proposed buffer would impose on land holdings that are impacted.

Plan 9 of the Growth Plan identifies a potential buffer (indicative) surrounding the future industrial expansion area. This buffer impacts majority of the north-west corner of the Growth Plan. The Growth Plan outlines that a number of existing and proposed land uses require the provision of buffers to minimise land use conflicts and reduce potential amenity impacts.

We are of the view that a buffer area does not need to be nominated within the Growth Plan or subsequent Precinct Structure Plan, given Clause 53.10 (Uses and Activities with Potential Adverse Impacts) would ensure that appropriate buffer distances are provided for uses with potential adverse amenity impacts.

It is also suggested that a buffer is provided within the industrial expansion precinct through the provision of a light industrial area along the eastern and southern boundaries which could have an applied Industrial 3 Zoning, ensuring that more suitable uses are established along the residential interfaces that do not create unused or underutilised areas of open space with no environmental or social benefits.

Figure 2 - Plan 9 Bushfire & Buffers – Bannockburn Growth Plan
2.1.3. Drainage Assets and Open Space

Plan 8 of the Growth Plan identifies an indicative drainage asset and linear park/open space either along the northern boundary or to the north of ___. The Growth Plan does not include any lot boundaries and therefore it is difficult to establish where potential assets are located.

Furthermore, further clarification is sought around VPA’s open space network funding arrangements and clarification should be provided regarding credited/uncredited open space networks.

2.1.4. Road Cross Sections and Intersections

The Growth Plan identifies the opportunity for the delivery of a complete multimodal transport network. Harvey Road is nominated as a proposed arterial (indicative) road in addition to an east-west future connector road either partially within the site or to the north. A proposed intersection is located where Harvey Road meets the proposed east-west future connector road. The Growth Plan does not specify which land holding this connector road falls within.

Further clarification is also required on the base line assumption of two-lane arterial roads, given the anticipated population and per hectare yield. These matters are PSP level detail however have the ability to significantly impact land take and/or development levies.

We strongly advocate for a maximum of one carriage way in either direction – a two lane arterial road.

The expected road cross sections have also not been clearly defined within the Growth Plan which provides uncertainty regarding the potential land take and implications on developable land. Likewise, it is unclear whether there are any baseline assumptions relating to intersection typology at this point as there is no mention of signalised intersections or roundabouts within the Growth Plan or background report.

We also suggest that greater flexibility is provided in relation to the arterial roads as the Growth Plan identifies that ‘it is proposed that the road be 60km/h’. It is suggested that this wording is slightly altered to ‘it is proposed that the road be designed to cater for a maximum speed environment of 60km/h’ to void the over design of the road and larger cross sections then specified within the Precinct Structure Plan.

The Growth Plan suggests that a second grade separated rail crossing is to be provided. We are of the view that flexibility should be provided as to how the rail crossing is delivered, as an at grade separation may be the best outcome for the anticipated growth of Bannockburn. The current wording contained within the Growth Plan does not allow for ‘at grade separation’ to be provided.

2.1.5. Development Sequencing

Generally, we are supportive of the development sequencing put forward within the Growth Plan with the key timing for the South West Precinct is 5 to 10 years.

The Growth Plan also seeks to prioritise development staging in location within proximity to existing infrastructure such as roads, retail and community facilities. This is common planning input but denies the future market influence and should be reworded to enable flexibility and for the development industry to respond to market demands.

The Growth Plan seeks to ensure that development staging considers activity centres and community infrastructure during early stages, however it is not clear whether this relates to early provision of these infrastructure items or securing land for these facilities.
Our client would appreciate the opportunity to work with Council and the VPA with respect to development sequencing and the constraints associated with land fragmentation, buffer distances and drainage issues associated with the existing business park.

2.1.6. Development Levies

The Growth Plan outlines that the South West Precinct will be planned for in the medium term by the VPA via a Precinct Structure Plan and Development Contributions Plan. A Development Contributions Plan is only referred to and it is suggested that an Infrastructure Contributions Plan is incorporated given the rate for Bannockburn is yet to be published. This will enable flexibility at the next stage of the process.

3. SUMMARY

We are supportive of the VPA’s work in preparing the Bannockburn Growth Plan which will guide the sustainable growth of Bannockburn to 2050.

We support the identification of residential and industrial land and the infrastructure items required to support the growing community, however we are of the view that further refinements could be made to the Bannockburn Growth Plan. These items include:

- Clarity regarding development Contributions and funding of infrastructure items including how certain infrastructure items will be funded and timings for delivery
- Drainage Assets and Open Space network and funding arrangements, ensuring that drainage and open space assets and networks are provided in suitable locations that can be properly utilised
- Clarity regarding the road cross sections and intersection typologies within the south-west precinct and the Growth Plan area. Further, the Growth Plan nominates a grade separated rail crossing, which could be delivered as an at grade crossing and therefore greater flexibility should be provided within the Growth Plan to enable either option to be delivered
- The buffer area surrounding the future industrial extension precinct is removed and a buffer is provided within the industrial expansion precinct through the provision of a light industrial area along the eastern and southern boundaries which could have an applied Industrial 3 Zoning. This would ensure that more suitable uses are established along the residential interfaces that do not create unused or underutilised areas of open space with no environmental or social benefits.
- Greater flexibility is provided in relation to development sequencing which may allow the south-west precinct to be delivered earlier than anticipated if constraints associated with land fragmentation, buffer distances and drainage issues associated with the existing business park can be resolved.
We greatly appreciate the opportunity to participate in this consultation process and look forward to working closely with the VPA and Golden Plains Shire Council.

If you have any questions, please don’t hesitate to contact me on [redacted].

Yours sincerely,